

# Code of Conduct

## OBJECTIVE AND PURPOSE OF USE

The Code of Conduct aims to:

- Commit the Company to the highest standards of business and ethical conduct;
- Promote ethical behaviour and sanction breaches of these standards in the Company; and to
- Develop a culture of ethical behaviour in the Company, based on ethical standards and ethical conduct that is respected by both management and all other employees.

The Code of Conduct is consistent with the guidelines set out in the Universal Declaration of Human Rights, the OECD Guidelines and the principles of the UN Global Compact.

## SCOPE OF USE

The management and employees of the Company regard this Code of Conduct as a joint commitment and undertake to ensure that its spirit and provisions are observed and respected throughout the Company.

The Company seeks to work with companies that share the same criteria and comply with applicable laws and regulations.

## **1.0. ETHICAL PRINCIPLES**

The Company is committed to ethical behaviour in all aspects of its business. In addition to the values of the corporate culture, the following are considered as ethical criteria that build on the value system:

- Equality;
- Non-discrimination;
- Honesty;
- Fairness;
- Transparency.

The Company expects consistent application of its values and ethical standards in its relationships with all those with whom it interacts.

The Company will seek to establish sustainable operating principles, which it will set out and report on in the Corporate Sustainability Report.

### **1.1 Prohibition of discrimination**

The Company provides a professional working environment that is free from discrimination or

harassment. Employment decisions such as hiring, promotion, access to training, termination or retirement are based only on lawful, relevant and objective criteria.

## 1.2 Compliance with laws and regulations

The Company complies with all applicable health and safety laws, rules, regulations and industry standards and takes all necessary measures to ensure a safe and healthy working environment. This includes:

- Implementation of a written occupational health and safety policy that applies to all employees;
- Reduction of hazards in the working environment as far as practicable;
- Provision of regular health and safety training for employees;
- Ensuring that the working environment is safe and meets the basic needs of employees.

## 2.0. HUMAN RIGHTS AND LABOUR RIGHTS

### 2.1. Respect for the fundamental human rights of employees

- Promoting equal opportunities and treatment for our employees regardless of skin colour, race, nationality, social background, disability, sexual orientation, political or religious beliefs, gender or age.
- Respecting personal dignity, privacy and rights of each individual.
- Preventing anyone from being employed against their will.
- Preventing unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination.
- Prohibiting behaviour, including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

### 2.2. Prohibition of child labour

- The Company prohibits the employment and work of children under the age of 15.

### 2.3 Prohibition of forced labour

- The Company prohibits all forms of forced or slave labour.
- Employees are free to move within the Company, to leave the Company at the end of the working day and to terminate their employment relationship with reasonable notice.
- Corporal punishment, physical or psychological abuse, threats of violence, financial penalties or fines, or the use or tolerance of intimidation are prohibited.
- Bullying and the use or tolerance of moral, sexual or other forms of harassment are prohibited.

### 2.4 Employee health and safety

The Company is committed to:

- Taking responsibility for the health of all our employees.
- Controlling hazards and taking the best reasonable precautions against accidents at work and occupational diseases.
- Providing a clean and safe working environment that meets the basic needs of employees.
- Providing occupational health and safety training for all employees.

- Implementing an ISO 45001:2018 Occupational Health and Safety Management System and reporting regularly on its objectives and achievements to external and internal stakeholders.

## **2.5 Employee rights**

The Company is committed to:

- Providing fair pay and ensuring that the legal minimum wage is met.
- Ensuring compliance with the maximum number of working hours required by law.
- Providing additional work on a voluntary basis and within the limits of the law.
- Respecting, to the extent permitted by law, the right of employees to freedom of association and not discriminating against members of trade union organizations.

## **3.0. ENVIRONMENTAL PROTECTION**

### **3.1. The Company is committed to:**

- Complying with applicable statutory and international environmental standards.
- Reducing its environmental impact and continually improving its environmental performance.
- Having an overarching ISO 14001:2015 Environmental Management System and reporting regularly on its objectives and achievements to external and internal stakeholders.
- Working together with its partners in a sustainable manner to reduce and eliminate the environmental impact of its activities.

## **4.0. ETHICAL AND LAWFUL BUSINESS PRACTICE**

### **4.1. Compliance with legislation**

- The Company operates in accordance with the laws of the applicable jurisdiction(s). The Company consistently demonstrates integrity in its business practices and applies the highest standards of business ethics.

### **4.2. Prohibition of corruption and bribery**

- Corruption is the unacceptable behaviour of people who try to take advantage of their position or commit unfair acts (contrary to positive moral values and good customs or moral and legal norms) in relation to other people or to nature or the natural environment.
- Corruption and bribery are strictly prohibited in SIBO GROUP and the Company has ZERO TOLERANCE.
- The Company has a specific policy on corruption and bribery and regularly reports potential incidents to internal stakeholders in management reviews.

The Company also complies with all applicable anti-money laundering and tax evasion laws.

### **4.3 Fair trade and antitrust compliance**

The Company is committed to free and open competition and complies with applicable antitrust and competition laws, including those relating to anti-competitive agreements and practices such as price fixing or other forms of unfair competition.

## 5.0. DATA PROTECTION

The Company is committed to:

- Protecting the personal data and business information of employees, customers and suppliers.
- Complying with applicable privacy laws and regulations.
- Appointing a Data Protection Officer (DPO).
- Implementing a policy for the protection of personal data and business information, regularly reviewing the policy and the operation of system solutions, and following the guidelines of ISO 27001:2022.

## 6.0. PROCUREMENT CHAIN SUPPLY

- Making reasonable efforts to encourage and inform its suppliers to comply with this Code of Conduct.
- Requiring suppliers with whom the Company works to accept the SIBO GROUP's Code of Conduct. A Code of Conduct will be presented for this purpose. Regularly reporting to internal stakeholders on the percentage of signatories in management reviews.
- Ensuring that suppliers are selected and treated in accordance with the principles of non-discrimination.
- Ensuring fair cooperation with suppliers.
- Ensuring transparent communication with suppliers.

## 7.0. FINAL PROVISIONS

This policy will be posted on the employer's notice board for one month and will then be kept in the Human Resources Office. Internal stakeholders will be able to consult the policy on the Company's internal portal throughout its validity.

The Company will also provide training and e-learning to raise awareness of the provisions of the document and report regularly to internal stakeholders.

### History of change management

In accordance with the Company's Rules of Procedure, we review the validity of the policy and update it as necessary.