

Ethical Behavior Code of Conduct Policy Statement

Purpose

This Code of Conduct outlines the ethical principles and standards that guide the behavior of all employees, officers, and directors of the Company. It is designed to ensure a workplace environment that is professional, ethical, and compliant with all applicable laws and regulations. Adherence to this Code is a condition of employment and critical to maintaining the Company's reputation and integrity.

Scope

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term, or temporary), consultants, contractors, and agency staff (collectively referred to as "employees") wherever they are located.

Our Core Principles

1. Integrity and Honesty

All Company business must be conducted with the highest level of integrity and honesty.

- Employees must be truthful and accurate in all internal and external communications and business records.
- Falsification of company records, including time records, expense reports, or other documents, is strictly prohibited.

2. Respect and Fair Treatment

We are committed to providing an inclusive and respectful work environment free from discrimination, harassment, and bullying.

- Treat all colleagues, customers, partners, and vendors with dignity and respect.

- The Company does not tolerate discrimination based on race, color, religion, sex, national origin, age, disability, sexual orientation, gender identity, or any other characteristic protected by law.
- Report any instances of harassment or discrimination immediately to a manager or Human Resources.

3. Compliance with Laws

Employees must comply with all national, state, and local laws, rules, and regulations applicable to the Company's business activities.

- This includes laws related to anti-corruption (such as the FCPA), data privacy, environmental protection, and labor practices.

4. Conflicts of Interest

Employees must avoid any situation where their personal interests conflict or appear to conflict with the interests of the Company.

- A conflict of interest exists when an employee's private interest interferes in any way with the interests of the Company.
- Examples include, but are not limited to, holding a financial interest in a competitor, supplier, or customer without prior Company approval.
- Any potential or actual conflict of interest must be disclosed immediately to your manager or Human Resources.

5. Protection and Proper Use of Company Assets

Employees are responsible for protecting the Company's assets and ensuring their efficient and legitimate use.

- Company assets include physical property, intellectual property (such as trade secrets, patents, and copyrights), and electronic resources.
- Company equipment and resources must be used primarily for business purposes. Incidental personal use is permitted but should not interfere with work responsibilities or violate any Company policy.

6. Confidentiality

Employees must protect the confidentiality of Company proprietary information, as well as information entrusted to the Company by customers, partners, and vendors.

- Confidential information should only be shared with those who have a legitimate business need to know.
- The obligation to protect confidential information continues even after employment with the Company ends.

7. Reporting Violations

The Company encourages all employees to promptly report any actual or suspected violations of this Code, Company policies, or applicable laws.

- Reports can be made to your immediate supervisor, human resources or owners.
- The Company strictly prohibits retaliation against any employee who, in good faith, reports a violation or cooperates in an investigation.

Policy Acknowledgment

All employees are required to read, understand, and comply with this Code of Conduct. Failure to comply with this Code may result in disciplinary action, up to and including termination of employment.
