



Code of Conduct Policy



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I. Definitions

The following terms, words, and phrases, should carry the same meaning wherever mentioned in this policy:

Bullying	Repeated and intentional aggressive behavior that intimidates, belittles, or undermines an individual's ability to perform their job. Bullying can be physical, verbal, or relational, and often involves power imbalances.
Code of Conduct	A set of guidelines and principles that outline the expected behavior and actions of employees and stakeholders, ensuring compliance with legal standards and the Company's values.
Company	Refers to Edgo, including all its affiliates, subsidiaries, joint ventures, parent companies, and any other entity that is directly or indirectly controlled by, or under common control with, Edgo.
Conflict of Interest	A situation where an individual's personal interests, relationships, or external commitments could potentially interfere with their ability to act in the best interests of the Company. This includes financial interests, family relationships, outside employment, or any other personal activities that could create bias or appear to do so.
Discrimination	Unfair treatment or bias against individuals or groups based on attributes such as race, gender, religion, nationality, disability, age, or any other protected characteristic. Discrimination undermines the principles of fairness and equality and is strictly prohibited.
Diversity	Diversity refers to the presence of varied characteristics and perspectives among individuals, including cultural, ethnic and gender.
Fairness	The principle of treating all individuals impartially, without bias or favoritism, ensuring equality of opportunity and outcomes.
Harassment	Unwanted or unwelcome behavior that creates a hostile, intimidating, or offensive work environment. This includes but is not limited to offensive comments, gestures, or inappropriate conduct based on race, gender, age, disability, religion, or other protected characteristics.
Inclusion	Inclusion is the practice of creating an environment where all individuals feel valued, respected, and empowered to contribute.



Integrity	Adherence to moral and ethical principles, including honesty, fairness, and respect for others. Integrity requires consistency in words and actions, even in challenging circumstances.
Respect	The act of treating all individuals, colleagues, stakeholders, and clients with dignity and professionalism. Respect involves fostering a culture of inclusion, valuing diverse opinions, and refraining from discriminatory or demeaning behaviors.
Sustainability	The practice of meeting the Company's current needs without compromising the ability of future generations to meet theirs, focusing on environmental, social, and economic well-being.

II. Policy Preface and Administration

1. For reviewing the policy preface & administration, please refer to the *Policy Preface Policy Document*.

III. Purpose

1. This Code of Conduct Policy establishes the standards of honest behavior expected from all individuals within Company and its subsidiaries, including directors, employees, business partners, contractors, and anyone involved in a relationship with the Company.
2. The Policy sets out the guidelines for how employees should behave and make decisions in their day-to-day professional activities.

IV. Scope

1. This Policy applies to all employees at the Company and its subsidiaries, regardless of position or employment status. It also applies to third-party contractors, suppliers, consultants, and any external parties who interact with the Company.
2. Compliance with the Policy is expected from all levels of the Company, including the senior management team and board of directors.

V. Core Values and Workplace Ethics

This section highlights the core values that define the Company's culture and guide employees' behavior. Employees are expected to embody these values in all aspects of their work.

1. **Integrity and Fairness:** The Company upholds honesty, impartiality, and transparency in all actions and decisions, ensuring equality and fairness while eliminating discrimination.



2. **Respect and Inclusion:** The Company embraces diversity, treats all individuals with dignity, and fosters a culture of inclusion and respect.
3. **Sustainability:** The Company is dedicated to integrating environmentally responsible practices into all aspects of its operations. By prioritizing resource conservation, waste reduction, and energy efficiency, and safety, the Company aims to minimize environmental impact while supporting sustainable growth and development.
4. **Excellence and Growth:** The Company fosters a culture of continuous learning and strives for high-quality performance, aligning individual development with organizational success.
5. **Accountability and Ownership:** The Company holds itself accountable for its actions, decisions, and outcomes, and encourages employees to demonstrate reliability and commitment to achieving organizational goals.
6. **Collaboration and Teamwork:** The Company encourages strong relationships and collaboration, working together to achieve shared goals effectively.
7. **Ethical Leadership:** The Company leads by example, inspiring others through ethical behavior, integrity, and transparent decision-making.

VI. Standards of Conduct and Behavioral Expectations

This section outlines rules and guidelines to ensure consistency, compliance, and professionalism in behavior and decisions, defining acceptable and unacceptable conduct in line with Company policies.

1. **Compliance with Laws and Regulations:** Follow all applicable laws, industry regulations, and internal Company policies in every jurisdiction where the Company operates.
2. **Prevention of Harassment and Bullying:**
 - 2.1. Be aware of and respect personal boundaries, avoiding inappropriate physical contact or gestures that could be interpreted as harassment.
 - 2.2. Refrain from any behavior that could create a hostile work environment.
 - 2.3. Any form of harassment or bullying will not be tolerated, and employees must report any incidents promptly.
3. **Integrity and honesty:** Act with the highest level of integrity and honesty. This includes:
 - 3.1. Providing truthful and accurate information in reports, financial statements, and communications.
 - 3.2. Avoiding misleading or deceptive conduct, including any misrepresentation of facts.
 - 3.3. Adhering to the Company's policies even when faced with challenges or pressure to act otherwise.
4. **Respect for Colleagues**



4.1. Treat all colleagues with professionalism, dignity, and fairness, fostering a culture of collaboration and mutual respect.

4.2. Avoid behavior or language that could undermine team dynamics or create conflict, ensuring a supportive workplace environment.

5. Anti-Bribery and Corruption: Refrain from offering, accepting, or engaging in bribery, kickbacks, or other unethical practices.

6. Appropriate Use of Resources: Use Company resources responsibly and only for authorized purposes.

7. Conflict of Interest Disclosure: Report and avoid situations where personal interests conflict with the Company's objectives. Employees must avoid situations where their personal interests' conflict with the Company's business objectives.

8. Confidentiality and Data Protection: Ensure all proprietary information is handled securely and avoid unauthorized disclosures. This includes:

8.1. Keeping sensitive documents secure.

8.2. Safeguard all physical and digital documents containing sensitive or proprietary information by using secure storage methods, encryption, or password-protected systems.

8.3. Avoiding public or unauthorized discussions.

8.4. Adhering to confidentiality and data protection policies.

9. Health and Safety Adherence: Participate in safety training, report hazards, and follow all safety policies and protocols.

10. Sustainability: Support the Company's environmental sustainability goals by minimizing waste, conserving resources, and adopting energy-efficient practices.

VII. Responsibilities of Management

Management, including Senior Management, Directors, Managers, and Team Leaders, is responsible for upholding the Company's standards, fostering a positive culture, and ensuring team compliance with the Code of Conduct. Key responsibilities include:

1. Exemplify Integrity and Ethical Leadership

1.1. Demonstrate honesty, transparency, and integrity in all actions and decisions.

1.2. Serve as role models by consistently upholding the highest ethical standards, inspiring employees to follow their example.

2. Communicate and Enforce the Code of Conduct



- 2.1. Monitor compliance and address any breaches of the Code swiftly and fairly.

3. Maintain a Safe and Respectful Work Environment

- 3.1. Monitor team dynamics to identify and address any instances of harassment, bullying, or discrimination.
- 3.2. Create an environment where employees feel safe reporting concerns without fear of retaliation.

4. Promote Diversity, Equity, and Inclusion

- 4.1. Foster a workplace culture that values diversity and ensures equal opportunities for all employees.
- 4.2. Actively identify and eliminate barriers to inclusion, ensuring every team member feels valued and respected.

5. Support Professional Growth and Development

- 5.1. Actively mentor and support team members in their career growth by identifying training opportunities and providing constructive feedback.
- 5.2. Encourage a culture of continuous learning, innovation, and performance excellence.

6. Encourage Feedback and Foster Collaboration

- 6.1. Regularly seek feedback from team members to identify areas for improvement in leadership and team operations.
- 6.2. Promote open communication and collaboration, ensuring all voices are heard and respected.

7. Drive Sustainability and Responsibility

- 7.1. Integrate the Company's sustainability goals into team activities by promoting eco-friendly practices and supporting environmental initiatives.

8. Hold Themselves Accountable

- 8.1. Take ownership of their decisions and actions, demonstrating accountability to employees, peers, and the organization.
- 8.2. Regularly evaluate their own performance and seek opportunities for self-improvement and leadership development.

VIII. Consequences of Non-compliance

1. Violating the Code of Conduct may result in disciplinary action. The severity of the discipline depends on the nature of the violation and can include verbal or written warnings, suspension, or demotion, and/ or termination of employment in cases of gross misconduct.



2. Employees found to have violated the Code of Conduct may face consequences, including possible legal action in severe cases, such as bribery, fraud, or other illegal activities.
3. Employees are encouraged to report misconduct, and all reports will be taken seriously. Investigations into violations will be conducted confidentially and impartially.

IX. Policy Implementation and Review

1. The Company will provide regular training to all employees on the Code of Conduct and honest decision-making. This ensures that all employees are aware of their responsibilities and understand how to apply the Policy in their day-to-day work.
2. This Code of Conduct will be reviewed annually to ensure that it remains relevant, comprehensive, and aligned with best practices, legal requirements, and the Company's evolving goals.
3. Feedback from employees and stakeholders will be considered during the review process.

X. Other Policies Under Enforcement

This document should be read in conjunction with other policies of the Company, which are actively enforced to ensure compliance and alignment with our organizational values and standards. These policies include, but are not limited to:

1. Conflict of Interest Policy
2. Whistleblowing Policy
3. Gifts, Hospitality, and Anti-Bribery Policy
4. Global Sanctions, Anti-Money Laundering (AML), and Trade Compliance Policy