

# CODE OF CONDUCT

The Uniteam Group of Companies (herewith “UGOC” or “Group”) Code of Conduct defines how we do business the right way. It is a guide to our daily decisions and actions in a wide range of situations. Our Code of Conduct is a declaration of the highest standards of ethics and integrity in all that we do with a set of values that guide our daily decisions and actions.

**The UGOC Code of Conduct is designed to help us meet our obligations, show respect to one another in the workplace and act with integrity in the market place.**

**The Code of Conduct must be carefully read and be referred to often for guidance. The reputation of the UGOC rests on how each of us conducts ourselves and how we conduct ourselves collectively as a Group.**

## COMPETITION

All products and services offered by any Company of the UGOC shall be marketed on their own merits and no unfair and misleading statements about competitors’ products and services shall be made. Any collection of competitive information shall be made only in the normal course of business and shall be obtained only through legally permitted sources and means.

- Degrading comments
- Intimidating or threatening behaviours
- Showing hostility towards others because of individual characteristics

Employee policies and practices shall be administered in a manner enforcing anti-harassment and ensuring equal opportunity based on merit.

## EQUAL OPPORTUNITIES EMPLOYER

All Companies of the UGOC shall provide equal opportunities to all its employees and all qualified applicants for employment, without regard to their race, caste, religion, colour, ancestry, marital status, sex, sexual orientation, age, nationality or disability. Employees of the UGOC shall be treated with dignity and in accordance to the Group policy of maintaining a work environment free of any form of harassment of any kind and/or any other offensive or disrespectful conduct. Harassment includes unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment. While the legal definition of harassment may vary by jurisdiction, the following represents a non-exhaustive list of what is considered as unacceptable behavior:

- Sexual harassment
- Offensive language or jokes
- Racial, ethnic, gender or religious comments

## GIFTS AND DONATIONS

Group Companies and its employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits which are intended to or perceived to obtain business or uncompetitive favours for the conduct of its business. However, any of the Companies and its employees may accept and offer nominal gifts given customarily.

## SAFETY, HEALTH AND ENVIRONMENT

The UGOC shall strive to provide a safe and healthy working environment and comply, in the conduct of its business affairs, with all regulations regarding the preservation of the environment of the territory it operates in.

## QUALITY OF SERVICES

All Companies under the UGOC shall be committed to supplying services of the highest quality standards, backed by efficient after-sales service consistent with the requirements

# CODE OF CONDUCT

of the customers to ensure their total satisfaction. The quality standards of the provided services shall meet the required national standards in any of the countries of operation and all of our Companies shall endeavour to achieve international standards.

## PUBLIC REPRESENTATION OF THE GROUP

In all its public appearance with respect to disclosing Group and business information to public constituencies such as the media, the financial community, employees and shareholders, each Company of the UGOC shall be represented only by specifically authorised directors and employees. It will be the sole responsibility of these authorised representatives to disclose information on any UGOC Company or the Group as a whole. When using any form of social media, employees must abide by the guidelines set under the UGOC Press and Media Guidelines and the UGOC Social Media Guidelines as indicated in the respective guides.

## ETHICAL CONDUCT

Every employee of any of the Companies of the UGOC, including directors and managers, shall deal on behalf of the Group with professionalism, honesty and integrity, as well as high moral and ethical standards. Such conduct shall be fair and transparent and be perceived to be as such by third parties.

## REGULATORY COMPLIANCE

Every employee of any Company of the Group shall, in his or her business conduct, comply with all applicable laws and regulations, in all the territories in which he or she operates. If the ethical and professional standards set out in the applicable laws and regulations are below that of the code, then the standards of the code shall prevail.

## CONCURRENT EMPLOYMENT

An employee of any of the Companies of the UGOC shall not, without the prior approval of the directors, accept employment or a position of responsibility (such as a consultant or a director) with any other company, nor provide 'freelance' services to anyone.

## CONFLICT OF INTEREST

An employee of any of the Companies of the UGOC shall not engage in any business, relationship or activity which might detrimentally conflict with the interest of his or her employer or the Group. A conflict of interest, actual or potential, may arise where, directly or indirectly:

- an employee of a Company of the UGOC engages in a business, relationship or activity with anyone who is party to a transaction with his or her employer;
- an employee is in a position to derive a personal benefit or a benefit to any of his or her relatives by making or influencing decisions relating to any transaction;
- an independent judgement of the Company's or Group's best interest cannot be exercised.

The main areas of such actual or potential conflicts of interest would include the following:

- act in a manner which influences a business decision in favour of a supplier, customer or potential business partner to which any principal, officer or representative is related to a member of staff of any Company of the UGOC, resulting in a benefit to him/her or his/her relative;
- award of benefits such as increase in salary or other remuneration, posting, promotion or recruitment of a relative of an employee of any of the Companies of the UGOC, where such an individual is in a position to influence the decision with regard to such benefits;
- acceptance of gifts, donations, hospitality and/or entertainment beyond the customary level from existing or potential suppliers, customers or other third parties which have business dealings with any of the Companies of the Group.

Irrespective of such or other instances of conflict of interest exist due to any historical reasons, adequate and full disclosure by the interested employees shall be made to the management. It is also mandatory for every employee to make a full disclosure of any interest which the employee or the employee's immediate family, which would include parents, spouse and children, may have in a company or firm which is a supplier, customer, distributor of or has other business dealings with his or her employer.

# CODE OF CONDUCT

---

Every employee who is required to make a disclosure as mentioned above has the obligation to do so, in writing, to his or her immediate superior. This information shall be forwarded to the Business Unit Managing Director/Shared Service Head, who in turn shall place it before the UGOC Board of Directors. Following the decision of the Board, the employee concerned will be required to take all necessary actions as advised to resolve/avoid the conflict. Failure on the part of an employee to make a disclosure as required herein shall result in disciplinary actions against the employee imposed by the management when the conflict of interest is revealed.

## PROTECTION OF ASSETS

---

The assets of any of the Companies of the UGOC shall not be misused but shall be employed for the purpose of conducting the business for which they are duly authorised. These include tangible assets such as equipment and machinery, systems, facilities, materials and resources as well as intangible assets such as proprietary information, relationships with customers and suppliers, etc.

## CITIZENSHIP

---

An employee of a Company of the UGOC shall in his or her private life be free to pursue an active role in civic or political affairs as long as it does not adversely affect the business or interests of the Company or the Group.

## INTEGRITY OF DATA FURNISHED

---

Every employee of any of the Companies of the UGOC shall ensure, at all times, the integrity of data or information furnished by him or her to the Company.

## PROTECTION OF DATA

---

Every employee of any of the Companies of the UGOC shall ensure that personal or any other form of data or information concerning clients, vendors, agents, associates, colleagues or any other third party acquired during the normal course of business must at all-time be kept confidential and used only for the intention it was obtained for.

## REPORTING CONCERNS

---

Every employee of any Company of the UGOC shall promptly report to the management any actual or possible violation of this Code, or an event he or she becomes aware of that could affect the business or reputation of his or her or any other Company of the UGOC. The UGOC policy protects employees who raise concerns in good faith.

For more information please contact the Human Resources Shared Service.