

C/NNEL

CODE OF CONDUCT

Introduction

Our company is committed to maintaining the highest standards of ethical behavior, integrity, and professionalism. This Code of Conduct outlines the principles and guidelines that all employees, contractors, and stakeholders must adhere to in order to promote a positive and inclusive work environment and to ensure that our business practices align with legal, ethical, and financial reporting standards. By adhering to this code, we contribute to the reputation and success of our company.

Basic Principles

- 1. Compliance with laws, regulations, and financial reporting standards
- 2. Integrity, honesty, and transparency in financial practices
- 3. Confidentiality and data protection
- 4. Accuracy of financial records and reporting
- 5. Protection of company assets
- 6. Compliance with internal controls
- 7. Avoidance of conflicts of interest
- 8. Compliance with anti-bribery and anti-corruption laws
- 9. Respect for intellectual property rights
- 10. Commitment to health and safety
- 11. Respectful and inclusive work environment
- 12. Prevention of harassment and discrimination
- 13. Fair employment practices
- 14. Environmental responsibility
- 15. Reporting violations and protecting whistleblowers

1. Compliance with Laws, Regulations, and Financial Reporting Standards

- 1.1. Understand and comply with all applicable local, national, and international laws, regulations, and financial reporting standards relevant to our business operations.
- 1.2. Ensure accurate and transparent financial reporting, maintaining the integrity of our financial records and statements.

2. Integrity and Honesty

2.1. Act with the highest level of integrity, honesty, and transparency in all financial and accounting practices.

- 2.2. Avoid engaging in fraudulent activities, misrepresentation of financial information, or any form of unethical behavior that could compromise the accuracy of financial records or statements.
- 2.3. Uphold the reputation and values of the company and avoid engaging in activities that could harm the company's financial interests or its stakeholders.

3. Confidentiality and Data Protection

- 3.1. Safeguard confidential financial and accounting information, including financial statements, internal reports, budgetary information, and any other financial data designated as confidential.
- 3.2. Ensure that personal data related to financial transactions is collected, stored, and processed in compliance with applicable privacy laws and company policies.
- 3.3. Obtain necessary approvals before disclosing financial information to third parties and handle such information with care to prevent unauthorized access or use.

4. Accuracy of Financial Records and Reporting

- 4.1. Maintain accurate and reliable financial records that reflect the true and fair financial position of the company.
- 4.2. Adhere to the appropriate accounting principles and standards relevant to our industry, ensuring consistency, completeness, and transparency in financial reporting.
- 4.3. Promptly report any suspected or observed errors, irregularities, or fraudulent activities in financial records or reporting to the appropriate authorities within the organization.

5. Protection of Company Assets

- 5.1. Use company assets, including financial resources, funds, and accounts, responsibly and in compliance with company policies and applicable financial regulations.
- 5.2. Safeguard company assets from unauthorized use, misappropriation, or theft, and promptly report any concerns or incidents to the relevant authority.
- 5.3. Exercise prudence and due diligence in financial transactions, including proper authorization, accurate recording, and appropriate internal controls.

6. Compliance with Internal Controls

- 6.1. Adhere to established internal control procedures and policies to ensure the accuracy, reliability, and security of financial data and transactions.
- 6.2. Comply with segregation of duties, approval processes, and internal review mechanisms to minimize the risk of errors, fraud, or misuse of financial resources.
- 6.3. Report any identified weaknesses or gaps in internal controls to the appropriate authority for prompt resolution and improvement.

7. Conflicts of Interest

- 7.1. Avoid conflicts of interest that may compromise judgment, objectivity, or decision-making in carrying out company duties.
- 7.2. Promptly disclose any actual or potential conflicts of interest to the appropriate authority and seek guidance on appropriate actions to mitigate or address them.
- 7.3. Refrain from using company resources, assets, or positions for personal gain or to benefit family members, friends, or associates unfairly.

8. Compliance with Anti-Bribery and Anti-Corruption Laws

- 8.1. Strictly adhere to all applicable anti-bribery and anti-corruption laws and regulations.
- 8.2. Prohibit offering, giving, soliciting, or accepting bribes or improper payments in any form, including kickbacks, facilitation payments, or other illicit benefits.
- 8.3. Maintain accurate records of all business transactions and expenses to ensure transparency and accountability.

9. Respect for Intellectual Property Rights

- 9.1. Respect the intellectual property rights of others, including patents, trademarks, copyrights, and trade secrets.
- 9.2. Use intellectual property assets, including software, documents, designs, and other proprietary information, only as authorized and in accordance with applicable laws and licenses.
- 9.3. Obtain appropriate permissions or licenses when using third-party intellectual property and respect confidentiality agreements.

10. Health and Safety

- 10.1. Prioritize the health, safety, and well-being of employees, contractors, clients, and the communities in which we operate.
- 10.2. Comply with applicable health and safety regulations and maintain a clean and hazard-free work environment.
- 10.3. Report any safety concerns, accidents, or near-misses promptly and participate in training programs to enhance safety awareness and practices.

11. Respectful and Inclusive Environment

- 11.1. Treat all individuals with respect, fairness, and dignity, regardless of their race, ethnicity, gender, sexual orientation, religion, age, disability, or other protected characteristics.
- 11.2. Foster an inclusive work environment that values diversity, promotes equal opportunities, and ensures that all employees feel safe and supported.
- 11.3. Prohibit harassment, discrimination, bullying, or any form of disrespectful behavior, whether verbal, physical, or written, based on protected characteristics.

12. Harassment Prevention

- 12.1. Prohibit all forms of harassment, including but not limited to sexual harassment, bullying, and intimidation.
- 12.2. Foster a culture of respect and professionalism where employees can work without fear of harassment.
- 12.3. Provide clear channels for reporting harassment complaints, ensure confidentiality, and conduct thorough investigations. Take appropriate disciplinary action against individuals found responsible for harassment.

13. Fair Employment Practices

- 13.1. Recruit, hire, promote, and compensate individuals based on their qualifications, skills, experience, and job performance, without discrimination or bias.
- 13.2. Foster a workplace free from harassment, intimidation, or retaliation, and promptly address any complaints or grievances through a fair and transparent process.

13.3. Provide reasonable accommodations for individuals with disabilities to enable equal access to employment opportunities.

14. Environmental Responsibility

- 14.1. Strive to minimize our environmental impact and promote sustainable practices throughout our operations.
- 14.2. Comply with applicable environmental laws and regulations, including waste management, pollution prevention, and resource conservation.
- 14.3. Seek opportunities to reduce energy consumption, promote recycling and reuse, and support environmentally responsible suppliers and partners.

15. Reporting Violations

- 15.1. Encourage and protect whistleblowers who report suspected violations of this Code of Conduct, company policies, or any other unethical behavior.
- 15.2. Provide accessible and confidential channels for reporting concerns or grievances, and ensure that appropriate actions are taken to investigate and address reported violations.
- 15.3. Prohibit retaliation against individuals who report violations in good faith and maintain confidentiality to the extent possible, respecting legal requirements and the rights of all parties involved.

Conclusion

Adhering to this Code of Conduct ensures that we maintain a positive work environment, foster ethical practices, and uphold the highest standards of financial integrity, human rights, and responsible business conduct. It is the responsibility of all employees, contractors, and stakeholders to act in accordance with these principles and guidelines. By doing so, we contribute to the long-term sustainability and growth of our organization while upholding the dignity, rights, and well-being of individuals.