

CODE OF CONDUCT

Purpose

This Code of Business Conduct (the “Code”) is applicable to employees, directors, and officers (the “Staff”) of Levare International Limited and all its subsidiaries (the “Company”). The purpose of this Code is to assist you in understanding what the Company expects of you and what you can expect of the Company with respect to business conduct.

- a) The Company is committed to the highest standards of ethical behavior.
- b) The Company requires a high standard of ethical conduct from all Staff and will apply appropriate sanctions in cases of proven misconduct within the Company.
- c) The Company endorses an ethical culture within the Company, based on standards and behaviors applicable to all Staff equally.

By adopting and complying with this Code, together with other corporate governance documents, Company policies and principles, the Company demonstrates its commitment to endorsing a high standard of ethical behavior.

The Company and its Staff undertake to comply with this Code and are committed to use their best endeavors to respect and act upon its provisions both in spirit and in deed. No person connected with the Company may ask a member of Staff to break the law or contravene Company policies and values.

Our Values

Adhering to the values set out below supports the creation of a corporate culture, essential to the achievement of our demanding business goals. Our values are reflected in our success. We do not compromise our values to make profit. We perceive our values as binding for all our business areas and, similarly, we expect the same in our relationships with our business partners.

- a) Equal opportunities to all Staff without regard to race, ethnic or national origins, color, nationality, religion or belief, sex, sexual orientation, marital status, age, or disability.
- b) Respect for the confidentiality of client and Company information.
- c) Fairness means a level of remuneration commensurate with achieved results and providing equal rights for further career development.
- d) Honesty in our relations and in provision of all information required for our work.
- e) Efficiency as sustainable achievement of maximum possible results in everything we do.
- f) Courage to resist taking any action against our policies and values and to assume personal responsibility for our own decisions.
- g) Care demonstrated by our best efforts to protect people from any harm or threat to their lives and health and by our intention to safeguard the environment.
- h) Trust in Staff to delegate power and responsibility for decisions and implement those decisions appropriately.

Ethical Principles

The Company’s ethical standards focus on our relationships both internally with our Staff and externally how we deal with customers, our business partners, government, society, and the community at large. The Company’s ethics are based on:



- a) Respect for the rules of applicable laws and regulations.
- b) Respect for human rights.
- c) Conducting business with integrity and fairness.
- d) Renouncing any form of corruption and bribery, including any payment or other form of benefit conferred on any government official, either directly or through any person or entity acting on behalf of the Company as a partner, agent, or distributor, for the purpose of influencing that official's decisions.
- e) Not giving or accepting gifts and entertainment unless they comply with Company policy and all applicable laws and regulations.
- f) Creating mutual benefit in all the Company's relationships.
 - a. building and fostering trust; and
 - b. demonstrating respect for the communities where the Company operates, as well as for the environment.

1. DEALINGS WITH OTHERS

1.1 Dealings with Clients, Lenders, Suppliers and Society

All our relations are based on a spirit of partnership and mutual respect.

- a) We are committed to fulfilling our obligations and expect our partners to do the same.
- b) We are interested in the sustainable development of our own business and the business of our partners.
- c) We seek long-term and mutually beneficial partnerships.
- d) We believe that a long-term relationship with our business partners founded on respect, trust, honesty and fairness is vital to our success.
- e) We value our clients and dedicate ourselves to producing high quality products and services.
- f) We place great value on our reputation and comply with the highest standards of business ethics and rights. We have a "zero tolerance" policy for any criminal or fraudulent conduct by the Company or any member of Staff.
- g) We expect our business partners, lenders, contractors, and suppliers to maintain high ethical standards. They must not act on the Company's behalf in any manner that is inconsistent with this Code or any applicable laws or regulations.
- h) We do not bribe or use any forms of unlawful payments nor use, or threaten to use, unethical or unfair ways of influencing our business partners or competitors.
- i) We conduct business with reputable suppliers, lenders, business customers and other partners who are involved in legitimate business activities and whose funds are derived from legitimate sources.

1.2 Dealings with Government

We seek to build and manage a sound relationship with governmental authorities on an arm's length basis in accordance with applicable laws and regulations.

- a) We conduct Company business in compliance with all applicable local competition and antitrust laws which strive to promote and protect free and fair competition.



- b) We are committed to complying fully with the applicable anti-bribery laws and laws on financial crime, including anti-money laundering legislation.
- c) We are committed to complying with all applicable sanction laws, including those of the US and the EU, which prohibit nationals of certain countries (including the US and EU), including those living abroad, from being involved, directly or indirectly, in activities that are subject to sanctions, or providing or assisting with the provision of certain services to individuals or companies who appear on sanctions lists.
- d) We abide by all other laws and regulations applicable to our activities, including any voluntary guidelines, which the Company has committed to follow.
- e) We pay our taxes in full and in a timely manner.
- f) We do not, directly, or indirectly, participate in party politics.
- g) We do not use corporate assets for political purposes.
- h) Staff may participate in political activities in their own time and at their own expense without using the name of, or affiliation with, the Company to promote any political activity, party or candidate.

1.3 Anti-Corruption and Anti-Bribery

The Company conducts business around the world and is therefore subject to numerous laws that prohibit the receiving, offering, providing, or authorizing the payment of bribes or kickbacks of any kind. The Company does not engage in any bribes or other behavior to improperly influence the decisions of others, including customers, potential customers, government officials or any other third parties or individuals for the purpose of obtaining or retaining business, or other such advantage to the Company.

All Staff are prohibited from accepting bribes from suppliers or third parties. Failure to comply with these requirements will result in disciplinary action, up to and including termination of employment. In addition to disciplinary action, violations of applicable anti-bribery laws may also result in criminal and civil penalties to the Company and individual Staff.

Refer to Schedule 1 – Anti-Corruption and Anti-Bribery Policy for further details.

Certain gifts and entertainment may be given at the Company's expense or accepted from a competitor or an individual or firm doing or seeking to do business with the Company provided they meet the criteria specified in the Anti-Corruption and Anti-Bribery Policy.

2. DEALINGS WITH STAFF AND THE COMPANY

The Company values its Staff as integral to its success. We work together to achieve results.

- a) We respect individual freedom and human rights, we give equal opportunities to everyone, and we do not support any form of discrimination or harassment in the workplace, including mental cruelty, sexual harassment, physical abuse, and racial, ethnic, and religious discrimination.
- b) The Company complies with minimum age requirements as prescribed by the ILO.
- c) We are committed to treating all our Staff with dignity, trust, and respect and to building long-term relationships based upon applicable law and the respect of human rights. We will not engage in conduct that could be perceived as offensive or unacceptable.
- d) We welcome leadership as the ability to make decisions at all levels. The necessary scope to take personal responsibility for the execution of their tasks is delegated to every Staff member.
- e) We value teamwork and the right to address proposals for improvement to the highest level of executive authority in the Company.



- f) We welcome constructive feedback and encourage regular dialogue regarding employment conditions and other issues that may affect Staff interest.
- g) We support the career development of Staff aimed at improved quality of work and attained results.
- h) We reward our Staff for their performance, based on performance objectives, and constructive and regular feedback through face-to-face meetings.
- i) We expect proactive engagement and maximum contribution in handling the Company's challenges.

2.1 Company Assets and Confidential Information

We place great value on our reputation, which we strive permanently to strengthen by our work and conduct. Accordingly, all Staff shall adhere to the following guidelines:

- a) Use of the Company's property, funds, information, tools, and resources is restricted to the Company's business only, i.e., the use of such information, tools and resources for private and personal purposes is an abuse of the Company's trust. Company assets should be safeguarded and used for Company business only, except for limited personal use that does not interfere with the Company's business and is otherwise in compliance with all applicable Company policies. This includes protection of the Company's physical assets, such as office facilities, furniture, equipment, supplies, information systems and other technology assets, intellectual property rights and Confidential Information (as defined below).
- b) The Company's information systems, including computers, e-mail, cell phones and other mobile devices, SIM cards and internet access, are to be used for proper purposes in a manner consistent with this Code and all applicable Company policies.
- c) Though some personal use of our information systems may be inevitable, such personal use should be kept to a reasonable minimum. Personal data on Company information systems is subject to all Company policies. Company information systems may not be used to send or forward content that breaches the Company's policy against discrimination and harassment, or any other applicable policy, or for any purpose that is misleading, dishonest or otherwise improper.
- d) It is generally not our intent to monitor internet usage or messages on our e-mail systems. However, the Company reserves the right to do so in appropriate circumstances in a manner consistent with all applicable laws and regulations and to take appropriate disciplinary action on a case-by-case basis.
- e) Staff having access to Company information systems are responsible for taking the precautions necessary to prohibit unauthorized access to those systems, including protecting passwords and other means of entry.
- f) Information is provided strictly on a need-to-know basis only. All Staff are responsible for protecting the Company's assets, including its proprietary information, and the proprietary information of any third party with respect to which the Company has incurred confidentiality and limited use obligations.
- g) Staff shall not, during or following their employment with the Company (i) disclose Confidential Information to any third party, or (ii) use, except on behalf of the Company, any Confidential Information. All Staff shall, upon termination of their employment with the Company, return to the Company all Confidential Information and all copies thereof and all other Company property then in their possession or control, even if not confidential or secret, such as correspondence, files and manuals.

“Confidential Information” means the Company's confidential, secret or



proprietary information, trade secrets or know how, or information not generally available to the public, including but not limited to the Company's internal management and financial reports, budgets, business plans, corporate strategies or unannounced information regarding potential mergers, acquisitions or divestitures; new inventions, discoveries and improvements; information related to trademarks, ideas and processes; products and services specifications, applications, instructions, drawings, sketches, plans, written descriptions, product performance information, manufacturing methods, manufacturing or field operating processes or procedures; market information; customer lists and contacts; prices paid or received for goods or services; and similar information.

- h) Every idea, process, trademark, invention, or improvement conceived by a member of Staff which relates to the Company's business, or which was created with the resources of the Company, shall be the exclusive property of the Company. Subject to any requirements of applicable law to the contrary, Staff who are employed in a technical capacity or in a capacity in which they may reasonably be expected to make technical developments, are required to disclose, and assign to the Company, if so requested, their entire right, title, and interest in and to any inventions. All Staff are further required to assist the Company, at no cost to such Staff, in obtaining, maintaining, enforcing, and defending patents related to such inventions.

2.2 Occupational Health & Safety and Environmental Protection

We value human life and health and prioritize them above economic results and performance.

- a) We strive to minimize accidents and occupational injuries. Optimization and improvement of occupational safety systems are one of the Company's key priorities. To achieve these aims, the Company will ensure that:
- Staff understand their accountability for performing their role and using their skills in a manner that does not compromise the health and safety of themselves or others or leads to environmental damage.
 - Resources are available to systematically manage health, safety and the environment through hazard identification, risk analysis and appropriate control measures.
- b) The Company seeks to fully comply with all official environmental norms and regulations as well as fully understanding the need to develop environmentally friendly processes, and does its best to:
- Efficiently use natural resources.
 - Develop and introduce resource-saving and non-waste technologies.
 - Seek to introduce applicable modern systems of environmental management at the Company's plants and facilities.
- c) Each member of Staff shall:
- Be aware of the risks accompanying their work and influencing their safety and health.
 - Safeguard their own and other employees' health and safety; by their own example promote safety-minded behavior of other members of Staff.
 - Comply with all safety norms and environmental standards applicable to their activities and be aware of possible consequences for the environment of any noncompliance with the



established procedures.

- Improve personal efficiency, initiate, and apply advanced approaches to industrial and environmental risk management.
- Demonstrate efforts to conserve resources and energy; be aware of the unique characteristics of the natural world and the need to preserve it for future generations.

Managers of all levels are directly responsible for safe working conditions and protection of the environment.

2.3 Efficiency and Profitability

The Company can achieve its goals only if each member of Staff performs efficiently and strives to surpass their personal goals.

- a) We are receptive to relevant changes and new requirements of the outside world and strive to review and improve the processes of our work to raise productivity and efficiency.
- b) We seek coherence and conformity in our decisions and actions.
- c) We analyze risks associated with our activity and use our best efforts to minimize them.
- d) We make investment decisions only after all the data, calculations of payback periods and expected rates of return are duly verified and proved.
- e) We strive to use opportunities to optimize all the involved resources.
- f) Our choice of suppliers and contractors is based on a fair and transparent selection process.
- g) The Company strives to maximize profits and the value of its business by defining its product mix to meet the needs of our clients, by gaining access to new markets, by expanding our production capacities and introducing advanced technologies.
- h) The Company balances and considers responsibly the requirement to prioritize urgent tasks along with any long-term consequences.

2.4 Conflicts of Interest

Staff shall act in the best interests of the Company and its customers and seek to avoid any conflict of interests in accordance with the following guidelines:

- a) Staff must ensure that their personal interests do not conflict, or appear to conflict, with the duties owed to the Company or which the Company owes to a customer or other third party.
- b) Staff must not engage in activities for personal gain in conflict with the interests of the Company.
- c) Staff must avoid real, apparent, potential, or perceived conflicts of interest in which personal interests might conflict with those of the Company.
- d) Staff shall not seek or accept, directly or indirectly, any personal loan or services from any individual or business concern doing or seeking to do business with the Company except from institutions offering like loans or services to the public in the ordinary course of their respective businesses.
- e) Staff must ensure they disclose any and all real or potential conflicts of interests to their supervisor and to the Legal Officer. This includes any family members (by birth, marriage, or adoption) including extended family relatives or other such connections that should be disclosed prior to entering any engagement or arrangement, including any offer of employment, consultancy, or any other such services.



- f) To the extent that the conflicts of interest cannot be avoided, Staff should inform supervisors and the Legal Officer and take themselves out of the decision-making process in connection with any action or decision that gave rise to the conflict of interest.

“Personal interests” covered include those that affect the spouse or partner and/or members of family of Staff, and any other person over whom a member of Staff may exercise substantial influence or control.

2.5 Criminal Wrongdoing and/or Fraud

Staff are responsible for safeguarding the tangible and intangible assets of the Company. Misappropriation of the Company’s assets is a breach of duty to the Company and may constitute an act of fraud against the Company. Similarly, carelessness, waste or unauthorized use of Company assets is also a breach of duty to the Company.

2.6 Freedom from Harassment

It is Company policy to provide a workplace that is free from disrespectful behavior and harassment based on age, sex, race, color, religion, national origin, disability, handicap, sexual orientation, military status, genetics, or any other classification protected by law. The Company prohibits retaliation against any employee who reports discrimination or harassment or participates in an investigation of such report.

Levare promotes a productive work environment and does not tolerate verbal or physical conduct by any employee that harasses, disrupts or interferes with another’s work performance or that creates an intimidating, offensive or hostile environment.

Refer to Schedule 2 – Anti-Harassment Policy for further details.

3. IMPLEMENTATION

3.1 Reporting and Investigating

The Company is committed to operating its business with honesty and integrity and in a manner that encourages a culture of openness and accountability. Staff are encouraged to report and address any concerns, potential breaches or violations as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected.

‘Whistleblowing’ is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, health and safety risks, damage to the environment or any breach of legal or professional obligations.

Any questions or concerns in regard to compliance with, or possible breach of this Code occurring at any of the Company’s plants or offices, should be raised to your immediate supervisor or to the Legal Officer. If you are uncomfortable speaking to your supervisor or the Legal Officer for any reason, you should contact the Whistleblowing Officer (details below).

The key for both the Company and its employees is that questions and concerns become known so that any issue can be addressed and resolved. The Company encourages openness and will support whistleblowers who raise genuine concerns, even if they turn out to be mistaken. However, if the Company concludes that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

The Company will not tolerate any retaliation against any employee who raises a question or concern about the Company’s business practices or by a whistleblower. Employees must understand,



however, that using these communication channels to report a wrongdoing will not absolve the employee from accountability for personal involvement in such wrongdoing.

Staff are expected to immediately report any suspected or attempted fraud or unexplained disappearance of funds by contacting his or her supervisor and the Legal Officer referred to below.

All Staff are required to cooperate fully with an appropriately authorized internal or external investigation, including but not limited to those involving ethical issues or complaints of discrimination or harassment.

Staff should never withhold, tamper with, or fail to communicate relevant information in connection with an investigation. Making false statements to or otherwise misleading internal or external auditors, investigators, legal counsel, or Company representatives may be grounds for immediate termination of employment or other relationship with the Company and may also be an act that can result in severe penalties.

In addition, Staff are expected to maintain and safeguard the confidentiality of any investigation to the extent possible.

Legal Officer
Irina Skidan
Email: irina.skidan@levare.com

Whistleblowing Officer
Michelle Pham
Email: michelle.pham@levare.com
Tel: +971 4568 1473

Office hotline: hotline@levare.com

3.2 Enforcement

Each individual is responsible for his or her ethical behavior. Adherence to this Code is made obligatory for all Staff, notwithstanding their rank or position, and is incorporated into all employee contracts by reference, and linked to all disciplinary procedures.

Willful or careless breach or neglect of one's duties and responsibilities pursuant to the provisions of this Code will be treated as a serious disciplinary matter and can lead to the suspension or termination of employment.

3.3 Effectiveness and Review

The effectiveness of this Code will be reviewed periodically by the Board of Directors of the Company which will make amendments when necessary. The last version of this document was dated 22 September 2022 and approved by the Board.

3.4 Declaration and Training

All Staff are required to read, understand, and comply with the Code and will be required to submit the Declaration as set out in Annex A to HR Manager. The Company may offer training on the Code as necessary from time to time.



Annex A

DECLARATION

I, the undersigned member of Staff of Levare International Limited or of one of its subsidiaries, declare that:

- a) I have read and understand the CODE OF CONDUCT (including the attached Policies set out in Schedule 1 (Anti-Corruption and Anti-Bribery Policy) and Schedule 2 (Anti-Harassment); and
- b) agree to be bound by it.

Signed: _____
Print name: _____
Date: _____



SCHEDULE 1

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

It is Company policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. The Company complies with all applicable laws forbidding bribery and corruption where we conduct business.

Any Staff who breach this policy will face disciplinary action, which could result in dismissal for gross misconduct or otherwise be subject to criminal or civil penalties.

Who must comply?

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

What is bribery?

The essence of bribery is the giving or receiving of an advantage in connection with some improper performance of functions. A “bribe” is a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting, or seeking a bribe. All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager.

Specifically, you must not:

- give or offer any payment, gift, hospitality, or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- accept any offer from a third party that you know, or suspect is made with the expectation that we will provide a business advantage for them or anyone else; or
- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure. Officially published fees for expedited processing services are not included in this restriction.

You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

Gifts and hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process). Gifts and entertainment may be given at the Company’s expense or accepted from a competitor or an individual or firm doing or seeking to do business with the Company provided it meets the following criteria:

- (a) it is consistent with this policy and does not violate applicable anti-bribery laws or ethical



standards;

- (b) it is not excessive in value or frequency;
- (c) it cannot be construed as an improper inducement to obtain or retain business;
- (d) it is properly disclosed and approved by the Chief Legal & Compliance Officer;
- (e) public disclosure of the facts would not embarrass the Company, or any member of Staff.

Payments or gifts of cash (or cash equivalent, such as vouchers, stocks or commodities) to or from a competitor or an individual or firm doing or seeking to do business with the Company are strictly prohibited and may not be solicited, offered, made or accepted by any member of Staff.

Record-keeping

You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

How to raise a concern

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your manager or report it to the Legal Officer or Whistleblowing Officer as set out in the Code of Conduct.



SCHEDULE 2

ANTI-HARASSMENT POLICY

1. What is harassment?

Sexual harassment may include:

Unwelcome sexual advances, requests for sexual favors and all other verbal or physical conduct of a sexual or otherwise offensive nature, especially where:

- Submission to such conduct is made either explicitly or implicitly as a term or condition of employment;
- Submission to or rejection of such conduct is used as the basis for decisions affecting an employee's employment; or

Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

Offensive comments, jokes, innuendos and other sexually oriented statements. Verbal abuse of a sexual nature, commentary about an employee's body, insulting or obscene comments or gestures, display or circulation in the workplace of sexually suggestive objects or pictures (including through email).

Harassment on the basis of any other protected characteristic is also strictly prohibited. For the purposes of this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, national origin, age, disability or any other characteristic protected by law or that of his/her relatives, friends or associates and that:

- Has the purpose or effect of creating an intimidating, hostile or offensive work environment;
- Has the purpose or effect of unreasonably interfering with an employee's work performance; or
- Has otherwise adverse effects on an employee's employment opportunities.

The Company is not stating what may be legally determined by a court as "harassment." It is, however, noting examples of behavior that may be offensive to employees and which the Company will correct – if any such behavior is brought to the Company's attention by the process noted below and, if after investigation, the Company concludes that remedial action and/or discipline must be taken.

2. The Complaint Process

All Staff are responsible for helping to enforce this policy against harassment. Any employee who has been the victim of prohibited harassment or who has witnessed such harassment must immediately notify their supervisor and/or the HR Department to file a formal written complaint to ensure the situation can be promptly investigated and remedied. In turn, the supervisor and/or Human Resources Department shall notify the HR Director at Levare's Head Office. If there is no supervisor and/or Human Resources Department at the relevant subsidiary, or the position is vacant at the time of the making of the complaint, then this notification must be sent to the respective Country Manager or directly to the HR Director at Levare's Head Office.

It is Company policy to investigate all harassment complaints thoroughly and promptly. To the fullest extent practicable, the Company will maintain the confidentiality of those involved. If an investigation confirms that harassment has occurred, the Company will take corrective action. Corrective action may include disciplinary action which may include immediate termination of employment. The



Company forbids retaliation against anyone who has reported harassment or who has cooperated in the investigation of harassment complaints.

3. Responsibilities

All employees must share the responsibility of understanding and preventing discrimination and harassment. Ultimately, no satisfactory investigation or resolution of complaints can occur without the initiative and continued cooperation of the affected person. Individuals who believe they have been discriminated against or harassed have the primary obligation of informing their supervisor and/or Human Resources Department of the act of discrimination, harassment, or retaliation, and filing a formal written complaint recounting specific actions or occurrences whenever possible. The Human Resources Department will perform a prompt investigation and make appropriate resolutions based on the circumstances.

Managers and Supervisors have the special responsibility as agents of the Company to act promptly to eliminate any discrimination or harassment which exists in their areas of responsibility. Immediate action will be taken to address the issue.

Any employee with supervisory or hiring responsibilities who is found to have engaged in conduct prohibited under this policy is subject to disciplinary action, including removal from that position for cause.

The Human Resource Department has the primary responsibility of implementing this policy. The Human Resources Department will respond to inquiries and complaints from management and employees regarding discrimination, sexual harassment, other harassment, or retaliation and maintain records of these inquiries and complaints as well as their resolution. Together with the Company and other staff, the Human Resources Department will also provide information and education to the employees and management on recognizing, understanding, and combating unlawful discrimination and harassment.

4. Confidentiality

Before filing a complaint

The Company aims to create a safe environment in which individuals are not afraid to discuss concerns and complaints or to seek general information about discrimination, harassment, and retaliation. The Company recognizes individuals may be concerned about the confidentiality of information they share and will strive to preserve confidentiality to the fullest extent possible.

However, confidentiality is not absolute, particularly when the Company must investigate the matter and when disciplinary action may be the result. Moreover, the Company may be legally obligated to act once informed that discrimination, harassment or retaliation has occurred or may be occurring. Thus, confidentiality, while a goal, cannot be guaranteed in every case.

During the complaint process

Once an individual discloses identifying information and such information is sufficiently complete and specific to state a claim of discrimination, harassment or retaliation, he or she will be considered to have filed a complaint with the Company. The Company aims to have all such complaints submitted in writing.

The Company will take prompt responsive action upon receipt of a complaint, which may include disciplinary action (up to and including termination), remediation, and/or training, for example, or no action at all, if the facts warrant that decision. Every decision will depend on the facts determined by the Company.

Whilst the confidentiality of the information received, the privacy of the individuals involved and the wishes of the complainant regarding action by the Company cannot be guaranteed in every instance, they will be protected to the fullest extent permitted by law. The expressed wishes of the



complainant for confidentiality will be considered in the context of the Company's legal obligation to act upon the charge and the right of the charged party to obtain information.

During the investigative process, any notes or documents written by or received by the person(s) conducting the investigation will be kept confidential.

5. No Retaliation

The Company strictly forbids retaliation against employees who report harassment or who participate in internal or external investigations of harassment. Agents of the Company shall not retaliate against, coerce, intimidate, threaten, harass, or interfere with any individual exercising their rights under applicable law or because an individual aided or encouraged any other individual in the exercise of rights granted or protected by applicable law. All employees are strongly urged to report all instances of retaliation via one the avenues listed above.

Revision History

Last adopted	September 2022
Revised and approved	December 2023

