

[INSERT COMPANY HEADER]

[NAME OF COMPANY] CODE OF CONDUCT (Template)

INTRODUCTION

The Company is committed to maintaining the highest standards of integrity, honesty, professionalism, and ethical conduct in all business dealings.

The purpose of this Code of Conduct is to outline the Company's expectations for compliance with legal and ethical standards in the conduct of the business of the Company [and the group of companies to which the Company belongs (the "Group")].

WHO THIS CODE APPLIES TO

This Code of Conduct applies to:

- all employees of the Company [and any other member of the Group];
- all directors and officers of the Company [and each other member of the Group]; • all agents and contractors of the Company [and each other member of the Group]; and
- all subsidiaries of the Company from time to time.

This Code does not form part of any employment contract and may be changed at any time at the discretion of the Company.

PROFESSIONAL CONDUCT

All persons subject to this Code of Conduct must adhere to the following principles at all times in the conduct of the business of the Company [and any other member of the Group]:

- **Conflicts of Interest:** Conflicts of interest must be avoided, or appropriately addressed, to maintain the Company's integrity and the trust of its stakeholders. Any actual or perceived conflict of interest must be disclosed to the board of directors of the Company (the "Board") without delay.
- **Anti-Bribery and Corruption:** The Company's Anti-Bribery and Corruption Policy sets clear standards and requirements which prohibit any form of bribery or corrupt practices in the carrying on of the business of the Company. Strict compliance is required at all times.
- **Anti-Money Laundering:** The Company endeavours to maintain stringent due diligence standards to detect and prevent any form of money laundering or financial misconduct. Any suspicious activities must be reported to the Board without delay.
- **Workplace Behavior:** The Company is committed to fostering a safe, inclusive and respectful workplace. All colleagues must be treated with respect and dignity and discrimination, bullying or harassment will not be tolerated. Compliance with the Company's human resources and health and safety policies is essential.
- **Confidentiality:** The confidentiality of Company and business information must be strictly maintained at all times. Nothing in this Code shall prevent an individual from disclosing information which they

are entitled to disclose under the Criminal Justice Act, 2011, as amended, or the Protected Disclosures Act, 2014-2022 provided that any such disclosure is made in accordance with the relevant legislation.

- **Privacy and Data Protection:** The Company’s approach to data protection involves strict adherence to relevant laws and regulations to safeguard data from unauthorised access, misuse or breach. We expect all employees, partners, and stakeholders to follow these principles by implementing robust measures to protect data and by promptly addressing and reporting any concerns or incidents.
- **Environmental:** The Company is firmly committed to environmental responsibility and sustainability. All persons subject to this Code of Conduct should familiarise themselves with the Company’s Environmental Policy and ensure they are aware of their obligations concerning sustainable workplace and business practices.

MONITORING AND OVERSIGHT

The [board of directors of the Company (the “Board”)] has primary and day-to-day responsibility for implementing this Code of Conduct, monitoring the use and effectiveness of this Code of Conduct and overseeing internal control systems and procedures to ensure compliance with this Code of Conduct.

TRAINING

Training on this Code of Conduct will be provided regularly.

VIOLATIONS

Any suspected violations of this Code of Conduct should be reported to the Board. Violations will be investigated promptly, and appropriate disciplinary action will be taken (which may include termination of employment).

REVIEW

This Code of Conduct will be reviewed by the Board annually or as needed based on legislative changes, updates to industry guidance, changes to other internal policies or procedures or incidents related to the issues addressed in this Code of Conduct.

QUERIES

Any queries in relation to this Code of Conduct should be directed to the [Board].

ACKNOWLEDGEMENT

I, _____ (name), acknowledge that on _____ (date), I received and read a copy of the this Code of Conduct and understand that it is my responsibility to be familiar with and abide by its terms.