

Code of Conduct

2025

QUICKSILVER
CONVENIENCE LTD

Our defining trait is an obsession with the highest standards.

**Dr. Rolph Balgobin
Executive Chairman**

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A. Our Purpose



Serving Creation Through Competitive Business.

B. Our Vision



For over Forty Years, the Quicksilver Group has pursued its Vision of a symbiotic relationship between business and society.

A vision that emphasizes beneficial engagement and charity, generating a multiplier effect of goodness and success in the communities we touch.

A vision of an improved society and world through successful businesses.

C. What we value

Our Group is values-driven. The six core values that underpin the way we conduct our business activities are:

1. INTEGRITY

We will be fair, honest, transparent and ethical in our conduct in all the industries and countries in which we operate; everything we do must stand the test of public scrutiny.

2. PEOPLE

We will invest in our people and partners, enable continuous learning, and build caring and collaborative relationships based on trust and mutual respect.

6. CHARITY

We will use the logic of business to ensure that what comes from the people goes back to the people many times over. We multiply good outcomes.

5. EXCELLENCE

We will be passionate about achieving the highest standards of quality, always promoting meritocracy.

4. INNOVATION

We will be brave and bold in improving what we do, how we serve our customers, and in developing innovative solutions.

3. SANCTITY

We will integrate spiritual and environmental principles in our businesses, ensuring that we preserve and enhance the sanctity of Creation in all that we do.



These universal values serve as the foundation for the Quicksilver Code of Conduct. They find expression within the procedural systems and behaviours of people in every Quicksilver company.

D. The purpose of this code

1. This Code sets out how we behave with:

- ▶ our employees, or those who work with us;
- ▶ our customers;
- ▶ the communities and the environment in which we operate;
- ▶ our value-chain partners, including suppliers and service providers, distributors, sales representatives, contractors, channel partners, consultants, intermediaries and agents;
- ▶ our financial stakeholders;
- ▶ the governments of the countries in which we operate; and
- ▶ stakeholders who interact with our group of companies.

2. In this Code, “we or us” means our company, our executive directors, officers, employees and those who work with us, as the context may require.

3. The term “Group” refers to all the companies within the Quicksilver Group of Companies.

4. This Code sets out our expectations of all those who work with us and all those who deal with us.

5. This Code underpins everything we do, and we will only operate in a manner consistent with it.

It is our commitment to adhere to the values and principles set out in this Code. By doing so, we strengthen our unique culture and identity.



E. Our Core Principles

“...never forget to approach the things you do and the creatures you come across every day with love and respect...It is the essence of all there is”.

Dr. Rolph Balgobin
Executive Chairman

Our Core Principles

1. We are committed to operating our businesses conforming to the highest moral and ethical standards. We do not tolerate bribery or corruption in any form. This commitment underpins everything that we do.

2. We are committed to good corporate citizenship. We treat social development activities that benefit the communities we operate as an integral part of our business plan.

3. We seek to contribute to the economic development of the communities of the countries and regions we operate in, while respecting their culture, norms and heritage. We seek to avoid any project or activity that is detrimental to the wider interests of the communities in which we operate.

4. We shall not compromise safety in the pursuit of commercial advantage. We shall strive to provide a safe, healthy and clean working environment for our employees and all those who work with us in all locations we operate.

5. When representing our company, we shall act with professionalism, honesty and integrity, and conform to the highest moral and ethical standards. In the countries we operate in, we shall exhibit culturally sensitive behaviour, remaining true to our values. Our conduct shall be fair and transparent and be perceived as fair and transparent by third parties.

6. We shall respect the sanctity of the human being, human rights and the dignity of all our stakeholders.

7. We shall strive to balance the interests of our stakeholders, treating each of them fairly and we will not permit unfair discrimination of any kind.

8. Our statements to our stakeholders shall be truthful and made in good faith.

9. We shall not engage in any restrictive or unfair trade practices.

10. We shall love, cherish and develop our people so that they may become the best version of themselves.

11. We shall strive to create an environment free from fear of retribution to deal with concerns that are raised or cases reported in good faith.

12. We expect the leaders of our businesses to demonstrate their commitment to the ethical standards set out in this Code through their own behaviour and by establishing appropriate processes within their companies.

13. We shall comply with the laws of the countries in which we operate and any other laws which apply to us. The law takes precedence over the Code. Where the standards required by law are lower, the Code takes precedence over the law.

“Good faith” means having a reasonable belief that the information you have provided truthful. It does not necessarily mean having ‘all the evidence’ about the potential violation or case reported. To act in good faith is to be fair, open and honest, not seeking an unfair advantage over another person.

F. Our Employees



“An employee of our Group has a look and character, a pattern of contemplation and action that mark them out as one of us. Our people should stand out as ideal models of modern thought and action. Such a person should quietly advance the cause of their family, community and society not only by what they do but who they are, and the manner in which they approach problems and opportunities alike”.

**Dr. Rolph Balgobin, Executive
Chairman**

Our Employees

Equal opportunity employer

1. We provide equal opportunities to all our employees and to all eligible applicants for employment in our company. We do not unfairly discriminate on any ground, including race, class, religion, colour, political affiliation, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability or any other category protected by applicable law.
2. When recruiting, developing and promoting our employees, our decisions will be based solely on background, history, performance, merit, competence and potential.
3. We shall have fair, transparent and clear employee policies. These policies shall provide for clear terms of employment, training, development and performance management.

Dignity and respect

4. Our leaders shall be responsible for creating a conducive work environment built on tolerance, understanding, mutual co-operation and respect for the individual's privacy.

5. Everyone in our work environment must be treated with dignity and respect. We do not tolerate any form of harassment, whether sexual, physical, verbal or psychological.
6. We have clear and fair disciplinary procedures, which necessarily include an employee's right to be heard.
7. We respect our employees' right to privacy. We have no concern with their conduct outside our work environment unless such conduct impairs their work performance, creates conflicts of interest, or adversely affects our reputation or business interests.

The Sanctity of the Human Being

8. We believe that people should be loved, cherished and respected. We encourage them to develop their spirituality and to educate themselves and their children.
9. We invest in our people to get the best out of them, creating ambassadors in homes and communities that they are a part of.



A job requirement entails extensive travel. One of the candidates has excellent and relevant experience and qualifications. However, this candidate is a single parent. As a result, I feel such a situation would significantly hinder this candidate's ability to cope with the job requirements. What should I do?

In accordance with the code, the decision to recruit an employee should be based upon merit. We cannot make an assumption that the candidate would not be able to meet the travel requirements of the job. All eligible candidates should be provided with equal opportunity to demonstrate or justify that they can cope with the travel requirements of the job.

Gifts and hospitality

10. Business gifts and hospitality are commonly used in the normal course of business activity. However, if offers of gifts or hospitality (including entertainment or travel) are frequent or of substantial value, they may create the perception of, or an actual conflict of interest or an 'illicit payment'. Therefore, gifts and hospitality given or received should be modest in value and appropriate, and in compliance with our company's Gifts and Hospitality policy.

Bribery and corruption

11. We prohibit corrupt practices in any form, including bribery, kickbacks, extortion, fraud, and other unlawful payments.

12. We will not give, offer, authorise, or take bribes in any form – that includes giving or receiving any payments, services, gifts, entertainment, or favours to obtain an improper business advantage.

13. We will not make facilitation payments, namely payments given to encourage a government employee to perform an existing duty, no matter how small the payment or task being requested.

14. We do not tolerate third parties engaging in corrupt behaviour on our behalf.

Freedom of association

15. We recognise that employees may be interested in joining associations or involving themselves in civic or public affairs in their personal capacities, provided such activities do not create an actual or potential conflict with the interests of our company. Our employees must notify and seek prior approval for any such activity as per the 'Conflicts of Interest' clause of this Code and in accordance with applicable company policies and law.



You are the procurement officer and a new supplier has come onto the market. He has recently been making offers to you and becoming more insistent that you accept. He has now offered you tickets to the upcoming cricket and carnival events. He said there are no strings attached. You do not want to offend this potential supplier as he provides a key product and you wish to accept the gifts. The tickets are valued at \$TT2500. How should you respond?

In accordance with the Gifts and Hospitality Policy, this must be submitted to the Talent Manager of your company for approval. You may accept the gifts only after having obtained the approval of the company as outlined in the Gifts and Hospitality Policy.

Note

Violation by even a single employee of any law relating to anti-bribery, anti-corruption, anti-competition, data privacy, etc. can cause irreparable reputational damage to the company and Group.



Paid Outside Work

16. Taking employment, accepting a position of responsibility or running a business outside employment with our company, in your own time, with or without remuneration, could interfere with your ability to work effectively at our company or create conflicts of interest. Any such activity must not be with any customer, supplier, distributor or competitor of our company. Our employees must notify and seek prior approval for any such activity as per the 'Conflicts of Interest' clause of this Code and in accordance with the Group's Conflict of Interest policy.

Integrity of information and assets

17. Our employees shall abide by the Group's Confidentiality Policy and similar policies of partner organisations. They shall not make any wilful omissions or material misrepresentation that would compromise the integrity of our records, internal or external communications and reports, including the financial statements.

18. Our employees and directors shall seek proper authorisation prior to disclosing company or business-related information. This includes disclosures through any forum or media, including through social media.

19. Our employees shall ensure the integrity of personal data or information provided by them to our company. We shall safeguard the privacy of all such data or information given to us in accordance with applicable company policies or law.

20. Our employees shall respect and protect all confidential information and intellectual property of our company. Under no circumstances should confidential information related to formulas and other business secrets, employee or customer information be divulged to unauthorised persons or parties within or outside the group unless expressly authorised by the Chairman, Deputy Chairman, President or COO.

21. Our employees shall safeguard the confidentiality of all third-party intellectual property and data. Our employees shall not misuse such intellectual property and data that comes into their possession and shall not share it with anyone, except in accordance with applicable company policies or law.

22. Our employees shall promptly report the loss, theft or destruction of any confidential information or intellectual property and data of any of our companies or that of any third party.

23. Our employees shall use all company assets, tangible and intangible, including computers and communication equipment, laboratory equipment, machinery and vehicles for the purpose for which they are provided and in order to conduct our business. Such assets shall not be used for personal matters or misused. We shall establish processes to minimise the risk of fraud, and misappropriation or misuse of our assets.

24. We shall comply with all applicable anti- money laundering, anti-fraud and anti-corruption laws and we shall establish processes to check for and prevent any breaches of such laws.

Insider trading and personal gain

25. Our employees must not indulge in any form of insider trading nor assist others, including immediate family, friends or business associates, to derive any benefit from access to and possession of sensitive Company or Group information.

26. Our employees must not indulge in or support any activity which would conflict with our businesses or use the know-how or specialised knowledge gained through employment with us as an employee or contractor to foster the advantage of a competitor.



I am an accountant in the finance department of my company. Due to my artistic skills, I received an offer to pen cartoons for a children’s publication for which I would receive compensation. I plan to undertake this activity during week-ends. What should I do before accepting this offer?

Before accepting the offer, you should disclose the details as required in our Code of Conduct and Conflict of Interest policy. The company will determine whether your undertaking this activity adversely affects its interests. On confirmation from the company that it does not do so, you would be free to take up the activity. It is also your duty to bring to the attention of the company whenever there is any change in the situation you have disclosed.

Prohibited drugs and substances

27. Use of prohibited drugs and substances creates genuine safety and other risks at our workplaces. We do not tolerate prohibited drugs and substances from being possessed, consumed or distributed at our workplaces, or in the course of company duties. We randomly test for prohibited substances.

Conflicts of interest

28. Our employees shall always act in the interest of our company and ensure that any business or personal association including close personal relationships which they may have, does not create a conflict of interest with their roles and duties in our company or the operations of our company. Further, our employees shall not engage in any business, relationship or activity, which might conflict with the interest of any company in our group of companies.

29. Should any actual, perceived or potential conflicts of interest arise, the concerned person must immediately report such conflicts in the prescribed manner and seek approvals as required by applicable law and company policy. The competent authority shall revert to the employee within a reasonable time as defined in our company's policy, so as to enable the concerned employee to take necessary action as advised to resolve or avoid the conflict in an expeditious manner.

30. In the case of all employees the Board of Directors of each company shall be the competent authority.



What is a Conflict of Interest?

A conflict of interest is a situation where an employee's personal interests can clash with their professional responsibilities at work, potentially influencing their decision-making or actions in a way that could benefit them personally at the expense of the company.

31. Our employees and directors shall make full disclosure to the company of any actual or potential conflict of interest. They must disclose relationships such as immediate family (including parents, siblings, spouse, partner, children), or persons with whom they enjoy close personal relationships once a conflict is perceived.

This will include relationships with persons in a family business or a company or firm that is a competitor, supplier, customer or distributor of, or has other business dealings with any company within our Group.

32. If there is a failure to make the required disclosure and our management becomes aware of an instance of conflict of interest that ought to have been disclosed by an employee or executive director, our management shall take a serious view of the matter and consider suitable disciplinary action as per the terms of employment. In all such matters, we shall follow clear and fair disciplinary procedures, respecting the employee's right to be heard.



Our company has recently announced the launch of a new business initiative. In connection with this, your friend who is a journalist with a leading business newspaper has asked you to provide some information that he could cover in his forthcoming article. He has promised not to quote you, or reveal your identity. Should you be giving him this information?

No. You should not be sharing information of this nature with your friend, even if it is assured that the source would remain anonymous. Only authorised personnel in the company are permitted to speak to the media and provide information of this nature.

Examples of Potential Conflicts of Interest

A conflict of interest, actual or potential, arises where, directly or indirectly, an employee or executive director:

1. engages in a business, activity or relationship with anyone who is party to a transaction with our company;
2. is in a position to derive an improper benefit, personally or for any family member or for any person in a close personal relationship, by making or influencing decisions relating to any transaction;
3. conducts business on behalf of our company or is in a position to influence a decision with regard to our company's business with a supplier or customer where a relative of, or a person in close personal relationship with, an employee or executive director is a principal officer or representative, resulting in a personal benefit or a benefit to the relative;
4. is in a position to influence decisions with regard to award of benefits such as increase in salary or other remuneration, posting, promotion or recruitment of a relative or a person in close personal relationship employed in our company or any of our group companies;
5. undertakes an activity by which the interest of our company or our group companies can be compromised or defeated; or
6. does anything by which an independent judgement of our company's or our group companies' best interest cannot be exercised.

Examples of activities normally approved (post-disclosure) as per applicable company policy:

Acceptance of a position of responsibility (whether for remuneration or otherwise) in the following cases would typically be permitted, provided the time commitments these demand do not disturb or distract from the employee's primary duties and responsibilities in our company, and are promptly disclosed to the relevant competent authority:

- (a) Directorships on the Boards of any of our group companies, joint ventures or associate companies.
- (b) Memberships/positions of responsibility in educational/professional bodies, where such association will promote the interests of our company.
- (c) Memberships or participation in government committees/bodies or organisations.



You are in a relationship with a colleague who has been recently moved into your team and would now be reporting to you. What should you do?

Romantic or close personal relationships with another employee where a reporting relationship exists and one is responsible for evaluating the other's performance, is likely to create a conflict of interest. In such a situation, you would need to report the potential conflict to your supervisor.

Your company is submitting a proposal to a company in which you were previously employed. You have confidential information pertaining to your previous employer, which you believe will help your present employer in winning the contract. Should you share this information?

No. You should not share this information with your company since it relates to confidential information of a third party. Your company respects its employees' duty to protect confidential information that they may have relating to their previous employers.

You are the purchasing manager in the procurement department of your company. you receive an invitation from a supplier to attend a premier sporting event as her guest. This particular supplier is one of the vendors who has submitted a proposal for an open tender issued by your company. Should you accept the invitation?

No. You should not accept the invitation in this instance. Since you are in a key decision-making role for the tender, any unusual benefit that you receive could be perceived as an inducement that could compromise your objectivity.

G. Our Customers



“We see our customers as invited guests to a party, and we are the hosts. It's our job to make the customer experience a little bit better.”

Jeff Bezos, Amazon Founder

Our Customers

Products and services

1. We are committed to supplying products and services of world-class quality that meet all applicable standards. Where local standards are lower than global standards, we will seek global compliance.
2. The products and services we offer shall comply with applicable laws, including product packaging, labelling and after-sales service obligations.
3. We shall market our products and services on their own merits and not make unfair or misleading statements about the products and services of our competitors.

Export controls and trade sanctions

4. We shall comply with all relevant export controls or trade sanctions in the course of our business.

Fair competition

5. We support the development and operation of competitive open markets and the liberalisation of trade and investment in each country and market in which we operate.
6. We shall not enter into any activity constituting anti-competitive behaviour such as abuse of market dominance, collusion, participation in cartels or inappropriate exchange of information with competitors.
7. We collect competitive information only in the normal course of business and obtain the same through legally permitted sources and means. We will not seek or receive information collected improperly.

Dealings with customers

8. Our dealings with our customers shall be professional, fair and transparent.
9. We respect our customers' right to privacy in relation to their personal data. We shall safeguard our customers' personal data, in accordance with applicable law. We will never sell the personal information of our customers.





You are the Regional Sales manager of our company. You have become a member of an “informal group”, on an instant messaging service, whose members are the regional sales heads of our company’s competitors. The administrator of the group has requested an in-person meeting to informally discuss market conditions and brainstorm on “pricing strategy” from an industry perspective. What should you do?

Any meeting with competitors, especially to discuss “pricing strategy”, could be an attempt to promote an anti-competitive practice or manipulate prices. You should respond by declining this invitation and exiting the “informal group”. You should also report this incident to the Talent Manager.

While working on a customer project, you receive a call from your colleague who recently left the company to work for a competitor. He used to manage that customer account before you took over his role. He recalls that he had worked with the customer on developing a new ordering system which he thinks would be beneficial for one of his current customers and requests you to send him the project details. What should you do?

You must not share this information. You are not permitted to share customer information with external parties.



Of Note...

Striving for excellence in the standards of our work and in quality of our goods and services is a core Quicksilver value. It is the unwavering practice of this value that builds and sustains customer trust in our brand.

H. Our Communities and the Environment



“Once we start to think about the kind of world we are leaving to future generations, we look at things differently; we realize that the world is a gift which we have freely received and must share with others. Since the world has been given to us, we can no longer view reality in a purely utilitarian way, in which efficiency and productivity are entirely geared to our individual benefit. Intergenerational solidarity is not optional, but rather a basic question of justice, since the world we have received also belongs to those who will follow us”.

Pope Francis (Laudato Si 159)

Our Communities and the Environment

Communities

We are committed to good corporate citizenship and shall actively assist in the improvement of the quality of life of the people in the communities in which we operate. We do this to advance the causes of improving education, alleviating hunger and providing shelter.

We encourage our workforce to volunteer on projects that benefit the communities in which we operate, provided the principles of this Code, where applicable, and in particular, the 'Conflict of Interest' section and related Policy are followed.

The environment

In the production and sale of our products and services, we respect the sanctity of nature and comply with all applicable laws and regulations in its protection and nurturing.

We seek to prevent the wasteful use of natural resources and are committed to improving nature, particularly with regard to the emission of greenhouse gases, consumption of water and energy, and the management of waste and hazardous materials.



I. Our Value Chain Partners



“Competitive Business implies innovation which strains against the rules. We set a code so that our people and partners know the boundaries beyond which we will not go”.

Dr. Rolph Balgobin
Executive Chairman

Our Value-Chain Partners

1. We shall select our suppliers and service providers fairly and transparently.

2. We seek to work with suppliers and service providers who can demonstrate that they share similar values. We expect them to adopt ethical standards comparable to our own.

3. Our suppliers and service providers shall represent our company only with duly authorised written permission from our company. They must abide by the Code in their interactions with, and on behalf of us, including respecting the confidentiality of information shared with them.

4. No employee shall engage a contractor or service provider, paid stakeholder, or other employee for goods or services in such a way that 1) the employee achieves personal gain at the Group's expense, or 2) the Group's relationship with the contractor or service provider, paid stakeholder, or employee is put at risk by this demand.

5. We shall ensure that any gifts or hospitality received from, or given to, our suppliers or service providers comply with our Group's Gifts and Hospitality policy.

6. We respect our obligations on the use of third party intellectual property and data.



Definition

Our value-chain partners would include our suppliers and service providers, distributors, sales representatives, contractors, channel partners, consultants, intermediaries agents, joint-venture partners and other business associates.



You are managing a contractor who is performing works at one of our companies. The contractor indicated to you that his company's rules does not require the use of Personal Protective Equipment at a particular site. He does not wish to follow our ISO policies. He is an outstanding performer and you are inclined to accede to his wishes. Is your behaviour correct?

No, all value chain partners must comply with the policies of the group. There must be no exceptions

J. Governments



“Businesses need to go beyond the interests of their companies to the communities that they serve”

Ratan Tata

Governments

Political neutrality

1. We shall act in accordance with the constitution and the laws of Trinidad and Tobago and all other countries in which we operate. We do not seek to influence the outcome of elections, nor to undermine or alter any system of government. We do not support any specific political party or candidate for political office. Our conduct must preclude any activity that could be interpreted as mutual dependence/favour with any political body or person, and we do not offer or give any company funds or property or other resources as donations

to any specific political party, candidate or campaign.

Government engagement

2. We engage with the government and regulators in a constructive manner in order to promote good governance. We conduct our interactions with them in a manner consistent with our Code.

3. We do not impede, obstruct or improperly influence the conclusions of, or affect the integrity or availability of data or documents for any government review or investigation.



You are a Salesperson for the company. You also support a political party and obtained free tee-shirts from the candidate vying for office in the upcoming elections. You are in a rush and wants to wear the tee-shirts to work. Are you violating the Code of Conduct?

Yes, you would be. While employees are free to associate with political parties they must not convey political affiliations while performing their duties or representing the company in any forum.

K. Our Group of Companies



“Businesses are under greater pressure than ever to generate profits, but this should never be at the expense of the environment. Companies have to be sensitive about sustainability, about issues such as pollution and the terrible consequences of carelessness, or worse, callousness”.

Ratan Tata

Across Our Group of Companies

1. We seek to develop our human and management resources and adopt leading governance policies and practices in accordance with applicable law, including adherence to competition law, where relevant. Best practices shall always be our aim.

2. We invest in the development of our people through training, development activities and assignment planning.

3. We shall ensure employees across all companies are held to the same standards and treated with the same level of respect and regard.



You have been working at one of the companies within the Group for more than a decade and the Group values are deeply instilled in your thoughts and behaviour. You notice that the new CEO of the most recent company in the Group is acting contrary to the Group's values. She is however, a high performer and is held in high regard within the Group.

While performance is highly valued it does not take precedence over the Group's values. You should bring the matter to the attention of your Manager and follow up to ensure it is addressed satisfactorily.

Raising Queries

We encourage our employees, customers, suppliers and other stakeholders to make disclosures when they become aware of any actual or potential violation of our Code, policies or law. We also encourage reporting of any event (actual or potential) of misconduct that is not reflective of our values and principles.

Avenues available for raising concerns or queries or reporting cases include:

- immediate line manager or the Talent Stable of our Group
- the Development and Ethics Director of our Group via kamla.mungal@oxis.edu.tt

We do not tolerate any form of retaliation against anyone reporting legitimate concerns. Anyone involved in targeting such a person will be subject to disciplinary action.



My supervisor has asked me to do something which I believe may be illegal. I am afraid if I do not do what I am told, I could lose my job. Should I do it?

No. Breaking the law is never an option. Discuss the situation with your supervisor to be certain that you both understand the facts. If your concerns are not resolved, report the matter to a higher level supervisor and the Group's Development and Ethics Director.

I feel that my supervisor is treating me unfairly for reporting a concern to the Development and Ethics Director. What should I do?

Retaliation against anyone who raises a concern is a violation of the Code. You should therefore promptly report this action of your supervisor, to the Development and Ethics Director and the CEO of your company.

Accountability

This Code is more than a set of prescriptive guidelines. It represents our collective commitment to our value system and to our core principles.

Every person employed by us, directly or indirectly, should expect to be held accountable for his/her behaviour. Should such behaviour violate this Code,

they may be subject to action according to their employment terms and relevant company policies.

When followed in letter and in spirit, this Code is 'lived' by our employees as well as those who work with us. It represents our shared responsibility to all our stakeholders, and our mutual commitment to each other.

Speak Up...

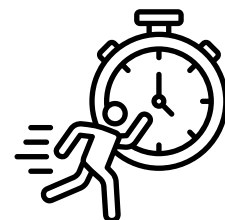
If you are unsure whether a particular action you are about to take is consistent with the principles set forth in the Code, ask yourself:

- Could it directly or indirectly endanger someone or cause them injury?
- Is it illegal/unlawful or out of line with our policies and procedures?
- Does my conscience reject it?
- Does it conflict with my personal values?
- Would I feel uncomfortable if the story appeared in the media?
- Would it shame my company, spouse, partner, parent or child?
- Does it 'feel' wrong?

If the answer to any of these questions is "Yes", please stop and consult your reporting manager, the Ethics Director or the Human Resource department to assist you in making the decision.

When faced with a dilemma:

- Stop
- Think
- Act Responsibly



Expectations

The Code does not provide a comprehensive and complete explanation of all expectations from a company standpoint or obligations from a stakeholder standpoint. Our employees have a continuing obligation to familiarise themselves with all applicable law, group-level advisories and policies, company-level policies, procedures and work rules as relevant. For any guidance on interpretation of the Code, please contact the Group's Development and Ethics Director. For any query or clarification on the Code, please contact the Group's Development and Ethics Director at kamla.mungal@axis.edu.tt

