

## **Policy Brief & Purpose**

Acota's Employee Code of Conduct Company Policy refers to the expectations that the company has from its employees regarding their behaviour towards their colleagues, supervisors, customers and suppliers. Although we promote freedom of expression and open communication practices all employees are still obliged to follow a code of appropriate conduct established by the company. It is essential for the avoidance of giving offence, participating in serious disputes and disrupting the workplace. It is also important to project a truthful image of a well-organised, respectful and collaborative environment.

## **Scope**

This policy applies to all prospective or current employees of Acota regardless of employment agreement or rank.

## **Our Standard**

We will each contribute to creating an inclusive work environment, where individuals are respected and where the value of having a diverse workforce is recognised. We have a personal and collective responsibility to maintain a healthy and secure workplace and to promote safe working practices.

## **Policy Elements**

Persons under the company's employment are bound by the terms of their contract to adhere to specific guidelines applicable to every work-related space and during the fulfilment of their duties. All employees are obliged to know the Employee Code of Conduct and follow its prescripts.

### **1) Compliance with Law**

All employees are obliged to protect the legality of the company by complying to the legal guidelines under which it is bound. These guidelines refer to all environmental, safety and fair dealing dictations of the local and international law as well as the company policy for social corporate responsibility. In addition to these, all employees are obliged to refrain from unlawful or offensive behaviour against the company where its finances, products, partnerships or public image are concerned.

### **2) Health & Safety**

Complying with safety rules and procedures is an essential minimum. We should also aim to prevent accidents happening by understanding the risks present in our workplace and daily operating environment, and by understanding how accidents can occur. We should all seek to identify those areas that can be improved to protect the safety of all those on our sites. Each of us has a responsibility for safety in the workplace. We have a responsibility to make sure we limit the potential for accidents to occur.

We must:

- Be familiar with and comply with the Company's Health and Safety policy and all local requirements
- Think through the risks and hazards in our workplace and daily operating environment
- Intervene immediately if someone is putting themselves or others at risk
- Report all safety risks promptly to a manager or Health and Safety representative
- It is essential that access arrangements at our facilities are strictly observed by employees, contractors and visitors.

This will help to make sure our workplace remains safe and secure.

### **3) Respect in the Workplace**

All employees are bound by the equal opportunity policy of the company. They are obliged to behave in a respectful manner towards their colleagues and strictly refrain from any kind of discriminatory behaviour, harassment or victimisation. We do not tolerate harassment of any kind including sexual, verbal, non-verbal and physical. Abusive, humiliating or intimidating behaviour is never acceptable. This applies to all aspects of the workplace from the recruitment and evaluation processes to interpersonal relations between employees. Acota has no tolerance for this kind of behaviour and disciplinary actions will be taken when appropriate.

We each have a personal responsibility to make sure we neither behave this way ourselves, nor allow others to do so. When we observe inappropriate or unacceptable behaviour, we have an obligation to do something about it. This may mean talking to the person or people involved and/or discussing the matter with your line manager.

### 4) Protection of Company Property

All employees are expected to treat the property of the company, whether material or intangible, with respect and care. The equipment of the company must not be misused or used frivolously. All kinds of incorporeal property, including law-binding creations such as trademarks and copyright, whether owned by the company or its suppliers or customers, as well as other elements for which it retains ownership (information, reports etc.) are to be respected and used only within the rights accompanying the duties of each position. The company's facilities and other material property (e.g. company cars) must not be damaged or vandalised with an employee's responsibility. Such actions will invoke disciplinary and/or legal action in cases of voluntary violation.

### 5) Professionalism

All employees must abide to certain rules that show integrity and high quality professionalism while executing their duties in the workplace.

The following include the company's expectations from its employees:

- **Personal Appearance**

All employees must follow the dress code and personal appearance guidelines of the company as communicated from time to time. Non-conformity will be met with disapproval and the employee will have to change their conduct to meet the company's standards.

- **Corruption**

All employees must adhere to the *Anti Corruption and Anti Bribery Policy* of the company.

- **Job duties and authority**

All employees must pay attention to their job duties and fulfil them with integrity and respect towards the customers, suppliers, and other stakeholders. Supervisors and managers are prohibited from abusing their authority but are expected to delegate duties to their subordinates with respect to their competences and workload. Mentoring and motivating are actively encouraged. All employees are expected to follow supervisor's instructions and execute all of their duties as assigned with skill and in a timely manner.

- **Absenteeism and Tardiness**

An important element that shows the professionalism of an employee is the degree to which they adhere to established schedules. This does not refer to occasional discrepancies that an employee might face that prevent them from following standard working hours or days, but rather a uniform stance towards the expected times of arrival and departure from work, as well as the amount of time someone spends on the execution of their duties.

- **Conflict of Interest**

All employees are expected to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties or be damaging to the company. Any situation voluntary or involuntary that might be perceived as conflict of interest must be reported to the appropriate manager.

- **Collaboration**

All employees are expected to maintain a climate of friendliness and harmony and endeavour not to disrupt the workplace for the execution of their duties or present obstacles to the work of their colleagues. It is important to respect others' work and efforts. All employees are encouraged to work collaboratively when applicable.

- **Communication**

All employees must be open for communication with their colleagues, supervisors or subordinates. It is important that any employee in the workplace can refer to another so that their work, as well as work conditions can be as productive and problem-free as possible.

- **Benefits**

All employees are discouraged from abusing the benefits provided to them by the company. This can refer to time off granted to an employee for a specific reason (e.g. sick leave), facilities or other benefits that the company offers.

All employees are obliged to be aware of and follow all the established policies that have been created by the company and apply to the procedures, benefits and relations of the workplace.

## **6) Disciplinary Actions**

Failure to comply with any part of the Code of Conduct's guidelines will result in appropriate disciplinary action. The party responsible for non-compliance will be subject to repercussions that vary in regards to the severity of the violation. Possible consequences will include reprimand, detraction of benefits for a definite or indefinite time, demotion, suspension or termination for more serious offences. Legal action may have to be pursued in cases of corruption, theft, embezzlement or other unlawful behaviour.

This Code applies to and is mandated for all employees of Acota. Each of us, wherever we work, must behave in accordance with these standards when dealing with fellow employees, customers, suppliers, contractors and competitors.

The Code is intended to be a guide as it cannot describe every law, policy or process that may apply to us or every situation that we may face within our everyday role. As a general rule, we are responsible for understanding and complying with the laws, regulations or policies that relate to our business activities. There may be times when we are faced with a dilemma that we are not sure how to resolve. If in doubt, always ask.