



Code of Conduct

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1. Mission Critical Behaviours & Core Values

At Sustain Right, our mission is to drive sustainability and ethical business practices globally. Our core values are the foundation of our culture and guide our actions and decisions. We expect all employees to embody these values in their daily work:

- **Integrity:** We uphold the highest standards of honesty and transparency. We are committed to doing the right thing, even when it is difficult, and we expect the same from our partners and stakeholders.
- **Excellence:** We strive for excellence in everything we do. We are dedicated to delivering high-quality results and continuously improving our processes and services.
- **Innovation:** We encourage creativity and innovation, seeking out new and better ways to achieve our goals. We are open to change and embrace new ideas that drive progress.
- **Respect:** We value diversity and treat everyone with dignity and respect. We believe that diverse perspectives strengthen our organisation and enhance our ability to serve our clients and communities.
- **Sustainability:** We are committed to environmental responsibility and long-term thinking. We integrate sustainable practices into our business operations and encourage our clients and partners to do the same.

2. Highest Ethical Behaviour

We are committed to conducting our business with the highest ethical standards. This commitment extends to all aspects of our operations, from our relationships with clients and partners to our internal practices.

a. Conflict of Interests

Employees must avoid any situation that could create or appear to create a conflict between their personal interests and the interests of Sustain Right. This includes situations where personal, financial, or other interests could influence decision-making. Employees are required to disclose any potential conflicts to their manager or the compliance officer promptly. We expect all employees to act in the best interest of the company and avoid activities that could harm our reputation or integrity.

b. Company Assets

Protecting and properly utilising company assets is the responsibility of every employee. Company assets include physical property, intellectual property, proprietary information, and financial resources. Employees must use these assets only for legitimate business purposes and safeguard them against loss, theft, misuse, and damage. Unauthorised use or distribution of company assets is strictly prohibited and may result in disciplinary action.

c. Bribery

Sustain Right strictly prohibits bribery and corruption in any form. This includes offering, giving, receiving, or soliciting anything of value to influence the actions of an individual or organisation. Employees must not engage in any activity that could be construed as corrupt or improper, and they must comply with all applicable anti-bribery and anti-corruption laws. This policy applies to all interactions with public officials, private individuals, and organisations.

d. Dealing with Governments

We conduct our dealings with government officials and entities with the highest level of integrity and transparency. All interactions must comply with applicable laws and regulations, including those governing lobbying, procurement, and public disclosure. Employees must avoid any conduct that could be interpreted as improperly influencing government decisions or obtaining an unfair advantage.

e. Competition

We are committed to fair competition and do not engage in practices that distort the competitive landscape. Employees must comply with all antitrust and competition laws and avoid activities such as price-fixing, market allocation, and bid-rigging. We seek to compete on the merits of our products and services, ensuring that our business practices are fair, ethical, and compliant with the law.

f. Business Across Borders

In our global operations, we respect and comply with the laws and regulations of the countries in which we operate. This includes adhering to international trade laws, export controls, and economic sanctions. We recognize the importance of cultural differences and strive to conduct our business in a manner that respects the local customs and traditions while maintaining our commitment to ethical practices.

g. Confidentiality

Protecting confidential information is vital to our business success. Employees must not disclose or misuse proprietary, confidential, or sensitive information about Sustain Right, our clients, or our partners. This obligation extends to information obtained during the course of employment and continues even after employment ends. Employees must take all necessary precautions to protect confidential information from unauthorised access or disclosure.

h. Data Protection and Data Security

We are committed to protecting the personal and business data entrusted to us. Employees must adhere to all applicable data protection laws and company policies related to data security. This includes securing data against unauthorized access, processing data in a lawful and transparent manner, and ensuring the accuracy and integrity of data. Employees are required to report any data breaches or security incidents immediately.

i. Keeping Records and Financial Integrity

Accurate and complete record-keeping is essential to our business integrity. Employees are responsible for ensuring that all financial records, reports, and disclosures are accurate, complete, and timely. We maintain our financial records in accordance with applicable accounting standards and legal requirements. Misrepresentation, falsification, or alteration of records is strictly prohibited and may result in disciplinary action, including termination of employment.

j. Prevention of the Facilitation of Tax Evasion

Sustain Right does not tolerate any form of tax evasion or the facilitation of tax evasion by our employees, clients, or partners. We comply with all tax laws and regulations and expect our employees to act with integrity in all tax-related matters. Employees must report any suspicious activity or concerns related to tax evasion to the compliance officer.

3. Respect for the People

We are committed to creating a work environment that fosters respect, diversity, and inclusion. We believe that every individual deserves to be treated with dignity and respect, and we are dedicated to promoting a culture of equality and non-discrimination.

a. Equal Opportunity

Sustain Right is an equal opportunity employer. We make employment decisions based on merit, qualifications, and business needs, without regard to race, color, religion, gender,

sexual orientation, age, national origin, disability, veteran status, or any other characteristic protected by law. We are committed to providing a work environment free from discrimination and harassment and to supporting the career development of all employees.

b. Non-Harassment

Harassment, including sexual harassment, bullying, and any other form of abusive or offensive behavior, is not tolerated at Sustain Right. We are committed to maintaining a workplace where employees feel safe and respected. Employees are encouraged to report any incidents of harassment or inappropriate behavior to HR or their manager. We will take all reports seriously and conduct thorough investigations, ensuring that no one faces retaliation for raising concerns.

c. Human Rights

We respect and uphold human rights in all aspects of our business operations. We are committed to ensuring that our business practices do not contribute to human rights abuses and to promoting the well-being of our employees, partners, and communities. We do not tolerate any form of forced labor, child labor, or human trafficking. We expect our suppliers and business partners to adhere to the same high standards of human rights.

d. Communication

Open and transparent communication is key to building a strong, inclusive, and collaborative workplace. We encourage employees to share their ideas, feedback, and concerns openly and constructively. We are committed to listening to our employees and fostering a culture of dialogue and mutual respect. We provide various channels for communication, including regular team meetings, employee surveys, and an open-door policy with management.

4. Environmental Stewardship

As a company dedicated to sustainability, we are committed to minimizing our environmental impact and promoting environmental responsibility in all aspects of our business.

a. Environment Protection

We strive to reduce our carbon footprint and implement sustainable practices throughout our operations. This includes minimizing waste, conserving energy and water, and reducing emissions. We encourage our employees to be environmentally conscious and to adopt sustainable practices both at work and in their personal lives. We comply with all

environmental laws and regulations and seek to exceed these standards whenever possible.

b. Product Stewardship

We take responsibility for the environmental impact of our products and services throughout their lifecycle. This includes designing products with sustainability in mind, sourcing materials responsibly, and ensuring safe and environmentally friendly disposal. We work with our suppliers and partners to promote sustainable practices and to reduce the environmental impact of our supply chain.

5. Safety & Health

The safety and well-being of our employees, clients, and partners are of utmost importance. We are committed to providing a safe and healthy work environment and to promoting the physical and mental well-being of our employees.

a. Safe Workplace

We prioritize safety in all our operations and activities. Employees are responsible for adhering to all safety guidelines, using personal protective equipment when necessary, and reporting any hazards or unsafe conditions immediately. We provide regular safety training and conduct risk assessments to identify and mitigate potential hazards.

b. Respect for Guidelines

Employees are expected to comply with all health and safety guidelines, including those related to emergency procedures, occupational health, and workplace ergonomics. We are committed to continuous improvement in our safety practices and to fostering a culture of safety awareness.

c. Drugs & Alcohol

The use of drugs or alcohol in the workplace can impair judgment and pose safety risks. Sustain Right prohibits the use, possession, distribution, or sale of illegal drugs or alcohol on company premises or while conducting company business. Employees are expected to be fit for work and free from the influence of substances that could impair their ability to perform their duties safely and effectively.

d. Workplace Violence

Sustain Right has a zero-tolerance policy for workplace violence, including physical violence, threats, intimidation, and harassment. We are committed to providing a safe and

respectful work environment and to addressing any incidents of violence or threatening behavior promptly and effectively. Employees are encouraged to report any concerns or incidents to HR or management.

6. Ethical Decision-Making Process

Making ethical decisions is critical to maintaining our integrity and reputation. Employees are encouraged to consider the ethical implications of their actions and decisions. If faced with an ethical dilemma, employees should ask themselves the following questions:

- Is the action legal and compliant with company policies?
- Does it align with our core values and ethical standards?
- Could it negatively impact Sustain Right's reputation or relationships?
- Would I be comfortable explaining this decision to a colleague, client, or the public?

If unsure, employees should seek guidance from their manager, HR, or the ethics committee.

7. Reporting and Enquiries

a. Speak Up!

We encourage all employees to speak up if they witness or suspect any unethical behavior, violations of this Code, or any other concerns. Reports can be made anonymously through our confidential reporting hotline or directly to HR or the compliance officer. We are committed to protecting whistleblowers from retaliation and to investigating all reports thoroughly and fairly.

b. General Enquiries

Employees with questions or concerns about this Code of Conduct or any related policies should contact the HR department or the compliance officer. We are here to provide guidance and support in understanding and applying our ethical standards.

8. We Live Our Values

At Sustain Right, we are committed to living our values every day. We hold ourselves accountable to the highest ethical standards and strive to make a positive impact on our communities and the environment. We recognize that our actions and decisions reflect on the entire company, and we are dedicated to maintaining the trust and confidence of our clients, partners, and stakeholders.



On a mission to make sustainability accessible
for one and all

**For inquiries,
contact us.**



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