

## **CODE OF CONDUCT**

### **Policy**

It is the policy of the Company to provide our Code of Ethics and Business Conduct. It defines the set of ethical and social rules to which Employees must comply.

The present code foresees the observance of the following ethical and social principles.

### **Build Trust and Credibility**

The success of our business depends on the trust and confidence we get from our clients. We obtain credibility by respecting and keeping our commitment, displaying honesty and integrity and reaching company goals solely through honourable conduct.

### **Respect for the Individual**

We all deserve to work in an environment where we are treated with equal dignity and respect.

Petros Plus is committed to create such environment because it brings out the full potential in each of us that contribute directly to our business success.

Petros Plus is an employer who guarantees equal opportunities to all workers prohibiting any form of discrimination. Any Employee who feels harassed or discriminated against should report the incident to the CEO of the company.

### **Create a Culture of Open and Honest Communication**

At Petros Plus everyone should feel comfortable and free to express his/her ideas.

Managers have the responsibility to create an environment that is open to dialogue and that can support all Employees. The Company will verify compliance with the rules established in this code.

Where there is evidence of the implementation of inappropriate behaviours, the company will have the obligation to take appropriate sanctions.

### **Uphold the Law**

Our Commitment to integrity begins respecting the local and international laws, rules and regulations. Moreover, each of us must understand the company policies, laws, rules, and regulations that apply in respect of our specific roles.

In case of any doubts about the legitimacy of an action, it will be necessary to request the opinion of a resource expert. We are called to comply with the law, to prevent all possible violations and to report any non-compliance.

### **Government and Regulatory Investigations, Legal Actions and Proceedings**

The Company's policy is to fully cooperate with any government or regulatory investigation or inquiry and any legal action or proceeding. Employees should never, under any circumstances, destroy or alter any Company documents in sight of any investigation, inquiry, action or proceeding or in anticipation of a request for those documents from any government or regulatory agency or court.

In addition, Employees should never like or make any misleading statements or attempt to cause any other Company Employee or any other person, to provide false or misleading information in relation to investigations, request actions or proceedings. Any doubts on these matters must be presented to the CEO.

**Conflict of Interest**

Each Employee is expected to avoid situations in which his or her financial interests or dealings are, or may be, in conflict with the interests of the Company. Accordingly, the Company expects its Employees to always act in the Company's interest.

Employees are advised not to be involved in any other business, commercial or investment activity that may conflict with their ability to perform their duties to the Company.

Employees must also not be engaged in any other activity (cultural, political, recreational, social) which could reasonably be in conflict with the Company's interests and interfere with the performance of their duties.

Employees must not use any Company's property, information or position, or opportunities arising from these for personal gains or to compete with or to tarnish the image of the Company. Employees should not get engaged in any business activity, which could be harmful to, or in competition with, the Company's business activities.

All Employees must avoid situations in which their personal interest could conflict with the interest of the Company. If, under any circumstances, Employees' personal interest conflict with those of the Company's, in all such circumstances, the Employee must seek advice from his or her reporting manager or from the CEO. For avoidance of doubt, more financial portfolio investments shall not be considered as activities that conflict with the business of the Company.

**Confidential Information**

For work reasons, Employees may be entrusted with confidential information related to the Company and/or to its affiliates, its customers and suppliers. Upon recruitment, Employees are required to separately read, acknowledge and sign the "Confidentiality Agreement" that shall explicitly mention the terms and conditions of the confidentiality obligations, the treatment of confidential information and intellectual Company property.

**Integrity of Financial Information**

Shareholders, senior executives and other interested parties must have complete and accurate financial information. Employees and Professionals who participate in accounting processes must ensure that all transactions recorded in Company's accounts are made accurately and promptly and they must immediately report any mistakes. Any incorrect statements arising from their intentional act that may cancel or obscure the true nature of a business transaction is a clear contravention to this Policy.

**Protection and Use of Company Property**

All Employees are responsible for protecting and taking reasonable steps to prevent the theft or misuse of, or damage to Company's assets, including all kinds of physical assets, used in carrying out their responsibilities. All Employees must use and maintain the Company's property and resources efficiently and with due care and diligence.

**Acceptance of Gifts and Other Benefits**

Employees should not give gifts, entertainment, or any other personal benefit or privilege that would, in any way, influence or appear to influence any business decision. It is strictly forbidden for Employees to accept money, gifts, entertainment, loans or any other benefit or preferential treatment from any existing or potential customer, supplier or business associate of the Company.

It is unacceptable to directly or indirectly offer, pay, solicit, or accept any kind of inducements or bribes. Any attempted transaction of this nature should be immediately reported to the CEO. The funds and resources of the Company shall not be used directly or indirectly for any such purpose.

**Bribes and Kickbacks**

Company does not authorize and will not condone any payment by any Employee to any third party which is in the nature of a bribe or kickback for obtaining any business or otherwise bestowing a special favour on the Company or its Employees. Gifts or payment may not be offered or given on behalf of the Company to any government official, political party or candidate for public office either in the UAE or abroad.

**Best Efforts**

All Employees shall devote their time and their best efforts to promote the Company's business. All Employees cannot be engaged in any other business activity for other Companies without the prior written consent of Petros Plus.

**Representing the Company**

No Employee should, under any circumstances, act as a potential spokesperson for the Company in response to inquiries by the news media, financial analyst or other similarly interested persons. Employees should not grant interviews or release statistical or printed information of any kind. If one of the Employees is approached for information, he/she should politely forward all requests to the CEO.

**Harassment**

The Company is committed to provide a work environment that is free of inappropriate behaviour of all kinds of harassment on account of age, physical disability, marital status, race, religion, caste, sex, sexual orientation or gender identity.

During the conduct of business conduct by any Employee, wherever or whenever harassment occurs to any such Employee as a result of an act or omission by any third party or outsider, the Company shall take the necessary and reasonable steps to assist the affected Employee in terms of support and preventive action.

**Misconduct and Non-Conformance with the Policy**

Non-observance of this Policy shall be construed as misconduct that could warrant disciplinary action, including dismissal in deserving cases. The decision in this regard will lie with the CEO and the Management and shall be binding on the Employees.

**Exceptions**

Any exception(s) to the norms laid down in this Policy may be at the discretion of the CEO or any appropriate authority delegated by him.

**Accountability**

All Employees must always understand and adhere to the Company's Code of Conduct and abide by the standards, requirements and procedures laid down herein.

Employees must always:

- commit their individual conduct in accordance with this Policy;
- observe both, the spirit and the letter of this Policy and their dealings on behalf of the Company;
- recognize Company's responsibility to its shareholders, customers, Employees, those with whom Company does business, and to society. Assess priorities in the context of discharging these responsibilities appropriately on Company's behalf.

**Amendments**

The Company reserves the rights to change/amend/add/delete/modify this Policy in whole or in part, at any time without assigning any reason whatsoever. The Employees acknowledge that they will not be personally advised of any such change/amendment/addition/deletion/modification. The Employees are advised to check for any such change/amendment/addition/deletion/modification regularly. The Employees hereby unconditionally agree to all such changes/amendments /additions/ deletions/ modifications.