

Appendix Two: Code of Conduct Policy

INDECS Consulting Limited is committed to conducting its business activities in an honest, ethical, respectful, and professional manner.

This Code of Conduct sets out INDECS Consulting Limited's corporate values and related responsibilities towards its stakeholders, clients, employees, suppliers, society, and the environment.

The principles set out in this Code of Conduct will help you as an employee of INDECS Consulting Limited to understand the core values of the Company. INDECS Consulting Limited's reputation and ability to conduct itself according to the highest system of corporate values depends on all of us wholeheartedly accepting these values and embodying them in our work.

Everyone at INDECS Consulting Limited is required to adhere to the principles in this Code of Conduct.

If you have any questions about how to comply with these principles or if you have reason to believe the code has been violated, please speak up and raise your concerns to your supervisor or a confidential advisor.

Our Principles

Towards Clients

To provide superior services through innovative, fit-for-purpose and competitive advice and solutions.

Towards Employees

To generate an attitude of enthusiasm and pride through the Company, through promoting high-technology products and providing a most favourable environment for professional and personal development, and to highly reward it.

Towards Suppliers

To support fair competition and strive for long-term stability in the relationship;
To jointly improve social and environmental performance.

Towards Society / Communities

To support and promote human rights and contribute to social welfare in the communities where we operate;
To support and promote business practices free of bribery and corruption.

Towards Environment

To minimize the negative impact and risks of our activities on the environment particularly aware of our and our clients responsibilities to the environment and co-operate with business partners to improve performance.

General Responsibilities

This document clarifies the responsibilities of INDECS Consulting Limited and its employees to each other, to clients, to suppliers, to society, and to the environment. In respect of Corporate Social Responsibility, we adhere to international standards such as the United Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, ILO conventions and the UN Global Compact.

Application

The INDECS Code of Conduct applies to all employees, agency personnel, officers, and directors of INDECS Consulting Limited.

Accountability and Compliance

INDECS Consulting Limited's Board of Management is responsible for ensuring this code is communicated, understood, and observed by all employees. Day to day responsibility is delegated to Senior Management. They are responsible for implementing the code, and if necessary provide more detailed guidance and training tailored to specific functions and local needs. Assurance of compliance is given and monitored every year and subject to review by the Board of Management supported by the audit committee.

We are implementing this code by:-

- active internal communication;
- introducing the code in our internal training sessions for both new and current personnel;
- employees, suppliers and customers can ask questions and report non-compliances with the INDECS Consulting Limited. Code of Conduct.

Wherever possible, INDECS Consulting Limited's Code of Conduct (or an equivalent code) should be made a part of all our contracts with suppliers and subcontractors, and all our suppliers' subcontractors should be aware of our Code of Conduct.

Responsibilities to Clients

Clients rely on INDECS Consulting Limited for the realisation of their expectations. Accordingly, we have the following responsibilities:

- Supplying high quality services;
- Supplying services to the highest standard and best of our ability;
- Providing a competitive market price;
- Meeting the agreed delivery time;
- Meeting the targets of customers;
- Showing respect for the wishes, interests and ethical standards of customers, in all aspects of the transactions;
- Avoiding conflicts of interest;
- Keeping client's information confidential;
- Informing customers properly and in good time;
- Supporting clients to adhere to globally agreed industry standards as regards Codes of Conducts for their operations.

Responsibilities to Employees

Employees dedicate a considerable portion of their time, knowledge, and expertise to INDECS Consulting Limited. Accordingly, we have the following responsibilities:

- Pursuing a personnel policy in which the best possible use is made of each person's skills and personal development is encouraged.
- Offering good and competitive terms of employment and safe and healthy working conditions.
- Pursuing an employment policy following the principles of equal opportunity, preventing any discrimination on the basis of a protected Characteristic in the Equality Act.
- Minimising risks for health and safety incidents by:-
 - providing appropriate training to all relevant personnel;
 - preventing undesirable conduct such as intimidation, harassment and abuse of authority;
 - communicating in an honest and clear manner;
 - being open to suggestion, ideas and criticism;
 - avoiding conflicts of interest between private activities and the employee's role in the Company's business, particularly in their relations with clients, competitors and suppliers;
 - avoiding disclosure of inside information;
 - not asking anyone to break the law;
 - preventing, as far as possible, problems of conscience in the performance of their work and striving to find a proper solution to them where these still arise;
 - establishing the means for employees to report suspected irregularities;
 - applying anti-drug, anti-smoking and anti-alcohol abuse policies.
- striving for a good relationship with those who represent INDECS Consulting Limited employees;
- providing a clear framework of operating procedures to promote efficiency and to prevent mistakes;
- preserving employee privacy and confidentiality of employee records;
- creating a climate in which employees are encouraged to adhere to this code;
- adhering to the fundamental ILO conventions regarding child labour, forced labour, non-discrimination, freedom of association and collective bargaining, including among others;

- preventing the employment of children under the minimum age of completing compulsory schooling;
- preventing the use of any form of forced labour;
- respecting freedom of association and collective bargaining.

Responsibilities to Suppliers

Suppliers provide INDECS Consulting Limited with products and services. Accordingly, we have the following responsibilities:

- Selecting suppliers on the basis of generally accepted market considerations.
- Paying market prices and making reasonable demands.
- Striving for long-term stability in the relationship, in exchange for value, quality, competitiveness and reliability.
- Paying suppliers on time, according to the agreements made.
- Being open and reliable in all our activities.
- Not accepting cash gifts or any substantial non-cash gifts (including entertainment). In general, gifts may only be made in strict accordance with the employee guidelines.

Responsibilities to Society / Communities

Society provides INDECS Consulting Limited with the social and physical infrastructure for entrepreneurship. Accordingly, we have the following responsibilities:

- Not doing business in countries subject to international and relevant national embargoes and respecting the export and import control regulations of countries where we work and operate.
- Respecting human rights as formulated in the Universal Declaration of Human Rights.
- Not undertaking commercial activities in countries where it is made impossible to adhere to this code.
- Not granting a cash gift or non-cash gift for the purpose of obtaining a contract or any improper business advantage.
- In general, the giving of gifts is only acceptable if such practice is not for an improper purpose, if such practice is accepted locally and in the industry as a token of appreciation, and if such practice is in compliance with applicable laws.
- Not offering or giving money or anything of value, whether directly or indirectly, to any public official, political party, or candidate to obtain or retain business or to direct business to any person.

- Taking all reasonable measures to avoid involvement or complicity in human rights violations in its relationships and interactions with state security forces.
- Supporting initiatives that, within the framework of our possibilities and aims, contribute to the improvement of social welfare.
- Not accepting any proceeds of crime or terrorism and taking appropriate measures to prevent money-laundering including the reporting of suspicious transactions (e.g. High value cash transactions, payments between unknown entities or through excessive intermediaries, payments made by/ received by suspicious entities or involving high risk countries).
- Striving for fair competition by respecting tangible and intellectual property rights of competitors and respecting the relevant competition laws (including the obligation not to engage in bid rigging, price fixing, or other similar arrangements designed to improperly undermine competition). Assessing the social, environmental and economic impact of our intended operations prior to the commencement of our operational activities, including the impact on local communities and human rights.