



## CODE OF ETHICS

### **Purpose**

At Codis, we are dedicated to conducting business with integrity, accountability, and mutual respect for our colleagues, our customers, and the communities we serve. This Code of Ethics outlines the core principles that shape our decisions, behaviours, and relationships. Every employee is empowered and responsible, regardless of role or seniority, for upholding these standards and acting with integrity in every situation.

### **Scope**

The Code of Ethics applies to every Company employee, every contractor, and everyone conducting business on behalf of the Company.

Each of us must read, understand, and comply with the principles set out in our Code of Ethics. If we believe that our ethical standards may be compromised, we have a duty to raise the concern.

There may be instances when the guidance in this Code varies from the local laws or customs of a particular country. In cases where local law or customs impose higher standards than those set in the Code, local law and customs should always apply. If, by contrast, the Code provides for a higher standard, it should prevail.

### **How to raise a concern**

If you have a concern or reasonably believe that a law, regulation, industry code of conduct, Company policy, standard, or any principle outlined in the Company's Code of Ethics has been or may be violated, you have a duty to report it.

You may use the reporting channel you feel is most appropriate:

- A supervisor or manager
- Human Resources
- The Ethics Hotline – 844-640-0009

All reports will be treated confidentially and investigated promptly. Codis strictly prohibits retaliation against anyone who raises a concern in good faith.

If an investigation substantiates the reported allegations, the Company will take appropriate corrective measures, which may include disciplinary action and/or legal proceedings, if warranted.

### **Fair Treatment and Workplace Behaviour**

At Codis, we are committed to fostering a workplace where everyone is treated with dignity, respect, and fairness. We believe that a positive and inclusive environment is essential to our success and to the well-being of every team member.

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### Our Expectations:

- **Respect for All:** Treat colleagues, clients, and partners with courtesy, empathy, and professionalism, regardless of role, background, or beliefs.
- **Zero Tolerance for Discrimination or Harassment:** We do not tolerate any form of bullying, harassment, sexual harassment, or discrimination based on race, gender, age, religion, disability, sexual orientation, or any other protected characteristic.
- **Inclusive Culture:** We celebrate diversity and strive to create a space where everyone feels valued, heard, and empowered to contribute.
- **Professional Conduct:** Maintain integrity, honesty, and accountability in all interactions. Uphold our values in both words and actions.
- **Speak Up:** If you witness or experience behaviour that violates these principles, report it promptly. We take all concerns seriously and will respond with fairness and confidentiality.

**Why It Matters:** A respectful workplace isn't just a policy — it is a shared responsibility. By treating each other with fairness and kindness, we build a culture of trust, collaboration, and excellence.

### Health, Safety and the Environment

At Codis, we are committed to protecting the health and safety of our employees, customers, and communities — while minimizing our environmental impact. These principles are central to how we operate and reflect our responsibility as a business and global citizen.

#### Health & Safety First:

- We prioritize safe working conditions, proactive risk management, and continuous improvement in our safety practices.
- Every employee is empowered to speak up about hazards and contribute to a culture of safety.
- We comply with all relevant health and safety regulations and strive to exceed industry standards.

#### Environmental Responsibility:

- We aim to reduce our environmental footprint through sustainable practices, efficient resource use, and responsible waste management.
- We support innovation that promotes clean energy, circular economy principles, and climate resilience.
- We engage with stakeholders to promote environmental awareness and accountability across our value chain.

#### Shared Commitment:

- All team members are expected to uphold our health, safety, and environmental standards in their daily work.
- We provide training, tools, and support to help employees make informed, responsible decisions.

We believe that protecting people and the planet is not just a policy — it's a promise.

Together, let's build a safer, healthier, and more sustainable future.

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## **Privacy and Personal Data**

At Codis, we are committed to safeguarding the privacy and personal data of our employees, customers, partners, and stakeholders. Respecting privacy is not just a legal obligation — it is a core part of our values and how we build trust.

### **Our Principles:**

- **Transparency:** We clearly communicate how personal data is collected, used, stored, and shared. We only collect data that is necessary for legitimate business purposes.
- **Consent & Control:** We respect individuals' rights to control their personal information. Where required, we seek informed consent and provide options to access, correct, or delete data.
- **Security:** We implement robust technical and organizational measures to protect personal data from unauthorized access, loss, or misuse.
- **Compliance:** We adhere to all applicable data protection laws and regulations, including the General Data Protection Regulation (GDPR) and other regional privacy frameworks.
- **Accountability:** All employees are responsible for handling personal data with care and in accordance with our policies. Breaches of privacy protocols are taken seriously and addressed promptly.

**Why It Matters:** Protecting personal data is essential to maintaining trust, ensuring compliance, and upholding our reputation. We are committed to continuous improvement and ethical data practices in everything we do.

## **Conflict of Interest**

At Codis, we are committed to maintaining the highest standards of integrity, transparency, and trust.

A conflict of interest arises when personal interests — financial, relational, or otherwise — interfere, or appear to interfere, with the Company's ability to make objective, unbiased decisions.

**Why It Matters:** Conflicts of interest can compromise judgment, damage reputations, and erode stakeholder confidence. Even the appearance of a conflict can be harmful, which is why we take a proactive approach to identifying and managing these situations.

### **Common Conflict of Interest Scenarios:**

- External Commitments: Working for or receiving compensation from a competitor, vendor, or customer
- Financial Interests: Holding investments or ownership in entities that do business with the Company
- Personal Relationships: Hiring, supervising, or transacting with relatives or close associates
- Gifts or Favors: Accepting gifts or favors that could influence — or appear to influence — business decisions

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## **Employee Responsibilities:**

All employees must:

- Disclose any actual or potential conflicts before engaging in related activities
- Report conflicts during hiring and throughout employment
- Consult with HR or your manager if unsure (self-assessment may be impaired by personal involvement)

By staying vigilant and transparent, we protect our Company's integrity and ensure fair, ethical decision-making across all levels.

## **Fighting, Bribery and Corruption**

At Codis, we are firmly committed to conducting business with integrity, transparency, and accountability. Bribery and corruption undermine trust, distort markets, and damage reputations. We take a zero-tolerance approach to any form of unethical conduct.

### **Our Commitment:**

- **Zero Tolerance:** We prohibit all forms of bribery, whether direct or indirect, including kickbacks, facilitation payments, improper gifts and hospitality.
- **Compliance with Laws:** We strictly follow anti-corruption laws and regulations in every country where we operate, including the UK Bribery Act, the U.S. Foreign Corrupt Practices Act (FCPA), and other applicable local statutes.
- **Due Diligence:** We conduct thorough checks on third parties, partners, and vendors to ensure they share our commitment to ethical business practices.
- **Employee Responsibility:** Every employee is expected to report suspected bribery or corruption immediately. Retaliation against whistleblowers will not be tolerated.
- **Training & Awareness:** We provide regular training to help employees recognize and avoid corrupt practices and to reinforce our ethical standards.

**Why It Matters:** Fighting bribery and corruption isn't just about compliance — it is about protecting our values, our people, and our long-term success. We believe in fair competition, honest relationships, and doing the right thing, even when no one is watching.

Let us lead with integrity and build a business we can all be proud of.

## **Participating in Public Life**

At Codis, we recognize that active participation in public life is essential to a vibrant, inclusive society. We encourage our employees to engage thoughtfully and responsibly in civic, cultural, and community activities that reflect their values and contribute to the common good.

### **Our Principles:**

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- **Respect for Individual Choice:** Every person has the right to express their views, vote, volunteer, and participate in public discourse. We support diverse perspectives and encourage respectful dialogue.
- **Civic Engagement:** Whether through voting, advocacy, or community service, we believe that informed participation strengthens democracy and fosters positive change.
- **Professional Boundaries:** While we support personal involvement in public life, employees must ensure that their activities do not conflict with Company policies, compromise confidentiality, or imply Company endorsement unless explicitly authorized.
- **Social Responsibility:** We value contributions that promote equity, sustainability, and social progress. Participation in public life is not only a right — it is a responsibility we share as members of a global community.

**Let's Lead by Example:** By engaging with integrity and purpose, we help shape a future that reflects our shared values and aspirations.

### **Free & Fair Competition**

At Codis, we believe that free and fair competition is the foundation of a thriving marketplace and a healthy economy. We are committed to conducting business with integrity, transparency, and respect for the rules that promote open competition.

#### **Our Commitment Includes:**

- **Compliance with Antitrust Laws:** We strictly adhere to all applicable competition laws and regulations in the markets where we operate. This includes avoiding practices such as price fixing, market allocation, bid rigging, or abuse of market dominance.
- **Ethical Business Practices:** We compete vigorously but fairly. We win business based on the quality of our products, services, and relationships — not through unfair or deceptive tactics.
- **Respect for Competitors:** We do not disparage competitors or misuse confidential information. We respect their rights and operate with professionalism in all interactions.
- **Employee Responsibility:** All employees are expected to understand and follow our competition compliance policies. If you are unsure whether a business practice may raise competition concerns, consult our Legal or Compliance team before proceeding.

Free competition drives innovation, lowers prices, improves quality, and empowers consumers. It also protects our reputation and ensures long-term success.

Let's continue to build a company that thrives through merit, not manipulation.

### **Confidential and Sensitive Information**

At Codis, we are entrusted with information that is critical to our operations, our clients, and our reputation. Protecting confidential and sensitive information is a fundamental responsibility of every employee, contractor, and partner.

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### What We Protect:

- **Company Information:** Business strategies, financial data, internal communications, trade secrets, and proprietary systems.
- **Client and Partner Data:** Contracts, pricing, project details, and any non-public information shared with us.
- **Personal Data:** Employee records, health information, and any data protected by privacy laws.

### Our Commitments:

- **Confidentiality:** Do not disclose or discuss sensitive information with unauthorized individuals, inside or outside the Company.
- **Secure Handling:** Store, transmit, and dispose of information using approved, secure methods.
- **Need-to-Know Basis:** Access confidential data only when necessary for your role.
- **Compliance:** Follow all applicable data protection laws, internal policies, and contractual obligations.

### If You're Unsure:

If you are uncertain whether information is confidential or how to handle it appropriately, consult your manager or HR before taking action.

**Remember:** A single lapse can lead to legal consequences, financial loss, and damage to our reputation.

### Preventing Insider Trading

At Codis, we are committed to maintaining the highest standards of integrity and ethical conduct. As part of this commitment, all employees must strictly adhere to laws and internal policies regarding insider trading.

Insider trading occurs when someone uses material non-public information (MNPI) to buy, sell, or tip others to trade on that information. This applies not only to public companies, but also to private or equity-backed organizations where internal share transactions may occur.

### Your Responsibilities:

- Do not trade in any securities (including Company shares or interests) while in possession of MNPI.
- Do not share confidential information with anyone, inside or outside the Company, unless authorized and necessary for business purposes.
- Report any suspected insider trading or breaches of this policy to HR immediately.

### Examples of MNPI include:

- Financial results not yet disclosed
- Strategic plans, mergers, or acquisitions
- Major operational changes or legal developments

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### **Consequences of Violations:**

Violating insider trading laws can result in severe penalties, including termination, civil fines, disciplinary action, and criminal prosecution.

If you have questions about what constitutes MNPI or whether a transaction is permissible, contact the Finance or HR team before proceeding.

### **Social Media Conduct & Brand Protection**

At Codis, our reputation is one of our most valuable assets. Every employee plays a role in shaping how we are perceived, both inside and outside the workplace.

### **Guidelines for Social Media Use:**

- **Be Respectful & Professional:** Whether posting publicly or privately, your comments can reflect on the Company. Avoid language or behavior that could be viewed as offensive, discriminatory, or inflammatory.
- **Protect Confidential Information:** Never share sensitive business details, client information, or internal communications online — even in private groups or messages.
- **Avoid Misrepresentation:** Do not speak on behalf of the Company unless authorized to do so. If you mention your role at Codis, make it clear that your views are personal.
- **Think Before You Post:** If a post could be misinterpreted, damage relationships, or harm our brand, it is best not to share it.
- **Report Concerns:** If you see online content that could negatively impact Codis, notify the Communications or HR team.

Social media is public, permanent, and powerful. One post can shape perceptions for years. Let's ensure our digital presence reflects the professionalism, integrity, and excellence we strive for every day.

### **Data Protection**

Dealing with requests under this policy involves processing the personal data of employees.

For more information about how personal data is processed, including:

- Our legal grounds for processing
- How long data is retained
- Who personal data is shared with
- Individual rights under data protection law
- Who to contact with concerns

Please refer to the **Employee Privacy Notice**, available via the Company website.

### **Status of Policy & Document Control**

This policy does not create contractual rights for any individual employee.

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The Company reserves the right to revise or amend any part of this policy at any time. Employees will be notified in writing of any significant changes.

<b>Document Title</b>	Code of Ethics		
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