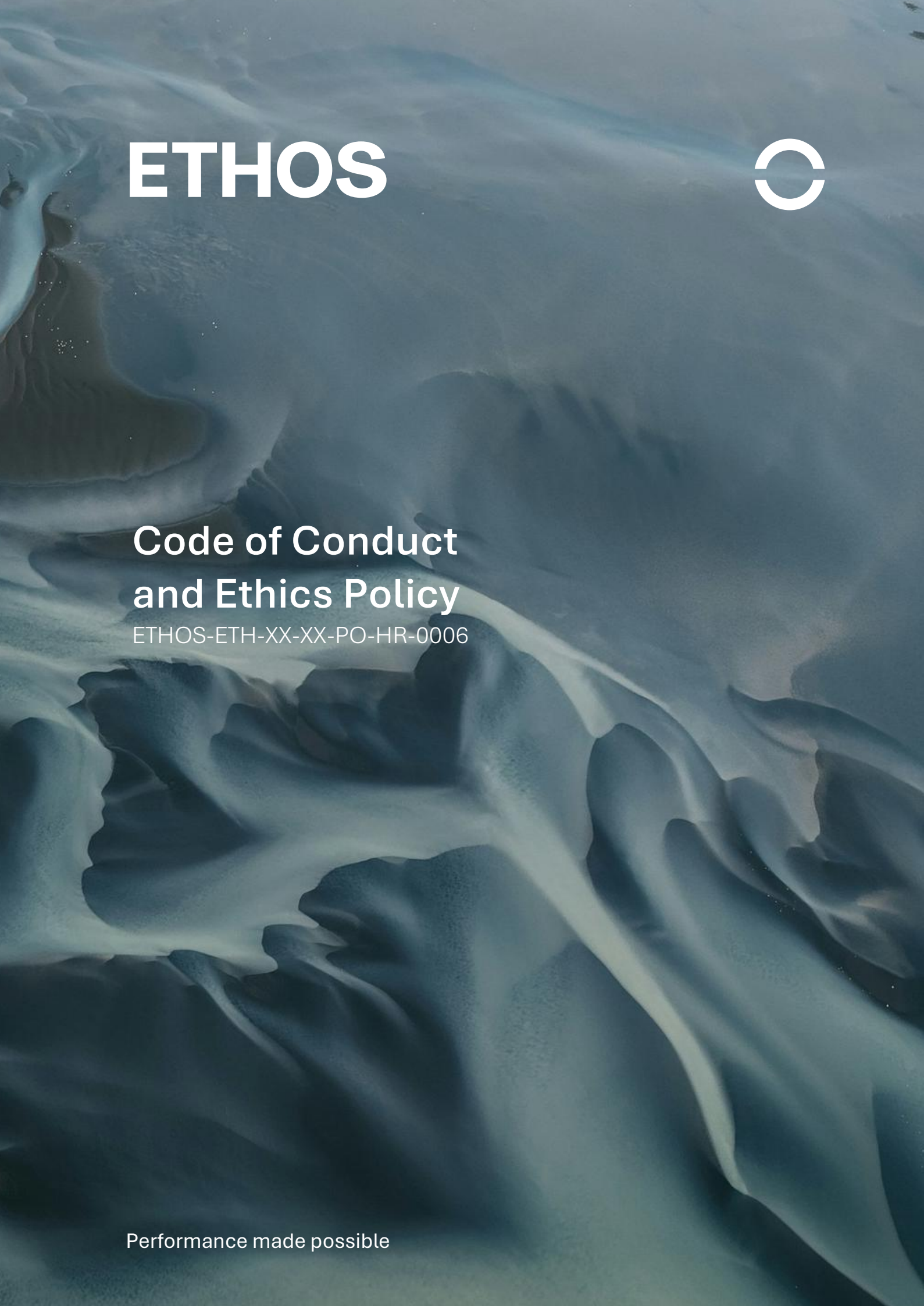

ETHOS

Code of Conduct and Ethics Policy

ETHOS-ETH-XX-XX-PO-HR-0006

Performance made possible

Code of Conduct and Ethics Policy

Current Issue			
Issue number	02	Issue date	20/01/25

Approval Process (print names)	
Originated by	Maya de Silva
Checked by	Alison Heffernan
Reason for issue	Policy reviewed

Previous Issues

Issue number	Date	Originator	Checker	Reason for issue
1	01/06/22	Alison Heffernan	Executive Directors	New policy

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Purpose

The Company requires ethical conduct in the practice of cyber security and any and all activities that impact on the results of the Company from all its employees, contractors and directors.

Employees and contractors hold important roles in corporate governance. They are uniquely positioned and empowered to ensure that the Company's interests are appropriately balanced, protected and preserved. This code provides principles that all employees must adhere to and advocate. This code is designed to deter wrongdoing and to promote:

- honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- full, fair, accurate, timely, and understandable disclosure in reports and documents that are made by the company;
- compliance with applicable governmental laws, rules, regulations and adherence to the Code of Conduct of the relevant professional bodies;
- the prompt internal reporting of code violations to an appropriate person or persons identified in the code; and
- accountability for adherence to the code.

This Code of Conduct and Ethics is applicable to all Employees, Contractors and Directors of Ethos.

Responsibilities

Employees and contractors will:

- Act at all times with honesty, integrity and independence, avoiding actual or apparent conflicts of interest in personal and professional relationships.
- Ensure strict adherence to the standards and practices that are generally accepted in the industry.
- Discuss with the appropriate level (senior management or board), in advance, any transaction that reasonably could be expected to give rise to a conflict of interest.
- Provide full, fair, accurate, complete, objective, and timely disclosures, financial and otherwise, in documents filed or submitted to any other government agency or self-regulatory organisation or used in public communications.
- Comply with the Company's policies and procedures, which include compliance with all applicable rules and regulations of applicable governments, commissions and exchanges in jurisdictions within which the Company conducts its activities.
- Act in good faith with due care, diligence and without knowingly misrepresenting material facts or allowing their better judgment to be subordinated.
- Protect and respect the confidentiality of information acquired in the course of their work except when authorized or otherwise legally obligated to disclose. Confidential information acquired in the course of their work will not be used for personal advantage.

- Be recognised as a responsible partner among colleagues.
- Responsibly use and control assets and other resources employed or entrusted to their supervision.
- Proactively promote and be an example of ethical behaviour as a responsible partner among peers, in the work environment and the community.
- Promptly report to the People and Talent Team or a Group Director any conduct that the individual believes to be a violation of law or business ethics or any provision of the Company's Codes of Conduct, including any transaction or relationship that reasonably could be expected to give rise to such conflict. Violations of this Code of Ethics, including failures to report potential violations by others, will be viewed as a severe disciplinary matter that may result in disciplinary action, up to and including termination of employment or contract.

Review

Ethos will review this Code of Conduct periodically. As it is not possible for this Code of Conduct to provide for every situation which may arise, employees and contractors must bear in mind that it is primarily their personal responsibility to ensure that all their activities, whether covered specifically or otherwise in this Code of Conduct, are governed by the ethical considerations implicit in the Code.

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