Business Conduct and Ethics Policy

Document Information

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Group Companies

This document applies across all Naviam Group Companies unless otherwise stated herein.

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Glossary

Company	All group companies within the Naviam brand
CISO	Chief Information Security Officer
ISQMS	Information Security Quality Management System
Group	Naviam Group Companies

1. Policy Objective

This policy defines the behavioral principles and professional standards that guide all employees, contractors, and representatives of Naviam.

It serves to ensure that all employees are aware of their individual and collective responsibilities with regards to the Company's ethics, and to emphasise our employees' and customers' expectations to being treated fairly and in accordance with good business practises. It aims to ensure integrity, trust, accountability, and professionalism in our operations and in the provision of our products and services.

2. Scope

This policy applies to all employees and officers of the Company, and to temporary workers, consultants, contractors, agents, partners and subsidiaries acting for, or on behalf of, the Company ("associated persons").

All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time by the Company.

3. Core Principles

3.1 Integrity in Business Dealings

We will act with integrity in dealings with all persons inside and outside the Company, including to:

- Provide accurate, complete, and truthful information to customers, employees and stakeholders at all times.
- Never seek to deceive customers or misrepresent our capabilities, including to gain unfair advantage.
- Provide proposals that are transparent, justified, and provide solutions considered beneficial to clients; do not recommend solutions solely for revenue recognition.
- Offer to perform only work for which we believe we have the necessary skills, experience and resources to deliver either directly or via our subcontractors.
- Always expect to and plan to meet our contractual commitments.

- Implement systems ethically and legally, respecting all licensing terms and regulatory requirements.
- Not knowingly engage in any business practise with any entity that does not match the Company's ethical standards.

3.2 Confidentiality

Protect all client and company data, business information and credentials from unintended access, including to:

- Always follow company security policies.
- Never disclose confidential information to a third party, or use that information to inform a third party behavior.
- Access confidential information only when required to perform a task.
- Never remove or copy data without formal authorization.

3.3 Conflict of Interest

Do not allow conflicts of interest to impact our behavior, including to:

- Disclose when pertinent any personal, financial, or familial interests that may influence professional judgment. Avoid situations where personal relationships interfere with objective decision-making.
- Not give to, or accept from, a business associate any material or extravagant gift, prize or entertainment benefit where these may appear to an objective observer as to be excessive or to be a factor in influencing that person's behavior.

3.4 Compliance with Laws

We have a duty to, and will commit resource to enable us to inform ourselves of any laws relevant to our particular activities. In doing this:

- We will comply with all applicable laws, rules and regulations as locally interpreted and administered in all jurisdictions in which the Company conducts business.
- We will immediately report any suspected illegal or non-compliant activity.
- We will adhere to antitrust and competition laws that promote and protect free and fair competition. We will not be complicit in price fixing and/ or anti-competitive behaviour.

3.5 Facilitation Payments

The Company prohibits its employees or associated persons from making or accepting any facilitation payments. Facilitation payments are distinct from an official, publicly available fast-track process.

Where a public official or an organizations representative ("requester") has requested a payment, employees or associated persons should ask for further details of the purpose and nature of the payment in writing. If the requester provides written details these should be provided to the Finance Director who will consider the nature of the payment and confirm if payment by the Company can be made or otherwise. Legal advice may be sought by the Company.

If an employee or associated person has any concerns about the nature of a request for payment, they should report it to the Finance Director.

Where commissions, consultants' fees, retainers and similar payments are required to be made and can be justified in the normal course of business, those payments must be clearly commensurate with the services performed and must be properly recorded in the Company's accounts. No other payments may be given or received. In particular, we may not, in the context of our relationship with Naviam, receive any personal payment or compensation from a source other than Naviam.

3.6 Compliance with Anti-bribery Legislation

Naviam has a zero tolerance approach to bribery and corruption. The Company prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe, kickback or other types of improper payments for any reason and it mandates compliance with Anti-bribery legislation in all domains in which we operate.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

4. Workplace Conduct

Within the workplace we will demonstrate the highest standards of personal integrity, truthfulness and honesty, and we will:

- Treat colleagues, clients, and partners with respect and consideration, and always without discrimination of any type, or harassment.
- Hold paramount the safety, health and welfare of colleagues and fully support them in the execution of their duties.
- Hold paramount the safety, health and welfare of the public in the performance of the Company's professional duties.
- Use company equipment and resources responsibly and solely for legitimate business purposes.
- Not use unlicensed software or unauthorized tools.

5. Leadership Commitments

The Company will work to ensure:

- That there is no discrimination on the basis of gender, physical or mental disability, age, marital status, family status, sexual orientation, religious belief, race, colour, ancestry or place of origin.
- A workplace free from intimidation, coercion and harassment.
- Fair and competitive compensation.
- Confidentiality of employee records.
- To have an open door policy and welcome suggestions and concerns from all employees. Creating an environment that will allow employees to feel comfortable discussing any issues and will serve to alert managers and Directors to concerns within the company.
- We use only licensed software and respect all software licenses and copyrights.

6. Policy Breaches and Misconduct

Employees or associated persons witnessing unethical behavior, policy violations, or suspected misconduct must report this to an appropriate person within the Company, such as HR or a Line Manager. Employees or associated persons who report such concerns in good faith will be supported by the Company. The Company will ensure that the individual is not subjected to detrimental treatment as a consequence of his/her report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence.

Breaches of this Policy will be dealt with in accordance with the respective Company disciplinary procedure or contractual agreements.

7. Approval

Approved on behalf of the Group:

Oliver Garthwaite
Group CEO