

Code of Conduct & Business Ethics

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1 Introduction

1.1 Purpose

This Code of Conduct & Business Ethics (the “**Code**”) establishes the core values, principles and expected standards of behavior for all EuroEnergy employees, directors, officers, contractors and representatives. It is designed to uphold professional standards and reinforce our values across areas such as workplace conduct, dress code, cybersecurity and internet use, social media, conflicts of interest, interpersonal relationships, visitor policies, and business solicitations.

Its purpose is to cultivate an environment of respect, integrity, cooperation and professionalism, guiding individuals through ethical dilemmas, promoting transparent and responsible conduct, and outlining channels for reporting misconduct. This Code forms the foundation of EuroEnergy’s culture and supports our commitment to lawful, ethical and accountable business practices.

1.2 Scope

This Code applies to all EuroEnergy Group companies, their employees, contractors and anyone acting on behalf of the Group. It must be followed in strict accordance with applicable laws in each country of operation.

Where local governance requirements are more restrictive, they shall prevail; where they are less restrictive, this Code prevails and local policies must be updated accordingly.

Compliance with the Code by each entity and/or region is the responsibility of each Country Manager.

1.3 Internal Review & Approval

This policy is reviewed by the Human Resources and Legal Departments on a periodic, as-needed basis to ensure it remains accurate, compliant and aligned with the EuroEnergy Group’s operational and regulatory requirements.

Following each review, updates are submitted to the EuroEnergy Group Leadership Team, which provides final approval.

1.4 Acronyms

Acronym	Description
CEO	Chief Executive Officer
EE or Group	EuroEnergy Group
ESG	Environmental, Social & Governance
EU	European Union
GDPR	General Data Protection Regulation
HR	Human Resources



Acronym	Description
HSE	Health, Safety & Environment

2 Our Values and Ethical Principles

Our core values serve as the guiding principles that define our workplace culture and how we operate. They provide a moral compass for all employees, shaping behavior, decision-making and fostering an environment of integrity, accountability and mutual respect.

These STARS values reflect who we are and who we aspire to be.

Success - We Evolve

We work with passion, enthusiasm, and dedication to always exceed our goals.

Team Spirit- We foster a Positive Team and Family Spirit

We motivate our people to work as a team. These strong bonds among employees increase engagement, enhance creativity, and boost our productivity.

Accountability - We are Accountable

Our success is based on our skills and the feeling of trust, loyalty, and responsibility we build with our stakeholders.

Respect - We Respect

We encourage different opinions and ideas and treat everyone fairly and politely to create an environment of acceptance, satisfaction, and diversity support.

Social Responsibility - We Care

The health and well-being of our employees, customers, co-workers, the environment, and communities where we do business are at the top of our priorities.

These values guide our decisions and behaviours, shaping a positive and ethical workplace.

3 Legal & Regulatory Compliance

EuroEnergy is committed to complying with all applicable laws, regulations, and obligations in every jurisdiction where we operate. Employees are expected to:

- Understand and follow the legal and regulatory requirements relevant to their role;
- Seek guidance from managers or Legal Department when unsure about compliance obligations;
- Act honestly and responsibly in all business dealings;
- Ensure that no business goal or target ever justifies violating the law or this Code.



4 Anti-bribery & Anti-Corruption

EuroEnergy Group and its subsidiaries and affiliates worldwide are committed to conducting their business with honesty, integrity, trustworthiness, and accountability. We have a responsibility to comply with all applicable laws in the countries where we do business.

The Group maintains zero tolerance for bribery, corruption of any kind or improper influence in any form, in connection with its business. Employees must not, under any circumstances:

- Offer, solicit, or accept bribes or kickbacks;
- Accept cash or items of excessive value;
- Accept gifts or hospitality above €50 without prior disclosure to their Head of Department;
- Accept undue hospitality intended to influence business decisions.

Any suspicious behaviour or attempted bribery must be reported immediately. The identity of individuals reporting violations will be kept confidential to the extent necessary for the protection of EE's interests or as required by applicable law.

Concerns may also be raised through the Group's confidential Grievance & Whistleblowing online platform. All disclosures will be handled fairly and sensitively. Where needed, matters may be escalated to senior management, who will make final determinations. The Group will take swift and vigorous action against any seconded employee who accepts any bribes, kickbacks, or other unauthorized commissions, payments, or favors.

5 Conflicts of Interest

EuroEnergy Group's Conflict of Interest policy applies to all prospective and current employees, independent contractors, and any individuals acting on behalf of the Group. A conflict of interest arises when personal interests, relationships, or external activities interfere, or appear to interfere, with an individual's ability to act in the best interests of EuroEnergy.

Conflicts can impair judgment, undermine decision-making, and negatively affect business outcomes. Examples include, but are not limited to:

- Using one's position for personal gain;
- Engaging in activities that benefit a competitor;
- Using Group contacts or relationships for personal purposes;
- Using Group resources to support external business activities;
- Acting in ways that could compromise EE's legal or ethical standing.

Conflicts of interest can often be addressed and resolved before any harm occurs. Employees must promptly disclose any actual, potential, or perceived conflict of interest to their Department Head so that appropriate steps can be taken. Supervisors also share responsibility for identifying, monitoring, addressing and resolving potential conflicts within their teams.



Concerns may also be raised through the Group's confidential Grievance & Whistleblowing platform. All disclosures will be handled fairly and sensitively. Where needed, matters may be escalated to senior management, who will make final determinations.

6 Workplace Conduct & Culture

EuroEnergy expects all employees to demonstrate professionalism, integrity, and respect in their daily conduct. Professional behaviour reflects not only on each individual but also on the Group's reputation and business relationships.

Employees are responsible for creating a safe, inclusive, and respectful environment, maintaining high ethical standards, and ensuring that their actions support collaboration, trust, and productivity. Professional behaviour includes:

- Acting with courtesy, fairness, and respect toward colleagues, clients, contractors, and visitors;
- Maintaining confidentiality and handling information responsibly;
- Using sound judgment and exercising discretion in all work-related actions;
- Representing EuroEnergy positively in all interactions, both inside and outside the workplace;
- Avoiding any form of harassment, bullying, discrimination, intimidation, or inappropriate behaviour;
- Promoting open communication, teamwork, and a supportive work culture;
- Ensuring conduct, online and offline, supports EuroEnergy's values, reputation, and legal obligations.

In support of these expectations, the following policies apply:

6.1 Professional Behaviour

Employees must demonstrate professionalism, civility, and respect toward colleagues, partners, and stakeholders. Harassment, bullying, discrimination, or any form of abusive behaviour is strictly prohibited.

Employees are expected to:

- Act with courtesy, fairness, and respect;
- Avoid harassment, bullying, discrimination, or abusive behaviour;
- Communicate openly, collaborate effectively, and support each other;
- Handle confidential information with discretion;
- Represent EuroEnergy professionally at all times, including off-site or online settings.

6.2 Dress Code

EuroEnergy operates a Business Casual dress code from Monday to Thursday and a Smart Casual dress code on Fridays. Employees must maintain a professional appearance suitable for their duties and settings, especially when representing the Group in front of clients,



partners, and visitors. That should always be both positive and appropriate, so attire should fit the particular occasion or setting at all times.

- Business Casual: smart, tailored attire paired with appropriate shoes (no denim, trainers/sneakers).
- Smart Casual (Fridays): more relaxed attire such as jeans and informal tops, while still maintaining a polished appearance.

In the case of business meetings or events where a more formal dress code is anticipated, employees should adjust their attire accordingly. When in doubt, managers may provide guidance on appropriate formal dress.

Employees must ensure that clothing is clean, professional, appropriate and in good condition. Sportswear, revealing clothing, or items with excessive logos are not acceptable. Religious or cultural attire is fully respected.

Managers may provide particular guidance or direction at their discretion regarding standards of dress and appearance. The Human Resources Department is also available to answer any queries about the Group's dress code.

6.3 Gambling / Betting

All forms of gambling or betting, including online gambling, are strictly forbidden on company premises, whether during or outside of working hours.

6.4 Alcohol, Smoking & Substances

Employees must not consume or be under the influence of alcohol, drugs, intoxicants, or any other prohibited substances during working hours or during rest breaks within the working period (such as lunch breaks). Smoking is permitted only in designated areas. Any serious breach of this policy may constitute Gross Misconduct and may result in summary dismissal.

6.5 Communication & Correspondence Etiquette

Emails are used in order to provide an improved channel of communication with our business partners. Proper business etiquette should be maintained when communicating in any manner.

Confidential information can get into the wrong hands through the manual selection of the wrong addressee. The laws of copyright and defamation apply equally to emails. Email, only the necessary people with the necessary message. Ensure that the reply is for the sender or specific group only and not the original mailing list - do not "reply all", unless there is a requirement to do so.

Employees must maintain professionalism in all communication. Email rules include:

- Avoid "reply all" unless necessary.; Use clear, respectful, and accurate language;
- Maintain confidentiality;
- Do not access, modify, or misuse others' email accounts;
- Do not distribute offensive, defamatory, or inappropriate content;



- Auto-forward emails only when approved by the IT Department and interested parties.
- Where it is absolutely necessary to distribute a large attachment to a number of people within the Group, use Shared Drives.

Email communications should resemble typical professional and respectful business correspondence. Sarcasm, poor language, inappropriate comments, attempts at humor, and so on should be avoided. When communicating via email or instant messages, there are no facial expressions and voice tones to assist in determining the meaning or intent behind a certain comment.

When writing a business email, be as clear and concise as possible. General messages to a wide group should only be sent where necessary and, in most cases, Bcc'd. It is not accepted to:

- Bully, harass, or abuse others through email. This includes sending information that insults/harasses others concerning sex, race, age, disability, or religion;
- Read/modify email messages of other users without their permission;
- Deliberately send junk emails;
- Send email using a mail client/software that has been installed for another employee (i.e. someone else will appear to be the sender) unless authorized to do so;
- Access/distribute pornography;
- Take part in electronic chain letters;
- Download/distribute copyright information or unauthorized software;
- Post confidential information about the Group and/or its affiliated entities, and the customers/suppliers without authorization;
- Use the system for personal purposes.

Remember:

- The corporate email system should be used only for duties of employment;
- Emails can be read by third parties (police can obtain printouts directly from internet service providers without a warrant);
- Emails can be used as evidence;
- Emails can create binding contracts;
- Ensure that the content of your emails is factually correct and non-defamatory;
- Emails must never be used to send abusive, offensive, sexist, racist, disability-biased, or defamatory material, including jokes, pictures, or potentially offensive comments. Such use may constitute harassment and/or discrimination. If someone receives unwanted messages of this nature, they should bring this to the attention of the Human Resources Department.

We consider any serious breach of these rules to be Gross Misconduct for which the normal action will be summary dismissal.



7 Fair Dealing & Responsible Business Practices

EuroEnergy expects employees to conduct business fairly, honestly, and with integrity. This includes:

- Being truthful and transparent in communications;
- Treating suppliers and partners with professionalism;
- Avoiding deceptive, misleading, or unethical practices;
- Making decisions based on merit and facts, not personal preference.

We compete vigorously, but always ethically.

8 Working with Third Parties

We expect our suppliers, contractors, partners, and intermediaries to uphold ethical and legal standards that align with our own. For this purpose, employees should:

- Conduct due diligence before engaging third parties;
- Ensure contracts reflect appropriate compliance and ethical obligations;
- Monitor third-party behavior and escalate concerns promptly.

EuroEnergy will not work with partners who engage in unethical, illegal, or corrupt practices.

9 Protection of Group Assets

Group assets, including physical property, digital systems, intellectual property, financial resources, and information, must be protected from loss, theft, misuse, or unauthorized access. Employees must:

- Use assets responsibly and for legitimate business purposes;
- Safeguard login credentials, equipment, and sensitive information;
- Follow IT and cybersecurity rules as defined in the Group's Cyber & Information Security Policy;
- Not install unauthorized software or circumvent security controls.

Misuse of Group assets may result in disciplinary action.

9.1 Physical & Digital Assets

Employees must protect Group equipment, documents, systems, and resources from loss, misuse, or unauthorized access. A clean desk approach should be adhered to at all times.

9.2 Confidentiality

Employees must safeguard all confidential information relating to EuroEnergy, its subsidiaries, business partners, clients, and suppliers. Such information must not be disclosed to any third



party during or after employment, except when required in the proper course of duties or by law, in accordance with the employee's confidentiality obligations.

Employees must not remove, copy, or retain documents, files, or any items containing confidential information without prior authorization. Upon request, and in all cases upon termination of employment, employees must return all Group property and securely delete or destroy any confidential information in their possession.

Confidential information must never be used for personal benefit or in a manner that could harm EE's competitive position. Any serious breach of confidentiality constitutes Gross Misconduct and may result in summary dismissal. The Group may also pursue legal action to protect its interests.

9.3 Intellectual Property

Intellectual property created during employment belongs to EuroEnergy. Employees must respect proprietary rights and comply with licensing rules.

9.4 Acceptable Use of Systems

Employees must comply with the Group's Cyber & Information Security Policy, which governs system use, password security, phishing awareness, and incident reporting.

10 Data Protection (GDPR)

EuroEnergy is committed to protecting personal data in accordance with applicable data protection laws, including the GDPR. Personal data refers to any information relating to an identified or identifiable individual. Employees must:

- Handle personal data lawfully, fairly, securely and only for legitimate business purposes;
- Use personal data only when required for their role;
- Protect personal data from unauthorized access, disclosure, loss or misuse;
- Report any suspected data-protection incident immediately through the appropriate channels defined in the Group's Cyber & Information Security Policy.

The detailed rules governing data subject rights, data retention, privacy notices, lawful processing, and breach-response procedures are set out in the Group Legal, Privacy & Cookies Policy and must be followed by all employees.

11 Health, Safety & Environment

EuroEnergy is committed to providing a safe and healthy workplace and to conducting operations responsibly, with respect for people, communities, and the environment. Maintaining a strong Health, Safety & Environment (HSE) culture is a shared responsibility



across the Group. Under this context, all employees and contractors/service providers working in Group premises including construction/operational sites, are expected to:

- Follow all safety procedures, instructions, and site-specific requirements;
- Report hazards, injuries, near-misses, or unsafe conditions immediately;
- Promote safe behaviors and support colleagues in maintaining a safe workplace;
- Use equipment, tools, and protective gear responsibly and as instructed;
- Support environmental protection initiatives and responsible resource use;
- Comply with all applicable HSE laws, regulations, and internal HSE policies.

EuroEnergy integrates environmental and social responsibility into its operations. Employees are expected to support the Group's broader sustainability commitments, including responsible project development, environmental stewardship, and community well-being.

For more detailed guidance, employees must refer to the Group's Sustainability Policy, which outlines the Group's environmental, social, and governance principles, including climate-change mitigation, biodiversity protection, community engagement, and responsible resource management.

Everyone shares responsibility for maintaining a safe and sustainable workplace.

12 Responsible Use of Media & Social Media

Media, social media, and other online communication channels have transformed the way we interact with colleagues, clients, partners, and the general public. As these platforms become more powerful and accessible, it is important that we use them responsibly and with awareness of the risks they may pose. The guidelines below are intended to help employees engage appropriately on digital and public platforms while protecting both their own reputation and that of EuroEnergy.

Employees must not make comments or statements on behalf of EuroEnergy, whether online, in print, in broadcast media, or at public events, without prior approval. Such approval should be obtained through the EuroEnergy Group Communications Department.

The integrity and reputation of the Group are closely linked to the actions and behavior of all employees both offline and online. All employees are expected to exercise the highest standards of behavior, always taking care to:

- Be respectful;
- Be professional;
- Exercise good judgment;
- Use common sense;
- Ask for help when in doubt.

These principles apply across all communication channels, including personal social media accounts when such use could be connected to or perceived as reflecting on the Company.



12.1 Guidelines

- **Media Enquiries:** If an employee is contacted by any member of the media seeking comments on behalf of EuroEnergy, they must not respond. All enquiries must be referred directly to the Communications Department.
- **Employee's Reputation:** While online tools and platforms may be used for social and professional matters, an employee should remember that they are identifiable via social networks or in the media and on speaking platforms and that their private reputation may well affect their professional one, affecting in turn the reputation of the Group.
- **Respect Confidentiality:** Never disclose confidential, internal or privileged information about the Group online or offline. Anything labeled "for internal use only" must not be shared outside the Group under any circumstances.
- **Exercise Caution:** If an employee is uncertain or uncomfortable about publishing content, they should pause and seek guidance from their manager or the Communications Department before posting.
- **Maintain Work Priorities:** Employees can manage some aspects of their social life at work, but they should not let their personal social media and their use cause unreasonable disruption to their working day.
- **Report Abuse:** If an employee becomes aware of unfair, offensive, or harmful online content about EuroEnergy, they should notify the Communications Department immediately so that appropriate action can be taken.
- **The Internet Is Not Anonymous Nor Does It Forget:** Everything written online can be traced back to its author one way or another and very easily. Posts in one forum are often replicated in others. Public speaking or speaking to a reporter also finds its way onto the internet and the possibility that an employee's name is linked to EuroEnergy.

12.2 Communication/Statements to the Media

Only the Communications Department is authorized to make official statements or communicate with the media on behalf of EuroEnergy, as long as they have received approval from management and Leadership first.

Employees authorized to speak publicly or post official content on social media, as part of their job, should adhere and follow the below guidelines:

- Never assume anything is "off the record" when speaking publicly or to the media;
- When making a statement on behalf of the Group, make sure you have the necessary approvals, not only from the Group, but also from referencing clients, partners, or suppliers, as appropriate. Be especially careful if you are being asked for endorsement'
- Respect the brand. Always use images, videos, logos and other Group assets in accordance with branding and visual identity guidelines'
- Respect copyright. If it is not yours, do not use it. Before posting someone else's work, you must seek approval from the owner first. Never assume that an image or video licensed for one purpose can also be used for a different purpose;



- Avoid responding to negative or inflammatory posts online. Strategies for addressing serious issues must be coordinated with the CEO and the Communications Department;
- Be transparent. Never create fake profiles or misrepresent identity to influence online engagement;
- Take responsibility for your actions. If you make a mistake, be frank about it and correct it promptly.

13 Reporting Concerns & Whistleblowing

EuroEnergy is committed to maintaining a culture of integrity, transparency and accountability. Employees, suppliers, contractors, and anyone acting on behalf of the Group are encouraged to speak up if they become aware of behavior that may violate this Code, Group policies, or applicable laws.

Concerns may relate to, but are not limited to:

- suspected fraud, bribery, corruption, or conflicts of interest;
- unethical, unsafe, or illegal conduct;
- discrimination, harassment, or inappropriate workplace behavior;
- breaches of confidentiality, data protection, or cybersecurity;
- ESG risks or violations;
- violations of the Group's policies, procedures, or commitments.

Employees may report concerns through any of the following channels:

- Their Department Head or Country Manager;
- The Human Resources Department;
- The Legal Department;
- The Sustainability & Regulatory Affairs Department;
- The EuroEnergy Grievance & Whistleblowing online platform, accessible to all employees, contractors, and external stakeholders.

Reports made through the Whistleblowing platform may be submitted confidentially or anonymously in accordance with the Group's Whistleblowing Policy. EuroEnergy strictly prohibits any form of retaliation against individuals who raise concerns or participate in investigations in good faith. Retaliation itself will be treated as a serious violation of this Code and may result in disciplinary action.

All reports will be handled promptly, sensitively, and fairly. The Company will take appropriate action to investigate concerns and address confirmed breaches in accordance with internal procedures and applicable laws.



14 Governance & Enforcement

Compliance with this Code is mandatory for all employees, contractors, and individuals acting on behalf of EuroEnergy. Violations may result in corrective or disciplinary action, up to and including dismissal, in accordance with the Group's policies and applicable law.

Managers are responsible for promoting the Code within their teams and ensuring its principles are understood and applied. EuroEnergy reviews this Code periodically to ensure ongoing alignment with legal requirements, regulatory expectations, and best practices.

Appendix: Disciplinary Procedure

All organizations need a minimum number of rules and procedures in order to protect the interests of both the employer and the employee, and the interests of others who come into contact with our company.

The rules that we have set out specify standards of performance and behavior, and the procedures referred to in this section are intended to promote consistency and fairness. The purpose of our rules and procedures is to emphasize and encourage improvement in conduct and performance, and is not necessary to be construed as punitive action.

Accordingly, every effort is made to ensure that when action is taken under the disciplinary procedure, that action is fair and reasonable, that each employee is given every opportunity to present their case, and that there is a right of appeal against any disciplinary decision which is considered to be either unfair or unjust.

The rules and procedures set out below are intended to ensure that:

- Disciplinary action, when taken, is taken quickly, fairly, and in a uniform and consistent manner.
- One will only be subjected to disciplinary action once there has been a full investigation of all of the facts and they have had an opportunity to present their side of the case. If they are disciplined, they will receive a clear explanation of both the decision reached and any penalty imposed and of the right to appeal against the decision and/or penalty.

Concerning any proposed dismissal/disciplinary action not covered by the procedures set out herein, or where it is not appropriate to observe these procedures under applicable law, the Group will observe the procedures prescribed by applicable law.

Rules and Categories of Conduct

The disciplinary procedure may be invoked as a result of any failure to observe the rules set out in this Code, or in any other instance of conduct/performance, which we believe could only properly be dealt with under the disciplinary procedure.



Other than for a probationary termination, or Gross Misconduct, it is unlikely that dismissal will be the first course of action taken. Conduct/performance, that proves to be unacceptable, will fall into one of the under-noted categories:

- Unsatisfactory Conduct
- Misconduct
- Serious Misconduct
- Gross Misconduct

Unsatisfactory Conduct

Any minor breach of the rules and regulations will fall into the category of unsatisfactory conduct. If it is considered sufficiently serious to warrant disciplinary action, then it is likely that if this is the first instance of such a minor misdemeanor the disciplinary consequence will be a verbal warning. In dealing with unsatisfactory conduct, it is the standard of conduct or indeed performance, which is considered, and not necessarily, a repetition of an earlier misdemeanor.

Misconduct

Disciplinary action may be taken where there is a continued repetitive action, which has resulted in a previous verbal warning for unsatisfactory conduct, and there has been no improvement or there has been a continued breach. It may well be, however, that the misconduct in question may be sufficiently serious to warrant an immediate written warning without there having been a previous verbal warning issued.

Serious Misconduct

Serious misconduct/serious shortfall in performance may in themselves require a final written warning to be issued irrespective of whether previous warnings have been given. A first and final written warning may be issued where it is considered that conduct or performance is not sufficiently serious to warrant dismissal, but it is considerably more serious than the action, which would normally have warranted a written warning for misconduct.

There will be occasions when one has received a combination of either verbal and/or written warnings in respect of their conduct/performance and there has still been no marked improvement or there has been a repetition of the action for which the previous warnings have been given. Consequently, if they have previously been given a written warning about their conduct/performance and there has been no improvement or there has been a repetition of the misconduct then the next disciplinary punishment will usually be a final written warning for serious misconduct.

Please note that following the issue of a final written warning, any further repetition or further breach in relation to conduct or performance will usually result in dismissal with contractual notice, after a disciplinary hearing.



Gross Misconduct

Certain aspects of behavior, conduct/performance, will be construed as gross misconduct, and this term, as the name implies involves conduct that is particularly serious in itself or in its consequences. In such cases, it is considered inappropriate to allow someone to continue at work, and the only proper penalty would be summary dismissal, which means summary dismissal after a disciplinary hearing with the forfeiture of any right to notice of termination.

The Group reserves the right to deal with every case entirely on its merits, but in return, it undertakes that it will always seek to conduct the disciplinary procedure reasonably, fairly and consistently.

Informal Counselling

Where a breach of conduct/performance is not regarded as being particularly serious and is shown to have been caused by the capability, competence, or behavior of an employee, we may deal with this matter informally in the first instance and allow improvement, if necessary, with training, rather than revert to the formal disciplinary procedure. Any decision to proceed in this way, however, is a matter of the Group's discretion and will depend entirely on the circumstances of each case.

Disciplinary Investigations and Hearings

When a matter arises, which we consider can be properly dealt with on an informal basis this would be our preferred approach. This is particularly the case where a matter relating to employees' abilities arises and which we believe can be resolved by discussion, training, or counseling. However, if there is no improvement after a suitable period has been allowed or training has been undertaken, the matter may have to be dealt with more formally.

In the event of a matter arising where it is considered necessary to invoke the disciplinary procedure, we will first seek to establish the facts of the case. Group employees or other seconded employees who may be involved in this investigation will be required to cooperate fully with the procedure.

On certain occasions, it may be considered prudent or necessary to suspend an employee with pay, pending the conclusion of any investigation and subsequent hearing. Further clauses within this section will indicate the level of authority vested in management levels within the business. It must be noted that suspension with pay is not in itself disciplinary action and is only seen as a temporary measure intended to assist in the proper conduct of the disciplinary process and is not a pre-judgment of that process. The authority to suspend with pay is vested with the Country Manager and CEO.

If, following initial investigation, it is considered that there is a case to answer, then a disciplinary hearing will be established as soon as possible. It should be noted that hearing someone may be accompanied by a Group employee or another seconded employee of their own choice. We do not consider that legal representation or representation by an external body/person is either appropriate or necessary, in what essentially is an internal matter. This restriction would apply to both sides.



The nature of the disciplinary matter will be explained to the employee in as much detail as possible, and he/she/they will have every opportunity to present his/her case in full, to call any witnesses he/she would feel appropriate, and to present any written evidence. If one requires further time to prepare their case, we may postpone the hearing until a later date, but normally only one adjournment will be granted. If their version of events so requires, we will undertake such further investigations as may be considered appropriate in order to establish the credibility of their explanation, and the result of these investigations will be put to them before any final decision is made.

After the hearing, if he/she/they accept that the matters raised against him/her/them are correct, or if a decision is made against him/her/them, then before any penalty is imposed, we will give him/her/them an opportunity to put forward any mitigating circumstances he/she/they feel may be relevant.

At that time, there will be a verbal explanation of the decision, and this will then be confirmed in writing to the employee. His/her right to appeal against either the findings and/or the penalty to be imposed will also be explained to him/her/them verbally and in writing.

Disciplinary Actions

Dismissal

Contractual dismissal for misconduct will result in the termination of employment with notice. Dismissal for gross misconduct offenses will result in summary termination without notice.

Warnings

All warnings, including verbal warnings, will be confirmed in writing, and will be sent to the employees and recorded on their file and will contain details of all matters raised during the disciplinary hearing, a summary of all interviews, and their explanations, and the final conclusions reached.

Warnings for matters connected with capability/performance will indicate a period of time for improvement and may contain certain recommendations for further training or counselling. Warnings for conduct may require that there is either immediate improvement and/or that there is no repetition of the offense.

Any further disciplinary process, which takes place after a previous warning, is likely to result in a more serious penalty being imposed, even if the second offense is of a different nature to the previous one, particularly where there is evidence that the first warning has not been heeded. Warnings will include confirmation of employees' right of appeal.

- Verbal warnings: A verbal warning will be disregarded after a six-month period.
- Written warnings: A written warning will be disregarded after a 12-month period.
- Final written warnings: A final written warning will be disregarded after a 12-month period.

We reserve the right to increase the above periods if the offense committed is particularly serious or if it is an offense, which might be repeated periodically.

