

Code of Conduct Policy

Last updated: January 20, 2023

Purpose

Our **Employee Code of Conduct company policy** outlines our expectations regarding employees' behavior towards their colleagues, supervisors and overall organization.

We promote freedom of expression and open communication. But we expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful and collaborative environment.

Scope

This policy applies to all our employees regardless of employment agreement or rank.

Policy Statement

Company employees are expected to follow our Employee Code of Conduct while performing their duties. We outline the components of our Code of Conduct below:

Compliance with law

All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

Respect in the workplace

All employees should respect their colleagues. We won't allow any kind of discriminatory behavior, harassment or victimization. Employees should conform with our Equal Opportunity Policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

Protection of Company Property

All employees should treat our company's property, whether material or intangible, with respect and care.

Employees:

- Shouldn't misuse company equipment or use it frivolously.
- Should respect all kinds of incorporeal property. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.

Employees should protect company facilities and other material property from damage and vandalism, whenever possible.

Professionalism

All employees must show integrity and professionalism in the workplace:

Corruption

We discourage employees from accepting gifts from clients or partners. We prohibit bribes for the benefit of any external or internal party.

Job duties and authority

All employees should fulfill their job duties with integrity and respect toward clients, stakeholders and the community. Supervisors and managers mustn't abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner.

We encourage mentoring throughout our company.

Absenteeism and tardiness

Employees should follow their schedules. We can make exceptions for occasions that prevent employees from following standard working hours or days. But, generally, we expect employees to be punctual when coming to and leaving from work.

Conflict of interest

We expect employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties.

Collaboration

Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

Communication

All employees must be open for communication with their colleagues, supervisors or team members.

Benefits

We expect employees to not abuse their employment benefits. This can refer to time off, insurance, facilities or other benefits our company offers.

Reporting Issues (Whistleblowing)

Employees will usually be the first to know when someone inside or connected with an organization is doing something illegal, dishonest or improper, but may feel apprehensive about voicing their concerns. The Equus Leadership Team does not believe that it is in anyone's interests for employees with knowledge of wrongdoing to remain silent.

The following examples demonstrate issues that are serious and should be reported:

- Fraud, corruption, bribery or other malpractice which could lead to a financial loss to the Group
- Criminal offences, e.g. Theft
- Breaches of our Companies Policies, particular around protecting Client Data
- Failure to comply with legal obligations
- Actions which are intended to conceal any of the above

If you become aware of any such activities or other possible malpractices you are encouraged to report this to your line manager either orally or in writing. You will need to be able to explain the reasons for your concern and Equus will not tolerate spurious or inconsequential allegations.

Equus will investigate all reports promptly and determine the appropriate action. If you make a report, Equus will do everything possible to keep your identity as confidential as possible during the investigation and you may assume that only Equus staff investigating the malpractice concern will know your identity. However, there may be circumstances (for example, if your report becomes the subject of a criminal investigation) where you may be needed as a witness and, once the investigation is complete, the findings may need to be communicated to the individual(s) concerned. Should this be the case we will discuss the matter with you at the earliest opportunity.

Policies

All employees should read and follow our company policies. If they have any questions, they should ask their managers.

Non-Compliance

Our company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include:

- Demotion.
- Reprimand.
- Suspension or termination for more serious offenses.
- Detraction of benefits for a definite or indefinite time.

We may take legal action in cases of corruption, theft, embezzlement or other unlawful behaviour.