

CENOZON

Integrity, Ethics, & Human Rights Policy

Revision no.	Date	Description	Approved by
1	2023-07-18	Management Review	Anton Shouli

Policy Statement

At Cenozon, we are committed to maintaining the highest standards of integrity and ethics in all aspects of our business operations. Cenozon will operate honestly and ethically, complying with all legislation, regulation, and industry standards in the countries and areas in which we operate.

Cenozon has zero tolerance for forced or involuntary labour, corruption, bribery and fraud in all of its forms. The purpose of this policy is to provide employees, stakeholders, partners, and customers with a clear understanding of our commitment to ethical behaviour and to establish a strong ethical culture within the organization.

Cenozon will facilitate effective communication channels to promote open dialogue and enable the reporting of ethical concerns.

Operating with respect, integrity, ethics, and honesty is an integral part of who we are.

Anton Shouli

Anton Shouli, CEO

Objectives

The objective of this policy is to:

- Outline Cenozon's zero tolerance approach to unethical business practices
- Set a code of conduct for individual behaviour and simultaneously establish a framework for accountability
- Ensure compliance with relevant regulations and laws, thereby mitigating risks and fostering a transparent business environment in which honest relationships based upon trust and good reputation are established between Cenozon and its customers, stakeholders, employees, and other third parties

Operating with Integrity

Cenozon will:

- Conduct our business with all third parties including, but not limited to public officials, community members, customers, and suppliers, with honesty, transparency, and fairness
- Not influence the will or objectivity of public authorities, officials, and any other entity through the direct or indirect gifting, offering, or promising of valuable assets and improper payment, in order to obtain undue advantages that infract upon applicable laws
- In no way finance or otherwise support any political party or trade union, including its candidates and representatives
- Ensure business relations are established with individuals and entities that have a good reputation and are committed to similar values of honesty, integrity, and ethics
- Ensure proper financial reporting, accountability and transparency by reflecting business operations, including financial transactions, in the appropriate records accurately and truthfully

Operating with Respect

Cenozon will:

- Treat all individuals with dignity, respect their rights, and foster an inclusive work environment free of harassment, abuse, intimidation, and hostility
- Promote environmentally and socially responsible practices
- **Operate in alignment with international regulations on human rights** including the 'International Bill of Human Rights',¹ International Labor Organization 1998 Declaration on Fundamental Principles and Rights at Work (ILO Declaration),² and the 'United Nations Guiding Principles on Business and Human Rights (UNGPs)'³
- In no way tolerate child labour, compulsory labor of any kind, and other breaches of internationally recognized human rights; all work is to be done voluntarily
- Facilitate our employees' freedom of association and collective bargaining
- Hold in high regard indigenous culture, history, traditions, and rights — and the importance of local indigenous communities

Operating with Ethics

Cenozon will:

- Avoid conflicts of interest; employees are expected to avoid situations that could create, or appear to create, a conflict of interest between their personal interests and those of the company.
 - In the case that the personal interest of any of Cenozon's employees conflicts with the company's interests, Cenozon shall guarantee its ability to act independently

¹ OHCHR. (2022). *International Bill of Human Rights*. OHCHR. <https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights>

² The ILO International Labour Organization. (2019). *The text of the Declaration and its follow-up (DECLARATION)*. Ilo.org. <https://www.ilo.org/declaration/thedeclaration/textdeclaration/lang-en/index.htm>

³ United Nations Human Rights Office of the High Commissioner. (2011). *Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect, and Remedy" Framework*. United Nations. https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

Cont.

- Compete fairly in the marketplace and respect laws and regulations related to anti-competitive behaviour
- Strictly prohibit bribery, kickbacks, facilitation payments, and any form of corruption in our business practices
- Protect the privacy and security of personal and confidential data entrusted to Cenozon, in accordance with applicable laws and regulations
- Maintain our Whistleblower mechanism that allows confidential and anonymous reporting at whistleblower@cenozon.com to encourage employees and stakeholders to report any unethical behaviour or concerns without fear of retaliation
- Promote internal awareness on preventing and combating fraud, corruption, and bribery through education and training

Employee Code of Conduct

Employees are expected to:

- Act honestly, ethically, and in the best interests of the company
- Adhere to professional standards of conduct and comply with all applicable laws, regulations, and company policies
- Maintain the confidentiality and security of sensitive information
- Report any evidence, doubt or suspicion regarding violations of the policy to the appropriate channel of communication

Employees who violate or act contrary to this policy may be subject to disciplinary actions, up to and including termination, in accordance with applicable laws and regulations.

We are committed to regularly reviewing and updating our Integrity, Ethics, & Human Rights Policy to adapt to evolving laws and practices. Feedback is valued and encouraged to ensure the ongoing effectiveness of the policy.