



Ming Yang Europe Code of Conduct



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Message from Leadership

At Ming Yang Smart Energy Group, we are committed to our mission of **“innovating clean energy for all”**.

As we expand our operation across Europe, we carry with us not only our technology expertise, but also our commitment to the highest standard of **integrity, compliance, and sustainability**.

This Code reflects our values and sets expectations for everyone representing Ming Yang Europe: directors, managers, employees, contractors, and business partners. It builds on our Group’s **Sustainability Development Code of Conduct** and addresses the legal and ethical requirements of operating in Europe.

Our success in Europe depends on the quality of our renewable energy solutions and the trust we build with customers, partners, communities, and regulators. Trust comes from ethical behavior, transparent operations, and respect for the laws and cultures of every country where we operate.

All **personnel of Ming Yang Europe** are expected to uphold this Code every day. When facing difficult decisions or questions, ask yourself:

- **Is this lawful?** Is it ethical? Does it align with Ming Yang’s values?
- If you are uncertain, pause and **seek guidance**.
- If you see or **suspect a breach, speak up promptly**. We will support those who raise concerns in good faith.

1. Overview and Scope

1.1 Purpose of this Code

This code of Conduct establishes the behavioural standards and compliance requirements for Ming Yang Europe's operations. It serves as:

- A guide for ethical decision-making in daily business activities
- A framework for compliance with EU and UK legal requirements
- A commitment to stakeholders on our **E**nvironmental, **S**ocial, and **G**overnance standards (**ESG**)
- A foundation for our corporate culture of integrity and excellence

The Code translates the principles of the Ming Yang Smart Energy Group Sustainability Development Code of Conduct into operational requirements specific to our European operations, ensuring full compliance with EU and UK laws, regulations, and international standards.

1.2 Definitions and Application

Definitions

- “**Ming Yang Europe**” means all Ming Yang entities and operations in Europe and the United Kingdom.
- “**Personnel**” means all directors, officers, employees (permanent or fixed-term), temporary staff (including interns and working students), secondees, and agency workers engaged by Ming Yang Europe.
- “**Third Parties**” means agents, consultants, distributors, contractors, suppliers, and other partners acting for, on behalf of or in connection with Ming Yang Europe.

Application

This Code applies to all Personnel of Ming Yang Europe.

It also applies to Third Parties when they act for, represent, or provide services to Ming Yang Europe, or otherwise engage with Ming Yang Europe in the course of business. Ming Yang Europe expects Third Parties to comply with the principles and standards set out in this Code, as relevant to their role and relationship.

1.3 Legal and Regulatory Framework

Ming Yang Europe operates in multiple jurisdictions with varying legal requirements. This Code is designed to ensure compliance with:

- European Union directives and regulations
- United Kingdom laws and regulations
- National laws of European Union Member States where we operate
- Relevant international conventions, principles and standards , including the UN Guiding Principles on Business and Human Rights, the ILO Core Conventions, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Conflict of laws principle: Where local law provides stricter requirements than this Code, local law prevails. Where this Code provides stricter requirements than local law, this Code prevails. Any conflict must be reported to the Ming Yang Europe Legal and Compliance Department for resolution.

1.4 Your Responsibility

1.4.1 Responsibilities of Everyone

All of us are responsible for living our values and meeting our legal and ethical obligations. In practice, this means you should:

- Understand and comply with this Code and all applicable policies
- Complete required training on the Code and specific compliance topics
- Seek guidance when uncertain about the right course of action
- Report suspected violations promptly through available channels, and cooperate fully with internal investigations
- Treat colleagues, customers, partners, and communities with respect and professionalism.

1.4.2 Responsibilities of Managers

Managers have a special responsibility to set the tone and create the right conditions for compliance. Managers are expected to:

- Lead by example and model ethical behaviour
- Communicate the importance of compliance to your teams

- Create an environment where employees feel safe raising concerns
- Ensure your team receives appropriate training
- Monitor compliance with the Code and policies in your area of responsibility
- Take prompt action when violations are identified
- Protect whistleblowers from retaliation

1.5 No Excuse for Violations

Business pressure is never an excuse for violating this Code. Meeting financial targets, winning contracts, or satisfying customers does not justify unethical or illegal behaviour. Ming Yang Europe will not tolerate violations of this Code even if they are intended to benefit the company.

If you are asked to violate this Code by a manager, colleague, customer, or business partner, you must refuse and report the request immediately (See Section 7).

1.6 How do we ensure this Code is Effective?

We maintain a risk-based compliance programme that includes training, advice and escalation routes, internal controls, third-party due diligence, and periodic monitoring. We review trends from reports, audits, and incidents, remediate root causes, and update this Code and supporting policies when risks, business activities, or laws change.

2. How We Work Together



2.1 What is Our Commitment to Equal Opportunity?

We provide equal employment opportunities and base all employment decisions on merit, qualifications, and business needs. Discrimination on the basis of race, color, ethnicity, national origin, religion or belief, sex, gender identity or expression, sexual orientation, age, disability or medical condition, pregnancy or maternity, marital or civil partnership status, political opinion, trade union membership, or any other characteristic protected by applicable law is strictly prohibited.

This commitment applies to every stage of the employment relationship, including recruitment, compensation, training, promotion, performance management, and disciplinary decisions.

2.2 What is Prohibited of Harassment and Bullying?

We provide a workplace free from harassment and bullying. Harassment means any unwanted behaviour related to protected characteristics that creates an intimidating, hostile, offensive, or humiliating environment or harms work performance.

This includes offensive jokes and slurs, unwanted physical contact, displaying inappropriate images, sexual advances or comments, bullying through emails or messages, and repeated aggressive behaviour intended to intimidate someone. All employees and managers must create a respectful workplace and report any harassment or bullying they see right away.

Harassment by customers or other third parties is also prohibited and must be escalated.

We take proactive steps to prevent sexual harassment, including harassment by third parties, and we expect all managers to act promptly and appropriately when concerns arise.



2.3 How do we Respect Human Rights?

We respect internationally recognized human rights as outlined in the UN Guiding Principles on Business and Human Rights and the ILO Core Conventions.

We strictly prohibit:

- Forced labour, human trafficking, or restrictions on freedom of movement
- Child labour and the employment of anyone below the minimum legal working age in the country where the work is performed
- Withholding identity documents or requiring deposits from workers
- Any form of physical punishment, threats, or coercion

We respect employees' rights to form, join, or refrain from joining labour unions and to engage in collective bargaining where legally recognized.

2.4 What are the rules on working hours and compensation?

Ming Yang Europe complies with all applicable laws and regulations relating to working time, rest periods, and compensation in the countries in which we operate.

Employees are expected to work in line with their contractual arrangements and applicable local requirements. Any overtime or additional working time must be managed in accordance with local laws, company policies, and individual contractual terms.

We are committed to fair and lawful compensation practices and to respecting employees' wellbeing and work-life balance.

2.5 How do we ensure workplace health and safety?

Ming Yang Europe provides a safe and healthy work environment. We conduct risk assessments, provide required PPE (Personal Protective Equipment) at no cost, establish emergency procedures, and maintain incident records.

All personnel must:

- Follow all safety rules and procedures
- Use equipment safely and wear required PPE
- Report hazards, incidents, and near misses immediately
- Never work under the influence of substances that impair safety
- Exercise the right to remove yourself from situations of serious and imminent danger

Remember:

We prohibit all forms of workplace violence, including:

- ☒ Physical violence
- ☒ Threats
- ☒ Intimidating behaviour
- ☒ Bringing weapons onto company premises

3. How We Protect Information and Assets



3.1 What is confidential information?

Confidential information includes all non-public information about Ming Yang Group, our customers, suppliers, and partners that could be valuable to competitors or harmful if disclosed. Examples include business strategies, financial information, technical specifications, customer lists, employee data, and research projects.

3.2 How must I protect confidential information?

- Use confidential information only for authorized business purposes
- Share information only with colleagues who have a legitimate need to know
- Never discuss confidential information in public places
- Secure documents and lock workspaces when unattended
- Return or destroy all confidential information when leaving the company

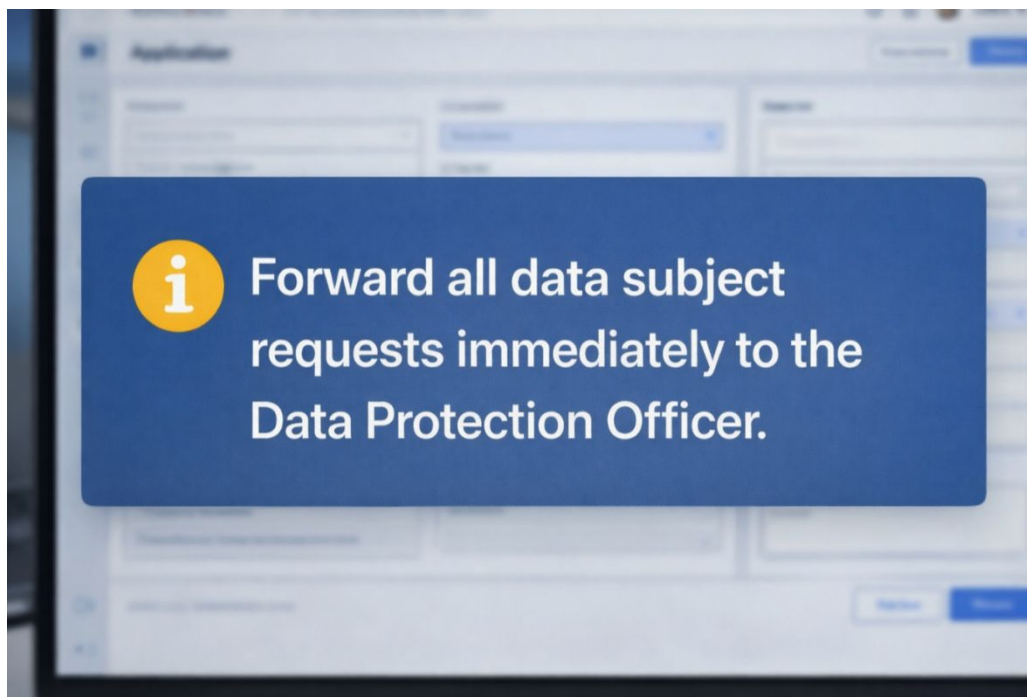


3.3 How do we protect personal data?

Ming Yang Europe is committed to protecting personal data in accordance with GDPR, UK Data Protection Act 2018, and national data protection laws.

When processing personal data, we must:

- Process only for legitimate business purposes
- Access only what is necessary for our job
- Keep data secure and never share passwords
- Use approved systems only
- Encrypt data when transmitting
- Report breaches immediately (within 24 hours) to the Data Protection Officer
- Delete data when no longer needed



3.4 How do we use information technology securely?

- Use strong passwords and multi-factor authentication
- Never share login credentials
- Lock devices when unattended
- Keep software updated
- Avoid public Wi-Fi for sensitive business activities
- Report lost or stolen devices immediately
- Be vigilant against phishing: verify sender identity before clicking links or opening attachments

3.5 Who owns intellectual property I create?

Ming Yang Europe owns all intellectual property created during employment that relates to our business, including inventions, designs, software, and technical documentation. We must promptly disclose inventions and assist with protection efforts. We never use company IP for personal benefit.

We respect third-party intellectual property rights: never use unlicensed software, copy materials without permission, or misappropriate trade secrets.

3.6 How do we handle records retention and record preservation instructions?

Keep records in line with our retention rules and applicable laws. Do not delete, hide, change, backdate, or destroy records to avoid scrutiny or to make something look better.

If Legal and Compliance issues a record preservation instruction relating to an investigation, audit, dispute, or regulatory request, you must keep all relevant records and follow the instructions provided. If you are unsure what to keep, ask Legal and Compliance.

3.7 How do we communicate externally and use social media?

Only authorised spokespeople may speak on behalf of Ming Yang Europe to the media, regulators, investors, or the public. Do not disclose confidential information, personal data, or make false or misleading statements.

When using personal social media, make clear you speak in a personal capacity, not for the company. Remain respectful and professional, and do not post content that could reasonably undermine trust in Ming Yang Europe, or breach confidentiality, data protection, or competition rules.

4. How We Conduct Business

4.1 What is our position on bribery and corruption?

Ming Yang Europe has zero tolerance for bribery and corruption. We comply with the UK Bribery Act, applicable EU/Member State anti-bribery laws, national anti-corruption laws, and the OECD Convention on Combating Bribery of Foreign Public Officials.

We never offer, promise, give, request, or accept anything of value to improperly influence a decision or gain an unfair advantage. This includes bribes to public officials or private counterparties, using third parties to channel improper payments, and facilitation payments.



4.2 What are the rules on gifts and hospitality?

Gifts and hospitality may only be offered or accepted when **modest, infrequent, clearly related to legitimate business purposes**, and **never intended to influence** a decision or create an obligation.

You must never:

- offer or accept cash or cash equivalents, including gift cards or vouchers
- request or solicit gifts or hospitality
- offer or accept anything lavish, inappropriate, or linked to an improper advantage
- provide gifts or hospitality to family members or personal friends of a business contact
- offer or accept gifts or hospitality during an active tender, procurement process, or contract award decision involving the counterparty

Public officials and public bodies:

Any gift, hospitality, travel, sponsorship, or donation connected to a public official or public body requires Compliance pre-approval regardless of value. No gifts or hospitality are permitted during tenders or procurement.

If you are unsure whether someone is a public official, treat them as one and seek advice.

Meals, travel, and events:

Reasonable meals directly linked to a legitimate meeting may be acceptable within thresholds. Travel, accommodation, per diems, entertainment, or event tickets require prior written approval in line with applicable policy and must never be used to influence decisions.

Recording requirement:

All gifts and hospitality offered or received must be recorded promptly and accurately in the gifts register in accordance with internal procedures.

If in doubt, decline and seek guidance from Compliance before proceeding.

4.3 How do we handle conflicts of interest?

A conflict of interest arises when personal interests interfere or appear to interfere with Ming Yang Europe interests.

Potential conflicts include financial interests in competitors, suppliers, or customers, outside employment with business partners, family or personal relationships in reporting lines, and receiving benefits that could influence business decisions.

All actual, potential, or perceived conflicts must be disclosed promptly to your line manager and HR. Failure to disclose may itself breach this Code.

4.4 How do we ensure fair competition?

Ming Yang Europe competes fairly and complies with EU and UK competition law. We strictly prohibit price fixing, market allocation, bid rigging, sharing competitively sensitive information with competitors (pricing, costs, capacity, strategies), and abuse of market dominance.

When interacting with competitors at industry events, avoid discussions about prices, costs, customers, or future plans. If inappropriate topics arise, object immediately, leave the conversation, and report the incident.

4.5 How do we maintain accurate business records?

All business records must be accurate, complete, timely and truthful. We should never make false entries, create off-book accounts, backdate documents, destroy records improperly, or conceal information from auditors or relevant reviewers.

This applies to all records in any format, including financial statements, expense reports, time sheets, contracts, quality and testing records, health and safety records, and any communications, filings, or submissions to regulators and other public authorities.

4.6 What are the rules on procurement and tender integrity?

We conduct procurement and tendering with integrity. Do not collude, coordinate bids, agree not to bid, or share bid strategy or pricing with competitors.

Do not offer, request, or accept anything of value to influence a tender, a specification, an evaluation, or a contract award. During active tenders or procurement processes, gifts and hospitality must not be offered or accepted.

All tender submissions and supporting documents must be accurate, complete, and approved in line with internal authorisation rules. If you suspect improper influence, conflicts of interest, or bid rigging, stop and report.

4.7 How do we comply with sanctions export controls and customs rules?

We must not transact with sanctioned or restricted parties, including through intermediaries, resellers, agents, or routing through third countries, or in prohibited jurisdictions. Where required, we must screen counterparties, intermediaries, end users, and projects before engagement and before payment, shipment, or service delivery.

We must comply with export control and customs requirements, including accurate classification, valuation, origin, licensing, and documentation. Do not misclassify goods or services, undervalue invoices, falsify end-use or end-user information, or route shipments or payments to circumvent controls.

If you are unsure, stop and escalate to Legal and Compliance before proceeding.

4.8 What is prohibited fraud or misuse of company resources?

Fraud is strictly prohibited. This includes theft, misuse of company assets, false expense claims, fictitious invoices, kickbacks, manipulating project data, misrepresenting performance, or bypassing approval processes.

Never create or approve payments without a legitimate business purpose and appropriate documentation.

Ming Yang Europe maintains risk-based controls to prevent fraud by Personnel and Third Parties and expects full cooperation with monitoring and investigations.

If you suspect fraud or financial misconduct, report it immediately via Section 7.

4.9 How do we prevent money laundering and suspicious payments?

We must understand who we are doing business with and the source of funds where relevant. Escalate before proceeding if you see red flags such as unusual payment routes, requests for cash, third-party payments that do not match the contract, reluctance to provide ownership information, or inconsistent documentation.

If in doubt, stop and consult your line manager, Finance and Legal and Compliance team before proceeding

4.10 What are the rules on charitable donations, sponsorship, political activity, and lobbying?

Charitable donations and sponsorship must be legitimate, transparent, properly recorded, and approved in line with internal controls. They must never be used to disguise bribery or to obtain an improper advantage.

Corporate political donations are not permitted unless expressly authorised under applicable law and approved in advance by senior management and Compliance.

Any lobbying or engagement with public officials on behalf of Ming Yang Europe must be authorised, accurate, and documented.

5. How We Protect People and Environment



5.1 What is our environmental commitment?

As a renewable energy company, environmental sustainability is core to our mission. We are committed to minimizing environmental impact, complying with all environmental laws , and continuously improving our performance.

All personnel must:

- Understand and comply with environmental requirements relevant to their work
- Obtain required permits before starting new projects
- Monitor environmental performance
- Report environmental incidents or spills immediately
- Cooperate with environmental inspections

5.2 How do we address climate change?

We address climate change by tracking and reducing energy consumption and greenhouse gas emissions across our operations and, where relevant, our value chain. This includes supporting the Group's Scope 1, Scope 2 and Scope 3 greenhouse gas inventory and product carbon footprinting activities (including, where applicable, product carbon footprint verification), using reliable data and consistent methodologies.

In line with the climate commitments of Ming Yang Smart Energy Group, we set and implement measurable actions appropriate to our European operations, improve energy efficiency, increase the use of clean energy where feasible, and support the Group's net-zero ambition through clear governance and transparent reporting.

We use resources efficiently through energy conservation, waste minimization (prevent, reuse, recycle), water conservation, and sustainable procurement.

We support the Group's climate and decarbonisation goals and will set and implement measurable actions appropriate to our European operations, in line with applicable legal and reporting requirements.

5.3 How do we protect biodiversity?

Where operations may affect natural habitats, we conduct environmental impact assessments, implement avoidance and mitigation measures, protect endangered species and sensitive habitats, and restore or offset impacts where needed.

6. How We Manage Our Supply Chain



6.1 What do we expect from suppliers?

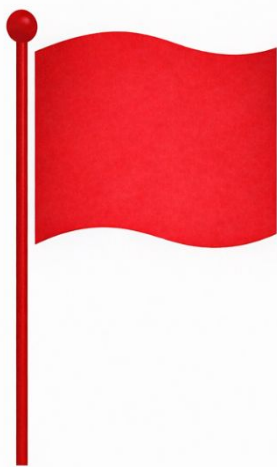
Ming Yang Europe expects suppliers, contractors, and business partners to uphold standards consistent with this Code, specified within Ming Yang's "Sustainability Suppliers Code of Conduct", including legal compliance, human rights respect, ethical business conduct, environmental responsibility, health and safety protection, and data protection.

6.2 How do we assess and monitor suppliers?

Before engaging suppliers, we conduct risk-based due diligence assessing legal compliance, labour practices, environmental performance, and anti-corruption controls.

We monitor supplier performance through contractual requirements, periodic audits, and incident tracking. Where suppliers fail to meet standards, we request corrective action and may suspend or terminate relationships for serious or persistent non-compliance.

Third-party intermediaries (agents, consultants) undergo enhanced due diligence and sign agreements with anti-corruption provisions.



Red Flags Requiring Scrutiny

Additional investigation is required before engagement where there are:

- ☒ Unusual payment requests
- ☒ A vague scope of services
- ☒ Excessive compensation
- ☒ Close relationships with officials
- ☒ A reputation for unethical conduct

7. Speaking Up and Seeking Guidance



We speak openly about
risks, concerns, and uncertainties.

7.1 What should I report?

All personnel have a duty to report suspected violations of this Code, company policies, laws, or any serious concerns including:

- Fraud, theft, bribery, or corruption
- Conflicts of interest
- Discrimination, harassment, or retaliation
- Competition law violations
- Data breaches or privacy violations
- Environmental incidents
- Unsafe working conditions
- Accounting irregularities

When in doubt, report:

Better to raise a concern that is unfounded than to remain silent about a potential violation



7.2 How can I report or seek guidance?

Reporting channels include:

- Direct manager (unless involved in the matter)
- Human Resources Department
- Legal and Compliance Department
- Whistleblower channels (phone and online portal), including anonymous reporting permitted by law
- Senior management
- External authorities in accordance with applicable law

All concerns will be investigated promptly and handled confidentially to the extent possible.

7.3 Will I be protected if I report?

Ming Yang Europe strictly prohibits retaliation against anyone who reports violations in good faith, participates in investigations, or refuses to engage in conduct violating this Code.

Retaliation includes termination, demotion, threats, harassment, negative evaluations, denial of promotions, or any adverse employment action.



Retaliation is a serious violation:

- ☒ Disciplinary action up to termination will result
- ☒ Regardless of whether the underlying concern is substantiated
- ☒ If you experience **retaliation**, report it immediately

7.4 What happens after I report?

All concerns will be:

- Investigated promptly by qualified personnel, led by the relevant function, with Compliance oversight and advice on a risk based basis
- Handled confidentially to the extent possible
- Documented and tracked through resolution
- Resolved through appropriate corrective action

You must cooperate fully if interviewed and maintain confidentiality about the investigation.

Where required by applicable law, we will acknowledge receipt and provide follow-up information within the relevant timelines, unless doing so would compromise the investigation or is not legally permissible.

8. Consequences and Compliance Governance



8.1 What are the consequences of violations?

Compliance with this Code is a condition of employment. Violations will result in disciplinary action appropriate to the nature and severity of the violation, which may include:

- Verbal or written warning
- Mandatory training
- Performance improvement plan
- Suspension
- Demotion or reassignment
- Termination of employment
- Legal action for serious violations

Managers have heightened accountability. Managers who violate the Code, fail to create a culture of compliance, or retaliate against employees will face serious consequences including potential termination.

Violations may also constitute violations of law, potentially resulting in civil liability, criminal prosecution, regulatory enforcement, or personal liability.

8.2 What training is required?

All new staff members must complete Code of Conduct training within 30 days of hire. All staff members must complete annual refresher training.

Role specific training is provided on a risk basis, depending on job function and responsibilities, in line with the Company's training plan.

All managers must complete annual compliance certification confirming they have read and understand the Code, complied during the reporting period, completed training, and disclosed any conflicts.

8.3 Who administers this Code?

The Compliance Department is responsible for maintaining this Code, providing guidance on its interpretation, and coordinating its implementation through a risk-based compliance programme, including reporting to senior management and the Compliance Committee.

- Business leaders and line managers are responsible for applying this Code in day-to-day decisions and for ensuring their teams complete required training and follow relevant procedures.
- Human Resources is responsible for coordinating Code training and employee communications, maintaining acknowledgements, and supporting a respectful workplace culture.
- Legal, Human Resources, and other relevant functions may conduct or support investigations as appropriate, with the Compliance Department overseeing the process and advising based on risk.
- The Compliance Committee provides oversight of this Code by receiving compliance reporting, reviewing significant matters, ensuring adequate resourcing, supporting implementation, and approving updates where appropriate
- The Board of Directors provides overall oversight of the Company's ethics and compliance framework and receives reporting on significant compliance matters.

This Code will be reviewed periodically to ensure it remains effective and aligned with applicable laws and company policies. Material updates will be communicated and may require acknowledgment.