

Adastra Principles of Conduct



1. Introduction

Adastra is committed to conducting business in an ethical, transparent, and responsible manner. This Code of Conduct reflects **our shared global values of customer success, continuous learning, quality excellence, integrity, diversity, and collaboration**. It is designed to foster a respectful, inclusive, and professional work environment where everyone: employees, sub-contractors, and agency workers alike, upholds these values through everyday actions and decisions.

Rooted in courtesy and common sense, these Principles of Conduct are here to support your success and Adastra's. You may find many of them already align with the way you work.

4.1 Purpose and Scope

The Code of Conduct applies to all our customers, consultants, distributors, agents, partners that provide products or services to Adastra worldwide, or that are engaged or instructed to act for or on behalf of Adastra, suppliers (and sub-contractors if used while engaging with Adastra), and other representatives ("Business Partners").

Compliance with local laws and adherence to the Code is always expected. The Code of Conduct does not supersede legislation; if the two are in conflict, legislation takes precedence. In cases where the Code sets a higher standard than local legislation, the Code should prevail. Adastra complies with all applicable laws and regulations in every location where we operate.

4.2 Respect for Human Rights

Adastra recognizes that respecting human rights is a fundamental part of conducting business with integrity. We are committed to ensuring that our actions, decisions, and partnerships uphold the dignity and rights of every individual. Our approach is guided by principles of fairness, inclusion, transparency, and accountability, and goes beyond compliance with laws. For more detailed information on our human rights commitments and how we embed them into our operations, please refer to the *Global Human Rights Policy*.

The Code of Conduct is valid in the English language. Where there are different language versions of this document, these shall be considered translations only.

2. Core Principles

4.3 Treat People with Respect and Courtesy

Treat all individuals, including superiors, peers, and subordinates, with respect and courtesy. Treating people with courtesy costs you nothing and will pay valuable dividends in creating pleasant and productive working relationships.

Foster an environment free from discrimination, harassment, or offensive behavior. Report any incidents to a manager or Human Resources.

We affirm our commitment to diversity, equity, and inclusion, ensuring that all employees, customers, and stakeholders feel valued, respected, and empowered, regardless of background, identity, or experience.

Support an inclusive workplace by adhering to the following conduct standards:

- Treat others with dignity and respect always.
- Address and report inappropriate behavior and comments that are discriminatory, harassing, abusive, offensive, or unwelcome.
- Avoid slang or idioms that might not translate appropriately across cultures.
- Confront the decisions or behaviors of others that are based on conscious or unconscious biases.
- Be open-minded and listen when given constructive feedback regarding others' perception of your conduct.

4.4 Keep Confidences

Keep all clients, company, and personal employment information confidential, sharing only with appropriate parties when permitted. Do not share client information outside of the client or Adastra without client's express permission. When someone shares information with you and asks that you keep it confidential you should do so, unless keeping the confidence will cause someone harm or will conceal an illegal, unprofessional, unethical, or immoral act. Protecting trust is vital for sustaining strong relationships.

4.5 Dress for Success

Dress appropriately for the client's business culture, whether it's business, business casual, or casual. Special events like executive presentations or social functions may require different attire, so assess and adjust accordingly. Always ensure your clothing is clean, neat, and in good condition, and regularly review your grooming. Remember, appearance impacts impressions of both you and Adastra.

4.6 Resolve Conflicts in an Appropriate Manner

- Conflicts are inevitable in business, often due to differing experiences and cultures.
- Handle conflicts professionally (directly and constructively); ideally face-to-face or via video call, avoiding email, which can escalate issues.
- Avoid shaming others by sharing your views widely in an email; this is rude and counterproductive.
- Focus on understanding the other perspective before presenting your own, aiming for a resolution that's acceptable to all parties and mutually beneficial.
- Address the problem, not the people involved. Focus on solving the problem without targeting individuals. If you can't resolve a conflict, escalate it to the appropriate Adastra manager or HR.

4.7 Communicate Clearly and Respectfully

- You should always converse and communicate in the language of the workplace or client. Communicating in a language that is not understood by your coworkers, or the client will invite unwelcome suspicion of your actions and motives.
- Vulgar language should never be used in a business context.

4.8 Take Making and Keeping Commitments Seriously

- Dependability is a highly valued trait in both things and people. Never make a commitment that you don't feel you can meet. Once you have made a commitment you must strive to meet the commitment.
- Be as clear as possible when making a commitment on what you are committing to and any assumptions or pre-requisites that keeping the commitment is contingent upon.

- If a change in circumstance dictates that a commitment must be broken this should be communicated as soon as possible to the appropriate Adastra manager.

4.9 Take Responsibility for Mistakes

We all make mistakes. This is one of the ways that we learn. When you make a mistake, you should:

- Acknowledge and take responsibility for the mistake.
- Try to correct the mistake.
- Learn from the mistake and don't repeat it.
- Share the experience with your team so that everyone can learn from it.

4.10 Be Value-Driven and Action Oriented

You should always be aware of the value that you are bringing to the company and on the lookout for further opportunities to add value to both the client and Adastra. For example, if you are unable to make progress on an assignment and are idle because of a problem outside of your control, ensure that you immediately and clearly communicate this fact to the appropriate Adastra manager.

Also think outside the box about solutions and share those with your Adastra manager. Act. Be proactive. Problem solve.

4.11 Be Generous with Praise, and Careful with Criticism

Everyone likes to be appreciated and have their contributions acknowledged and appreciated. You should always recognize and provide positive feedback whenever appropriate. You should always recognize the contribution of others when you are praised for your contribution.

You must always be careful with criticism. Even legitimate and constructive criticism can be a poison if it is given in an inappropriate manner or circumstance. Constructive criticism should be discussed first with an Adastra manager who would provide guidance on how to deal with the issue.

3. Business Ethics

Adastra's commitment to ethical behavior is central to our operations globally. All Adastra staff and third-party partners are expected to uphold these standards, ensuring compliance with applicable laws and fostering a workplace culture of trust, integrity, and respect.

We strictly comply with all applicable laws and regulations on bribery, corruption, conflicts of interest, and prohibited business practices, and will never offer, promise, or give anything of value to improperly influence a decision.

3.1 Act with Integrity and Authenticity

Represent Adastra truthfully and with authenticity, avoiding any misrepresentation. Maintain unwavering commitment to honesty, integrity, and ethical behavior in all actions. These principles extend to how we engage with our partners, clients, and colleagues, fostering a foundation of trust.

3.2 Compete Fairly

Adastra values fair competition and complies with antitrust laws. Avoid agreements that could be considered anti-competitive and always operate independently and transparently when making business decisions, from pricing to marketing.

3.3 Avoid Conflicts of Interest

Avoid any relationship or activity that might impair, or even appear to impair, your ability to make objective and fair decisions when performing your job. Never use Adastra or Client property or information for personal gain or personally take for yourself any opportunity that is discovered through your position with Adastra.

Here are some examples in which conflicts of interest could arise:

- Having personal interest, financial interest or potential gain in any Adastra or Client transaction.
- Placing company business with a firm owned or controlled by your family.
- Accepting gifts, discounts, favors, or services from a client, potential client, competitor or supplier, unless equally available to all Adastrans.
- Determining whether a conflict of interest exists is not always easy to do. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest,

or if you have a question about conflicts of interest, you should seek advice from an Adastra manager or Human Resources.

3.4 Respect for Client Policies and Practices

All clients will have certain policies and practices that guide the behavior of both their employees and anyone they engage. You should always conform to these practices and policies wherever possible. If you encounter a practice or policy that you cannot conform to, you should escalate the matter to the appropriate Adastra Resource Manager. You should never take undue advantage of a client's practices or policies by misusing or abusing them.

Suppliers and Third Parties: We require commitment to our Supplier Code of Conduct, audit rights, cascading of requirements to sub-suppliers, and cooperation on corrective action plans. In cases of serious and unresolved breaches we may suspend or terminate the relationship.

3.5 Do Not Accept Bribes or Fraud

Adastra prohibits all forms of bribery, facilitation payments, and extortion. Staff must not offer, accept, or engage in bribery or any other unethical practices. Any form of gift, payment, or benefit that could appear illegal or corrupt is unacceptable. This policy applies worldwide, adhering to laws relevant to each Adastra location.

3.6 Prevention of Money Laundering

Adastra is committed to preventing money laundering. We implement due diligence for all business relationships, conduct regular staff training on identifying suspicious transactions, and report any relevant activities to authorities as per applicable local laws. As part of our commitment, we are implementing an Anti-Money Laundering (AML) policy within a broader package that also includes our Global Code of Conduct and Human Rights policies.

3.7 Financial Integrity and Responsibility

Maintain accurate and truthful financial records. Staff are expected to follow all accounting procedures and report business transactions with integrity, ensuring compliance with Generally Accepted Accounting Principles (GAAP) and avoiding any actions that could be perceived as fraudulent.

3.8 Data Protection and Confidentiality

Data Protection and Confidentiality: Adastra upholds strict data protection and information security controls. Staff must handle personal and business data lawfully and securely, in line with applicable data protection laws in each Adastra location and internal policies. Protect sensitive information from unauthorized access, loss, or disclosure, follow access control and retention rules, and promptly report suspected breaches.

Digital Rights: In line with our Human Rights Policy, we commit to privacy by design and to the ethical and transparent use of data and artificial intelligence. We work to prevent discriminatory outcomes in digital tools and services and apply appropriate human oversight and explainability where feasible. We also consider children's protection and overall digital safety when we design, build, or deploy technology.

3.9 Intellectual Property and Plagiarism

Respect intellectual property rights. Only claim credit for your original work and properly cite sources. Use third-party intellectual property only with the correct permissions, protecting the rights and creative contributions of others.

3.10 Training, Audits, and Whistleblower Protection

All staff are familiar with the full set of documentation related to our Business Ethics Policy. This includes *the Global Code of Conduct*, *the Anti-Money Laundering (AML) Policy*, and *the Global Human Rights Policy*. We conduct periodic audits to ensure compliance and effectiveness of our ethics program. Adastra supports a whistleblower policy, ensuring staff can report misconduct without fear of retaliation.

4. Workplace and Social Responsibility

Adastra is committed to upholding internationally recognized human rights in line with the UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Core Conventions, and other relevant international standards. The principles in this section are complemented and further detailed in our Global Human Rights Policy, with which all employees are familiar.

We promote diversity and inclusion across all aspects of our workforce, valuing differences in gender, age, disability, sexual orientation, ethnicity, nationality, religion, and other personal characteristics. We also recognize the importance of work-life balance as part of employee well-being and support flexible, fair, and respectful working conditions.

Through these commitments, we aim to foster a safe, inclusive, and equitable workplace for everyone, while aligning our practices with ESG and CSRD requirements and continuously improving in response to evolving global standards.

4.1 Uphold Fair Labour and Human Rights

Adhere to fair working conditions, including contracts, compensation, and working hours. Respect staff's rights to time off.

4.2 Promote Diversity

Promote diversity in hiring and workplace practices. Address biases and strive for gender balance.

Adastra respects the feelings and actions of others and does not tolerate any form of discrimination or harassment in the workplace.

4.3 Substance Abuse and Safety

Adastra has zero tolerance for drugs, alcohol abuse, weapons, or inappropriate content within the workplace. We also do not tolerate or permit threats, violence, or other disruptive behavior in our work environments.

- Protect Company Property and Use Technology Wisely
- Treat Adastra and client property, whether material or intangible, with respect and care. You should protect company facilities and other material property (e.g. company cars, computers) from damage, vandalism or theft, whenever possible.
- Adastra complies with current laws, regulations, and Company practices related to the safety and health of staff, the workplace, and our products and services.
- **Electronic Devices:** Use your electronic devices (cell phone, laptop, tablet, etc.) responsibly at work, ensuring it doesn't distract you or others. Follow these simple guidelines:
 - Use it for business purposes (calls, apps, calendars, etc.).
 - Keep personal calls brief and take them in a private area.
 - Avoid excessive messaging or gaming.
 - Never use your electronic devices while driving a company vehicle.

- Don't record confidential information or access inappropriate content on the company or client networks.
- **Corporate Email:** Email is vital for work; check it regularly and use it primarily for professional purposes. Limited personal use is permitted:
- Work-related: Use your corporate email freely for job-related tasks, including signing up for newsletters or services supporting your role.
- Personal use: Use email for personal matters occasionally, keeping it secure and avoiding spam or sharing confidential information.
- Client email accounts should be used only for work-related purposes.

4.4 Security Practices

Adastra will never misuse private or public security forces in the protection of its projects. All security measures will prioritize the safety and well-being of individuals and will comply with applicable laws and ethical standards.

5. Environmental Responsibility

5.1. Stay Sustainable and Safe

- Comply with all applicable environmental laws and strict local or international standards.
- Reduce resource consumption, manage waste responsibly, and ensure safe handling and disposal of hazardous materials.
- Meet requirements for chemical and waste management, wastewater treatment, air emissions control, environmental permits, and reporting.
- Respect the rights of individuals and communities to land, forest, and water resources, and prevent practices such as forced evictions that could harm these rights.
- Recognize the link between these resources and the livelihoods, cultures, and identities of local and indigenous communities.
- For more detailed information on our environmental commitments, goals, and practices, please refer to the *Adastra Group Environmental Policy*, available [\[LINK\]](#).

6. Raising Concerns and Whistleblower Protection

- Adastra encourages speaking up and is committed to a safe, fair, and confidential process for handling concerns. This mechanism applies to employees and third parties in all locations and is harmonized with our *Global Human Rights Policy* and local laws. Reports are handled discreetly, and anyone reporting in good faith is protected from retaliation. Nothing in this section limits the right to report to competent authorities.
- Grievance and Speak-Up Mechanism
- **Scope and Access:** Employees and third parties can report concerns about human rights, discrimination or harassment, ethics, data protection, or digital rights at any time. Reports may be submitted to line management, who promptly inform the Global Chief People Officer, or directly to the Global Chief People Officer using the designated contact details [vladimira.carroll@adastragrp.com]. Confidentiality is ensured and retaliation is strictly prohibited.
- **Owner:** The Global Chief People Officer oversees the process and coordinates HR, and Legal to ensure timely follow-up.
- **Process and timelines:** Acknowledgement is provided within 7 calendar days, triage and assignment occur within 10 business days, immediate action is taken if there is imminent risk, and the target is to conclude within 90 days. If additional time is required, updates are provided at least every 30 days.
- **Outcome and Remediation:** Findings lead to corrective actions, for example training, disciplinary measures, policy changes, or a supplier corrective action plan. The reporter receives a summary of the outcome, subject to privacy and legal limits.
- **Recordkeeping and Learning:** Cases are documented in line with law and internal policy, and aggregated insights inform prevention efforts and annual reporting.