



Code of Conduct

March 2024



**effo**

At Effo we are committed to conducting our business to the highest standards of ethics, integrity, and responsibility. This Code of Conduct (the “Code”) outlines the principles and guidelines that govern the actions and decisions of our employees, officers, and representatives.

The purpose of the Code is to create a sound corporate culture preserving the integrity of Effo by helping employees to promote standards of good business practice. Further, the Code is intended to be a tool for self evaluation and a vehicle for development of Effo’s identity.

1. Compliance with Laws and Regulations

The management in Effo will assist in ensuring that we comply with all applicable laws and regulations in the countries and regions where we operate. This includes environmental, health and safety, and labor laws, among others.

2. Ethical Conduct

We will conduct our business with honesty, integrity, and transparency. We will not engage in unethical practices, including bribery, corruption, or any form of illegal or unethical behavior.

3. Health and Safety

The health and safety of our employees, contractors, and the communities in which we operate are of the utmost importance. We will maintain a safe and healthy work environment and strive to prevent accidents and injuries.

4. Environmental Responsibility

We are committed to minimizing our environmental impact. This includes sustainable resource management, energy efficiency, and the responsible use of natural resources.

5. Quality Management

We strive for excellence in our products and services, meeting or exceeding customer expectation. Our commitment to quality includes continuous improvement and adherence to ISO 9001 standards.

6. Confidentiality and Data Protection

We will protect the confidentiality of sensitive information, including customer data, business plans, and intellectual property. We will comply with data protection laws and regulations.

All employees keep corporate and other matters confidential to prevent the risk of authorizing third party access to confidential information.

Only the CEO and the Chairman of the Board of Effo is entitled to make public statements on behalf of Effo.

7. Fair Competition

We will compete fairly and ethically in the marketplace, adhering to antitrust and competition laws. We will not engage in unfair business practices, collusion, or anti-competitive behavior.

Effo requires all employees to be loyal to Effo, and to refrain from actions or interest that make it difficult to perform their work objectively and effectively.

All employees have a responsibility to notify Effo of any situation where they have a material interest, direct or indirect, in a transaction or other matter entered into by Effo or binding Effo.

Conflicts of interests should be avoided.

8. Respect for People

Effo shall be a professional and positive workplace with an inclusive working environment. We treat all individuals with dignity and respect, free from discrimination or harassment. All employees are to help to create a work environment free from any discrimination.

Effo and its business partners shall not exploit children as a labour force.

9. Reporting Violations

Employees are encouraged to report any violations or concerns regarding the Code. Reports can be made anonymously, and there will be no retaliation for reporting in good faith.

Conclusion

The Code reflects our commitment to ethical business practices and responsible corporate citizenship. All employees and representatives are expected to uphold these principles in their daily activities.

Adopted by the Board of Directors on 19 March 2024