



## Anasia Code of ethics & Conduct V.1

At Anasia, we inspire and enable every employee to thrive personally and professionally in a culture that values excellence, fairness, and shared success.

Our Code of Business Conduct & Ethics is your guide to making sound choices, treating everyone fairly, and winning business ethically.

**Living the Anasia Values:** Understanding and following the Code is key to maintaining our company culture and reputation. The Code provides a wealth of resources to help you make the best decisions in any business situation.

**Beyond the Guidelines:** The Code is a framework for ethical decision-making, not a rulebook for every scenario. Use it to guide your choices, and ask questions when needed.

### **1. Who this Code Applies To**

Everyone at Anasia plays a part in upholding our ethical culture and business practices. This includes everyone from full-time and part-time employees to our Board of Directors, regardless of location, position, or company affiliation (including segments, platforms, and operating companies). We're all in this together, and by following the same rules, we build a stronger Anasia.

#### **Our Business Partners**

We also expect our business partners – Vendors, suppliers, consultants, agents, and others – to act ethically and in accordance with our Code and other relevant policies. We won't do business with anyone who doesn't meet our high standards or undermines our values.

### **2. Ethical Responsibility**

**Leaders** (including managers and above) have a **special responsibility** at Anasia. Your actions, words, and even body language significantly influence the team. You play a critical role in shaping employee perception of whether ethical behavior is truly valued here. In short, **you set the tone for ethical conduct** on your team.

#### **Diversity is Our Strength**

At Anasia, we celebrate our diverse workforce. It enriches our company culture, strengthens our communities, and fuels our success. We believe everyone deserves to be treated with respect, and their unique skills, ideas, and backgrounds are valuable assets.

### **3. A Safe and Inclusive Workplace**

We're committed to a professional work environment free from discrimination and harassment. We follow all labor and employment laws, ensuring equal opportunity for



everyone. This means qualified applicants and employees, with or without reasonable accommodations, get a fair shot.

### **Zero Tolerance for Harassment**

Harassment of any kind is unacceptable and will not be tolerated at Anasia.

Harassment is any unwelcome conduct that creates an intimidating, hostile, or offensive work environment or interferes with an individual's ability to work.

Harassment can be verbal, physical, visual, or digital, and may occur in the workplace, at company events, during business travel, or through emails, messaging platforms, and social media.

Examples of Prohibited Conduct Include (but are not limited to):

- Unwelcome sexual advances, requests for favors, or inappropriate comments
- Offensive jokes, slurs, or derogatory remarks
- Insulting, humiliating, or threatening behavior
- Displaying offensive images, symbols, or messages
- Inappropriate physical contact or gestures
- Repeated unwanted messages, calls, or online interactions
- Retaliation against someone who reported harassment

Harassment is prohibited regardless of position or seniority. Managers, employees, contractors, and third parties are all subject to this rule.

### **Respect Starts with You**

Each of us is responsible for maintaining a respectful workplace by being mindful of our words and actions, we can all prevent harassment. If you ever witness or experience discrimination, harassment, retaliation, or any other unethical behavior, report it immediately to your manager, HR or Compliance Department. All reports will be treated seriously, investigated promptly, and handled confidentially.

## **4. Professional Appearance and Dress Code**

At Anasia, how we present ourselves reflects our professionalism and respect for our colleagues, clients, and business partners. Employees are expected to dress in a manner that is clean, appropriate, and aligned with the nature of their work and business environment.

### **Smart Casual Attire (Regular Office Days)**

For Men: Collared shirts (button-up or polo), Slacks, Smart clean shoes, Optional: Blazers or coats

For Women: Blouses or dress shirts, Dress pants, tailored skirts, or knee-length dresses, Closed-toe shoes or professional flats, Optional: Cardigans or blazers.



### Formal Attire (Client Meetings, Presentations, Corporate Events)

For Men: Suits or tailored slacks with a blazer, Shirts (tie preferred), Polished, formal shoes.

For Women: Tailored suits (pantsuit or skirt suit) or professional dresses, Blouses in conservative styles, Closed-toe heels or formal flats.

### Prohibited Attire

The following items are not permitted in the workplace or during company-related activities:

T-shirts with slogans or offensive messages, Short skirts or dresses, Cut-off jeans or distressed denim, Crop tops, Sneakers or flip-flops, Athletic wear or lounge clothing, Revealing or excessively casual clothing.

### Responsibility

Employees are expected to use good judgment when choosing their attire.

Managers may request changes if clothing does not meet company standards.

Failure to comply with the dress code may result in corrective or disciplinary action.

## 5. Building a Diverse and Inclusive Team

### Do:

- **Seek Out Talent Everywhere:** We actively recruit skilled and dedicated individuals with integrity from a wide range of backgrounds.
- **Embrace Our Differences:** We foster a diverse workforce and create a workplace where everyone feels valued and has the opportunity to thrive.
- **Make Merit Matter:** We make employment decisions based on qualifications, not someone's background.
- **Equal Opportunity for All:** We provide reasonable accommodations to ensure a level playing field for qualified individuals throughout the employment process.
- **Follow the Rules:** We comply with all wage and hour laws wherever we operate.

### Don't:

- **Exploit Others:** We have zero tolerance for child or forced labor, and we won't do business with anyone who does either.
- **Discriminate:** We treat everyone with respect, regardless of race, color, religion, disability, national origin, gender, sexual orientation, gender identity, marital status, age, or any other protected characteristic.

## 6. Speaking Up and Reporting Concerns

We all have an obligation to report any activity that is suspected to be unlawful, fraudulent or unethical as soon as possible. Here is what you can expect from Anasia:



- We take all reports of violations seriously.
- We will investigate all reports promptly.
- We will treat all reports as confidential to the extent possible.
- We will make every effort to protect the anonymity of anyone who reports a possible violation in good faith.
- We will not tolerate retaliation against anyone who reports in good faith.

We encourage everyone to speak up about unethical conduct or violations of this Code.

**How to report:**

- Contact your manager, HR, Internal Audit or Compliance Departments.
- Report anonymously through the Whistleblower channel, connect platform or reporting email.

## 7. Safety First

We're all in this together to create a safe and secure work environment for everyone at Anasia. This includes following these general safety guidelines, as well as any specific local safety policies that apply to your job (check with your HR team for details).

- **Be Aware of Your Surroundings:** We all have a responsibility to keep our work areas hazard-free and prevent violence.
- **Stay Focused and Fit for Duty:** Avoid using alcohol, illegal drugs, or anything that could impair your ability to work safely and consciously. If prescription medications or a medical condition affect your ability to do your job safely, talk to the HR about it.

### Safety Beyond Ourselves

At Anasia, safety goes beyond our employees. We're committed to providing high-quality, trusted products and services. This means:

- **Knowing the Rules:** Each of us is responsible for understanding and following all safety and quality regulations that apply to our products and services.
- **Speak Up for Safety:** If you see a safety violation, potential hazard, or unsafe product, report it immediately to your manager, HR, Internal Audit or Compliance Departments.
- **Protecting Our Reputation:** By upholding our safety and quality standards, we earn customer trust and avoid putting them at risk.

**Remember**, safety is a team effort. Let's work together to keep ourselves, our colleagues, and our customers safe.

## 8. Taking Care of What's Ours

Anasia's success depends on using our resources wisely. This means protecting our property from theft, damage, waste, or misuse. Our property includes everything from buildings and equipment to computer systems, ideas, and confidential information.



### **Be Mindful and Report**

If you see someone putting Anasia's property at risk, speak up! Whether it's careless handling, potential theft, or a violation of our information security policies, report it to your manager, HR, Internal Audit or Compliance Departments or any of the resources listed in this Code.

**Remember**, by protecting our assets, we protect Anasia's future.

## **9. Intellectual property**

### **Ideas are Valuable**

Patents, copyrights, and trademarks are legal ways to protect inventions, creative works, and brand names. They essentially say "this is ours, don't use it without permission." These rights are typically granted country-by-country.

### **Protecting Anasia's Innovations**

Sometimes, we create ideas or technologies that belong to Anasia or our customers. This "intellectual property" is valuable, and by law, we agree to assign ownership to Anasia.

### **Using Other's Work Responsibly**

Just like our own ideas, others' intellectual property needs respect. This includes digital assets (photos, videos), customer project references, and more. Never copy or use protected materials like data, designs, manuals, names, or software without permission. The same goes for written materials - avoid plagiarism and inappropriate use of published works.

### **Software Safety**

Downloading unauthorized software can be risky. It might violate copyright laws or introduce security threats. Always check with IT before downloading anything, and consult legal if you have questions about intellectual property rights.

**Remember:** By respecting intellectual property, we protect both Anasia's creations and the work of others.

## **10. Protecting Anasia's Secrets**

### **Anasia's Secrets: Keeping Them Safe**

Anasia's confidential information is important, and we all share the responsibility of protecting it. This includes any non-public information that could be a competitive advantage or harm us or our customers.

### **Guarding Confidential Information**

- **Be extra careful:** Always be mindful of confidential information, both on and off the job.



- **Sharing is limited:** Share confidential information only with colleagues or authorized outsiders who absolutely need it for their work.
- **Public places are off-limits:** Avoid discussing confidential information in public (trains, restaurants, etc.) where others might overhear.

### Protecting Personal Information Too

We also take protecting employee personal information seriously. We follow all privacy and data protection laws to keep this information secure.

### Working with Others Securely

Anasia sometimes partners with other companies who might also be competitors, suppliers, or customers. When collaborating, we take steps to safeguard our confidential information from accidental sharing or misuse outside the partnership. This includes following specific joint venture agreements that limit access to Anasia's information and systems.

### Confidentiality Beyond Employment

Our commitment to confidentiality goes beyond our time at Anasia. The obligation to protect confidential information continues even after employment ends.

**Remember:** By working together, we can ensure Anasia's confidential information stays secure. If you have any questions, don't hesitate to consult your manager, HR, Internal Audit or Compliance Departments.

**Q: My commute involves taking the bus, and sometimes I use that time to catch up on work calls. Is there anything I should be mindful of?**

**A:** Absolutely! It's great to be proactive, but be careful not to discuss confidential information while on public transportation. This includes trains, buses, elevators, or even loud conversations in restaurants. Anyone nearby could potentially overhear sensitive details. If your call might involve confidential information, it's best to wait until you're in a private space.

## 11. Protect Privacy

At Anasia, we Protect your personal data seriously. We use technical and organizational measures like secure IT systems and access controls to safeguard this data. We only access and use your personal information for legitimate business reasons, and limit who has access to it based on their job duties and for how long they need it.

### Understanding Personal Data

Personal data is any information that can be used to identify you, either alone or combined with other data. Some information, like health records, government IDs, or salary details, is considered "sensitive" and has even stricter protections.



### Keeping Your Data Safe

In addition to We take steps to prevent unauthorized access, use, disclosure, loss, or destruction of your personal data, we also follow local laws regarding data retention, meaning we don't keep your information longer than necessary. Additionally, some countries have regulations on transferring data internationally, and we respect those laws as well.

**Overall, we're committed to protecting your privacy and handling your personal data responsibly.**

### 12. Using Anasia Resources Responsibly

Anasia equips us with computers, phones, and other tools to do our jobs. While some personal use is okay, it shouldn't interfere with your work or violate any Anasia policies or laws.

Here are some things you can't do with Anasia resources:

- Share confidential information inappropriately.
- Engage in illegal activities.
- Access inappropriate content.
- Send discriminatory, harassing, or threatening messages.

**Important Note:** Anasia reserves the right to monitor messages, browsing history, and other information sent, received, or viewed using company resources. There's no expectation of personal privacy when using these tools, unless otherwise permitted by law.

**Remember:** Let's use Anasia resources responsibly and professionally.

### 13. Keeping Track of Important Documents

Anasia deals with a lot of information, both physical and digital. It's important to understand how long to keep documents and records, and how to dispose of them properly.

#### What Belongs to Anasia

- All work-related records belong to Anasia, even those you helped create.
- This includes emails, texts, social media posts related to your work.

#### When to Keep, When to Dispose

There are specific policies about how long to keep different types of documents.

#### Legal Matters

If you're notified that certain documents you have might be relevant to a legal case, investigation, or audit, don't change, delete, or destroy them. Follow the instructions you receive in the notification.



**Remember:** By following these guidelines, we can ensure Anasia manages information effectively and responsibly.

#### 14. One Voice, Strong Message

At Anasia, we present a unified front to the public. This means only authorized spokespersons can speak on the company's behalf.

##### Need Media Help?

If you're contacted by a reporter, analyst, investor, or potential investor, here's what to do:

- **Media Inquiries:** Contact Anasia's External Communications Department.
- **Financial Inquiries:** Forward requests from analysts or investors to Anasia's Investment Division.

##### Remember:

- Don't speak for Anasia unless authorized.
- Don't feel pressured to answer questions you can't.

#### 15. Avoiding Conflicts of Interest

A conflict of interest arises when your personal interests clash, or seem to clash, with Anasia's best interests. This can cloud your judgment and affect your ability to do your job fairly and effectively.

Whenever possible, avoid situations that could create a conflict of interest, or even the appearance of one. This includes things like:

- Personal relationships with business partners or vendors.
- Financial investments in competitors or suppliers.
- Outside employment that could interfere with your work at Anasia.
- Using company information or resources for personal gain.

**An Important Note:** Taking loans or guaranteeing obligations from Anasia or a third party because of your position at Anasia is strictly prohibited, as it can look like a conflict.

**Remember:** By avoiding conflicts of interest, we can ensure our decisions are always made in the best interest of Anasia. If you're unsure about a situation, consult your Manager or the legal department.

##### Addressing Unavoidable Conflicts

It's natural to have interests outside of work, but it's crucial to disclose any situation that may create an actual or potential a conflict of interest. Complete transparency protects you and the company, here's what to do then:



- **Open Communication:** Discuss the potential conflict with your direct Manager, HR, Internal Audit or Compliance departments as soon as possible.
- **Manager's Role:** Your Manager will assess the situation and determine to what extent it actually conflicts with the company's interest.
- **HR Support:** If your Manager is not conflicted, he can work with HR to find a solution that protects both your interests and Anasia's.

By following these steps, we can ensure ethical decision-making even in challenging situations.

**Remember:** a conflict of interest does not necessarily mean a violation, but hiding it is what poses the real problem.

## 16. Spotting Opportunities? Let's Work Together

Sometimes, during our work at Anasia, we might encounter interesting business ideas. However, it's important to remember that any opportunities discovered through Anasia resources (property, information, or our position) belong to the company. Here's the key:

- **Opportunities Belong to Anasia:** We can't pursue these ideas for ourselves or help others do so.
- **We're Here for Anasia's Success:** Our priority is to use our knowledge and resources to advance Anasia's legitimate business interests.
- **No Competition:** This means we can't compete with Anasia in any way.

**If you discover a potential opportunity, discuss it with your supervisor. They can help determine if it aligns with Anasia's goals.**

## 17. Giving Back on Your Own Time

Anasia encourages employees to be active in their communities! We support your right to donate your personal time and money to charitable causes you care about.

### Important Reminders:

- **Use Personal Resources:** Contributions should come from your own time and funds, not Anasia's resources or name.
- **Get Permission First:** If you wish to use Anasia's resources or name for a charitable contribution or donation, get approval beforehand. Anasia also prohibits political donations or support for any candidate or political party in the company's name.
- **Report Pressure:** If you feel pressured to contribute, report the incident to your Manager or HR.
- **No Impact on Your Job:** Your support (or lack thereof) for a charity will not affect your standing at Anasia.



**Remember:** We value your civic engagement, but it's important to keep personal contributions separate from your work at Anasia.

## 18. Working with Auditors

Anasia is committed to transparency and accountability. This means cooperating fully with any internal or external audits this means:

- **Be Open and Helpful:** If approached by auditors, cooperate by providing them with the information they request.
- **Honesty is Key:** Do not try to mislead or influence any auditor, reviewing Anasia's records. This includes encouraging others to do so.
- **Need Help? Ask!** If a government investigator requests your participation in inspections, interviews, or asks for documents, don't act alone. Immediately notify your manager, HR, Internal Audit and the Anasia Legal Department to get further guidance.

**Remember:** Cooperation helps ensure Anasia operates with integrity.

## 19. Navigating the World: Laws and Us

Anasia operates around the globe, and different countries have different rules. This means laws, regulations, and even business customs can vary widely.

At Anasia, we are committed to operating in accordance with the highest legal and ethical standards in all the countries in which we operate

### When Rules Collide

Sometimes, there might be a situation where our Code of Conduct, Anasia policies, or local laws seem to conflict. In those cases, it's important to seek guidance before acting.

### Here's How to Get Help

- **Talk to Your Managers:** They can often provide clarity and direction.
- **Review Our Resources:** The Code of Conduct itself might have additional information.
- **Consult** your manager, HR, Internal Audit or Compliance Departments. They have expertise in navigating complex situations.

**Remember:** By following the law and seeking guidance when needed, we can ensure we're always acting appropriately, no matter where we are in the world.

## 20. Building Trust Through Accurate Records

At Anasia, maintaining accurate business records is essential. This helps us manage our operations effectively and ensures our financial statements and other reports to the public and governments are complete, truthful, and easy to understand. Every piece of



information we submit, whether it's about people, time, expenses, or safety, plays a part in this big picture.

### Keeping it Honest and Accurate

That's why it's important to be completely honest, accurate, and thorough when submitting any data or information to Anasia's records. Here's how we can all contribute:

- **Following Internal Controls:** We need to follow the company's established system of internal controls and accounting requirements when recording data.
- **Proper Documentation:** Always submit the necessary contract documents for all transactions.
- **Ethical Business Practices:** Our commitment to Anasia's Values and Code of Conduct means we only engage in legitimate and authorized business activities.

### Reporting Concerns

If you ever notice any irregularities in accounting, auditing, or suspect fraud related to Anasia's finances, report your concerns immediately. It's important to remember that you are protected from retaliation for making good-faith reports.

### Working Together, We Build Trust

By working together and upholding these standards, we can ensure Anasia maintains accurate records and builds trust with all stakeholders.

## 21. Protecting Anasia from Financial Crime

Money laundering involves disguising illegally obtained money to make it appear legitimate. Anasia is committed to fighting financial crime and fully complies with anti-money laundering laws worldwide.

### Be Aware, Be Prepared

We all play a role in keeping Anasia's finances safe. Here's what to watch out for:

- **Unusual Payments:** Be alert for payments made in currencies not on the invoice, attempts to pay with cash, or payments made by/to unexpected third parties.
- **Suspicious Payment Methods:** Look out for requests to split payments across multiple methods or requests for overpayments.

### Activities We Prohibit

Anasia has zero tolerance for activities that could be linked to money laundering. This includes:

- **Deception:** We don't make false statements, written or verbal.
- **Hiding Money:** We don't conceal funds or mislead about transactions.
- **Secret Accounts:** We don't create hidden or unrecorded financial accounts.
- **Turning a Blind Eye:** We don't knowingly allow illegal financial activity to occur.



**If you suspect money laundering, report it immediately.** We take all reports seriously and have procedures in place to investigate concerns. Remember, you are protected for making good-faith reports.

**Together, we can keep Anasia's finances secure and combat financial crime.**

## 22. Winning Right: Competing with Integrity

At Anasia, we believe in winning fairly. That means being honest and transparent with our customers and business partners. We avoid manipulation, hiding information, misuse of confidential details, or misrepresenting facts. We also don't bad-mouth competitors or their products.

### Finding Out About the Competition: The Ethical Way

Our commitment to ethical competition extends to how we gather information about our competitors.

#### What's Acceptable?

- **Public Sources:** It's perfectly acceptable to use publicly available information like competitor websites, articles, price lists, ads, brochures, presentations, annual reports, and published sales materials.
- **Customer Conversations (Non-Confidential):** Information gleaned from conversations with customers (as long as it's not confidential) can also be helpful.

#### What's Off-Limits? Inside Information

There are certain types of information we can never use, even if we hear about them:

- **Company Secrets:** This includes things like future earnings, operational changes, new products or services, major financial transactions, stock splits, mergers, acquisitions, asset sales, management changes, legal issues, or government investigations.

**Remember:** By playing fair and gathering information ethically, we can maintain a strong competitive edge while preserving our values.

## 23. Playing Fair: No Bribes Ever

### What is a Bribe?

A bribe is anything of value (money, gifts, travel, entertainment, loans, discounts, job offers, donations, etc.) offered to influence someone to benefit Anasia in a dishonest way.

At Anasia, we believe in winning business on merit, not through bribes. Offering or paying bribes, kickbacks, or anything of value to gain an unfair advantage is strictly forbidden, regardless of location. This includes situations where refusing a bribe might lead to delays or lost business.



### Why We Take a Strong Stance

Bribery and corruption are not only unethical; they can also have serious consequences:

- **Legal Trouble:** These practices violate anti-corruption laws in many countries, potentially resulting in hefty fines, criminal charges, and even jail time for individuals and Anasia itself.
- **Loss of Business:** Companies caught bribing can be barred from future government contracts.
- **Damaged Reputation:** Engaging in corruption can seriously harm Anasia's reputation and public trust.

### What We Don't Tolerate

Anasia has zero tolerance for bribery, extortion, or embezzlement in any form. This includes situations involving:

- **Public or Private Parties:** These practices are unacceptable with any third party, government or private.
- **Direct or Indirect:** Whether offered, paid, accepted, or solicited directly by employees or through a third party, it's wrong.

**Remember:** By playing fair and refusing to engage in bribery, we can protect ourselves, Anasia, and our reputation. If you ever suspect bribery is happening, report it immediately.

**Integrity is not an option; it is the cornerstone of our customers and partners' trust in Anasia.**

### Building Relationships in the Right Way

Gifts, entertainment, and hospitality can be great ways to build strong connections with business partners. However, there are clear guidelines to ensure these gestures are never seen as bribes or create conflicts of interest.

**Keeping it Ethical** - Here's what to remember:

- **Follow the Rules:** Always refer to Anasia's Code of Conduct, company policies, and the law when offering or accepting gifts, meals, entertainment, or hospitality.
- **Avoid Conflicts:** These gestures should not create the impression of a conflict of interest.
- **Government Customers:** Rules for government contracts are stricter and more complex. If you work with government clients, you're responsible for understanding and following their specific rules.

**Remember:** By following these guidelines, we can build strong relationships without compromising our integrity. If you're unsure about a situation, consult your supervisor or the legal department.



### A partnership built on trust

Anasia seeks to build long-term relationships based on integrity and mutual respect with all its business partners, here's how we do that:

- Select suppliers according to objective criteria such as quality, price and adherence to ethical values.
- Treat all customers fairly and transparently.
- Not accepting or offering any undue benefits that could affect neutrality or business decision.

**Remember:** Ethical business relationships build trust and maintain Anasia's reputation as a responsible organization.

## 24. Building a Sustainable Future

At Anasia, we believe in creating value for everyone. That includes protecting the environment, our employees, and the communities we touch. Here's how we do that:

- **Sustainable Practices:** We're committed to finding ways to operate that are good for business and the environment in the long run.
- **Following Environmental Rules:** We comply with all environmental laws and regulations to minimize our impact on the planet.
- **Conserving Resources:** We strive to use natural resources and energy efficiently to reduce waste.
- **Minimizing Harm:** We work to find ways to reduce or eliminate hazardous substances in our operations.

## 25. Social Media Responsibility

As Anasia employees, you are encouraged to use social media platforms for personal expression. However, please be mindful that your online activities reflect on the company. Always act responsibly and professionally, upholding Anasia's values and reputation. Any inappropriate use or publication of content that offends public morals or the company or violates its policies may lead to disciplinary action in accordance with the internal discipline regulations.

## 26. Disciplinary Action

Failure to comply with the Code of Conduct, failure to comply with the law or required certification process, or failure to cooperate with an internal investigation may result in an actual violation of the law and ANSA's internal policies and be grounds for disciplinary action, up to and including termination of service. Where applicable, Anasia may also refer serious violations to law enforcement or regulatory authorities. Disciplinary procedures are applied fairly, consistently and in line with local laws.

## 27. Governance and Oversight

- The Legal, Internal Audit department and Compliance Departments are responsible for overseeing and updating the Code of Conduct.
- The Code must be reviewed annually or as needed in accordance with legal requirements.
- The Internal Audit Department reviews compliance with it within the periodic audit plan.
- All employees must acknowledge in writing that they have read the blog and understood its content.

**Leadership role:** Managers are accountable for setting an example of ethical behavior, guiding their teams to adhere to the code, and creating an environment that encourages transparency and accountability.

**In conclusion:** Commitment to the Anasia's Code of Conduct and Ethics is a commitment to excellence, not only at work, but in the way, we represent our company and its principles in everything we do.

**We Inspire ... Engage ... Enable ... in a culture of Excellence.**