



## **Confluence Talent Limited**

*Mission-Critical Manpower Solutions Across Europe*

**Engineering | Construction | Data Centers | Renewable Energy**

## **Code of Conduct and Ethics Policy**

## 1. Code of Conduct

### 1.1 Professional Behavior

- **Integrity:** All employees must conduct themselves with integrity, honesty, and fairness in all business dealings and interactions.
- **Compliance:** Adherence to all applicable laws, regulations, and internal policies is mandatory.
- **Confidentiality:** Employees must protect confidential information related to the Company, its clients, and candidates.

### 1.2 Respect in the Workplace

- **Non-Discrimination:** The Company is committed to providing a work environment free of discrimination and harassment. Discrimination based on race, color, religion, gender, age, sexual orientation, disability, or any other protected characteristic is prohibited.
- **Harassment:** Any form of harassment, including sexual harassment, bullying, or any unwelcome behavior that creates a hostile work environment, will not be tolerated.
- **Dignity and Respect:** All employees are expected to treat each other, as well as clients and candidates, with dignity and respect.

## 2. Ethics

### 2.1 Ethical Conduct

- **Transparency:** All business activities should be conducted transparently, honestly, and ethically.
- **Conflict of Interest:** Employees must avoid situations where personal interests conflict, or appear to conflict, with the interests of the Company.
- **Fair Competition:** Employees must engage in fair competition and not engage in anti-competitive practices.

### 2.2 Social Responsibility

- **Sustainability:** The Company is committed to sustainable business practices and minimizing environmental impact.
- **Community Engagement:** The Company encourages involvement in community activities and supports charitable organizations.

## 3. Human Rights

### 3.1 Commitment to Human Rights

- **Respect for Human Rights:** The Company is committed to respecting and promoting human rights as defined by the European Convention on Human Rights and the Universal Declaration of Human Rights.

- **Non-Exploitation:** The Company opposes all forms of forced labor, child labor, and human trafficking.
- **Fair Working Conditions:** The Company ensures fair wages, reasonable working hours, and safe working conditions for all employees.

### 3.2 Equal Opportunities

- **Equality and Diversity:** The Company promotes equality and diversity in its workforce and provides equal opportunities for all employees.
- **Inclusion:** The Company is committed to creating an inclusive work environment where all employees feel valued and respected.

## 4. Anti-Bribery and Corruption

### 4.1 Zero Tolerance Policy

- **Prohibition of Bribery:** The Company prohibits any form of bribery, whether direct or indirect, and in both the public and private sectors.
- **Facilitation Payments:** The Company does not allow facilitation payments, which are small unofficial payments made to secure or expedite a routine government action.

### 4.2 Gifts and Hospitality

- **Acceptable Gifts:** Employees may accept or offer gifts and hospitality only if they are reasonable, proportionate, and not intended to influence business decisions.
- **Disclosure:** All gifts and hospitality must be declared and recorded in accordance with the Company's policy.

### 4.3 Reporting and Compliance

- **Reporting:** Employees must report any suspected or actual bribery or corruption incidents immediately to their supervisor or the designated compliance officer.
- **Compliance Monitoring:** The Company will regularly monitor compliance with this Policy and conduct audits where necessary.

## 5. Implementation and Enforcement

### 5.1 Communication and Training

- **Policy Awareness:** This Policy will be communicated to all employees, contractors, and associates.
- **Training:** Regular training will be provided to ensure understanding and compliance with this Policy.

### 5.2 Disciplinary Actions

- **Non-Compliance:** Any breach of this Policy may result in disciplinary action, up to and including termination of employment.
- **Whistleblower Protection:** The Company ensures protection for employees who report violations of this Policy in good faith.

### 5.3 Review and Updates

- **Regular Review:** This Policy will be reviewed annually to ensure its effectiveness and compliance with current legislation.
- **Updates:** The Policy will be updated as necessary to reflect any changes in laws or Company practices.

### 6. Conclusion

This Code of Conduct and Ethics Policy sets the standards for behavior and practices at Confluence Talent. All employees are expected to adhere to these principles to maintain the integrity, reputation, and success of the Company. Compliance with this Policy is essential to our commitment to ethical conduct, respect for human rights, and adherence to anti-bribery regulations.