

CODE OF ETHICS AND BUSINESS CONDUCT

JANUARY 2021



Message from our Managing Partner, Dr. Caitano Jose Fernandes

Our commitment to ethical behaviour and our solid ethical foundation are essential operational components of CAM Industrial Services. We are committed to doing business the right way, based on a culture of ethics and compliance.

In the long term, we can successfully face the challenges of competitive market environment by following the imperatives of moral responsibility, both as individuals and as a company. In performing the job duties, the employees should always act lawfully, ethically and in the best interests of CAM Industrial Services.

Thank you for upholding our values and helping us in doing our work the right way. In addition to being well-made, rightly priced with exceptional quality, our products and services also ensures that ethics and integrity are always borne in mind. Our material is sourced only from suppliers with impeccable human rights and compliance records, also ensuring that the supply chain is of high integrity. We monitor our entire operation for compliance with our Code.

We are committed to sustainable practices, and our adherence to social and environmental standards takes us closer to the sustainable development goals.



Dr. Caitano Jose Fernandes

(Managing Partner)

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1. Introduction

This Code of Ethics and Business Conduct of CAM Industrial Services serves as our ethical commitment and as a guide to decorous business conduct for all our stakeholders. We, at CAM Industrial Services are committed to doing business legally, ethically and in a transparent manner.

1.1. Our Mission:

At CAM Industrial Services we intend to provide innovative, novel and sustainable sanitation solutions to every household, specifically targeting households with meagre income and poverty-stricken sectors in the nation. Our mission is to corroborate scientific collection and disposal of waste to attain an integrated waste management system. We intend to contribute towards a cleaner, more habitable and sustainable environment for future posterity.

1.2. Applicability:

- a. This document applies to all staff who work for CAM Industrial Services (including officers, directors, managers, team leaders, employees, temporary, agency, interim, sub-contractor, or consultant staff), and also includes other organisations who do business with us.
- b. CAM Industrial Services expects its staff to be impartial and honest in all affairs concerning their job. All staff bear a responsibility in general, to uphold core values of good faith and fair dealing. That they would not do anything to subdue the trust necessary for employment.
- c. The success of our business is based on the trust we earn from our employees, customers, and shareholders. We gain credibility by adhering to our commitment to fairness and reaching our goals solely through ethical conduct. All staff members are expected to adhere to this Code in their professional, as well as personal conduct, treat everyone with respect, honesty, and fairness. Even staff hired through outsourcing agencies shall adhere to this code.
- d. CAM Industrial Services is open to any questions at any time and will not allow punishment or retaliation against anyone for reporting a misconduct in good faith.
- e. Managers and leaders have higher responsibility for demonstrating, through their actions, the relevance of this Code. Managers and leaders are responsible for promptly addressing every raised ethical question or concern. Employees must cooperate in investigations of potential or alleged misconduct.
- f. We are committed to making efforts to apply our values and norms also throughout the entire value chain of our own suppliers, sub-contractors, service providers and business partners.

1.3. Non-compliance

Non-compliance to this Code considered as a misconduct that could warrant disciplinary action, including termination of employment or other contract in deserving cases.

2. Ethical Principles

This Code incorporates the basic principles of ethical behavior and standards of conduct applicable to all CAM staff. The following basic principles of ethical behavior must be always followed by all staff:

- Honesty
- Integrity
- Trustworthiness
- Respect for the dignity, worth, equality, diversity, and privacy of all persons
- Responsibility and Professional Commitment
- Accountability
- Reliability
- Obedience to the law
- Independence and Impartiality

2.1. Ethical Decision-making

Ethical conduct is essentially value-driven decision-making. Several key questions can help to identify situations that may be unethical, inappropriate, or illegal. Ask yourself:

- Is what I am doing legal?
- Does it reflect our company values and ethics?
- Does it comply with the Code and company rules/policies?
- Does it respect the rights of others?
- How would it look if it made the news headlines?
- Am I being loyal to my family, my company and myself?
- Is this the right thing to do?
- What would I tell my child to do?
- Have I been asked to misrepresent information or deviate from normal procedure?

2.2. Compliance with laws and regulations

Our commitment to integrity begins with complying with laws, rules, and regulations. We understand and comply with the legal requirements and commercial practices of lawful business.

We are committed to adhere to every valid and binding contractual agreement that we conclude, and we do not abuse our rights.

Our staff members must follow applicable laws and regulations, always including the Code and must ensure compliant operations. We expect employees to be ethical and responsible while dealing with our company's finances, products, partnerships, and public image.

2.3. Sustainability: People + Profit + Planet

We are committed to meet current requirements without compromising the needs of future generations. To this, we combine economic, environmental, and social factors in our operation and our business decisions.

2.4. Human rights

We are committed to respect human dignity and rights of each individual and community whom we interact with during work. We shall not, in any way, cause or contribute to the violation of human rights. Our staff shall treat everybody with dignity, respect and care and uphold human rights.

2.5. Fair labour practices and working conditions

We are committed to promote equality in our employment practices and to fair employment and remuneration policy in compliance with applicable laws. We firmly oppose employment of child labour or slave labour or any form of forced or compulsory or bonded labour. We condemn all forms of illegal, unfair, unethical labour practice that exploits workforce, destroys social security, or serves as tax evasion, including but not limited to undeclared and "grey" work or holding back wages.

All employees in the organization are required to act with integrity and treat fellow employees with respect. Our Code of Ethics also extends to staff hired through outsourced agencies, who are also required to comply with all relevant local laws and regulations applicable for CAM's operations. CAM ensures, through contractual agreements, that all hired staff from outsourced agencies are paid at or above industry benchmarks and provided employee benefits.

2.6. Discrimination and harassment

We provide equal opportunity in employment, and we do not tolerate any discrimination or harassment or any type of abuse. No direct or indirect discrimination shall take place based on any professionally non-relevant trait or circumstances, like gender, marital status, age, national or social or ethnic origin, colour, religion and political opinion, disability, sexual orientation, employee representation, property, birth, or other status. Any kind of discriminatory behaviour, harassment, bullying, or victimization is prohibited.

All staff is expected to follow the highest standards of conduct in all verbal and written communication based on mutual respect, and must refrain from any form of harassment, slander or any behaviour that could be taken as offensive, intimidating, humiliating, malicious or insulting.

2.7. Health, Safety and Environment

We provide clean, safe, and healthy work conditions and are dedicated to maintaining a hygienic environment. We are committed to minimise the impact of our operations on the natural environment. We make efforts to reduce the use of finite resources, like energy or water, and harmful emissions, like waste.

All staff must follow and comply with every relevant health, safety and environmental protection laws, regulations and rules all times.

2.8. Fair competition and business conduct

Our relationships with business partners are built upon trust and mutual benefits compliant with competition law. We are dedicated to ethical and fair competition, as we sell products and services based on their quality, functionality, and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities, nor will we engage or assist in unlawful boycotts of particular customers. We commit to comply with all applicable trade controls, restrictions, sanctions, and import-export embargos.

We do not allow any violence of the fairness of any tendering process in any way. We refrain from damaging competition and the reputation of any business partners and any behaviour that harms competitor's creditability.

We do not hold back maliciously, unlawfully, or unduly payments towards our partners, and we do not allow such practices in our supply chain. We fight the unethical practice of "debt chain".

Our staff is responsible for ensuring fair business during their job and adhere to every competition, consumer protection and fair marketing rule. Customers and business partners shall be treated fairly and equally, products and services shall be

displayed in a manner that is fair and accurate (fair marketing and advertising), and that discloses all relevant information.

3. Anti-corruption

We firmly condemn and do not tolerate all forms of corruption. It is prohibited directly or indirectly offering, promising, giving, asking, soliciting, or accepting any unfair advantage or benefit, in order to obtain, retain or facilitate in any way the business. An unfair advantage or benefit may include cash, any cash equivalent (e.g., voucher), gift, credit, discount, travel, personal advantage, accommodation, or services. We do not permit facilitation (or “grease”) payments to government officials or private business to secure or speed up routine actions. Corruption also covers the misuse of function or position as well, when someone makes that false appearance that s/he improperly influences a decision maker.

Corruption for either to obtain or retain business, or to obtain or retain an advantage in the conduct of business is considered gross misconduct. Similarly accepting or allowing another person to accept a bribe is considered gross misconduct. Our staff members have to account for all benefits received while doing business and must not give or receive bribes or otherwise act corruptly.

4. Gifts and Hospitality

We shall avoid any actions that create a perception that favourable treatment was sought, received, or given in exchange for personal benefits.

Business courtesies or benefits include gifts, gratuities, meals, refreshments, entertainment or other advantage from persons or companies with whom we do or may do business. We will neither give nor accept such benefits that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies, or would cause embarrassment. Our staff may never use personal funds or resources to do something that cannot be done with our resources.

We may accept and offer occasional gifts and hospitality that are customary and conform to reasonable ethical practices of the market, if they are not inappropriately excessive, not frequent and do not reflect a pattern of frequent acceptance, does not create the appearance of an attempt to influence business decisions. Only trivial gifts with low value can be accepted. All other gifts must be politely refused or, if received through post, returned to the donor. If return is not possible it shall be offered for charity or community purposes. It is the responsibility of the person offering, providing, receiving, or accepting the gift to decide whether the gift is appropriate.

5. Security, protection, and proper use of company assets

We are responsible for the security, protection and for the economic use of company resources. Our resources, including time, material, equipment, and information are provided for legitimate business use only. Occasional personal use is permissible if it is lawful, does not affect job performance or disrupts workplace morale.

All staff is obliged to follow appropriate security measures and they should treat company property, whether material or intangible, with respect and shouldn't misuse company assets or use it carelessly.

6. Confidentiality, information security, proprietary information, and intellectual property

We are committed to business information confidentiality, integrity and accessibility, we implement proper technical security measures this and it is our staff's obligation to uphold this. Proprietary information includes all non-public information that might be harmful to the company or its customers, business partners if disclosed to unauthorised parties. All staff must handle any such information as secret. It also covers that, no one is entitled to trade with securities while in possession of non-public information or deliver non-public information to others that could have impact on the securities. Every rule ensuring information security must be followed all times.

We respect the property rights of others. We will not acquire or seek to acquire trade secrets or other proprietary or confidential information by improper means. We will not engage in unauthorized use, copying, distribution or alteration of software or other protected intellectual property.

7. Bookkeeping, true reporting and financial integrity

Our books, records, accounts, and financial statements must be maintained in appropriate detail, must truly and properly reflect our transactions. We condemn all forms of money laundering, so we are committed to do business with partners involved in legitimate business activities with funds derived from legitimate sources.

We commit ourselves to fair taxation and to avoid all tax evasion practices, including such as failing to issue receipt or accounting fake expense invoices.

All staff must follow accounting procedures, ensure that business transactions are recorded and documented appropriately and make certain that all disclosures made in financial reports are full, honest, accurate, timely and understandable. All staff must not improperly influence, manipulate or mislead any audit.

8. Anti-Fraud

Fraud – the act or intent to cheat, steal, deceive or lie – is both unethical and, in most cases, criminal. Fraud in every form, (including e.g., submitting false expense reports; forging or altering financial documents or certifications; misappropriating assets or misusing company property; making any untrue financial or non-financial entry on records or statements) is prohibited.

9. Conflict of Interests

Our decisions shall be based on objective and fair assessments avoiding the possibility of any improper influence. A "conflict of interest" exists when an employee's personal interest (that can be linked to e.g. friends, family, or customer, competitor, supplier, contractor entity, as well) interferes or potentially interferes with the best interests of CAM Industrial Services determining whether a conflict of interest exists is not always easy to do, thus anyone with a conflict of interest question should seek advice from management.

Conflicts of interest could arise:

- Being employed (you or a close family member) by or being in economic relation with an actual or potential customer, competitor, supplier, or contractor.
- Being employed (part-time or full-time) by another firm.
- Hiring or supervising family members or closely related persons.
- Serving as a board member for another company or organization.
- Owning or having a substantial interest in a customer, competitor, supplier, or contractor.
- Having a personal interest, financial interest, or potential personal gain in any company transaction.

If co-workers become involved in personal relations with each other, the onus is on the senior employee concerned to bring this to the attention of his or her manager to confirm that there is no conflict of interest, nor will a conflict of interest arise.

10. Privacy, personal data protection

We respect people's privacy, and we acknowledge customers, employees and other natural persons' need to feel confident that their personal data is processed appropriately and for a legitimate business purpose. We are committed to comply with all personal data protection laws. We only acquire and keep personal information that is necessary, and we give proper information on these activities to

data owners. We implement proper security measures to assure confidentiality, integrity, and availability of personal information.

Our staff must observe the legal requirements, apply compliant practices, and follow related procedures to ensure legality of personal data handling and processing activities.

11. Whistle blower Policy

- CAM's policies apply to all staff members who report, in good faith, suspected wrongdoing of corporate significance and may be subjected to retaliation consequently. Wrongdoing of corporate significance implies a significant risk to CAM, i.e., harmful to its interests, reputation, operations, or governance (such as fraud, corruption, waste of resources, sabotage, substantial and specific danger to public health or safety, sexual exploitation and abuse). Individual grievances, such as complaints regarding discrimination, harassment, or other negative interpersonal situations in the workplace are administered separately by the HR.
- Individuals who suspect wrongdoing of this nature, who are neither concerned that their supervisor may be involved nor fear retaliation, can inform their supervisors through the usual hierarchy. In all cases, supervisors or managers who receive a report of suspected wrongdoing must take prompt and decisive action and must either seek guidance from HR, or report to the executive management for investigation as applicable.
- As such, individuals who, in good faith, report suspected wrongdoing will be protected from retaliation in accordance with the policy on whistleblowing and protection against retaliation. However, the intentional filing of a false or misleading report is itself a violation of the Organization's regulations and rules that may constitute wrongdoing and may result in disciplinary proceedings. CAM industries services does not tolerate retaliation against its staff members who in good faith report a suspected wrongdoing/violation. The matter will be investigated, and appropriate remedial action will be taken.

12. Dissemination of the Code of Ethics

This Code of Ethics will be published on the website and disseminated to its employees, and to existing and potential stakeholders such as members of the board of directors, executive members, customers, partners, vendors, suppliers, potential/ newly hired employees, and the general public. It is the image that the company wants to convey to these stakeholders about who the company is and what these stakeholders can expect in terms of value-driven treatment.

This Code of ethics is both an internal commitment to a standard of behaviour and beliefs and a public declaration of the organization's position on a set of standards, values, principles, and beliefs.

Managers have a special responsibility to stay updated on the code of ethics of CAM Industries Services. They will be instructed about Code of Ethics on the regular basis, and it is their responsibility to conduct bi annually meeting on code of ethics with their respective team, make sure code of ethics are read and understood by newly hires and discuss the same with the executive management team timely. It is the responsibility of the managers to make sure all non- managerial staff members are updated with code of ethics bi-annually and communicate all the updates in code of ethics on regular basis with the entire team during weekly/ monthly team meetings.