

# ECLARO

## **Code of Conduct & Work Ethic Policy**

Eclaro is committed to the highest form of ethical, professional and legal standards. The Company envisions a workplace that is free from fear, harassment, threat and discrimination, where co-workers are respected, and provided an appropriate environment so as to encourage good performance and conduct.

### **Ethical Standards**

To achieve this goal, all employees are expected to observe a certain level of ethical behavior towards others and must:

- treat co-workers with utmost respect, courtesy, honesty and fairness
- recognize individual differences and the importance of a multi-cultural work environment
- observe empathy and promote team spirit
- support family-oriented activities • value the integrity of data and privacy of information
- protect and preserve all properties and assets of the Company with due care and diligence

### **Professionalism**

The individual conduct and business activities of employees shall conform to the standards expected of persons in their positions, especially those at the leadership roles who are viewed as models of good behavior and conduct which include:

- a commitment and adherence to the highest level of professional standards in their work and in their interactions with other employees, as well as clients of the Company;
- a collaborative effort to build an open, transparent and mutually supportive work environment;
- a responsibility to prioritize the goals and objectives of the organization; and
- a strong adherence to confidentiality of shared information and business strategies.

### **Human Rights in the Workplace**

#### **Equal Employment Opportunity and Fair Employment Practices; Discrimination and Harassment Policy**

Eclaro is an equal employment opportunity employer which is committed to ensuring full compliance with the letter and spirit of all laws regarding fair employment practices and non-discrimination, and expects that all of its Suppliers shall also fully comply with all laws regarding fair employment practices and non-discrimination. Eclaro recruits, employs, retains, compensates, trains, promotes, disciplines, terminates and otherwise treat all employees and job applicants based solely on qualifications, performance, and competence. All employees and applicants will be treated without regard to age, sex, color, religion, race, national origin, citizenship, veteran status, current or future military status, sexual orientation, gender identification, marital or familial status, physical or mental disability, legal source of income or any other status protected by law. Eclaro's policy prohibits all forms of discrimination, harassment and intimidation

based on a person's race, sex, gender, pregnancy, gender identity or expression, color, creed, religion, national origin, nationality, citizenship, immigration status, age, disability, genetic information, marital status (including domestic partnerships and civil unions as defined and recognized by applicable law), sexual orientation, culture, ancestry, familial or caregiver status, military status, veteran's status, socioeconomic status, unemployment status, status as a victim of domestic violence or other basis prohibited by law. This policy reflects the organization's belief that providing equal opportunities for all employees is both a moral responsibility and good management practice.

### **Freely Chosen Employment and Child Labor**

Eclaro is committed to implementing systems and controls aimed at ensuring that freely chosen employment is the policy within its organization and in its supply chain. Freely Chosen Employment: workers shall not be forced, mentally or physically coerced, bonded, indentured, or subjected to involuntary prison labor or slave trafficked or compulsory labor in any form, including forced overtime. All work must be carried out voluntarily. Workers must have the right to terminate their employment freely, as appropriate following a reasonable period of notice in accordance with applicable laws and collective agreements, and without the imposition of any improper penalties.

The Company policy adheres to Child Labor Avoidance: child labor shall not be employed. The term "child" refers to any person under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is the greatest. Subject to the overriding prohibition on the use of child labor, if workers under the age of 18 are employed then particular care shall be taken as to the duties that they carry out and the conditions in which they are required to work to ensure that they come to no physical, mental or other harm as a direct or indirect result of their work or working conditions.

Wages, Benefits and Working Hours: Compensation should comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Employees should be able to earn fair wages, as determined by applicable local law. Work weeks should not exceed the maximum set by local law.

### **Prohibition of Alcohol & Substance Abuse**

The standards of this conduct strictly prohibit employees the unlawful possession, use, or distribution of illicit drugs and alcohol, and abuse of any substances, at all of its operating sites or as part of any of its business activities. Possession or use of any such substances may only be permitted if with medical prescription for health treatment.

In compliance to this policy, applicable regulations governing alcoholic beverages applies if in any case there may be management approved company-sponsored events. Hereunder, all employees are expected to drink responsibly and lawfully, understanding the health issues related to the consumption of alcohol, and avoiding excessive or any other abuse of alcohol that may negatively affect one's behavior and health.

### **Safety in the Workplace**

The safety and security of the workplace is a primary concern of Eclaro. The Company adheres to all applicable laws regarding health and safety and security in the workplace. In addition, threats or acts of violence in the workplace or failure to report them will not be tolerated.

## **Sustainability**

At the foundation of our company is the firm belief that Corporate, Social and Economic Responsibility is essential to our ongoing sustainability and growth. Appropriate environmental stewardship is a key component of this Corporate Social and Economic Responsibility, as resources are not unlimited and we all have a responsibility to reduce our impacts on the environment. Eclaro has taken the initiative to develop and enforce an Environmental Management System (EMS) with guidelines and policies to promote sustainable practices as it relates to environmental sustainability and corporate global citizenship. We will be utilizing this EMS as a strategic tool to grow our business via sustainable practices. Eclaro expects all employees to operate in an environmentally responsible manner. Eclaro has also revised its Supplier Conduct Principles to articulate the company's overall social and environmental requirements to our suppliers as well.

## **Enforcement of the Code of Conduct and Work Ethics Policy**

This "Code of Conduct and Work Ethics Policy" was formulated in order to foster and maintain employee trust and confidence in the professionalism and the integrity of the employees of the Company. Everyone is expected to appropriate standards of conduct asset out in this Policy which aims to provide guidance to all Eclaro officers and employees on how and in which manner should they conduct themselves whenever they undertake business on behalf of the Company. In case of any doubt as to how employees should behave under a specific circumstance which is not covered hereunder, it will be more prudent to seek guidance from their immediate superior and/or from the Human Resource Department.

Subject to due process and investigation, a breach of the Policy may result in disciplinary action against the employee concerned including, potential dismissal or termination of employment, or any other legal action as may be available to the Company.

## **Amendments**

The Company reserves the rights to change or amend this Policy in whole or in part, at any time without assigning any reason whatsoever. The employees upon hiring hereby unconditionally agree to all such changes and amendments