

CHAPTER 23: CODE OF CONDUCT

Objective:

At Gateway Distriparks Limited, our Code of Conduct is intricately designed to embody and reinforce our foundational values of respect, integrity, and fairness, aiming far beyond mere compliance to inspire a culture of ethical excellence. This framework is pivotal in nurturing an environment where every employee feels valued, supported, and motivated to excel. It guides our actions and decisions, ensuring they align with both our moral compass and our strategic objectives. By embedding these principles into our daily operations, we commit to a standard of conduct that enhances our relationships with stakeholders, enriches our community engagements, and fosters sustainable growth. This Code is not just a set of rules but a reflection of our collective commitment to uphold the highest ethical standards, making Gateway Distriparks Limited a beacon of trust and integrity in the industry.

Applicability:

This Code of Conduct applies equally to every employee at Gateway Distriparks Limited, across all functions and locations, including full-time outsourced personnel.

Conduct Guidelines:

- 1. Behavioral and Workplace Conduct:** Employees shall maintain the highest standards of moral and ethical behavior, fostering an environment free from discrimination and harassment. There is zero tolerance for behaviors or actions based on, but not limited to, gender, race, colour, origin, age, religion, disability, or marital status, that create a hostile, intimidating, or offensive workplace or interfere unreasonably with an employee's performance. Ensuring respect and inclusion for all is a fundamental principle that guides our interactions and practices.
- 2. Legal Compliance:** Every employee is required to adhere to all applicable laws and regulations, including but not limited to corporate, tax, employment, and trade laws. This commitment ensures our operations respect and comply with legal standards at all levels.

- 3. Environmental Responsibility:** We encourage employees to actively participate in environmental sustainability initiatives. This includes adopting practices that reduce waste, conserve energy, and promote recycling in our daily operations. Our collective effort towards environmental stewardship not only benefits the planet but also aligns with our corporate values of responsibility and respect for the communities we serve.
- 4. Conflict of Interest and Integrity:** All employees are mandated to disclose in writing any personal interests that might conflict with the interests of Gateway Distriparks Limited. Prior written approval from senior management is required before proceeding with any business decision or transaction that presents a potential conflict. This directive extends to transactions involving employees' relatives, whether as vendors or customers. Employees must refrain from any action that could compromise the company's interests against competitors or engage in unfair practices to gain business or personal advantages. Utilizing one's association with the company for personal gain, to the detriment of Gateway Distriparks Limited's interests, is strictly forbidden and will be addressed with utmost seriousness.
- 5. Substance Policy and Workplace Safety:** Employees shall not operate under the influence of intoxicating substances or engage in the use of harmful drugs on work premises. The possession of unauthorized weapons, illegal firearms, or explosives within company premises is strictly prohibited. Additionally, engaging in criminal conduct, acts of violence, or making threats of violence towards anyone on company premises or while representing the company is unacceptable and will not be tolerated, ensuring a safe and secure working environment for all.
- 6. Dress Code and Personal Hygiene:** All employees are expected to adhere to a formal business dress code during working days, with a more relaxed dress code allowing collared T-shirts, sneakers, and jeans on Fridays. For meetings with external parties, a formal dress code is mandatory on all days. Additionally, employees are required to maintain high standards of personal hygiene and grooming as a courtesy to colleagues and customer representatives, ensuring a professional and respectful workplace environment for everyone.
- 7. Confidentiality, Insider Information, Data Protection, and Third-Party Information:** Employees are required to protect all forms of confidential information, including company data, internal discussions, strategies, customer, and vendor data, whether in physical or

electronic form. Unauthorized disclosure of such information to competitors, customers, external agencies, or any other third party without prior approval is strictly prohibited. This extends to a strict ban on trading in the company's or its subsidiaries' shares by employees and their relatives with access to unpublished price-sensitive information. Upholding the confidentiality of company, customer, and vendor information is crucial to maintaining our stakeholders' trust and compliance with legal and ethical standards.

- 8. Protection and Care of Company Property:** Employees must ensure that physical assets of the company are not utilized for personal purposes. The level of care and respect afforded to these assets should mirror the care one would take with their own property, emphasizing stewardship and responsibility in their use and maintenance.
- 9. Respect for Company Time and Resources:** Employees are reminded of the importance of using company time and resources wisely. This includes focusing on work-related activities during business hours and using company assets responsibly. Efficient use of time and resources is crucial for maintaining productivity and ensuring the company's success.
- 10. Authorization and Representation:** Employees are prohibited from making any representations or commitments on behalf of the company to customers, the public, statutory authorities, or any other entity if such actions are known, or reasonably should be known, to exceed the scope of their authorization. It is imperative that all communications and commitments are aligned with the employee's designated authority and the company's policies.
- 11. Public Representation and Media Relations:** Only designated spokespersons are authorized to speak on behalf of the company to the media or in public forums. This policy ensures consistency, accuracy, and professionalism in our public communications, maintaining the company's image and integrity.
- 12. Digital Communication and Social Media Use:** Employees are expected to maintain professionalism in all forms of digital communication, including social media. This involves ensuring that online interactions reflect the company's standards of respect and integrity. While representing the company, employees should avoid sharing confidential information and engaging in discussions that could harm the company's reputation, and should adhere to the guidelines as laid out by the IT team from time to time.

- 13. Professional Development and Continuous Learning:** The company supports ongoing professional development and continuous learning for all employees. This commitment includes access to training programs, workshops, and seminars that enhance job skills, encourage innovation, and foster career growth. Employees are encouraged to seek out learning opportunities that align with their professional goals and the company's strategic objectives.
- 14. Teamwork, Support, and Conflict Resolution:** We emphasize the importance of fostering a spirit of teamwork and support among employees, encouraging the role of mentorship and the willingness to seek and offer assistance. Engaging in open and transparent discussions is key to our collaborative and inclusive work environment. Moreover, we advocate for constructive conflict resolution, urging employees to address disagreements through open communication and, when necessary, seek mediation or guidance from supervisors. A positive approach to resolving conflicts and supporting one another strengthens our team dynamics and contributes to a harmonious workplace.
- 15. Health and Wellness:** We recognize the vital importance of our employees' well-being for the overall success of our organization. We encourage everyone to adopt best practices that support a healthy work-life balance, emphasizing mental and physical health. Through promoting wellness initiatives and encouraging healthy habits, we aim to create a supportive atmosphere that enables all employees to achieve personal and professional well-being.
- 16. Compliance with Industry Standards and Best Practices:** Adherence to industry standards and best practices is essential for maintaining our reputation for excellence. Employees are expected to stay informed about relevant guidelines and regulations, ensuring that our business practices not only meet but exceed the required standards for quality, safety, and ethics.
- 17. Anti-Bribery, Corruption:** We enforce a zero-tolerance policy against accepting or offering bribes, kickbacks, or any illicit considerations in dealings with customers, vendors and any external agencies. This is further detailed in the Anti-Bribery and Corruption policy of the company. Acceptance of gifts is also covered under this policy and employees must adhere to the same. Violations will result in disciplinary action, including termination of employment and which may include legal proceedings as well. Our commitment to ethical conduct

underlines the importance of integrity in all business interactions and the protection of our assets.

18. Theft: Any theft of company property or any third party property in custodianship of the company is prohibited and violations will result in disciplinary and legal action.

19. Employee Feedback and Continuous Improvement: We value employee feedback as a cornerstone for fostering a culture of continuous improvement. Employees are encouraged to share their insights, suggestions, and innovative ideas to enhance workplace practices and policies. A formal feedback mechanism ensures all voices are heard, contributing to the company's adaptive and innovative growth.

20. Policy Awareness and Clarification: Employees are required to thoroughly read and adhere to all company policies. In the interest of ensuring full understanding and compliance, everyone is encouraged to seek assistance or clarifications from their colleagues or reporting manager regarding any policy details. This proactive approach promotes a well-informed workforce and ensures that our practices are consistently aligned with the company's standards and expectations.

21. Acceptance: To further enhance the commitment to our Code of Conduct, we require each employee to electronically sign an acknowledgment on the HR portal of the company. This acknowledgment signifies the employee's understanding of the Code and confirms their commitment to adhere to its principles and guidelines. This formal acceptance helps ensure a shared responsibility towards maintaining and promoting our ethical standards across the organization, reinforcing our dedication to integrity, respect, and fairness in all aspects of our work at Gateway Distriparks Limited.

Approval Authority: Board of Directors

Date of Approval: February 14, 2024