



CODE OF CONDUCT

Introduction

PADU ASSOCIATES is committed to upholding the highest standards of ethical conduct and integrity in all our operations. This Code of Conduct outlines our expectations for all employees and partners, aligning with our core values of Integrity, Innovation, Collaboration, Excellence, and Sustainability.

1. Professionalism and Integrity

- a. Responsibilities:
Associates are expected to perform their duties with professionalism, dedication, honesty, and integrity. High standards of performance and ethical conduct are required at all times.
- b. Statutory Compliance:
Associates must comply with all applicable laws, regulations, and PADU's internal policies and procedures.

2. Compliance with Laws and Regulations

All employees must comply with all applicable laws and regulations of the jurisdictions in which we operate. Failure to comply can result in severe legal penalties for both the individual and PADU ASSOCIATES.

3. Workplace Conduct and Environment

- a. Respectful Workplace:
PADU ASSOCIATES is committed to a workplace where mutual respect is the standard, and discrimination or harassment of any kind is not tolerated.
- b. Safety and Health:
Maintaining a safe and healthy work environment for all employees and visitors is a priority. Employees are responsible for observing safety and health rules and practices and reporting accidents, injuries, and unsafe equipment or conditions.

4. Integrity and Accountability

- a. Conflicts of Interest:
Employees must avoid situations where personal interests could conflict with professional obligations or the interests of PADU ASSOCIATES. Any potential conflicts of interest should be disclosed immediately to management.
- b. Protection of Assets:
All employees should protect PADU ASSOCIATES's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on PADU ASSOCIATES's profitability and are prohibited.

5. Confidentiality and Data Protection

- a. Confidential Information:
Employees must maintain the confidentiality of information entrusted to them by PADU ASSOCIATES or its customers, except when disclosure is authorized or legally mandated.
- b. Privacy:
Respecting the privacy of both our customers and employees is fundamental. Personal information shall be treated with care and in accordance with the law.

6. Fair Dealing

- a. Anti-Bribery and Corruption:
PADU ASSOCIATES prohibits bribery and any form of unethical business behavior. All employees must conduct all business dealings transparently and without expectation of improper advantage.
- b. Gifts and Hospitality:
Giving or receiving any gift or hospitality that could be deemed to influence a business decision is prohibited. Exceptions can be made for modest gifts or hospitality that fall within the scope of accepted business practices, pending approval from management.

7. Sustainability and Community Engagement

- a. Environmental Stewardship:
Employees are expected to perform their duties in a manner that minimally impacts the environment.
- b. Community Involvement:
PADU ASSOCIATES encourages employees to engage with and contribute to the community, reflecting our commitment to social responsibility.

8. Reporting and Enforcement

- a. Reporting Violations:
Employees are encouraged to speak up about real or apparent violations of this Code, without fear of retaliation.
- b. Enforcement:
Violations of the Code can lead to disciplinary action, including termination of employment.

Conclusion

This Code of Conduct is the cornerstone of our ethical framework. It is designed to foster a culture of transparency, respect, and accountability, ensuring that we continue to deliver excellence in every aspect of our operations.