

Gneiss Code of Conduct Policy

Why do we have this Code of Conduct?

The Code of Conduct outlines the expected standards of behaviour and business conduct for all employees of Gneiss. We anticipate these standards, rooted in the principle of acting ethically, to guide individuals in their daily responsibilities as Gneiss employees or representatives. Each employee is accountable for upholding our dedication to ethical business conduct.

Who does the Code of Conduct apply to?

This Code of Conduct extends to all subsidiary firms under Gneiss along with their directors, officers, managers, employees, and temporary workers.

What is required of me?

You are required to thoroughly read and comprehend this policy, and to assume personal accountability for adhering to its principles consistently, ensuring that you conduct yourself ethically when interacting with colleagues and other stakeholders. If you hold a managerial or supervisory position, you bear an additional responsibility to set a positive example. It is imperative that you ensure your team members understand this policy, have access to guidance when needed, and address any reported concerns appropriately.

Our operational framework incorporates detailed policies that complement the principles outlined in this policy and are referenced throughout. It is essential that you acquaint yourself with these policies, accessible in our company handbook or from the HR department.

While this policy offers guidance and a framework for ethical behaviour, it may not cover every situation encountered in your daily activities. If you encounter an ethical dilemma and are uncertain about the appropriate course of action, consider the following questions:

- **Was it the right thing to do?**
- **Does this action comply with legal, moral, and ethical standards?**
- **How would this action be perceived if it were publicly disclosed in the media?**
- **Would I be at ease defending this action in a legal setting?**
- **Does this action sit well with my personal values and beliefs?**

Frequently, employing a practical and rational approach guided by these principles will lead to the appropriate course of action. Nonetheless, if you still harbour concerns, it is advisable to seek additional guidance.

Should you encounter any issues or apprehensions pertaining to a current or potential violation of this policy, it is imperative that you report them promptly.

What about different laws and business practices in different countries?

Gneiss is dedicated to adhering to the legal requirements and business regulations of all the countries where we conduct operations. This policy is applicable across all our locations worldwide. Even if local laws or business customs allow for lesser standards of conduct, we uphold the principles outlined in this policy.

Where can I get further guidance?

If you need additional guidance on how to handle a specific situation or any arising issue, feel free to reach out to your line manager or the HR department for assistance.
(admin@thegneissway.com)

What do I do if I am concerned about a breach of the Code of Conduct?

If you believe that you have encountered or observed behaviour that falls short of the standards outlined in this policy, it is important to take action. You may choose to start by discussing the issue informally with your line manager. For more serious matters, our Whistleblowing Policy offers a channel through which employees can raise concerns about policy application or broader business practices, without fear of retaliation. The contact information for the external Speak Up helpline is provided at the end of this policy. This helpline operates 24/7, and reports can be made anonymously if preferred. If you feel you are being unfairly treated as a result of raising a concern, you should report the issue via the Speak Up helpline.

Gneiss is dedicated to upholding sound and ethical business practices in our interactions with key stakeholders. Any such allegations will be thoroughly investigated. Individuals found to engage in retaliation or reprisal will be deemed in violation of this policy.

What if something goes wrong?

Occasionally, mistakes can occur. We're all human, and errors can happen. If you become aware of something going amiss, what should you do? It's crucial not to overlook it. Our policy mandates that you report it. Ignoring the issue won't resolve it; in fact, it could exacerbate matters.

What are the consequences of breaching the Code of Conduct?

Gneiss views any non-compliance with this policy as a serious matter. Therefore, violations of this policy may be addressed as misconduct, and Gneiss reserves the right to take disciplinary measures, including termination of employment.



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Chief Executive Officer
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