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CORPORATE CODE OF ETHICS AND BUSINESS CONDUCT

WAPS Global

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1. Introduction

WAPS Global is committed to conducting business with the highest ethical standards, integrity, and transparency. This **Code of Ethics and Business Conduct** defines the principles guiding our decisions, actions, and relationships with employees, clients, suppliers, partners, and communities. It aligns with global frameworks, including the **UN Global Compact**, ensuring accountability to people and the planet.

2. Core Values

Our actions are rooted in these principles:

- Integrity: Uphold honesty and transparency in all interactions.
- Sustainability: Prioritize environmental stewardship and social responsibility.
- Respect: Foster inclusivity, dignity, and fairness for all stakeholders.
- Excellence: Deliver innovative, high-quality solutions that exceed expectations.
- Accountability: Take responsibility for our actions and their impacts.

3. Ethical Standards

3.1 Health, Safety, and Environmental (HSE) Responsibility

WAPS Global prioritizes health, safety, and well-being of employees, contractors, clients, and communities. We integrate sustainability into all operations to minimize environmental impact.

Employee Responsibilities:

- Comply with all applicable laws, WAPS Global HSE policies, and client-specific HSE requirements.
- **Stop unsafe work** immediately if risks to health, safety, or the environment are identified.
- Maintain competency, fitness, and alertness to perform duties safely.



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- Report **all incidents, near-misses, or hazards** promptly to your line manager via the Company's digital reporting tool.
- **Seek guidance immediately** if you are unsure about your HSE responsibilities or suspect a violation of legal, company, or client requirements. Report concerns promptly through approved channels (e.g., your manager, HR).
- Zero tolerance for violence, harassment, or substance abuse (including alcohol/drugs during work hours).

3.2 Quality and Innovation

WAPS Global delivers products and services that consistently exceed customer expectations by integrating **innovation, technology, and sustainability** into every process.

Guidelines:

- Implement strict quality assurance procedures to track, evaluate, and enhance operations.
- Leverage **data-driven insights** and emerging technologies to drive innovation.
- Incorporate **continuous improvement** into daily operations.
- Align with global standards and customer-specific requirements.
- Prioritize **sustainability** in procurement, logistics, and service delivery.

3.3 Confidentiality and Data Protection

All WAPS GLOBAL personnel, contractors, and partners must respect and protect the confidentiality of proprietary, client, and supplier information entrusted to them. Disclosure is strictly permitted only in the following cases:

- **Authorized by the Company:** Approval from senior management.
- **Legal Requirement:** Compliance with a court order, subpoena, or statutory obligation (e.g., GDPR).
- **Prohibited Use:** Confidential information must never be used for personal gain, shared with unauthorized parties, or disclosed in violation of contractual agreements. WAPS GLOBAL outright forbids using unethical, unlawful, or improper means to access confidential information.
- **Breach Reporting:** Suspected or actual breaches of confidentiality must be reported immediately to the senior management.

Employee Obligations:

- Proprietary information includes **all non-public data** that could benefit competitors, harm WAPS GLOBAL, or negatively impact employees, customers, suppliers, or partners if disclosed. This covers trade secrets, financial records, client lists, intellectual property, pricing policies, and internal processes. Avoid unauthorized disclosure or use of sensitive data for personal gain.



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- Employees are not allowed to disclose proprietary information with external parties or use it for personal gain.
- Adhere to **data protection laws** (e.g., GDPR) and cybersecurity protocols.
- Report **data breaches** or suspected leaks immediately to management.
- Respect employee privacy and guarantee lawful collection/usage of personal data.

3.4 Fair Competition and Antitrust Compliance

WAPS Global competes fairly, ethically, and in compliance with **antitrust/competition laws** across all markets.

Guidelines:

- Prohibited practices: Price-fixing, bid-rigging, market allocation, or collusion with competitors.
- Avoid discussions with competitors about pricing, customers, or business strategies.
- Comply with regulations in digital marketplaces and e-commerce platforms.
- Report unethical business practices to senior management.

3.5 Equal Opportunity and Inclusivity

WAPS Global fosters a diverse, inclusive workplace free from discrimination or bias.

Guidelines:

- Prohibited discrimination based on **gender, race, religion, age, disability, sexual orientation, gender identity, or neurodiversity**.
- Recruitment, promotions, and training based solely on merit and job-related criteria.
- Provide reasonable accommodations for employees with disabilities.

4. Compliance and Accountability

All employees, contractors, and partners must adhere to this Code.

Enforcement:

- **Ethics Committee:** Oversees compliance, investigates violations, and recommends disciplinary actions.
- **Disciplinary Measures:** Range from warnings to termination, depending on severity.
- **Annual Review:** Employees must recertify their understanding of this Code.