



## **Code of Conduct**

It is the policy of **BK Energy Efficiency** to provide our Code of Conduct, which serves as a guide to establish and maintain appropriate business conduct for all employees (management, employees, contractors, student interns, trainees and volunteers). We expect all employees to exhibit the highest standards of ethical behaviour and business integrity in their conduct.

### **Employees must:**

1. Comply with all applicable laws and regulations in the countries in which we operate, including relevant international laws and regulations such as those on trade sanctions, export controls, reporting obligations, data protection and antitrust.
2. Adhere to a zero tolerance to all forms of bribery, corruption, extortion or embezzlement.
3. Declare any conflict of interest in business dealings. Any ownership or beneficial interest in a business owned by a government official or representative of a political party must also be declared.
4. Ensure any business entertaining, hospitality or gifts are kept reasonable in nature, entirely for the purpose of maintaining good business relations and not intended to influence in any way decisions about future business.
5. Utilize competitive information obtained only through legitimate means and for legitimate purposes in compliance with all applicable laws and regulations. No attempt may be made at any time to divulge information about competitors that is commercially sensitive or confidential, and not in the public domain.
6. Ensure all business and commercial dealings are transparently performed and accurately recorded in the books and records. There must be no actual or attempted participation in money laundering or engagement in insider trading.
7. Always safeguard confidential information, know-how and intellectual property. All information provided through our relationships that is not in the public domain is deemed confidential and is only to be used for its intended and designated purpose. All and any personal information about individuals must be handled with full respect for the protection of their privacy and for all relevant privacy laws and regulations.
8. Store and deliver products and services to meet the specifications and quality and safety criteria specified in the relevant contract or product documents to ensure they are safe for their intended use.
9. Adopt and adhere to the legal and contractual rights of employees, both permanent and casual.
10. Be provided with a total compensation package that includes wages, overtime pay, benefits and paid leave which meets or exceeds the legal minimum standards or appropriate prevailing industry standards, whichever is higher, and compensation terms established by legally binding collective bargaining agreements are implemented and adhered to.
11. Not work more than the regular and overtime hours allowed by the law of the country where the employees are employed. All overtime work by employees is on a voluntary basis.

12. Treat all employees with respect and dignity. No employee may be subject to any physical, sexual, psychological verbal harassment, abuse or other form of intimidation. There is no discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement. Discrimination, based on race, age, role, gender, gender identity, colour, ethnicity, religion, country of origin, sexual orientation, marital status, pregnancy, dependents, disability, social class, union membership or political views is prevented.
13. Be over the age of 15 or the local legal minimum age for work or mandatory schooling age, whichever is the higher. When young employees are employed they must not do work that is mentally, physically, socially or morally dangerous or harmful or interferes with their schooling by depriving them of the opportunity to attend school.
14. Know and have copies of their terms and conditions of employment. Forced labour, whether in the form of indentured labour, bonded labour or other forms, is not acceptable. Mental and physical coercion, slavery and human trafficking are prohibited.
15. Promote a healthy and safe workplace that aims to prevent accidents and injury arising out of, or occurring during work or as a result of the employer's operations.
16. Operate in an environment whereby the legal rights of employees to freedom of association and collective bargaining are recognised and respected. Employees must not be intimidated or harassed in the exercise of their legal right to join or refrain from joining any organization.
17. Respect the rights and title to property and land of the individual, indigenous people and local communities. All negotiations regarding their property or land, including the use of and transfers of it, must adhere to the principles of free, prior and informed consent, contract transparency and disclosure.

**Employees are free to raise their concerns and those who speak out are protected from retaliation**

