

Code of Conduct





Introduction

At Endproc, we are committed to reflecting our constant determination to move forward by establishing values and ethical principles that guide our activities and our relationships with all those involved in the business.

Compliance with the principles of our Code of Conduct is essential to preserve our reputation, reliability, and long-term success.

This Code is not intended to be a definitive solution to complex regulations, but rather a clear representation of the core values that support our business and our responsibilities.

Applicability of the Code of Conduct

The Endproc Code of Conduct establishes the ethical standards and principles that guide our operations in all the markets we attend. It applies to all Endproc employees, board members, agents, consultants, contract workers, and any individuals acting on behalf of or representing Endproc in any capacity.

Additionally, we encourage our partners, subcontractors, and suppliers around the world to align with these principles, ensuring consistency in our values across all aspects of business operations.

How to Use This Document

This booklet is a resource designed to promote ethical decision-making and foster transparency, ensuring stakeholders and employees act in alignment with our shared values.

- **Understand the Code of Conduct**

Take time to familiarize yourself with the Code of Conduct outlined in this document. It clearly defines the standards of behavior and ethical guidelines expected from all stakeholders.

- **Refer to the Table of Contents for Guidance**

Table of Contents to locate the relevant section that addresses your concern. This will help you find specific guidance quickly and effectively.

- **Consult Before Proceeding with Business Decisions**

If you are unsure about the correctness of a business decision on behalf of the company, it is essential to formally consult the organization before acting. Avoid making any decisions until you receive clear directions to ensure responsible and ethical outcomes.



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01

Ensuring a Respectful Workspace for Everyone

1.1. Fairness in Employment Practices

At Endproc, we are committed to creating and maintaining an inclusive workplace as an equal-opportunity employer. Our employment decisions are based solely on merit, experience, skills, and potential, ensuring fairness and objectivity in our processes.

We do not discriminate based on race, color, gender, age, religion, national origin, ancestry, physical or mental disability, veteran status, sexual orientation, or any other characteristic protected under applicable law.

Additionally, Endproc strictly prohibits and does not support activities that involve human trafficking, child labor, or forced labor. This policy applies not only to our employees but also to all subcontractors involved in delivering services under Endproc contracts.

1.2. Workplace Free from Harassment

Endproc is committed to creating a workplace where discrimination, harassment, and retaliation have no place, ensuring an environment built on respect, equity, and integrity.

This commitment applies to all locations where our work is performed, including client premises and off-site business settings. We prioritize the creation of a supportive, respectful, and professional environment for all individuals.



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Building fair relations with clients and suppliers

2.1. Serving Clients

At Endproc, serving our clients lies at the core of everything we do. Our priority is delivering exceptional value and exceeding client expectations, ensuring sustained demand for our expertise and services.

We are committed to accurately representing the scope of our services and transparently communicating the terms and conditions under which they are provided.

2.2. Collaborating with Sub-consultants and Suppliers

Endproc is dedicated to ensuring the fair and respectful treatment of all sub-consultants and suppliers. We carefully select partners who align with our commitment to providing the best value for both the company and our clients.

This includes honoring client preferences while ensuring all sub-consultants and suppliers uphold the quality and standards we demand. This value-driven approach reflects our commitment to ethical business practices and long-term collaboration.



03

Preventing Conflicts of Interest

3.1. Identifying a Conflict of Interest

A conflict of interest arises when your personal or financial interests interfere with your ability to make sound and objective business decisions on behalf of Endproc.

You need to avoid any situation where even this type of bias is perceived. The perception that a conflict of interest exists that jeopardizes our business integrity can be as damaging to our reputation and our business as the existence of such a conflict.

To determine whether a conflict of interest exists, you should ask yourself:

- Does this action or situation violate company policies?
- Could this action potentially affect my ability to make sound business decisions?
- Is it likely to influence my objectivity or be perceived to do so?
- Is it possible that my co-workers would think the situation would affect the way I work?
- Could it influence Endproc's revenues or profits?
- Would I or any member of my family gain any financial or personal benefit?

If you answer yes to any of these questions, you should discuss the activity, financial interest, or relationship with your supervisor or Human Resources Manager immediately and before proceeding.

3.2. Outside jobs and activities

Outside work and activities may affect your ability to perform your job at Endproc. Examples of inappropriate outside work and activities include:

- Working for, or performing services for, an actual or potential competitor of Endproc, a customer, supplier, subcontractor, or agent, while employed by Endproc.
- Using company assets, contacts, or other company resources to start or support another company or non-profit organization.



3.3. Accepting and Offering Gifts

To ensure transparency and maintain ethical business practices, we have clear guidelines on accepting or offering gifts, favors, or other benefits.

What Is Not Allowed

- **Gifts from/to business partners:** Employees may not solicit, accept, or offer gifts, including tickets to sports or cultural events, meals, beverages, travel, or any other items of value, to or from any individual or entity that does business with or seeks to do business with Endproc, unless explicitly permitted under this policy.
- **Event-related gifts:** Gifts must not be solicited or accepted for internal events.
- **Cash and equivalents:** Cash, prepaid credit cards, checks, or loans cannot be accepted or offered under any circumstances.

What Is Allowed

Nominal value gifts: You may accept or offer occasional gifts of low value, provided they meet common standards of courtesy, hospitality, or protocol.

Conditions for acceptance/offering:

- All accepted or offered gifts must comply with company policies and must be appropriately documented.
- Gifts must not exceed an aggregate value of \$750 per individual within 12 months.

By following these guidelines, we uphold our commitment to ethical business operations and avoid any potential conflicts of interest. If you have questions or need clarification, please contact your manager.

3.4. Conducting Business with Family or Related Businesses

If you plan to engage in business transactions with a family member or a company in which you hold a financial interest, you must first obtain written approval from your supervisor. This is crucial to prevent potential conflicts of interest.

When determining whether a financial interest may lead to a conflict of interests, the following factors will be taken into account

- **Size and Nature of Investment:** How substantial the investment is and its characteristics.
- **Business relationship:** The nature of business interactions between the other entity and Endproc.
- **Access to Confidential Information:** Whether your role provides access to sensitive or restricted information.
- **Decision-Making Influence:** Your ability to impact Endproc's decisions regarding the other entity.



04

Interacting with communities

4.1. Use of Social Media

Employees are responsible for the content they post online, including written statements and shared images. It is essential to exercise discretion and adhere to all relevant company policies when publishing any company-related material on social media platforms.

Below are the rules that must be followed to guarantee compliance and professionalism:

- Ensure that communications do not violate any applicable laws (e.g., libel, slander, defamation, harassment, or copyright regulations) or company policies, particularly those regarding the disclosure of confidential or privileged information or speaking on behalf of Endproc.
- Company-owned logos, images, and copyrighted materials may not be used for commercial purposes without proper authorization. This includes digital content such as photographs, infographics, articles, videos, and blogs, which are subject to the same copyright restrictions as printed materials.
- When discussing your professional life, clearly state that these are personal views and do not necessarily represent company views.
- Do not mention company customers, partners, or suppliers on social media without obtaining their prior written consent. Unauthorized disclosures can lead to significant legal and contractual complications for both the company and the individuals involved.
- Confidential company or employee information must never be shared under any circumstances. Protecting both company and personal data is vital to maintaining trust and security.



4.2. Participation in Political Activities

At Endproc, we respect and uphold your right to participate in political activities during your personal time. Employees may choose to engage in political causes or support political action committees voluntarily, without any influence or expectation from the company.

Our policy is clear: Endproc does not apply direct or indirect pressure on employees to make political contributions, support a political party, endorse any candidate, or participate in political causes. Your political choices are entirely your own and remain a personal matter.

To ensure compliance with ethical and legal standards, the use of corporate funds, property, services, or assets, including employee work time, for political purposes is either strictly prohibited or highly restricted. Any engagement in political activities authorized by policy or regulation must be transparently documented, with all related costs clearly recorded and accounted for.



05

Using Company Assets Responsibly

5.1. Confidential and Proprietary Information

Endproc's confidential and proprietary information is one of our company's most important assets, including information that is not in the public domain, and that if disclosed could benefit our competitors or harm the company.

Confidential and proprietary information covers a wide range of examples, including but not limited to:

- Technical information, process designs, or data
- Pricing strategies and business or strategic plans
- Details on acquisitions or partnerships
- Work processes, project practices, and know-how
- Software, technology, and research and development insights
- Customer and supplier lists
- Information from third parties entrusted to Endproc under confidentiality obligations.

Every employee has a responsibility to protect Endproc's confidential and proprietary information, whether inside or outside the workplace, follow these guidelines to protect this information:

- **Share only when necessary:** Disclose this information only to authorized colleagues or third parties who have a valid business need to know, and only after confirming with your supervisor that the recipient is bound by confidentiality obligations.
- **Avoid public discussions:** Never discuss sensitive information in public spaces where others may overhear, such as cafes, public transport, or social gatherings.
- **Follow safeguards:** Always adhere to the company's measures designed to prevent unauthorized access, accidental leaks, or intentional misuse of sensitive information.
- **Keep the obligation post-employment:** Your duty to protect Endproc's sensitive information does not end when you leave the company.



Manager Responsibilities

Managers have an additional duty to:

- Implement measures that minimize the risk of accidental or intentional misuse of confidential information.
- Share sensitive information with employees only on a need-to-know basis.

5.2 Personal use of company assets

On occasion, you may need to use company equipment and computer systems on a personal basis. This is permitted within certain limits, as long as your use is reasonable and meets your work goals.

Use of facilities or equipment for unauthorized, abusive, immoral, or inappropriate purposes will not be tolerated.

Do not overuse or abuse company-owned property for personal use or benefit, or to perform work for others. Inappropriate use may even constitute fraud or theft.

5.3 Software, Hardware, and Data Security

Endproc is licensed to use the technology used in our industry, including hardware, software, and computer systems which are integral to our operations and success. To ensure their proper use and security, all employees have a responsibility to protect these critical resources.

Responsibilities and Reporting

If you suspect that any Endproc or third-party system, information, or data has been compromised or its security jeopardized, promptly report your concerns to your supervisor. Immediate action is crucial to maintaining the integrity of our technological resources and information security.

Appropriate Use of Endproc Resources

Endproc resources are provided to enable you to perform your role effectively. These resources must not be used for:

- Personal financial gain or profit.
- Illegal activities.
- Accessing or downloading obscene, sexually explicit, or any other inappropriate material.
- Downloading copyrighted material without proper permission.
- Communicating messages that are discriminatory, harassing, or threatening.

Employees should understand that there is no expectation of personal privacy when using company resources. Endproc reserves the right to monitor and review all messages and information transmitted or received via Company systems, as permitted by applicable laws.



Additionally, remember that electronic documents and information can be retrieved even after they appear to have been “deleted” from your computer’s memory.

Installing Software or Hardware

The use of any new software or hardware must be approved by the IT department. Unauthorized installations or use of unlicensed software pose security risks and are strictly prohibited. Always ensure compliance with copyright laws.

Granting Third-Party Access

Before allowing any third party to access the Endproc network, software, or systems, ensure proper authorization has been obtained. Confirm the appropriateness and legality of such access to protect sensitive information.

Password and Access Data Security

Sharing your password, user ID, or other access credentials with others is strictly prohibited. Such actions can breach license agreements and lead to improper disclosure of confidential or proprietary information.

5.4. Document Retention Practices

We often handle large quantities of documents and records, both paper and electronic. It is important for you to know how long these documents and records should be retained and how you should dispose of them. If you are notified that documents in your possession may be relevant to litigation, an investigation, or an audit, you should retain those records and follow the instructions outlined in the notice.

5.5. Protection of Intellectual Property and copyright compliance

Patents, trade secrets, copyrights, and trademarks are legal terms that define when an invention, know-how, product, idea, written work, or name is owned by a person or company, and its use by others is prohibited without express permission.

You may not use another company’s name or logo without permission. Nor should you copy articles, data, photographs, music, videos, or software without the required authorization from the author or owner.

Just because something is posted on the Internet does not mean it is freely available for use. In addition, permission may be required from more than one source.

Occasionally, employees may develop ideas, processes, and technology on behalf of Endproc or in the scope of their work for Endproc. This “intellectual property” belongs to the company or the company’s customers (depending on the situation and the customer’s contractual terms) and not to the employees.



06 |

Using Third-Party Information with Integrity

6.1. Information received from customers and stakeholders

Our customers, suppliers, and partners often entrust us with highly confidential data and information, this information is often governed by data privacy laws, contractual obligations, and Endproc's internal policies and practices.

Every day, many Endproc employees handle this sensitive data as part of their roles. You must always respect and protect this information with the highest level of care, even when you are no longer part of Endproc.

6.2. Information related to Competitors

To compete effectively in the marketplace, it is essential to gather appropriate competitive information. However, this must always be done in a responsible, ethical, and lawful manner. Below, we outline acceptable practices for collecting and using such information.

Acceptable Practices

You may collect and use publicly available information from reliable sources, including:

- **Public Publications:** Newspapers, professional journals, or websites.
- **Public Shared Materials:** Annual reports, brochures, and sales materials.
- **Customer Insights:** Non-confidential insights shared by customers.
- **Industry Events:** Information exchanged during professional association meetings or industry conferences.



Additionally, a customer may share information about a competitor's proposal, that information can be used only if:

- The information is not confidential.
- It does not include sensitive details about bids, especially for government contracts. Always consult your supervisor before using or disclosing this type of information.

Unacceptable Practices

We must not obtain or use competitive information through unethical or dishonest methods. Specifically:

- Do not attempt misrepresentation or impersonation to gather information.
- Never use dishonesty to access proprietary or confidential data. If there is any doubt regarding the ethical nature of collecting certain information, consult your supervisor for guidance.

6.3. Confidential information from previous employers

New employees have confidential or proprietary business information about customers, partners, and competitors because of their work with a previous employer. Such information may include:

- Specific technical, design, or process data
- Trade secrets or confidential information
- Software licensed from a previous employer
- Anything considered confidential or privileged and which is not available to the public.

You must respect the confidentiality of this information. Never disclose or ask a co-worker to disclose confidential or privileged information about a previous employer or violate a confidentiality agreement with a previous employer. If a co-worker offers to disclose such information, do not accept the offer.



07

Dealing with Audits

Always provide accurate and complete information and never delete or destroy records that are subject to government or internal investigation, subpoena, or lawsuit (or are likely to be in the future).

Do not attempt to improperly influence any auditor, inspector, or investigator who is examining our company's records, or encourage anyone else to do so. If you are contacted by a government inspector or investigator in connection with Endproc, you must notify your manager.

You must not provide any Endproc records to outside investigators without the prior written approval of Endproc's Senior Management.



08

Conducting Business around the World

8.1. Standing Firm Against Bribery

In many parts of the world, the payment of bribes to obtain business contracts is unfortunately accepted and expected. However, Endproc will not tolerate bribery of any kind, with any third party, public or private, either directly or indirectly through third parties, even if we lose business or face impediments due to our refusal to tolerate bribes.

The consequences for violating anti-corruption laws are severe for both, our company and the individuals involved, including potential civil and criminal liability.

8.2. Recognizing the Red Flags of Money Laundering

Money laundering is the process by which individuals or entities move illegal funds through the financial system to hide traces of illegal origin or attempt to make these funds appear legitimate.

While you may never be in a position to violate money laundering laws, you need to be alert to irregularities in the way payments are made. If you notice the following, you should report the matter immediately:

- Payments made in currencies other than those specified on the invoice.
- Payments made to or received from countries unrelated to the transaction
- Attempts to make payments in cash or cash equivalents
- Payments made by a third party not involved in the contract or an account other than the business account normally used.
- Requests or attempts to make payments for each invoice or group of invoices through multiple payment methods.

8.3. No Tolerance for Human Trafficking or Labor Exploitation

Endproc is committed to fostering an environment that respects and supports all aspects of human rights. Endproc does not tolerate the use of child or forced labor, human trafficking, or sexual exploitation. It is your responsibility to ensure that Endproc does not maintain relationships with suppliers, contractors, or other business partners who accept or engage in these practices.



09

Complying with Health, Safety, and Environmental Regulations

9.1. Commitment to the Environment, health and safety

Endproc is deeply committed to ensuring a safe and healthy working environment for our employees while prioritizing environmental responsibility.

Providing a safe working environment gives us a competitive advantage in attracting the best candidates, as well as generating and retaining our customers.

9.2. Environmental Protection

At Endproc, we are deeply dedicated to protecting the environment. Adhering to applicable environmental policies and regulations is a fundamental part of everything we do.

For our employees, this means ensuring that all tasks are performed in full compliance with current environmental standards. We recognize that environmental responsibility is a shared effort, and every team member plays a vital role in maintaining this commitment.

For our stakeholders, we integrate environmental considerations into every aspect of our operations. All project designs and plans we deliver to our clients meet and exceed existing environmental laws, reflecting our promise to minimize impact and prioritize sustainability.



10

Understanding and Addressing Violations of our Code of Conduct

10.1. Reporting Concerns

Endproc strongly encourages everyone to report any violations or potential breaches of our Code of Conduct. Reporting such concerns is vital to ensuring that appropriate actions are taken and any issues are resolved effectively.

To report concerns, you may choose from the following channels, depending on the nature of the issue:

- Your immediate supervisor
- A higher-level manager
- The Human Resources Department

10.2. Consequences of Code Violations

Violating the rules and standards outlined in the Endproc Code of Conduct may result in disciplinary action, up to and including termination.

Disciplinary measures may apply if an individual:

- Directly authorizes or engages in behavior that violates the Code of Conduct or company policies.
- Fails to properly supervise someone who commits a violation.
- Does not report a violation or intentionally withhold critical information about it.
- Retaliates or attempts to retaliate against an employee who reports concerns or suspected violations.



10.3. Investigating violations and prohibiting retaliation

Endproc guarantees protection from retaliation for anyone who raises concerns, reports a violation of our Code of Conduct, or participates in an investigation related to suspected violations of laws, policies, the Code of Conduct, or procedures.

We are dedicated to fostering a work environment that is free from harassment, intimidation, retaliation, and discrimination. Key to this commitment is maintaining a workplace atmosphere where employees feel safe to communicate openly and honestly, ask questions, and report concerns without fear of retaliation.

Retaliation in any form is strictly prohibited. This includes actions against individuals who:

- Report issues or raise questions in good faith.
- Participate in investigations.
- Decline to participate in any improper or unlawful activity.
- Exercise workplace rights protected by law, including disclosures to authorized public entities or the sharing of confidential company information when required or permitted by law.



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