



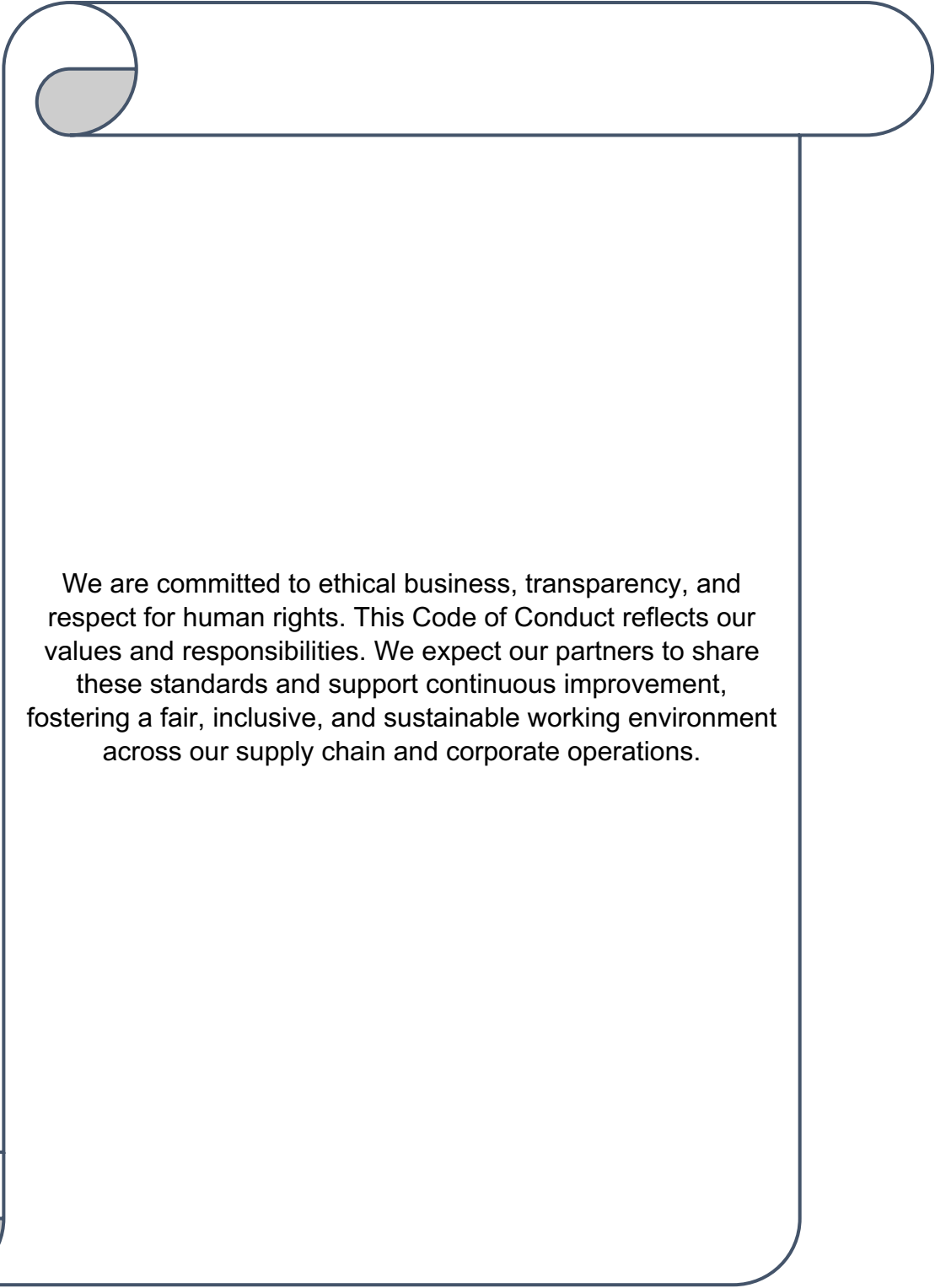
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# **ESG Pro Limited**

## **Supplier Code of conduct**

**April 2026**

## **MESSAGE FROM THE BOARD**



We are committed to ethical business, transparency, and respect for human rights. This Code of Conduct reflects our values and responsibilities. We expect our partners to share these standards and support continuous improvement, fostering a fair, inclusive, and sustainable working environment across our supply chain and corporate operations.

Our code is founded on the guidelines and principles established by our clients and the pertinent United Nations bodies, with a particular emphasis on the Declaration of Human Rights and several fundamental ILO conventions. Furthermore, we endeavoured to integrate the perspectives and understandings of non-governmental organisations.

### **Suppliers code of conduct**

- 1. We shall strive diligently** to comply with each stipulation outlined in the code of conduct of our clients. We will exclusively collaborate with enterprises that have received prior approval from our customers.
- 2. Child Labour:** Child labour shall not be accepted. Our company policy prohibits collaboration with business partners who employ individuals below the age of 15. Additionally, no employee shall be under the minimum legal school age requirement of the respective country. In the event that the local legislation mandates a minimum age exceeding 15, that threshold will be applied. Youth workplace apprenticeship programmes will receive our support in adherence to the relevant local legislation.
- 3. Forced labour and modern-day slavery:** Modern slavery and forced labour: We are adamantly opposed to engaging in business collaborations with factories or organisations that employ forced labour, indentured labour, or modern slavery. Unacceptable is all forms of coerced labour, whether overt or covert, explicit or implicit, direct or indirect.
- 4. Discipline procedures:** It is expected that each of our business partners will establish an open and transparent process to implement disciplinary measures in adherence to local legislation. We will not engage in business collaboration with organisations whose personnel subject their colleagues to corporal punishment, verbal or physical abuse, or any other form of coercion.
- 5. Legal requirements:** It is our presumption that all of our business associates adhere to the pertinent local legislation concerning commercial activities.
- 6. Ethical standards:** We exclusively collaborate with organisations that uphold the same ethical standards as our own.
- 7. Working hours:** We have a preference for working with clients who strive to maintain a workweek of no more than 60 hours. Upon exceeding the standard work hours, we expect to remunerate the employees with additional compensation in compliance with local legislation. While we are amenable to flexible scheduling, we will not collaborate with business partners who consistently exceed the

suggested 60 hours per week. In addition, every seven days, employees should receive a minimum of one day off.

- 8. Wages and Benefits:** We will exclusively engage in partnerships with businesses that ensure lawful compensation for their employees and furnish them with all legally owed benefits.
- 9. Freedom of Association:** We affirm and support the entitlement of every employee to participate in collective bargaining. Companies that hold this view should take precautions against discriminating against employees who participate in or support such movements; we will collaborate with such organisations. With the exception of any violations of local legislation, these personnel ought not to be penalised for their affiliation with the aforementioned organisation or movement.
- 10. Discrimination:** While acknowledging differences in culture, religion, and other personal characteristics, we maintain a strong conviction that employment candidates ought to be selected exclusively on the basis of their credentials. In determining an applicant's employability, caste, religion, race, and similar factors shall not be considered.
- 11. Subcontracting Without Authorisation:** Subcontracting without authorisation is considered a Zero Tolerance Violation at ESG Pro Limited. Any aspect of production that a vendor subcontracts must be disclosed to the group companies in advance and receive their approval. In the event of a violation, collaboration with said organisations and factories will be terminated.
- 12. Health and safety:** We will exclusively collaborate with factories and companies that provide a safe and healthy working environment for their employees.
- 13. Environment:** We anticipate that our business partners will implement measures to guarantee that their activities do not contribute to any adverse environmental impacts. It is anticipated that all of our business partners will adhere to legal regulations pertaining to environmental affairs and make concerted efforts to surpass statutory obligations.
- 14. Dormitories:** Any business partner offering a place for employees to live should make sure it's safe and sanitary.
- 15. Use of worker-paid recruitment fees:** Suppliers must ensure that workers are not required to pay fees or costs associated with their recruitment. Any expenses incurred in the hiring process must be borne by the supplier, thereby protecting workers from financial exploitation and potential debt bondage.

**16. Compulsory overtime:** Suppliers must guarantee that all overtime work is voluntary and adequately compensated in compliance with local legislation. This prevents undue pressure or coercion on employees, fostering a fair and supportive working environment.

**17. Confiscation of workers' original identification documents:** Suppliers must refrain from retaining workers' passports, ID cards, or other original documentation. This practice is a critical measure to safeguard employee autonomy and prevent situations resembling forced labour or exploitation.

**18. Accessing remedy, compensation, and justice for victims of modern slavery:** Suppliers are required to establish and maintain mechanisms that enable victims of modern slavery to access remediation, compensation, and justice. These mechanisms must be transparent and accessible, ensuring that affected individuals receive appropriate support and redress.

ESG Pro Limited declares that all regulations and processes that it anticipates from its suppliers shall be adhered to. Nevertheless, we adhere to our own set of ethical business and employment practices.

**Employment and business practices:**

- 1. Product and services safety:** To ensure the safety of our products and services, ESG Pro Limited develops and implements safety programmes throughout all phases of our operations that meet or exceed legal requirements.
- 2. False advertising and marketing:** The pricing of our service products is predicated exclusively on their inherent value. Deceptive or false advertising, as well as the misrepresentation of others' services and products, are not practices that ESG Pro Limited partakes in.
- 3. Intellectual property:** All employees and partners are obliged to protect ESG Pro Limited's intellectual property such as trade secrets, trademarks, designs, or patents.
- 4. Personal information and information security:** ESG Pro Limited has implemented privacy security policies that guarantee data protection by design and default, as well as through the utilisation of the most advanced information protection systems available, in order to protect the privacy of individuals, including customers, employees, and business partners.

5. **Fair Competition:** ESG Pro Limited guarantees that its policies adhere completely to the competition, antitrust, and fair-trade laws and regulations that are relevant in every country and region where it operates. All practices and agreements that divide markets, fix prices or impede equitable competition in any way.
6. **Fair procurement:** The selection process for our contractors and suppliers is predicated on competitive pricing, quality, and punctuality, among other pertinent criteria.
7. **Anti-corruption:** It is strictly prohibited for any ESG Pro Limited employee to receive or provide bribes, considerations in kind or cash, to any business associate. A distinct policy addressing anti-corruption and anti-fraud regulations clarifies the expected behaviour of personnel with regard to these issues. We shall implement protocols to detect violations of legislation pertaining to anti-money laundering, anti-fraud, and anti-corruption within our institution's personnel. It is the responsibility of employees to ensure that suppliers we appoint adhere to our stated ethics and principles. Prior to engaging fresh suppliers, it is imperative that we carry out due diligence and risk assessment in adherence to the Anti-Bribery and Anti-Corruption Policy.
8. **Decision making:** Business decisions must be made on an informed basis and in good faith. Every decision must not violate any applicable law or internal rule and no personal interest is involved.
9. **Reporting of information:** We are ensuring that all information is recorded accurately, in a timely manner, and as a representation of the facts, including but not limited to financial and book records.
10. **Insider trading:** ESG Pro Limited strictly prohibits all instances of insider trading and illicit security-related trade practices; violators will face legal consequences in the form of civil and criminal penalties. An individual who divulges non-public financial information, such as earnings, dividend strategies, research developments, new products or services, or any other noteworthy undertaking, shall be deemed an insider.
11. **Conflict of interest:** Should an individual suspect the potential emergence of a conflict of interest, they are advised to refer to the relevant conflict of interest policy for direction. When one suspects that a potential conflict of interest may arise, they are obligated to provide the legal team of ESG Pro Limited with complete disclosure and counsel.

**12. Non-retaliation:** ESG Pro Limited strictly prohibits any type of retaliatory action against an individual who voluntarily discloses information regarding a suspected violation. Disciplinary action will be taken against any individual who retaliates against an individual who conducts an investigation or makes a report.

If you have any questions or concerns that you wish to report in respect of this Code of Conduct, please don't hesitate to contact our Managing Director.

Formalised and approved by the board of directors on **15 April 2026**



Humperdinck Jackman  
CEO



Natashia Lee  
Managing Director

#### Version control

Date issued	Version number	Date reviewed	Approved
15 April 2026	V4.0		H. Jackman
20 July 2024	V3.0	1 August 2024	H. Jackman
20 July 2023	V2.0	1 August 2023	H. Jackman
20 July 2022	V1.0	1 August 2022	H. Jackman