Code of Conduct

Policy Summary

This summary provides an accessible overview of the E Co. Code of Conduct. It is designed to be the "moral compass" for everyone working on behalf of E Co.The Mission:

Why this Code matters

E Co. is a purpose-led B Corp aiming for a "world sustainably transformed." Our external credibility—our "license" to deliver climate finance solutions—relies entirely on our internal integrity. This Code exists to protect our teams, the vulnerable communities we serve, and our reputation as a trusted, values-driven consultancy.

The 4 Key Pillars of Behavior

1. Professional Integrity & Scope (The Guardrails)

Role Definition: Individuals must clearly identify as Technical Advisors or Consultants, never as regulated financial or legal advisors.

Strategic Advice: Work must remain within the scope of our climate finance expertise. Teams must use approved Liability Disclaimers on all deliverables to ensure clarity.

AI Usage: Any AI-generated output must be reviewed by a human and used in compliance with our AI use and Data Protection Policies.

2. Personal Conduct & Safeguarding

Core Values: Conduct must consistently reflect E Co.'s values: Empathetic, Driven, Connected, Delivering Excellence, Diverse and Impactful.

Respect & Dignity: Zero tolerance for harassment, discrimination, or intimidation.

Safeguarding: Strict prohibitions exist against the abuse or exploitation of anyone, particularly women, children, and vulnerable beneficiaries. Power imbalances must never be leveraged for personal or sexual gain.

Substance Use: Work must not be conducted under the influence of illegal substances or alcohol.

3. Operational Accountability

Integrity: We maintain zero tolerance for corrupt, fraudulent, or coercive practices.

Conflicts of Interest: Any personal, financial, or regional connection that could compromise objectivity must be disclosed to HR and relevant leads immediately.

Personal Relationships: Close personal or romantic relationships between colleagues must be disclosed to HR, and without any delay if they affect a reporting line or project oversight.

Environmental & Human Rights: We commit to minimizing our carbon footprint and adhering to the highest standards regarding human rights and modern slavery.

4. Safety, Security & Reporting

Psychological Safety: We foster a culture where sensitive matters and concerns can be raised without fear of reprisal.
Anonymous Reporting: The E Co. Integrity Portal is our primary channel for raising sensitive concerns around fraudulent action or serious misconduct (anonymously, if preferred) without fear of retaliation.
Escalation: If a sensitive issue involves the Head of HR, it should be escalated directly to the Managing Director.

The Bottom Line

Compliance is mandatory for all internal staff, consultants, and associates. While we seek to prioritize partners and suppliers who align with our environmental and social standards, this Code is our "North Star." It is not just about avoiding trouble—it is about ensuring our "how" is just as excellent and sustainable as our "what."

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1. Policy statement

Why Ethical and Responsible Conduct Matters to E Co.

As a purpose-led B Corp and climate finance consultancy, E Co.'s credibility, our trust and support of the communities we serve, and the psychological safety of our teams are our most critical assets. Our mission is to build "a world sustainably transformed." We cannot achieve external sustainable transformation without maintaining internal ethical integrity. Every person acting on behalf of E Co.—whether an employee, consultant, associate, or partner—is a custodian of this mission. Irresponsible or unethical conduct does not merely violate rules; it compromises our collective safety, erodes the trust of the vulnerable communities we serve, and devalues the impact of our climate work. Doing things responsibly is not just a compliance requirement—it is a protective guardrail for ourselves, our teammates, and our shared purpose.
In our commitment to deliver climate finance solutions and create "a world sustainably transformed," we align our operations with our core values: Empathetic, Driven, and Connected. We require everyone acting on behalf of E Co. to refuse to misuse unequal power dynamics, using their influence instead to protect, listen to, and empower the diverse communities we serve. This policy establishes our framework for Ethical Conduct to ensure our operations remain secure, legally compliant, and deliver a material, positive impact across our global operations.

Core Pillars of Policy Compliance:

- **Values-Driven Performance:** Technical or commercial excellence will never override or excuse behavioral failures. All team members are evaluated via the People Analyzer, where maintaining a positive threshold across our core values is required for sustained seat placement and career advancement.
- **Communication Hygiene and Mutual Respect:** In our highly distributed, remote ecosystem, communication is our culture. Professional, timely, and empathetic written and verbal communication is a baseline requirement. Bullying, harassment, defensive or exclusionary language, and a failure to maintain responsiveness without a valid capacity flag are direct policy breaches.
- **Conflict of Interest and Integrity:** All employees and associates must conduct business with absolute transparency. Any personal, financial, or regional connection that could compromise—or appear to compromise—objective

decision-making in our project pipelines, bidding processes, or recruitment funnels must be immediately disclosed to HR and Operations.

- **Accountability and LMA Guardrails:** Leaders and line managers are held to an elevated standard of LMA (Leadership, Management, Accountability). Managers must actively model this Code, address behavioral detours early during weekly O3 sessions, and are prohibited from absorbing or bypassing performance gaps to protect short-term delivery at the expense of team well-being.

2. Purpose

The purpose of this Code of Conduct is to explicitly define the non-negotiable behavioral, ethical, and professional standards required of everyone acting on behalf of E Co. As a purpose-led organization committed to redressing global climate imbalances, our external impact must be mirrored by our internal integrity. This Code does not seek to anticipate every operational scenario; rather, it serves as a moral and professional compass. It bridges the static design of our Job Role Frameworks and Accountability Charts with the lived experience of our core values: Empathetic, Driven, and Connected. Ultimately, this document ensures that we protect our psychological safety, insulate our "Strategic Moat" (our reputation and network), and guarantee that how we deliver our work is as excellent and value-aligned as what we deliver.

The purpose of this Policy is to define the framework for a framework for Ethical Conduct at E Co.. By aligning our operational requirements with our commitment to corporate responsibility, we aim to:

a) **Establish Standards:** Define clear expectations and responsibilities regarding ethical conduct across all levels of the organisation.
b) **Ensure Compliance:** Maintain full adherence to applicable laws, external regulations, and E Co's rigorous internal standards.
c) **Drive Positive Impact:** Mitigate potential risks while proactively identifying and optimising opportunities for ethical conduct to create a material positive impact on society and the environment.
d) **Promote Accountability:** Foster a culture of transparency, safety, and stakeholder accountability throughout our global operations.

3. Application of this policy

For the purpose of this policy, 'E Co. Team Members & Associates' encompasses all internal staff, external consultants, suppliers, and partners acting on behalf of E Co.

Scope and Intent. This policy sets the minimum global standards for E Co. and is borderless in its application. It applies to all work conducted on behalf of the company, whether from a home office, a regional hub, or while on assignment in complex environments.

Applicability by stakeholder group. The standards within this policy are tailored to the following groups, recognizing that our ability to influence and assess alignment varies by relationship type:

a) **Internal Team (UK & Overseas):** Mandatory for all employees and internal staff regardless of jurisdiction. This policy sets the non-negotiable baseline for our internal culture and operational conduct.

b) **Direct Suppliers (External Consultants):** Adherence to this policy is a condition of engagement. Consultants are expected to mirror our standards when representing E Co. or delivering on our projects.
c) **Supply Chain & Procurement:** We seek to engage with vendors and service providers whose practices reflect our ethical and environmental principles. Where possible, we prioritize partners who share our commitment to these values.
d) **Business Partners:** We aim to collaborate with technology providers and consortium partners who demonstrate a commitment to social and environmental impact. We favor partnerships that align with our core principles and ethical framework.
e) **Communities & Clients:** We place the safety and empowerment of the communities we serve at the heart of our consulting practice. In all project work, we strive to protect and uplift the rights of women, children, and vulnerable stakeholders.

International Standards: While recognising that local laws and cultures differ, E Co. is an international organisation and this Code is developed from International and UN standards.

Jurisdictional Priority. As a global organisation, E Co. adheres to the following hierarchy:

- Where local laws are more lenient than this policy, this policy prevails.
- Where local laws are stricter, local law prevails.
- For UK-based employees, this policy complements statutory rights but does not form part of the employment contract.

4. Related documents and forms

This Code of Conduct is intended to be read in conjunction with E Co.'s broader policy suite. The table below outlines the key tools, templates, and mandatory training required to effectively implement these standards in practice.
Where there is an overlap or conflict between this Code and other specific operational policies, the more specific policy takes precedence. For policy interpretation or resolution of such conflicts, please contact the Head of HR. If a matter involves the Head of HR or requires executive escalation, please contact the Managing Director.

Related document/form/tool	Type	Description/ Comment
Anti-corruption policy	Policy	Detailed rules on bribery, money laundering, and terrorism financing.
E Co. Integrity Portal	Tool	Secure platform for anonymous reporting of actual or suspected violations or ethical concerns.
Data Protection Policy	Policy	Framework for handling monitoring data and privacy.
Human Rights and Modern Slavery Policy	Policy	Outlines our commitment to respecting human rights, preventing modern slavery and human trafficking, and implementing

		due diligence across our operations and supply chains.
AI Policy	Policy	Detailed rules on using AI tools.
Guidance on reputational risk	Guidance	Guidance on presenting work, attribution and managing reputational risk
Health & Safety policy	Policy	Defines the framework and standards for maintaining a safe, healthy, and legally compliant working environment for all hybrid and remote staff, covering risk assessments, accident reporting, and welfare provisions.
Hybrid & Remote Work Policy	Policy	Defines the framework and expectations for employees working in flexible, hybrid and non-office-based environments.
Lone Working Policy	Policy	Establishes safety protocols and support systems for employees working without direct supervision or in isolation.
Leave Policy: Holidays and Sick leave	Policy	Explains procedures and entitlements for annual leave, medical absences, and other types of time off.
Whistleblowing Policy	Policy	Framework for raising concerns about danger or illegality in the workplace, providing a secure, confidential channel for reporting wrongdoing without fear of retaliation.
Sexual Harassment Policy	Policy	Defines expectations, prevention protocols, and reporting mechanisms to maintain a workplace free from sexual harassment, abuse, or exploitation.
Wellbeing & Sustainable Productivity Policy	Policy	The primary framework for balancing employee health with high-performance output across global operations.
Grievance Register	Tool	Centralised tracking log used to record,

		monitor, and manage the status and resolution of formal grievances.
Grievance mechanisms policy	Policy	Defines the operational framework for managing and resolving internal and external workplace concerns and grievances to ensure transparency, compliance, and procedural fairness.
Disciplinary policy	Policy	Outlines the standards of conduct and procedures for addressing performance or behavioral issues fairly and consistently.
Appeals policy	Policy	Framework for reviewing and appealing formal decisions to ensure procedural fairness and transparency.
Equality and DEIB Policy	Policy	Supports non-discrimination, equal opportunity, and inclusion.
Safeguarding and Prevention of Sexual Exploitation and Abuse (PSEA) policy	Policy	Outlines our framework and commitment to safeguarding team members, partners, and local communities from sexual exploitation, abuse, and harm across all operations.

5. Principles

E Co. is committed to conducting business with integrity and in accordance with the highest ethical standards. Our "Ethical North Star" guides our global operations through three core pillars of responsibility:

- **B Corp Standards:** Balancing profit with purpose to benefit our workers, communities, and the environment.
- **The UN Global Compact:** Upholding the ten principles of human rights, labour, environment, and anti-corruption.
- **Women's Empowerment Principles (WEPs):** Advancing gender equality in our workplace, supply chain, and the communities where we consult.

Our commitment to ethical conduct is founded on the following core principles, designed to ensure ethical excellence, social equity, and long-term value creation for all stakeholders:

- **Ethical North Star & Framework Alignment:** We operate within a global ecosystem of responsibility. Our actions are guided by the B Corp Standards (balancing profit and purpose), the UN Global Compact (human rights and anti-corruption), and the Women's Empowerment Principles (WEPs).
- **Environmental Stewardship (Walking the Talk):** As a climate finance firm, our internal footprint must reflect our external advice. We hold ourselves to the same high standards we recommend to clients. This includes prioritising virtual consultation where possible, adhering to mandatory carbon-offsetting protocols for essential travel, and favoring vendors who are B Corp certified or demonstrate exceptional ESG performance.

- **Decolonising Advice & Local Empowerment:** We recognise the power dynamics inherent in international development. We are committed to providing advice that empowers local stakeholders rather than imposing external financial structures. Our goal is to co-create solutions that suit the local context, ensuring that our work supports the autonomy and long-term resilience of the communities we serve.
- **Inclusive Consulting & Gender Equality:** In alignment with the WEPs, we ensure that women and marginalised groups are not just "considered" but are actively consulted during our on-the-ground data gathering and design phases. We strive for a "net positive" outcome that promotes social equity alongside climate goals.
- **Empathetic Engagement & Safeguarding:** We lead with listening. We prioritise the safety and dignity of all stakeholders, maintaining a proactive stance on safeguarding to prevent harm, exploitation, or the misuse of power in unequal relationships.
- **Connected Collaboration:** We believe in being Connected. Our operational standards rely on teamwork and personal relationships to ensure that our global commitments are met through collective accountability and partnership.
- **Driven to Deliver Excellence:** We aim to exceed minimum standards. We are dedicated to transparency, accountability, and the highest level of professional rigor.

6. Standards of Professional Conduct

6.1 Professional Scope, Regulatory Boundaries & Liability Guardrails

To protect the firm, our clients, and individual representatives, E Co. operates within strict regulatory and professional parameters. E Co. is not regulated by the UK Financial Conduct Authority (FCA). Consequently, all E Co. Team Members & Associates must adhere strictly to the following operational boundaries:

- **Define the Role:** Representatives must clearly state in all contracts, project deliverables, and professional communications that they are providing technical, economic, or policy advisory services, and are not providing regulated financial or legal advice.
- **Prohibition on Regulated Advice:** Representatives must refrain from providing specific legal advice, investment advice, or "buy, hold, or sell" instructions for financial instruments, funds, or direct investment products. E Co. insights are strictly limited to non-regulated technical and strategic climate finance analysis.
- **Prohibition on Marketing and Financial Promotion:** Representatives must not engage in marketing, promotional activities, or the solicitation of specific financial products, investment opportunities, or regulated financial services on behalf of E Co. or any third party.
- **Mandatory Disclaimers:** All E Co. Team Members & Associates must ensure that every report, slide deck, proposal, and formal email containing strategic climate finance analysis includes E Co.'s approved Liability Disclaimer, explicitly stating that the content does not constitute regulated financial, investment, or legal advice.

6.2 Individual Conduct & Integrity

As E Co. employees or E Co. Team Members & Associates are expected to:

6.2.1 Uphold the integrity and reputation of E Co.

- Ensure professional and personal conduct is demonstrably consistent with E Co.'s values and standards.
- Be accountable for actions and manage the power that comes with an E Co. position with appropriate restraint.

- Be sensitive to and respectful of local customs and culture, seeking support or advice from E Co. if local norms differ from this Code.
- Not work under the influence of alcohol or use, or be in possession of, illegal substances on E Co. premises, vehicles, accommodation, or while conducting business on behalf of E Co.

6.2.2 Treat all people with respect and dignity and challenge any form of harassment, discrimination, intimidation, exploitation or abuse.

- Treat all people with respect and dignity.
- Actively challenge any form of harassment, discrimination, intimidation, exploitation, or abuse.
- Never abuse the position of power, including unequal power relationships, in relation to partners, clients, or the communities E Co. serves.
- Never engage in any form of sexual abuse or exploitation of any person of any age.
- Strictly prohibit sexual relations with children (under 18 years old) or with beneficiaries in exchange for assistance or any other reason, recognising the inherent unequal power dynamics.
- Not exchange money, offers of employment, goods, or services for sex or sexual favours, or engage in any other forms of humiliating, degrading, or exploitative behaviour.
- Use best endeavours to report any such behaviours or malpractice by others to management or through recognised confidential reporting systems.

6.3 Personal Relationships at Work

E Co. values an empathetic, open, and connected work culture. We recognize that close personal relationships may develop between colleagues. While the company does not restrict personal relationships between consenting peers, we must ensure that such relationships do not create actual or perceived conflicts of interest, bias, or operational disruption.

Key Requirements:

1. **Mandatory Disclosure:** Employees who enter into a close personal or romantic relationship must inform Human Resources, and they need to do so without any delay, if they:
    - Get to work in a direct or indirect reporting line.
    - Serve as a line manager, reviewer, or sign-off authority for one another.
    - Collaborate closely on shared client assignments or bid evaluations.
2. **Management of Potential Conflicts:** Following disclosure, HR and relevant management will work confidentially with the individuals to implement sensible safeguards (such as reassigning line management or oversight duties) to protect both parties and the team.
3. **Recusal:** Employees must automatically recuse themselves from any commercial, performance, or supervisory decisions involving a personal partner.
4. **Confidentiality:** HR will maintain the confidentiality of all disclosures. Information will be shared with key leadership and then with staff only on a need-to-know basis for resourcing and governance purposes, while ensuring transparent updates are provided to the involved parties.

6.4 Financial Integrity, Anti-Corruption & Stewardship of Resources

To maintain financial integrity and responsible stewardship, E Co. employees and E Co. Team Members & Associates will:

6.4.1 Zero Tolerance for Prohibited Practices: Corrupt, Fraudulent, Collusive, Coercive, and Obstructive

- **Corrupt Practices:** Do not offer, give, receive, or solicit, directly or indirectly, anything of value to influence improperly the actions of another party.
- **Fraudulent Practices:** Do not engage in any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation.
- **Collusive Practices:** Do not enter into an arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party.
- **Coercive Practices:** Do not impair or harm, or threaten to impair or harm, directly or indirectly, any party or the property of the party to influence improperly the actions of a party.
- **Obstructive Practices:** Do not deliberately destroy, falsify, alter, or conceal evidence material to an investigation or make false statements to investigators in order to materially impede an E Co. or client investigation into allegations of a prohibited practice.

6.4.2 Stewardship of Resources and Financial Integrity

- Use discretion when handling sensitive or confidential information.
- Seek authorisation before communicating externally in E Co.'s name to avoid any unintended detrimental repercussions.
- Use company resources (money, equipment, digital tools) with a high level of care and only in the best interest of the company.

6.4.3 Ethical Use of Technology and AI

- Human Oversight: Ensure that any AI-generated outputs used in technical advice or consulting are reviewed and validated by a qualified human expert to prevent bias or inaccuracies.
- Only use E Co. pre-approved AI tools as per our AI usage policy
- Disclose the use of AI tools to clients when they significantly contribute to deliverables or data analysis.
- Use AI tools only in compliance with E Co.'s Data Protection Policy, ensuring that sensitive or confidential client data is never processed through unsecured or unauthorised AI platforms.

6.4.4 Responsibility for Local Subcontractors (Local Coordinators, Translators and Drivers)

- Employees and Associates are responsible for ensuring that any local E Co. Team Members & Associates they directly hire or manage on behalf of E Co. behave in a manner consistent with this Code (particularly regarding anti-bribery, respectful treatment, and safeguarding).

6.5 Safety, Security & Global Citizenship

Regarding safety, security, and global citizenship, E Co. employees and E Co. Team Members & Associates will:

6.5.1 Protect Health, Safety, and Security

- Undertake and act on appropriate risk assessments, and in line with E Co's Health and Safety policies and procedures
- Comply with local security management guidelines and proactively inform management of any necessary changes.
- Behave in a way that avoids any unnecessary risk to the safety, health, and welfare of myself and others.
- Report any solicitation of "protection money" or extortion to management immediately.

- **Bribery under duress:** If an employee or representative faces a demand for payment accompanied by an immediate threat to physical safety, life, or liberty, they are permitted to make the payment. Personal safety is the company's priority. However, any such payment must be reported immediately to management as soon as it is safe to do so.

6.5.2 Promote human rights, protect the environment and oppose criminal or unethical activities

- Ensure conduct is aligned with E Co.'s environmental policy and consistent with the human rights framework to which E Co. subscribes.
- Proactively consider the environment in daily work and while on assignment. This includes minimizing waste (such as during workshops or meetings), recycling wherever possible, choosing accommodations with strong environmental credentials, and minimizing air travel in favor of virtual engagement where feasible. If air travel is unavoidable, E Co. Team Members & Associates must ensure it is carbon-offset according to E Co.'s protocols.
- Contribute to preventing all forms of criminal or unethical activities.
- Inform E Co. of any relevant criminal convictions or charges prior to or during employment that may impede the ability to perform duties, subject to national legislation.

6.5.3 Prevention of Modern Slavery and Human Trafficking

- Require all direct suppliers and service providers to certify that they do not engage in or facilitate any form of modern slavery.
- Ensure all internal and external recruitment processes are transparent, and no fees are charged to candidates for employment.
- Use best endeavours to report any indicators of forced labour or exploitative working conditions observed during project delivery or field assignments.

6.6 Communications & Reputational Integrity

Recognising that E Co.'s credibility depends on honesty and transparency, the following standards apply to all professional communications and representations:

- **Intellectual Property & Attribution**: All work produced for or on behalf of E Co. remains the exclusive property of the company. Team members must represent contributions accurately and avoid claiming personal credit for company output.
- **Factual & Evidence-Based Reporting:** All internal and external communications must be factual, neutral, and evidence-based. Do not exaggerate, imply, or overreport project results, scope, or impact.
- **Neutrality & Public Endorsements:** Maintain professional objectivity at all times. Avoid expressing personal judgment in official communications or endorsing a client's contested public statements.
- **Media & External Enquiries:** Immediately escalate all media, donor, press, or official social media enquiries to senior management before responding.

7. Required actions to address risks

To ensure policy compliance and effective risk mitigation, responsibilities are assigned as follows. This document defines the rules of engagement.

Stakeholder Group	Responsibility
Employees and External Consultants	Responsible for adhering to the policy principles in their daily work, completing training, and reporting any potential breaches or risks through the approved channels
Line Managers	Responsible for overseeing compliance within their teams, approving related requests or

	expenses in line with policy thresholds, and ensuring staff have time to complete required training.
ESG Experts	Responsible for providing specialist guidance on sustainability and social impact, interpreting ESG policy requirements for complex cases, and maintaining the environmental and social governance tools and templates referenced in this document.

8. Exceptions and waivers

N/A

9. Training and support

All E Co. team members, as well as associated external staff, suppliers, and Associates representing E Co., are required to read this Code of Conduct in full upon induction, at the start of each calendar year, and prior to commencing work on any new engagement.

While there are no formal training modules, understanding and compliance are mandatory performance requirements. It is the individual responsibility of every representative to familiarise themselves with this document and all related policies.

By signing this policy annually (or upon onboarding for external engagements), representatives confirm that they have read the requirements, understand their professional boundaries, and commit to the safety and ethical standards of the organisation.

If anyone requires clarification or feels unable to fulfill their duties within these ethical guardrails, they must proactively seek guidance from their Line Manager or the HR Department. Operating without a clear understanding of these boundaries is considered a compliance risk.

10. Monitoring and compliance

E Co. reserves the right to conduct regular assessments, audits, and reviews to verify compliance with this policy. All monitoring activities, including the collection and analysis of data, will be conducted in accordance with E Co.'s Data Protection Policy and relevant Privacy Notices. Employees are encouraged to proactively raise concerns or ask questions regarding compliance by contacting the Head of HR. We are committed to open communication and continuous improvement.

Reporting obligations: data gathered through these monitoring activities will be used to assess policy effectiveness. Where applicable, data will be disaggregated by gender and other relevant diversity metrics to ensure equitable outcomes in alignment with the Women's Empowerment Principles UNGC and B Corp. Such data will be pseudonymised where possible to protect individual privacy and used strictly for the purpose of assessing policy impact.

Compliance is mandatory. Failure to comply will result in disciplinary action for employees (which may include dismissal) or termination of business relationships for third parties.

11. Grievance mechanism & remediation

We foster a culture of psychological safety where all stakeholders — including employees, contractors, suppliers, and community members — are encouraged to raise concerns without fear of reprisal. Actual or suspected violations should be reported through our established channels. To ensure accessibility and overcome systemic barriers to reporting:

- **Internal:** Concerns can be raised with the Head of HR or via Vedrana Božić.
- **External/Anonymous:** Stakeholders may use E Co. Portal, which allows for anonymous reporting and is also accessible to external partners. To learn how the portal works, please refer to the handbook.
- **Gender-Sensitive Approach:** In alignment with the **Women's Empowerment Principles (WEPs)**, our reporting channels are designed to be gender-responsive. We recognise that power imbalances can discourage reporting; therefore, complainants or victims may request a point of contact or investigator of a specific gender to ensure comfort and safety.

Impartial Investigation: All reports will undergo a prompt, impartial, and thorough investigation HR Department. Investigations involving harassment, discrimination, or gender-based violence will be handled by individuals trained in trauma-informed and gender-sensitive interviewing techniques.

Non-Retaliation: We guarantee a strict zero-tolerance policy toward retaliation against any individual who reports a concern or violation in good faith, refuses unethical practices (including refusing to pay or accept a bribe), or reports safety risks. No employee, contractor, or stakeholder will be penalised, demoted, or subjected to any adverse consequences or reprisal for raising concerns, refusing unlawful or unethical demands (even if it results in E Co. losing business), or exercising their right to refuse an assignment in a region where they feel their personal safety is at an unacceptable risk.

Remediation & Redress: If a breach is substantiated, E Co. is committed to providing timely and appropriate remediation. This may include corrective actions, policy changes, or restitution to affected parties.

12. Glossary

- **UNGC** - United Nations Global Compact
- **Gender-Responsive** - an approach that identifies and acknowledges the different needs and constraints of individuals based on their gender and takes active steps to address them.
- **Material Positive Impact** - a significant and measurable beneficial effect on a social or environmental issue, moving beyond "doing no harm" to actively improving conditions.
- **Stakeholders** - any individual or group affected by E Co.'s operations, including employees, customers, suppliers, local communities, and the environment.

13. Oversight and governance

Policy owner: Head of HR (Vedrana Božić)
Approver: Managing Director (Rowan Putman)
The Policy owner is responsible for the daily implementation, governance, and maintenance of this policy. Their duties include authorising exceptions, overseeing training programmes, and updating compliance tools.
Contact: for guidance, approval, or interpretations regarding this policy, please contact: Vedrana Božić.
This policy is a living document. It will be reviewed Annually by the HR and ESG Teams to ensure it remains relevant and effective. Updates may occur more frequently if necessary to adapt to evolving legal frameworks, technological advancements, or industry best practices.

In the event of a conflict between these policies, the most specific policy applies, or consult the Head of HR for resolution. For general guidance, approval, or policy interpretation, please contact the Head of HR. If an issue involves the Head of HR or requires executive escalation, please contact the Managing Director.

14. Distribution record

Distribution group	Method of distribution	Date of record/announcement
Internal team	HRIS (e.g., BambooHR) announcement & Staff Handbook update	24/09/2026
External Consultants & Suppliers	Appended to new contracts / Associate Portal update	24/09/2026
Public disclosure	E Co. Website / Transparency Page	30/09/2026

15. Document control & review

Policy owner	Head of HR
Approved by:	Managing director
Original approval date:	01/05/2020 Anti Corruption - Code of Conduct Policy
Date of last revision and approval:	01/09/2026
Revision number:	2.0 (Second Revision)
Date of next revision:	1/10/2026

Rowan Putman
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