

1. Purpose and Scope

Purever is fully committed to conducting all of our operations with respect, integrity, and accountability. This Code of Ethics and Business Conduct Policy sets out the high ethical standards across all business activities, promoting safe, inclusive, and compliant work practices.

This policy will be reviewed regularly to maintain its relevance and effectiveness in line with legal standards.

This policy applies to all Purever employees, subcontractors, consultants, trainees, agency staff, and any other individuals engaged by Purever in any of the jurisdictions in which we operate.

The purpose of this policy is to:

- a. Establish responsibilities for ethical practices across all employees, subcontractors, and supply chain partners.
- b. Provide guidance on maintaining safe and compliant conduct across our projects.
- c. Outline procedures to mitigate risks associated with safety, environmental impact, compliance, and anti-corruption.
- d. Ensure consistent communication of our ethical standards to employees and stakeholders.
- e. Explain how potential breaches against this code should be reported and investigated.

2. Definition

Purever Group defines ethics and business conduct as:

- A A set of guidelines and regulations that governs the expected behaviours of all those who work with or on behalf of the group.
- B A basis on which business decisions are made in a transparent and professional manner.
- C Recognition of our ambition to always do the right thing when nobody is watching.

3. Policy Requirements

Health and Safety

Purever prioritizes a safe working environment:

- a. All employees and subcontractors must follow comprehensive safety guidelines, including Safe Plans of Action (SPAs), Risk Assessment Method Statements (RAMS), and extensive Safety Training before working on any Purever factory or site.
- b. Regular safety inspections are conducted to ensure compliance of same.
- c. Our ethos is such that if we are in any doubt we will temporarily suspend works on site where there is a safety concern, until such time as it is mitigated.

Environmental Responsibility

To minimize our environmental impact, Purever is committed to:

- a. Complying with global environmental standards and local regulations
- b. Implementing sustainable practices in line with international standards and best practice benchmarks.
- c. Fully comply with the laws and regulations in every jurisdiction in which we operate.

Employment Legislation

Purever complies with all applicable local, national, and international laws, including:

- d. Employment law
- e. Anti-corruption and anti-bribery legislation
- f. Fair labour practices
- g. Anti-discrimination regulations

Fostering equality, diversity and inclusion as part of our DNA

Purever is committed to fostering an inclusive work environment that respects human rights and dignity at work:

- a. Zero tolerance for discrimination or harassment in any shape or form
- b. Fair treatment and equal opportunity for all
- c. Reporting in respect of minority categories
- d. Respect in everything we do and celebrating difference

Bribery and Corruption

Purever operates a zero-tolerance policy toward bribery and corruption. Employees must not:

- a. Offer or accept any form of bribe
- b. Engage in any behaviour that might be perceived as corrupt
- c. Facilitate improper payments or accept gifts
- d. Be unduly influenced by anything other than legitimate business practices

4. Roles and Responsibilities

All employees and associated persons are responsible for adhering to this Code of Conduct and to report any activity that could result in a potential breach of the policy. Compliance with the policy is mandatory. Disciplinary action, up to and including dismissal, may be taken following any investigation that determines that there is a case to answer in respect of any employee, contractor or any other person acting on behalf of the group.

5. Reporting and Non-retaliation

- Regular training will be provided to all employees and contractors.
- Compliance checks will be conducted to identify and address any potential non-conformities with the policy.
- Feedback mechanisms are in place to report potential breaches confidentially (Protected Disclosure Policy) or otherwise (Grievance Policy).

- Extensive stakeholder engagement and policy communication is undertaken on a regular basis.
- Regular communication ensures shared understanding and compliance.

6. Monitoring and Review

The Board of Directors has overall responsibility for ensuring that this policy complies with Purever’s legal and ethical obligations and to ensure compliance across the Group. Effectiveness of this policy will be regularly reviewed by the Board. Internal control systems and procedures will be subject to audit under standard internal audit processes.

Policy Revision History

Owner	Revision No.	Effective Date
HR/ESG	1	1 st Dec 2024
HR/ESG	2	18 th Jun 2025

1. Purpose and Scope

Purever will comply with all laws, rules and regulations applicable to our business in all the countries in which we trade. Purever have and will continue to adopt a zero-tolerance approach to slavery and human trafficking throughout all of its business entities. Purever is fully committed to ethical trading and ensuring that the highest standards of integrity are maintained as we conduct our business.

Taking responsibility for the impact of our activities on society and the environment, we have developed and embedded our ethical trading principals into our organisational policies and procedures.

Purever's Anti-Slavery and Human Trafficking Policy outlines our commitment to ensuring that through our different systems and controls that modern slavery or human trafficking does not and will never exist in our daily business activities.

Purever is committed to:

- Acting ethically and with integrity throughout all of our business dealings;
- Implementing and enforcing effective systems and controls to ensure modern slavery is not occurring anywhere within our business or within any of our supply chains; and
- Ensuring there is transparency in our approach to tackling modern slavery in our business and in our supply chain.

The policy aims to:

- a. Outline the responsibilities of both our employees and those working alongside Purever to ensure that slavery and human trafficking do not exist.
- b. Provide information and guidance to Purever employees on how to recognize and deal with slavery and human trafficking issues.
- c. Describe the processes for dealing with allegations of slavery and human trafficking within the organization.
- d. Explain how potential slavery and human trafficking cases should be reported and investigated.
- e. Ensure compliance with local slavery and human trafficking law.

The policy applies to all Purever employees, consultants, subcontractors, trainees, seconded staff, agency staff, sub-contractors, business partners or any other person working with or on behalf Purever, worldwide.

2. Definitions

Modern slavery can take different forms:

- a. Slavery, servitude and forced or compulsory labour
- b. Human Trafficking
- c. Meaning of exploitation.

3. Policy Requirements

3.1 Prohibited Conduct

The following actions are strictly prohibited:

- The use, facilitation, or toleration of any form of modern slavery, including:
 - Slavery
 - Servitude
 - Forced or compulsory labour
 - Human trafficking for any purpose
- Employing individuals who are below the legal minimum working age in any jurisdiction
- Hiring or engaging individuals without proper and verified right-to-work documentation
- Retention of workers' identity documents (passports, ID cards) without their consent
- Coercive recruitment practices, including threats, deception, or debt bondage
- The payment of recruitment fees by workers
- Any form of physical, verbal, or psychological abuse or restriction of movement
- Blackmail, extortion, or threats in connection with work performance or employment status
- Falsification, concealment, or destruction of documents that could indicate forced labour
- Paying excessive or illegal recruitment or placement fees to third parties
- Knowingly entering into business relationships with third parties that violate modern slavery standards

3.2 Consequences of breaches of this policy

Disciplinary Action

Persons who are found to have breached this policy will have committed gross misconduct and will be dealt with in accordance with the Disciplinary Policy. The local Human Resources Lead will determine whether to invoke action in accordance with established disciplinary procedures. Allegation of policy breaches will be thoroughly investigated and may result in disciplinary action, up to and including dismissal.

Where appropriate, in the event of a suspicion of slavery or human trafficking Purever's default approach is to immediately contact the local policing authorities, with a view to initiating criminal prosecution.

3.3 Supply Chain

Purever expects all of our supply chain partners to have in place policies and procedures that eliminate the potential for slavery and human trafficking as part of commercial terms. We will regularly audit our supply chain partners to ensure that they have the appropriate documentation in place required to ensure eligibility to work in all jurisdictions. We will work with our supply chain partners to actively ensure that there are no incidents of slavery or

human trafficking across all of our working environments (sites, factories and offices). Purever will terminate its relationship with a supplier if it is in breach of this policy.

4. Roles and Responsibilities

Everyone within the organisation, at whatever level, has a responsibility for ensuring the implementation of this policy and the upholding of our ethical principals as part of their work.

Purever staff and suppliers must report any incidence or suspicion of modern slavery at the earliest possible stage to:

- a. If you are a Purever staff member you must report the incident to your Line Manager; or you local Human Resource Lead
- b. If you are a Supplier, you must report the incident to your business contact within Purever.

5. Reporting and Non-retaliation

All of our employees and supply chain partners are made aware of this policy and are informed of their responsibilities in terms of addressing modern slavery. Everyone is encouraged to raise any concerns they may have about any issue, potential issue, or suspicion of malpractice at the earliest possible stage.

Employees should feel they can discuss workplace concerns directly with management without fear of harassment or retaliation. No employee will suffer any detriment as a result of raising genuine concerns about breaches of this policy, even if they turn out to be mistaken. All reported instances will be dealt with in the strictest of confidence.

6. Monitoring and Review

The Board of Directors has overall responsibility for ensuring that this policy complies with Purever's legal and ethical obligations and to ensure compliance across the Group. Effectiveness of this policy will be regularly reviewed by the Board. Internal control systems and procedures will be subject to audit under standard internal audit processes. In addition, the company will ensure compliance with local regulations and arrangements to detect and avoid slavery and human trafficking in all forms will be strictly monitored.

Policy Revision History

Owner	Revision No.	Effective Date
HR/ESG	1	1 st Dec 2024
HR/ESG	2	16 th Jun 2025

Purpose and Scope

Purever is committed to the highest standards of business and ethical behaviour including compliance with all applicable laws and regulations, as well as company policies, practices and procedures. Purever respects internationally recognised Human Rights as established in the Universal Declaration on Human Rights and the International Labour Organisation’s Core Conventions. We commit to comprehensive and ongoing human rights due diligence processes to identify, prevent, and mitigate potential human rights impacts.

In line with the UN Guiding Principles on Business and Human Rights, Purever recognises the corporate responsibility to respect these principles. We also engage with our business and supply chain partners to mitigate potential human rights impacts beyond our direct control. Our support of internationally recognised Human Rights is consistent with our dedication to enriching our workplace, partnering with our supply chain, preserving the environment and supporting the communities where we operate.

The policy applies to all Purever employees, consultants, subcontractors, trainees, seconded staff, agency staff, sub-contractors, business partners or any other person working with or on behalf Purever, worldwide.

The policy aims to:

- a. Inform employees, business partners and our current and potential customers of Purever’s commitment to human rights.
- b. Establish Purever’s commitment to demonstrate our respect for human rights through on-going human rights due diligence.
- c. Maintain Purever’s high ethical standards.
- d. Contribute to the realisation of human rights globally.

1. Definitions

Human rights are basic rights inherent to all human beings, regardless of nationality, place of residence, sex, sexual orientation, national or ethnic origin, colour, religion, language, or any other status.

Our policy is based on the principles set out in internationally recognised Human Rights instruments including United Nations conventions on human rights, We internalise our duty to respect human rights throughout our operations by applying the principles set out in the UN Guiding Principles on Business & Human Rights (“UNGPs”).

2. Policy Requirements

3.1 Human Right principles / commitments:

- a. We actively promote inclusivity and are committed to fostering a work environment where everyone feels respected and valued.

- b. All employment with Purever is voluntary. We do not use child or forced labour in any of our operations or facilities. We do not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude. We fully respect all applicable laws establishing a minimum age for employment, in order to support the effective abolition of child labour worldwide.
- c. Purever abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.
- d. Purever respects our employees' right to choose to join or not join a trade union, or to have recognised employee representation in accordance with employment law.
- e. Diversity is embraced at Purever. We recognise that a diverse mix of backgrounds, skills and experiences helps us maintain our competitive advantage. We do this by creating an environment that attracts the best candidates in a way that is welcoming and respectful for all concerned as well as recruiting diverse levels of staff throughout our business.
- f. Purever believe everyone should be treated with respect regardless of their background. We are committed prevent harassment, bullying, aggression, violence or discrimination on any grounds or behaviours that exclude others. / to the elimination of discrimination based on gender, race, class, economic status, ethnic background, sexual orientation, age, political beliefs, veteran status, marital status or any other protected class.

3.2 Supply Chain

We ensure equal treatment and non-discrimination in all employment practices and expect our partners to uphold the same standards.

Purever's Supply Chain Management System includes the requirement for all suppliers, vendors, contractors, consultants and agents to adhere to Purever's Labour standards and Code of Conduct policies. Any breach will result in this vender being removed from Purever's approved vender list. Please see Purever's Anti-Slavery and Human Trafficking Policy for further details. All suppliers are required to engage in human rights due diligence to identify and address any risks of rights infringements in their operations. Purever reserves the right to disengage from suppliers or partners that fail to meet these commitments.

3.3 Due Diligence

Purever conducts its business in a manner that respects the rights and dignity of all people, complying with all applicable laws and regulations. Our policies reflect our commitment to respecting the protection of internationally recognised Human Rights. We commit to comprehensive and ongoing human rights due diligence processes to identify, prevent, and mitigate potential human rights impacts.

3. Roles and Responsibilities

Managers

- Maintaining awareness of this and other related policies.
- Promote a culture of openness and transparency in all business dealings.
- Report any potential breaches of policy.
- Lead by example when it comes to avoiding any activity that might result in a potential breach of this policy.
- Report any breaches of this policy to a member of the Human Resource team.

Employees

- Maintaining awareness of this and other related policies.
- Perform duties in line this policy
- The prevention, detection, and reporting of human rights violations are the responsibility of all employees.
- Notify your line manager as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future.
- Avoid any activity that might result in a breach of this policy.

Any employee who breaches this policy may face disciplinary action, which could result in a disciplinary sanction, up to including dismissal in the case of gross misconduct.

4. Reporting and Non-retaliation

Employees are encouraged to raise any concerns they may have about any issue, potential issue, or suspicion of policy breaches at the earliest possible stage. Employees should feel they can discuss workplace concerns directly with management without fear of harassment or retaliation. No employee will suffer any detriment as a result of raising genuine concerns in respect of human rights, even if they turn out to be mistaken.

5. Monitoring and Review

The Board of Directors has overall responsibility for ensuring that this policy complies with Purever’s legal and ethical obligations and to ensure compliance across the Group. Effectiveness of this policy will be regularly reviewed by the Board. Internal control systems and procedures will be subject to audit under standard internal audit processes.

Policy Revision History

Owner	Revision No.	Effective Date
HR/ESG	1	1 st Dec 2024
HR/ESG	2	16 th Jun 2025

1. Purpose and Scope

It is Purever's policy to conduct its' business in an honest and ethical manner. We have a zero-tolerance approach to bribery or any other form of corrupt practices. We aim to enforce effective systems that prevent bribery in all of our business dealings and in accordance with all local legislative requirements related to bribery and corruption in which we operate. This policy will be reviewed regularly to ensure compliance with local regulations and best practice.

The purpose of this policy is to support the prevention, detection, and reporting of potential incidents of bribery and corruption, ensuring all Purever staff are aware of their reporting responsibility. The policy applies to all Purever employees, consultants, subcontractors, trainees, seconded staff, agency staff, sub-contractors, business partners or any other person working with or on behalf Purever.

The policy aims to:

- a. Outline the responsibilities of both our employees and those working alongside Purever to ensure that bribery and corruption do not exist.
- b. Provide information and guidance to Purever employees on how to recognize and deal with bribery and corruption issues.
- c. Describe the processes for dealing with allegations of anti corruption and bribery within the organization (Matters related to fraud are addressed in Purever's separate Anti-Fraud Policy).
- d. Explain how potential bribery or corruption should be reported and investigated.
- e. Ensure compliance with local bribery and corruption law.

The policy applies to all Purever employees, consultants, trainees, seconded staff, agency staff, sub-contractors, business partners or any other person working with or on behalf of Purever, worldwide.

2. Definitions

Bribery can be defined as the crime of giving someone money or something else of value, often illegally, to persuade that person to do something you want.

Corruption is defined as the abuse of entrusted power for private gain, including dishonesty and illegal behaviour by people in positions of authority or power.

For the purposes of this policy, Bribery and Corruption also covers facilitation payments, inappropriate donations, or deliberately ignoring potential or actual conflicts of interest.

3. Policy Requirements

Creating or using a False Document

It is not acceptable for any employee to corruptly create or use a document knowing or believing it to contain a false or misleading statement with the intention of inducing another person to undertake an act in relation to his/her office, employment, position, or business to the prejudice of that other person.

Gifts and Hospitality

We will only accept gifts and entertainment if they are of minimal value. We will not give or accept cash payments at any time. Gifts and entertainment of a value or frequency which might be seen as compromising our integrity will not be accepted.

Gifts include flowers, vouchers, food, drink, event tickets given or received as a mark of friendship or appreciation. Hospitality includes entertaining, meals, or event tickets (when used in a hosted business context) given or received to initiate or develop relationships. We realize that the giving and receiving of gifts and hospitality, where nothing is expected in return, helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery, and consequently, such actions are not considered a breach of this policy.

We expect our staff to behave professionally at all times while on company business, whether during the working day or while entertaining after normal office hours, in a respectful manner with all those they come into contact with, ensuring their conduct is beyond reproach.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from their Business Unit Director. Similarly, no gift or offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from their Business Unit Director.

A record will be made of every instance in which gifts or hospitality are given or received. As the law is constantly changing, this policy is subject to review, and the Company reserves the right to amend this policy without prior notice. The giving or receipt of gifts is not prohibited if the following requirements are met:

- a. It is not made with the intention of influencing any third party with an aim to retain their business or to gain any type of business advantage.
- b. It does not include cash or a cash equivalent.

- c. Taking into account the reason for the gift (Christmas time), it is of an appropriate type and value and given at an appropriate time of the year.
- d. All travel and accommodation for clients (e.g. to attend overseas hospitality) must have a bona fide business purpose and require written approval of a senior director.
- e. The gift is given in a transparent way, and there is no secrecy involved.

Conflict of Interest

It is not acceptable for you (or someone on your behalf) to:

- a. Offer any type of payment or gift for any other purpose other than to build a business relationship or to offer normal courtesy.
- b. Offer a payment or gift with an expectation of gaining something in return. Purever employees should never give any type of payment, gift, or hospitality with the expectation or hope that a business advantage will be received or to reward a business advantage already given.
- c. Give any type of facilitation payments. Purever employees should never give any type of payment, gift, or hospitality to a government official, agent, or representative to facilitate or expedite a routine procedure.
- d. Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them.
- e. Threaten or retaliate against another worker who has refused to commit a bribery offense or who has raised concerns under this policy.
- f. Engage in any activity that might lead to a breach of this policy.
- g. Gifts should not be offered to or accepted from government officials or representatives, regulators, representatives, politicians, or political parties without the prior approval of the Managing Director.

Facilitation Payments

We do not make nor accept facilitation payments of any kind. Facilitation payments are typically small unofficial payments made to secure or expedite a routine action by an official. All employees must avoid any activity that might lead to or suggest that a facilitation payment has been made or accepted by Purever.

Donations & Sponsorships

All charitable donations made by Purever are made in a legal and ethical way, following local laws and practices. No donation must be offered or made to any third party unless they are given in accordance with the agreed procedures.

The following considerations should be made when making charitable donations:

- a. Charitable donations made by Purever at the request of a third party connected to a client or prospective client may be a concern.
- b. All charitable contributions made by Purever must receive prior written approval from an Executive Board Member.
- c. Political donations by Purever will require the prior written approval of the Group CEO.

Third Party Relationships (due diligence and monitoring)

If any third party is to be retained on behalf of Purever, a due diligence review is generally required. Where appropriate, this should include a consideration of the reputation, beneficial ownership, professional capability and experience, financial standing, and credibility of the third party.

Recording of Payments & Expenses

Purever agrees to keep financial records and have appropriate internal controls in place which will provide evidence of the business reason for making any payments to third parties. All expense claims relating to hospitality, gifts, or expenses incurred to third parties must be submitted in accordance with our expenses policy through our online expenses system. Digital receipts will be included with all expense claims relating to all hospitality, gifts, or expenses.

4. Roles and Responsibilities

Managers

- Maintaining awareness of this and other related policies.
- Promote a culture of openness and transparency in all business dealings.
- Report any potential breaches of policy.
- Lead by example when it comes to avoiding any activity that might result in a potential breach of this policy.
- Report any breaches of this policy to a member of the Human Resource team.

Employees

- Maintaining awareness of this and other related policies.
- Perform duties honestly and with integrity
- The prevention, detection, and reporting of bribery and other forms of corruption are the responsibility of all employees.
- Notify your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- Avoid any activity that might result in a breach of this policy.

Any employee who breaches this policy may face disciplinary action, which could result in a disciplinary sanction, up to including dismissal in the case of gross misconduct.

5. Reporting and Non-retaliation

Employees are encouraged to raise any concerns they may have about any issue, potential issue, or suspicion of malpractice at the earliest possible stage. Employees should feel they can discuss workplace concerns directly with management without fear of harassment or retaliation. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

6. Monitoring and Review

The Board of Directors has overall responsibility for ensuring that this policy complies with Purever’s legal and ethical obligations and to ensure compliance across the Group. Effectiveness of this policy will be regularly reviewed by the Board. Internal control systems and procedures will be subject to audit under standard internal audit processes. In addition, the company will ensure compliance with competition law and arrangements to detect and avoid anti-competitive behaviour.

Policy Revision History

Owner	Revision No.	Effective Date
HR/ESG	1	1 st Dec 2024
HR/ESG	2	16 th Jun 2025



Equity, Diversity, Inclusion & Belonging Policy (EDIB) Groupwide Policy

Issue: 1
Revision: 3

1. Purpose and Scope

At Purever, we believe diversity drives innovation, and inclusion strengthens our performance. Our policy outlines our commitment not only to preventing discrimination, but to actively creating an environment where all individuals can contribute, belong, and thrive.

Purever Group is appreciative of and sensitive to the needs of minority groups and considers their needs when formulating company policies and practices.

We are committed to fostering an inclusive culture that embraces diverse backgrounds, experiences, and perspectives. This policy sets out our commitment to equity, diversity, inclusion, and belonging, across all entities; guiding how we hire, develop, and support our workforce.

Our EDIB policy also aims to prevent discrimination and unequal treatment by embedding clear anti-discrimination requirements, and to increase positive perceptions of inclusion across the organisation. The policy applies to all employees, job applicants, contractors, suppliers, agency workers, and any third parties acting on behalf of the Purever Group.

The policy applies to all aspects of our employee life cycle, across all work environments (Sites, Factories and Offices), including but not limited to:

- a. Recruitment and onboarding
- b. Training, employee development, and opportunities for progression
- c. Compensation and benefits
- d. Engagement with contractors, suppliers, and partners

The policy aims to:

1. Outline the responsibilities of both our employees and those working alongside Purever to ensure a respectful, inclusive, and equitable work environment, free from discrimination, harassment, and bias, across all levels of the organisation, within our supply chain and for all stakeholders.
2. Provide information and guidance to Purever employees on how to uphold inclusive behaviours, support underrepresented groups, and apply fair, unbiased practices in recruitment, employee development, and across all day-to-day workplace engagements.
3. Explain how concerns, violations, or incidents related to discrimination, exclusion, or bias should be reported and investigated, ensuring confidentiality, fairness, and protection from retaliation.

2. Definitions

Equity: Ensuring individuals are treated fairly and that equal opportunity for all is enshrined in our decision-making processes.

Diversity: Recognise, value, and harness our differences. It includes visible and non-visible differences such as cultural background, thinking styles, and life experiences.

Inclusion: Creating a culture and environment where everyone is valued, respected, supported, and empowered to reach their full potential.

Protected Characteristics: These characteristics include age, disability, gender, marital or civil partnership status, family status, race, ethnicity or nationality, religion or belief systems, sexual orientation, and neurodiversity.

Belonging: A sense of security and support where individuals feel accepted for who they are. Belonging in the workplace means that employees feel they can be authentic and are truly valued members of the organisation, that they can contribute to a stronger and more cohesive team, and be confident that their voice counts.

3. Policy Requirements

Equal Opportunities

We commit to providing equal opportunities for all employees and job applicants. Decisions in relation to recruitment, selection, development, and progression are based on individual merit and the needs of the business.

Zero Tolerance of Discrimination or Harassment

Discrimination, harassment, bullying or victimisation of any kind is not tolerated under any circumstances. We maintain clear procedures for reporting, investigating, and addressing such conduct promptly and fairly.

Types of Discrimination

- a. **Direct Discrimination:** This occurs when someone is treated less favourably because of a protected characteristic.
 - **Positive Example:** Ensuring diverse representation across project teams.
- b. **Indirect Discrimination:** This happens when a policy or practice applies to everyone but disproportionately disadvantages people with a particular protected characteristic.
 - **Positive Example:** Providing flexibility in working hours to take account of employees with caregiving responsibilities.

- c. Victimization:** This is when someone is treated unfairly because they have made or supported a complaint of discrimination.
 - **Positive Example:** Include employees who raise matters of concern in policy reviews.
- d. Harassment:** Any unwanted conduct related to protected characteristics that has the purpose or effect of violating a person’s dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment.
 - **Positive Example:** Abuse of hierarchical position to impose or try to inappropriate conduct.

Inclusive Work Culture

We aim to foster a workplace where differences are respected, and individual contributions are valued. Managers and team leaders at all levels must actively encourage open dialogue and inclusivity in decision making. A key part of this culture is fostering a sense of belonging, where every individual feels safe, seen, and included as an integral part of the team.

Diverse Workforce Representation

We promote workforce diversity and inclusion at all levels by:

- a. Striving to ensure that our workforce is representative of local demographics across all jurisdictions in which we operate.
- b. Removing both conscious and unconscious bias from decisions relating to recruitment and promotion.
- c. Encouraging underrepresented groups to develop and progress within the company.
- d. Supporting flexible work arrangements in line with operational needs.
- e. Creating a workplace that is focused on respecting the views and contributions of others.
- f. Providing training in respect of allyship and encouraging our people to become active rather than passive bystanders.

Training and Awareness

All employees will receive appropriate EDIB training relevant to their role. All EDIB training can be accessed through the Learning Management System (Talent LMS). Managers will receive enhanced training to help build inclusive teams and recognise bias.

Supplier and Contractor Alignment

We require all third-party suppliers, subcontractors, and partners to uphold similar standards in respect of EDIB. Where possible, we will collaborate with diverse suppliers and encourage inclusive practices across our value chain.

Accessibility

We are committed to ensuring that our workplaces, systems, and communications are accessible to people with disabilities or other access needs. Where individuals have a disability or health condition that places them at a disadvantage in the workplace, we will make reasonable adjustments to remove or reduce those barriers. These adjustments may include changes to the working environment, equipment, duties, or hours of work, and will be considered on a case-by-case basis in consultation with the individual.

Cultural Sensitivity

Given our global footprint, we recognise and respect cultural differences. While upholding core EDIB principles, we will remain mindful of local customs, provided they do not conflict with the policy's intent.

4. Roles and Responsibilities**The Senior Leadership Team are accountable for:**

- Setting the tone for an inclusive culture
- Monitoring progress and championing EDIB initiatives
- Ensuring appropriate resource and accountability structures are in place

Line Managers and Supervisors are responsible for:

- Modelling inclusive behaviours
- Addressing inappropriate conduct
- Ensuring fair decision-making in people related matters
- Applying EDIB principles in relation to hiring and employee development

The Human Resources team are responsible for:

- Implementing the policy
- Developing and implementing EDIB strategies and training
- Monitoring EDIB data and addressing any issues that arise
- Providing confidential support and guidance to team members
- Managing employee surveys that include feedback on EDIB in practice

All employees are expected to:

- Treat their colleagues and other stakeholders with respect at all times
- Speak up against discrimination or unfair treatment
- Engage with EDIB training and initiatives to develop a greater understanding and appreciation for the challenges faced by those with protected characteristics

5. Reporting and non-retaliation

Employees and contractors are encouraged to report concerns related to EDIB without fear of retaliation. All reports of discrimination, harassment, or inequality will be treated confidentially and investigated impartially. Retaliation against individuals who raise concerns or participate in investigations is strictly prohibited.

Purever enforces a zero-tolerance policy on retaliation. Any act of reprisal will be subject to disciplinary action.

Reports may be made through a line manager, business unit leader, a member of the HR team, or directly in confidence to the Group's Chief People Officer.

6. Monitoring and Review

We will monitor the implementation and effectiveness of this policy through:

- a. Anonymous workforce surveys and feedback
- b. EDIB metrics (e.g. hiring, promotions, retention)
- c. Incident reporting and resolution tracking
- d. Annual reviews by senior management

This policy will be reviewed on a periodic basis and updated as needed to ensure continued relevance and compliance with evolving standards, global human rights regulations, and modern business practices. Internal control systems and procedures will be subject to audit under standard internal audit processes.

The Board of Directors has overall responsibility for ensuring that this policy complies with Purever's legal and ethical obligations and to ensure compliance across the Group. Effectiveness of this policy will be regularly reviewed by the Board.

Policy Revision History

Owner	Revision No.	Effective Date
HR/ESG	1	1 st Dec 2024
HR/ESG	2	16 th July 2025
HR/ESG	3	20 th August 2025

1. Purpose and Scope

Purever Industries is committed to the highest possible standards of openness, transparency and accountability in all its affairs. We have a zero-tolerance approach to fraud in all its forms. The Group requires all staff to act with honesty and with integrity and to safeguard the Group's assets and resources.

Fraud is an ever-present threat to these resources and hence must be a concern to all members of staff and persons employed in a similar capacity. Fraud may occur internally or externally and may be perpetrated by staff, consultants, suppliers, sub-contractors or development partners, individually or in collusion with others.

This policy will be reviewed regularly to ensure compliance with local regulations and best practice. This document is intended to provide guidance and should be read in conjunction with the relevant Human Resource Policies.

The policy applies to all Purever employees, consultants, subcontractors, trainees, seconded staff, agency staff, sub-contractors, business partners or any other person working with or on behalf Purever, worldwide.

The policy aims to:

- a. Clearly define what we mean by "fraud"
- b. Set out your responsibilities with regard to fraud prevention
- c. Highlight what to do if you suspect fraud and the action that will be taken by management
- d. Provide a definitive statement to staff forbidding fraudulent activity in all its forms
- e. Provide clear guidance as to responsibilities for conducting investigations into fraud related activities
- f. Offer protection to employees in circumstances where they may be victimised as a consequence of reporting, or being a witness to, fraudulent activities.

2. Definitions

Purever Industries defines fraud as:

- a. Wrongful or criminal deception intended to result in financial or personal gain
- b. Use of deception with the intention of obtaining an advantage, avoiding an obligation or causing loss to another party

Third party: Any individual or entity not employed by Purever but engaged in business with or on behalf of the Group.

3. Policy Requirements

3.1 Prohibited Conduct

The following actions are strictly prohibited:

- Theft of funds
- Falsification of costs or expenses
- Concealment of material facts
- Forgery or alteration of documents
- Destruction or removal of records
- Blackmail or extortion
- Paying of excessive prices or fees to third parties with the aim of personal gain.

3.2 Consequences of Fraud

Disciplinary Action

Persons who are found guilty of fraud have committed gross misconduct and will be dealt with in accordance with the Disciplinary Policy. The Group Human Resources Manager will determine whether to invoke action in accordance with established disciplinary procedures. Proven allegations of fraud may result in dismissal.

Where appropriate, In the case of proven fraud, or suspected fraud of a serious nature, Purever Industries reserve the right to refer the matter to the Gardaí/Police at the earliest possible juncture, with a view to initiating criminal prosecution.

Disciplinary action should not be undertaken until the investigation has been completed and Human Resources has been consulted for procedural guidance and information on past precedents. (Note that suspension is not deemed to be a disciplinary action in this context, as it is a precautionary step and not indicative of guilt.)

Recovery of Losses

Where Purever Industries has suffered loss, full restitution will be sought of any benefit or advantage obtained and the recovery of costs will be sought from the individual(s) or organisations responsible for the loss.

If the individual(s) or organisation cannot or will not accept responsibility for the loss, consideration will be given to taking civil legal action to recover these losses. This is in addition to any criminal proceedings which may result.

4. Roles and Responsibilities

Managers

It is the responsibility of managers to be familiar with the types of fraud that might occur in their area, be alert for any indication of fraud or improper activity and maintain controls to avoid such occurrences.

The day-to-day responsibility for the prevention and detection of fraud rests with line managers who are responsible for:

- Fostering an “anti-fraud” culture
- Identifying the risks to which systems, operations and procedures are exposed
- Developing and maintaining effective controls to prevent and detect fraud
- Ensure that controls are being complied with
- Ensure that staff be encouraged to report suspected issues of fraud.

Employees

- Be alert for occurrences of fraud, be aware that unusual transactions or behaviours could be indications of fraud
- Carry out their work in such a way as to prevent fraud from occurring
- Report potential cases of fraud to your line manager as soon as possible
- Avoid any activity that might result in a breach of this policy.

Any employee who breaches this policy may face disciplinary action, which could result in a disciplinary sanction, up to including dismissal in the case of gross misconduct.

5. Reporting and Non-retaliation

Irrespective of the amount involved, all cases of attempted, suspected or proven fraud shall be reported to a senior director of the Group or the local HR Lead.

Employees who suspect fraud should not do any of the following:

- Contact the suspected individual(s) directly to determine facts or demand explanations
- Discuss the issue with anyone within Purever Industries other than a senior director of the Group or the local HR Lead
- Discuss the issue with anyone outside of Purever Industries, except as legally required

Employees are encouraged to raise any concerns they may have about any issue, potential issue, or suspicion of malpractice at the earliest possible stage. Employees should feel they can discuss workplace concerns directly with management without fear of harassment or retaliation. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

6. Monitoring and Review

The Board of Directors has overall responsibility for ensuring that this policy complies with Purever’s legal and ethical obligations and to ensure compliance across the Group. Effectiveness of this policy will be regularly reviewed by the Board. Internal control systems and procedures will be subject to audit under standard internal audit processes.

Policy Revision History

Owner	Revision No.	Effective Date
HR	1	1 st Dec 2024
HR	2	16 th Jun 2025

1. Purpose and Scope

Purever is committed to engage and maintain ethical, transparent, and responsible relationships with our customers. This Customer Engagement Policy outlines the principles governing how Purever interacts with customers throughout the relationship lifecycle.

This Policy complements and must be read together with the Group's Code of Ethics and Business Conduct and other relevant Purever policies, including the Human Rights Policy, Anti-Slavery & Human Trafficking Policy, Anti-Bribery & Corruption Policy, Anti-Fraud Policy, and Protected Disclosure (Whistleblowing) Policy.

The purpose of this Policy is to:

- a. Establish clear expectations for ethical, transparent, and customer-focused conduct.
- b. Ensure that customers receive accurate information and professional communication at all times, as part of high-quality service.
- c. Integrate responsible business practices into customer interactions.
- d. Support compliance with legal, regulatory, and contractual obligations in every jurisdiction where Purever and its subsidiaries operate.
- e. Provide guidance on addressing customer concerns, feedback, and complaints in a consistent and professional manner.

2. Definition

- a. A set of principles, behaviours, and practices that guide all interactions with customers, from first contact to completion of services, and after sales.
- b. A commitment to transparency, fairness, and service excellence, ensuring customers receive honest, complete, and timely information that supports responsible decision-making.
- c. The recognition that strong customer relationships are central to Purever's mission and are built on trust, integrity, and alignment with our sustainability commitments.

3. Policy Requirements

3.1 Ethical Conduct and Transparency

All employees must engage with customers in a manner consistent with Purever's Code of Ethics and Business Conduct.

This includes:

- Providing accurate, complete, and honest information.
- Communicating respectfully and professionally.
- Ensuring decisions and actions remain free from conflicts of interest.
- Complying with Purever's Anti-Bribery & Corruption, and Anti-Fraud Policies regarding gifts, hospitality, or improper influence.

For prohibited behaviours, definitions, and reporting processes, employees must refer to the relevant Group policies listed above.

3.2 Data Protection and Confidentiality

Customer personal data and business information must be handled in accordance with:

- Purever's internal data-protection requirements.
- Applicable legislation such as GDPR.
- Employees must report any suspected data breaches or confidentiality concerns in accordance with internal procedures.

3.3 Quality, Safety and Compliance

All commitments made to customers must be delivered in accordance with:

- Applicable laws and industry standards.
- Purever's SHEQ (Safety, Health, Environment & Quality) policy, procedures and standards.
- Contractual obligations.

3.4 Handling Customer Complaints and Feedback

Purever ensures that customers can raise questions or concerns through established channels.

Employees must:

- Respond to complaints professionally and in a timely manner.
- Document claim issues according to internal procedures.
- Escalate recurring or significant concerns to management, their local director, or the relevant support team.

3.5 Sensitive Sectors and End-Use Screening

When customer engagements involve sensitive, regulated, or dual-use sectors, Purever will apply an enhanced internal assessment to ensure:

- Compliance with international law, regulations, and contractual obligations.
- Alignment with Purever's ethical and legal obligations, including but not limited to the following Group policies:
 - Code of Ethics & Business Conduct
 - Anti-Slavery & Human Trafficking Policy
 - Human Rights Policy
 - Anti-Bribery & Corruption Policy
 - Anti-Fraud Policy
 - Safety, Health, Environment & Quality (SHEQ) Policy
- Engagements do not conflict with Purever's vision of *Protecting Life*
- Purever does not pursue projects that violate international law or contradict our ethical or sustainability principles.

Such internal assessments will result in a documented recommendation, with clear justification for proceeding with, or declining the particular business opportunity. Where a customer operates in sensitive or restricted sectors, or where ethical, legal, compliance, or reputational concerns are identified, the matter must be escalated to the Group Leadership Team (GLT) for review and final decision.

Employees must not make such decisions independently. All decisions must be transparent, consistent, fully documented, and aligned with Purever's ethical commitments and all applicable laws.

4. Roles and Responsibilities

Board of Directors:

- Ensures this Policy and related controls are in place and effective.
- Reviews the Policy periodically and oversees compliance.

Managers:

- Promote responsible customer engagement practices.
- Ensure their teams understand this Policy and all related policies (Human Rights, Anti-Slavery, Anti-Bribery & Corruption, Anti-Fraud, Data Protection).
- Monitor customer interactions within their area of responsibility and be alert to potential improper conduct, misinformation, risks, or non-compliance.
- Maintain and apply internal controls that prevent misconduct and ensure compliance with legal and contractual obligations.
- Encourage employees to report concerns.
- Report all instances of suspected, attempted, or proven acts of bribery or corruption to a senior executive or a local HR representative.

Employees:

- Adhering to the principles of this Policy.
- Ensuring customer interactions reflect Purever's ethical standards.
- Immediately reporting any concerns, improper conduct, or potential breaches.
- Protecting customer data and confidentiality.

5. Non-retaliation

All cases of attempted, suspected, or proven concerns related to customer engagement or potential breaches of this Policy shall be reported at the earliest possible stage to a senior executive of the Group, to the local HR representative, or under the Protected Disclosure (Whistleblowing) Policy.

Purever guarantees confidentiality and protection against retaliation for all individuals who report genuine concerns in good faith.

Employees must not do any of the following:

- Confront the suspected individual(s) directly to determine facts or demand explanations.
- Conduct their own investigations: or
- Discuss the issue with anyone within Purever other than a senior director of the Group or the local HR Lead. And
- Discuss the issue with anyone outside of Purever, except as legally required.

No employee will suffer any retaliation, harassment, or disadvantage as a result of raising a concern in good faith in respect of any of the above, even if it is later found to be unsubstantiated.

6. Monitoring and Review

The Board of Directors holds ultimate responsibility for ensuring implementation across the Group, including monitoring and review of this Policy.

Internal control systems and procedures will be subject to audit under standard internal audit processes.

This Policy will be reviewed periodically and updated as necessary to reflect best practices and legal or organisational changes.

Policy Revision History

Owner	Revision No.	Effective Date
HR/ESG	1	19 th Nov 2025

1. Purpose & Scope

This policy is in place to encourage and enable our employees to raise matters of concern they may have about potential wrongdoing in respect of any and all Purever Group activities. Under this policy an employee can make a disclosure without any fear of being penalized or a threat of less favorable treatment or any form of retribution. Furthermore, this policy aims to provide a transparent confidential process for dealing with matters of concern in Purever and its affiliates and encourages employees to make disclosures in respect of significant matters by providing protection to the person making the disclosure.

The Protected Disclosures Policy is intended to apply to major concerns that an individual may have regarding any aspect of Purever activities or the conduct of any of its employees that is not properly addressed within the scope of other company policies. This policy covers all employees, irrespective of the level at which they operate, aims to re-assure employees that they will be fully protected from reprisals for making a disclosure in good faith and in accordance with this policy.

2. Definition

A “*Whistleblower*” is defined as any employee of Purever Group who reports an activity that the employee considers to be illegal or dishonest or not in line with other company policies, such as Anti-bribery and Corruption, Anti-Slavery & Human Trafficking, Human Rights, Anti Fraud, etc. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate representatives of the board will be charged with these responsibilities.

Examples of illegal or unethical activities are violations of local laws; billing for services not performed or for goods not delivered, other fraudulent financial reporting. consistent and ongoing behaviors that are contrary to the Company Values.

3. Policy Requirements

All reports of illegal and/or dishonest fraudulent activities should be submitted to the Group Chief People Officer who is responsible for arranging a formal investigating and coordinating corrective action. In a case where a member of the human resources team may be party of the investigation, then the whistleblower should report the concern directly to the CEO.

Employees must make a complaint under this policy in good faith . An employee who intentionally files a false report of wrongdoing will be subject to disciplinary action, up to and including dismissal.

4. Protection

Whistleblower protections are provided in two important areas -- *confidentiality* and against *retaliation*.

(1) Confidentiality

Insofar as is legally possible, the confidentiality of the whistleblower will be fully maintained. However, in certain circumstances the identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide individuals accused of wrongdoing with the right to defend themselves.

(2) Against Retaliation

Purever will not retaliate against any whistleblower and encourage employees to raise serious matter of concern under the policy. This includes, but is not limited to, protection from retaliation in the form of any adverse employment action such as termination, reductions in compensation, or less favourable work assignments. Any whistleblower who believes they are being retaliated against must contact the human Group Chief People Officer immediately. The right of a whistleblower to protection against retaliation does not include immunity from any personal wrongdoing if they were part of the alleged wrongdoing.

5. Protected Disclosures

The following is a list of relevant wrongdoings covered by the policy, albeit that this is not an exhaustive list:

- An offence has or is likely to be committed
- Failing to comply with legal obligations
- A miscarriage of justice
- Endangering the health and safety of any individual
- Damage to the environment
- Unlawful or improper use of public funds or resources
- An act or omission by or on behalf of a public body being oppressive, discriminatory or negligent
- Concealment or destruction of information relating to any of the foregoing
- Constant and deliberate acts, the intent of which is to undermine an individuals employment.

An employee does not need to be certain of the facts of the disclosure. It is enough to reasonably believe that the information that they have tends to show one or more

wrongdoings, and they have obtained this information in connection with their employment.

6. Making a Disclosure

All disclosures by the Relevant Person to the recipient (CEO or Group Chief People Officer) should be made formally in writing. The Relevant Person will need to be able to demonstrate and support the reasons for their concerns and provide evidence of their concerns where such evidence is available. Any report setting out an individual's concerns should be factual (to the best of their knowledge) and should address the following key points to the extent that such information is known to the individual in relation to a wrongdoing that has occurred, is occurring or is likely to occur:

- what has occurred (or is thought to have occurred)
- when it occurred?
- where it occurred?
- who was involved?
- have any individuals been negatively impacted?
- has the company been put at risk or suffered a loss as a result?
- has it happened before?
- has it been raised with anyone else either within the Group or externally? If so, details of when/whom should be provided?
- are there any witnesses?
- is there any supporting information or documentation?
- how the matter came to light?

7. Review and Evaluation

This policy shall be reviewed annually to ensure its effectiveness and relevance by the Board of Directors. Updates will be made as needed, in line with local regulations and best practice.

8. Roles and Responsibilities

Board of Directors:

- Ensures this Policy and related controls are in place and effective.
- Reviews the Policy periodically and oversees compliance.

Managers:

- Promote responsible business practices;
- Ensure their teams understand this policy and all related policies (Human Rights, Anti-Slavery, Anti-Bribery & Corruption, Anti-Fraud, Data Protection);
- Monitor interactions within their area of responsibility and be alert to potential improper conduct, misinformation, risks, or non-compliance;
- Maintain and apply internal controls that prevent misconduct and ensure compliance with legal and contractual obligations;
- Encourage employees to report concerns;
- Report all instances of suspected, attempted, or proven acts of bribery or corruption, or other unethical practices to a senior executive or a local HR representative.

Employees:

- Ensuring customer interactions reflect Purever's ethical standards;
- Immediately reporting any concerns, improper conduct, or potential breaches.

5. Non-retaliation

Employees are encouraged to raise matters of concern they may have about any issue, potential issue, or suspicion of malpractice at the earliest possible stage. Employees should feel they can discuss workplace concerns directly with their manager, local director, a member of the HR team, either formally or informally. The purpose of this policy is to provide a process to address matters that fall into the more serious of categories; matters that potentially impact 'the public good' or issues that could negatively impact the future of the company on a whole. For the avoidance of doubt, no employee will suffer any negative consequences as a result of raising a genuine concern in good faith, even if the complaint is subsequently assessed as being unfounded.

6. Monitoring and Review

The Board of Directors has overall responsibility for ensuring that this policy complies with Purever’s legal and ethical obligations and to ensure compliance across the Group. Effectiveness of this policy will be regularly reviewed by the Board. Internal control systems and procedures will be subject to audit under standard internal audit processes.

Policy Revision History

Owner	Revision No.	Effective Date
HR/ESG	1	25 th Nov 2025

Purpose

This Group-level Safety, Health, Environment, and Quality (SHEQ) Policy establishes a unified commitment across all Purever companies. It provides a common framework that promotes consistency while recognizing the specific needs and operational realities of each subsidiary. The policy supports a shared vision of operational excellence, sustainability, and stakeholder trust, aiming at full compliance of applicable SHEQ laws and industry standards

Our Commitment

Purever Group is committed to continuously strengthening its culture of safety, quality, and environmental responsibility and provides the leadership, resources, and oversight necessary to ensure that the following principles are progressively integrated and upheld across all its entities:

Protecting People and the Planet

We protect people and the environment by ensuring safe, inclusive workplaces and actively reduce environmental impact through carbon reduction, resource efficiency, and circular practices, supported by a strong culture of wellbeing and responsibility, where everyone is accountable for SHEQ

Delivering Operational Excellence and Quality

Quality and operational excellence are core values across the Group. We apply ISO-certified systems, lean methodologies, and strict quality controls to ensure excellence at every stage. Our partners and suppliers are selected based on shared QSHE values.

Exceeding Expectations and Building Trust

Our commitment to operational excellence is deeply rooted in a client-centric approach. We exceed expectations through transparent, proactive collaboration and tailor-made solutions, ensuring each project meets our clients' evolving needs with precision and integrity.

Empowering Our People

We grow through our people. Continuous learning, SHEQ training, and leadership development foster ownership, innovation, and a high-performance culture, ensuring everyone has the skills and qualifications to work against stringent standards.

Driving Innovation and Continuous Improvement

Learning and improvement are part of Purever's DNA. Our teams are committed to identifying efficiencies and risks and adopting best practices that drive performance and value. We transform audits, incidents, and feedback into innovation, leveraging technology and digitisation to build smarter, more sustainable, and more resilient operations.

Acting Responsibly in Our Communities

We give back to the communities where we live and work. Through local partnerships, social initiatives, and inclusive opportunities, we support wellbeing, development, and shared success beyond our business.

Framework for Subsidiaries

This applies to all entities within the Purever Group. Each subsidiary is expected to align with Group principles while operating management systems suited to its context. Subsidiaries contribute to Groupwide goals through performance reporting, knowledge-sharing, and continuous improvement.

The Group ensures consistent implementation by providing guidance, resources, and support across all entities.

Governance and Review

The Purever Group Global Leadership Team (GLT) oversees implementation, monitoring, and periodic review of this policy through established governance and regular engagement with subsidiaries.

It is reviewed as needed to remain aligned with our values, regulations, and stakeholder expectations, and is communicated across the Group and made available to all stakeholders.