



Code of Ethics and Conduct

At PSRH Global, we are committed to conducting our business with the highest standards of ethics and integrity. This commitment goes beyond simply complying with the letter and spirit of the laws and regulations that govern our operations. It also entails leading by example in all aspects of our business conduct and fostering respectful and ethical relationships with colleagues, candidates, clients, business partners, and investors.

Our **Code of Conduct** outlines the standards of behavior to which we adhere:

- 1. Compliance with Laws and Regulations**
We are committed to full compliance with all applicable laws and regulatory requirements. We conduct our business in an ethical and honest manner, adhering to both the letter and spirit of relevant legal obligations. We cooperate fully with law enforcement agencies and regulatory authorities in their inquiries, and uphold all Group standards unless prohibited by local laws.
- 2. Rejection of Bribery and Corruption**
We maintain a strict policy of zero tolerance for bribery and corruption. We do not offer or accept any bribes, improper inducements, or facilitation payments to secure business or gain personal or corporate advantage. Additionally, we refrain from any deceptive or misleading accounting and financial reporting practices. We expect all individuals acting on our behalf to uphold these ethical standards.
- 3. Prevention of Conflicts of Interest**
We actively work to identify and manage any potential conflicts of interest that may arise between our employees, candidates, clients, and business partners. We are committed to acting in the best interests of the Group, avoiding situations where personal interests may conflict with professional duties.
- 4. Gifts and Entertainment**
We maintain a policy of avoiding situations where gifts, entertainment, or other benefits could appear to compromise professional relationships. We do not offer or accept any gifts or benefits that may influence business decisions or create a perception of improper conduct.
- 5. “Speak Up” Policy**
We encourage all employees to report any concerns related to misconduct, unethical behavior, or violations of the law. Should any issues arise, we provide confidential channels through which employees can report their concerns in good faith without fear of retaliation.
- 6. Fair and Honest Dealings**
We treat candidates, clients, and business partners with fairness and integrity. We do not engage in deceptive practices or misrepresent our services. Complaints are

addressed promptly, respectfully, and with a commitment to resolving issues in a fair and transparent manner.

By adhering to these principles, we ensure that our actions and decisions reflect the highest ethical standards and contribute to the long-term success and reputation of our organization.

Commitment to Ethical Standards and Corporate Responsibility

At PSRH, we are committed to maintaining the highest standards of ethics, integrity, and professionalism in all aspects of our business. We recognize that our reputation is built on the principles of respect, fairness, and transparency, and we are dedicated to upholding these values across every interaction with our colleagues, candidates, clients, business partners, and suppliers.

1. Confidentiality of Personal and Corporate Information

We respect the confidentiality of both personal and corporate information. In accordance with applicable laws, regulations, and Group standards, we ensure that confidential information is protected and not disclosed without written authorization, unless legally required. We adhere to stringent confidentiality practices to safeguard sensitive data and respect the privacy of individuals and organizations.

2. Diversity, Equality, and Respect

We are committed to promoting diversity, equity, and inclusion in the workplace. We treat all colleagues, candidates, clients, and business partners with fairness and respect, regardless of gender, race, color, ethnicity, national origin, marital status, family circumstances, age, disability, sexual orientation, political beliefs, or religious convictions. We uphold the right of our employees and candidates to work in an environment free from discrimination, bullying, and harassment. We also champion the principles of human rights and align with internationally recognized human rights standards. PSRH does not support or tolerate the use of forced or child labor.

3. Responsibility to Communities and Regulators

We are committed to being open, honest, and cooperative with our regulators. We ensure that the information provided to regulatory bodies is accurate, complete, and timely. We believe in transparency and uphold our responsibilities to the communities in which we operate.

4. Safe and Healthy Work Environment

The safety and well-being of our employees, clients, and partners are of paramount importance. We strive to maintain a safe and healthy work environment for all individuals. Every employee is responsible for adhering to safety protocols and ensuring the well-being of those within their area of responsibility.

5. Environmental Responsibility

We are proactive in managing our environmental impact and work towards minimizing energy consumption and water usage across our operations. PSRH is committed to promoting

sustainability and contributing to the economic and environmental well-being of the communities we serve.

6. Upholding High Ethical Standards Across Our Business Relationships

At PSRH, we pride ourselves on being a reputable and trustworthy organization. We are dedicated to upholding high ethical standards in all our business dealings, consistent with our core values and Employee Code of Conduct. We recognize the importance of our relationships with suppliers in achieving business excellence and supporting PageGroup's purpose of "Changing Lives for People through Creating Opportunity to Reach Potential."

We view our suppliers as extensions of our own team, and the way they conduct their business reflects directly on us. As such, it is essential that our suppliers meet the same high standards we uphold. We expect them to share our commitment to ethical business practices, and in turn, we commit to treating our suppliers with respect and fairness.

Supplier Code of Conduct

The **Supplier Code of Conduct** applies to all third parties, consultants, and contractors engaged to provide goods and services to or on behalf of PSRH Consulting. This Code outlines our basic requirements for ethical conduct, rather than representing the maximum standard. It is a reflection of our core values and expectations for how business should be conducted.

We expect our suppliers to fully adhere to the standards set forth in this Code of Conduct and to promote these same standards within their own supply chains. Suppliers are expected to implement processes and systems that support compliance with these standards and must be prepared to provide evidence of compliance upon request. PSRH Global may seek assurance that suppliers comply with this Code through our procurement processes and through periodic compliance reviews. The scope of these reviews will vary depending on the nature of the service or goods provided, ranging from self-assessments to independent audits.

1. Zero Tolerance for Bribery and Corruption

PSRH operates a strict zero-tolerance policy towards bribery and corruption. We support international initiatives such as the work of the Organisation for Economic Co-operation and Development (OECD) in shaping policies aimed at combatting corruption, fostering prosperity, equality, opportunity, and well-being for all.

Under no circumstances do we offer or accept bribes, improper inducements, or facilitation payments to secure business or to gain any advantage, either for the Company or any individual.

We expect our suppliers to conduct business in an ethical and responsible manner, ensuring full compliance with anti-bribery and anti-corruption legislation. This includes refraining from any actions or practices that would constitute an offence under applicable laws, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. Suppliers must not engage in, consent to, or participate in any activities or conduct that may be considered corrupt or unethical.

2. Supplier Responsibilities

We require our suppliers to implement adequate procedures to prevent any individual associated with their operations from committing an offence under anti-bribery and anti-corruption legislation. This includes ensuring that no inducements, rewards, or other improper incentives are offered or received in exchange for the improper performance of duties or participation in corrupt practices.

By partnering with PSRH, suppliers are expected to uphold the same high standards of integrity and compliance that we expect from our internal operations, contributing to a business environment based on trust, fairness, and ethical conduct.

3. Gifts and Hospitality

At PSRH, we understand that building and maintaining strong professional relationships with suppliers is essential to the success of our business. We recognize that suppliers may occasionally offer business courtesies, such as reasonable entertainment or modest gifts, as a gesture of goodwill. However, we are mindful that, without proper care, such practices can unintentionally create the perception of improper influence or undermine objectivity in decision-making.

Suppliers must not offer gifts, hospitality, or entertainment with the intention—or in situations where it could be perceived—that they may improperly influence a PSRH Consulting employee's judgment or decision-making process regarding the supplier's engagement. All business courtesies should be appropriate, transparent, and in compliance with PSRH's policies and applicable laws.

Conflicts of interest can undermine both the integrity of our business and its reputation, potentially leading to unethical practices, unfair treatment, and legal violations. To maintain the highest standards of integrity, it is essential that any potential conflicts of interest be identified and addressed in a timely and transparent manner.

Suppliers are required to:

1. **Disclose Conflicts of Interest:** Suppliers must promptly disclose any situations where their personnel are engaged in activities or relationships with PSRH employees that may create, or be perceived to create, a conflict of interest. This includes, but is not limited to, personal or familial relationships between a supplier's employee and a PSRH employee that could affect impartiality in decision-making.
2. **Manage Conflicts Appropriately:** Once identified, any potential or perceived conflicts of interest must be managed in an appropriate and transparent manner to avoid any negative impact on the business relationship or decision-making process.

We expect all suppliers to act proactively in identifying and addressing conflicts of interest, ensuring transparency and fairness in all dealings with PSRH Global.

Competition and Antitrust Compliance

PSRH Global is committed to upholding the highest standards of fair competition, fully adhering to applicable competition and antitrust laws. We strictly prohibit any practices that undermine free and fair competition, and we are dedicated to promoting ethical business conduct that maintains the integrity of the marketplace.

Competition laws are designed to protect the principles of open and free competition. Suppliers must not engage in, condone, or support any form of anti-competitive behavior, including, but not limited to, cartel activities. Cartels and agreements that involve:

- Fixing or manipulating market prices, discounts, commissions, or rebates;
- Limiting market access, technical development, or sources of supply;

are strictly prohibited.

Violations of competition laws can lead to severe consequences, including substantial financial penalties—up to 10% of global turnover—and potential criminal prosecution of individuals involved.

PSRH expects all suppliers to comply with all applicable competition laws and regulations. If there is any suspicion or evidence of anti-competitive activities, suppliers are encouraged to report such concerns through our Speak Up process, ensuring transparency and accountability in our business operations.

Supplier Code of Conduct

Workplace and Personal Safety

Suppliers are required to comply with all applicable health and safety laws and regulations in every country where they operate, in line with the services they provide. Suppliers must ensure that a safe and healthy working environment is maintained for all employees, visitors, and any other individuals affected by their activities. This includes the responsibility to establish, implement, and communicate appropriate health and safety policies and procedures to staff as needed.

Suppliers must provide relevant health and safety training to all employees, including regular refresher courses as necessary. Additionally, suppliers and subcontracted partners must adhere to PSRH's health and safety policies when conducting activities at any PSRH location.

To further promote a safe workplace, suppliers must establish a process that enables employees to report health and safety concerns without fear of retaliation or intimidation. Suppliers must also have a mechanism in place to track and manage these reports, ensuring that they are resolved promptly and appropriately.

Diversity, Equality, and Inclusion

At PSRH, we are committed to fostering a workplace that values diversity, inclusion, and equality. We expect all employees, both within PSRH and at our suppliers, to treat each other with dignity, respect, and fairness.

We believe that all employees—whether permanent or temporary—should have the fundamental right to be treated with respect and dignity, in the same way that PSRH values its own employees. Discrimination of any kind, including but not limited to discrimination based on race, color, ethnicity, national origin, marital status, family circumstances, age, disability, sexual orientation, gender identity, political or religious beliefs, union membership, or political affiliation, is strictly prohibited.

Harassment-Free Workplace

All PSRH employees are entitled to work in an environment free from harassment, intimidation, and any form of discriminatory behavior. As a global organization, we operate in various countries with diverse laws and cultural practices. While we respect these variations, our core principles remain consistent and are reflected in the legal requirements of every country in which we operate.

PSRH maintains a zero-tolerance policy towards harassment, intimidation, and abusive behavior, and we expect the same level of commitment from our suppliers. All employees, regardless of their location or position, must be provided with a working environment where they can thrive, free from harassment or any form of abusive behavior.

Definition of Harassment

Harassment is defined as any unwanted conduct that is reasonably perceived to have the purpose or effect of violating the recipient's dignity, or creating an intimidating, hostile, degrading, humiliating, or offensive environment for the individual concerned.

PSRH expects its suppliers to treat their employees with integrity and respect, fostering a workplace culture that does not tolerate any form of harassment. This includes, but is not limited to, physical, psychological, verbal, or sexual harassment, threats of harassment, or retaliation against individuals who report harassment.

Suppliers must implement clear policies and procedures to prevent and address harassment in the workplace, ensuring that employees are protected from any form of inappropriate behavior.

Human Rights

Suppliers must have policies and processes in place that recognize, respect, and protect the human rights of their employees, supply chain, stakeholders, and the communities in which they operate. PSRH expects suppliers to uphold the following key international standards:

- The **Universal Declaration of Human Rights**

- The **International Labour Organization's Declaration on Fundamental Principles and Rights at Work**
- The **OECD Guidelines for Multinational Enterprises**

We expect that all employees of our suppliers, whether permanent or temporary, are treated with the same fundamental rights to respect and dignity as PSRH employees. This includes:

- **Child Labor:** Suppliers must not engage in the use of child labor. Employment policies related to child labor must comply with the relevant International Labour Organization (ILO) standards.
- **Forced Labor:** Suppliers must ensure that all employment is freely chosen, and there must be no use of forced, bonded, or involuntary labor. Employees should not be required to surrender identity papers or financial deposits to secure employment and must be free to leave the employment relationship after giving reasonable notice.
- **Training and Development:** Suppliers must provide access to relevant training and personal development opportunities for employees, supporting their growth and empowerment in the workplace.
- **Freedom of Association:** Employees must have the freedom to associate with others, form or join organizations of their choice, and engage in collective bargaining without interference from their employer.
- **Employment Agreements:** Wherever possible, employment should be based on a formal, recognized employment agreement that aligns with national laws and practices.
- **Working Hours and Overtime:** Suppliers must comply with applicable laws and regulations regarding working hours, rest days, and overtime. Overtime must be voluntary and compensated in accordance with legal requirements.
- **Wages and Benefits:** Suppliers must ensure that employees receive at least the legally mandated minimum wage and benefits for the country in which they are employed.

Environmental, Social, and Governance (ESG) – Supply Chain Management

PSRH is dedicated to fostering a sustainable business model that prioritizes environmental protection and upholds ethical practices throughout our operations. We expect our suppliers to adhere to socially responsible practices and to align with our commitment to reducing environmental impact.

To meet these expectations, suppliers are required to:

1. **Adopt an Environmental Policy:** Suppliers must implement a clear Environmental Policy and a management system that complies with applicable local, national, and international environmental laws and regulations.
2. **Promote Sustainability:** Suppliers should actively pursue sustainability within their own operations and throughout their supply chain, working towards minimizing their environmental footprint.

3. **Conduct Due Diligence:** Suppliers must perform due diligence within their supply chain to ensure that their subcontractors and partners demonstrate a similar level of commitment to sustainability in their operations.
4. **Product Design and Development:** Suppliers should consider the environmental impact of the products they design and develop, with a focus on the potential for reuse and recycling.
5. **Optimize Resource Use and Minimize Emissions:** Suppliers should strive to optimize resource utilization and reduce pollution, including greenhouse gas (GHG) emissions, ideally by setting reduction goals that are validated by the Science Based Targets Initiative (SBTi).
6. **Share Environmental Data:** Suppliers must provide relevant environmental data, including waste and emissions information, as requested by PSRH. This may include data related to the environmental impact of the supplier's products or services provided to PSRH.

We are committed to continuous improvement in minimizing our environmental footprint, and we expect our suppliers to collaborate in driving efficiency initiatives that support this goal. This includes reducing the consumption of non-renewable energy and promoting recycling where possible. Suppliers must be willing to engage with PSRH in the development and implementation of sustainable processes and provide relevant data regarding the environmental impact of the goods and services they supply, as requested by PSRH for use in our sustainability efforts.

Supplier Code of Conduct

Financial Integrity

PSRH expects all suppliers and their employees to act with the highest levels of integrity and honesty. Suppliers must refrain from engaging in fraudulent or dishonest activities, including, but not limited to, money laundering, misreporting of time, expenses, or third-party costs, tax evasion, or misappropriation of property. We expect our suppliers to conduct their business with transparency and fairness, in accordance with the law.

Confidential Information

Information is a critical asset for PSRH, and its protection is paramount. This includes all forms of information, such as emails, databases, voicemails, paper communications, photos, and videos.

As a supplier to PSRH, you may have access to confidential information through your interactions with our employees, systems, or other suppliers. Suppliers are expected to handle, store, transmit, and process this information securely and only for the purposes defined in their contract with PSRH. Suppliers must not disclose any confidential information to third parties without prior authorization, except as permitted under the terms of their agreement with PSRH.

For further guidance on how we expect our suppliers to manage and protect information, please refer to PageGroup's Information Security Policy.

Data Protection and Information Security

As part of the services you provide to PSRH, it is likely that you will process personal data related to PageGroup's clients, candidates, and employees. In such cases, we expect you to respect individuals' privacy rights and to process personal data in full compliance with all relevant data protection laws and information security regulations, as well as industry best practices and our specific instructions.

All suppliers are required to:

1. **Treat Personal Data as Confidential:** Personal data must be handled with the utmost confidentiality, ensuring that it is protected at all stages of processing.
2. **Use Personal Data Only for Authorized Purposes:** Personal data should only be used for the specific purposes of providing services to PSRH, and not for any other purpose without prior authorization.
3. **Implement Security Measures:** Suppliers must implement and maintain appropriate technical and organizational measures to ensure the security of personal data. These measures should protect personal data from loss, unauthorized access, destruction, misuse, modification, and disclosure.

Respect for Free Competition Code

We, the undersigned, commit to upholding the principles of free competition, ensuring that our business practices contribute to an open, fair, and dynamic marketplace where all participants can compete based on merit. Our commitment to free competition is rooted in the belief that such a marketplace fosters innovation, consumer choice, and overall societal benefit. We will uphold this code by adhering to the following guiding principles:

1. Fairness in Competition

We will engage in business practices that are fair and non-exploitative. This includes avoiding any deceptive, misleading, or predatory tactics designed to harm or eliminate competitors through unfair means.

2. Prohibition of Anticompetitive Behavior

We will not engage in or tolerate practices such as:

- Price fixing, collusion, or market division agreements.
- Abuse of market dominance to stifle competition or exploit consumers.
- Unjustified exclusion of competitors from markets or access to resources.
- False advertising or misrepresentation of competitors' products or services.

3. Transparency and Accountability

We will operate transparently, providing accurate, truthful, and clear information about our products, services, and business practices to customers, competitors, and regulators. We will also ensure transparency in our pricing, supply chains, and business dealings.

4. Innovation and Market Entry

We will foster innovation and create opportunities for new entrants into the market. We believe that encouraging new ideas, technologies, and business models enriches the competitive landscape and benefits consumers.

5. Respect for Intellectual Property

We will respect the intellectual property rights of others and refrain from infringing on patents, copyrights, trademarks, or trade secrets. At the same time, we will actively protect our own intellectual property from unauthorized use.

6. Ethical Marketing and Communication

We will engage in honest and ethical marketing practices, ensuring that all claims made about our products and services are substantiated and clear. We will avoid engaging in negative campaigns or disinformation about competitors to damage their reputation.

7. Collaboration within Boundaries

We recognize the importance of collaboration and partnerships, but such collaborations will be transparent and in compliance with antitrust laws. We will not form agreements that limit market access, reduce competition, or artificially inflate prices.

8. Consumer Protection

We commit to prioritizing the needs and interests of consumers by offering high-quality products and services at competitive prices. We will respect consumers' rights to make informed choices and ensure that they have access to accurate, accessible information.

9. Commitment to Legal and Regulatory Compliance

We will adhere to all applicable competition laws, regulations, and guidelines in the jurisdictions in which we operate. We will cooperate with regulators and competition authorities and take responsibility for ensuring our actions comply with the law.

10. Fair Treatment of Employees, Partners, and Suppliers

We will maintain a workplace culture that values fairness, respect, and integrity. We will engage in business practices that treat employees, partners, and suppliers ethically, avoiding any exploitation or coercion that would harm healthy competition in the market.

Commitment to Upholding the Code

By signing this code, we affirm our dedication to these principles and commit to working in good faith to ensure that our business practices remain in alignment with the spirit of free competition. We understand that free competition is integral to a thriving economy, and we pledge to contribute positively to this environment.

