
Sucden Financial Limited's Corporate Code of Conduct

Introduction

Sucden Financial Ltd (SFL), as part of the Sucden Group, is committed to conducting business in a lawful, responsible, ethical, and sustainable manner and requires that its employees and business partners worldwide demonstrate this same commitment.

SFL adopted a **Corporate Social Responsibility (CSR) Framework** centred around five main principles: **Business Practices, Social Standards, Respect for the Environment, Supply Chains and Community Involvement**.

Our Corporate Code of Conduct (CCC), which complements our CSR Framework, defines the business practices and behaviours we expect from our employees worldwide. It outlines the principles we uphold when conducting business worldwide and our commitment to comply with all relevant government laws, rules, and regulations. Our CCC also stipulates how we manage human rights, labour, social equality and welfare, health and safety, environmental protection, anti-corruption, anti-bribery, anti-money laundering as well as economic/trade sanctions.

SFL is dedicated to developing mutual trust and confidence with business partners who share these same values and business practices.

Business Practices

1. Compliance with all applicable laws and contractual obligations

- SFL is committed to conducting its business and operations in compliance with applicable laws and regulations and in accordance with our contractual obligations.
- To comply with applicable laws, we established specific anti-bribery (including gifts & invitations), anti-corruption, and AML policies applicable to all SFL employees.

2. Integrity

- SFL undertakes to manage business fairly and with integrity.
- We respect the intellectual property rights and confidential information of our competitors, customers and suppliers and do not use them in an inappropriate manner.
- We comply with trade restrictions and boycotts that apply to our activities and business opportunities.
- We deal fairly with our customers, suppliers and other business partners and treat them respectfully and honestly. SFL has implemented a Whistleblowing policy to consider and review any report of serious misconduct violating the present code or any act that would constitute a criminal offence.

Social Standards

1. Employment laws and social standards

- SFL is resolute regarding the respect of human rights.
- We recognise, and adhere to, the principles set out in the Universal Declaration of Human Rights and by the International Labour Organisation.
- We comply with local and international relevant regulations regarding forced, involuntary or child labour.
- We support equal rights and non-discrimination in employment and at work.
- We comply with applicable employment laws and regulations. We pay fair living wages and benefits, and we invest in the development of our employees.

2. Health and Safety

- SFL is committed to ensuring healthy and safe working conditions for all office employees and visitors.
- We comply with all applicable health and safety laws and regulations.
- We expect employees to follow health and safety laws and requirements that apply to their jobs.

Respect for the Environment

1. Environmental Footprint

- SFL supports and encourages more efficient use of natural resources and the protection of the environment.
- We adhere to all environmental laws and regulations that apply to our operations.
- We work to reduce the impact of our activities on the environment.
- We are reducing our industrial and environmental impact through efforts to minimise waste, more efficient use of resources, and a reduction in emissions.
- We are committed to reducing our environmental footprint worldwide, having adopted a more flexible working approach and are assessing current waste management and recycling policies.

Supply Chain

- SFL carefully selects its partners and has a strong Know Your Customer process; it expects its partners to conduct similar due diligence.
- SFL is engaged in a continuous improvement approach to CSR and expects partners to act similarly.

Community Involvement

1. Good corporate citizenship

- SFL aspires to be a good corporate citizen and commits to supporting the people and communities where it operates.
- The Sucden Foundation provides financial support to communities in need and for programs that meet our targeted objectives of access to education, protection of the environment and promotion of health and nutrition.