

Code Of Conduct

1. Scope

To increase corporate value of a company, it is essential for all the employees, including management, to truly realise the social responsibility of the company, abide by laws and regulations in every aspect of work activity, and to act ethically. This Eden Leisure Group Code of Conduct provides the guideline of conducts which we should bear in mind in our daily business operation, aimed to assure that ELG is consistently being an ethical corporate group.

This Code exemplifies ethical views and corporate guidelines, but does not cover all the circumstances that may arise. In each individual situation, we should judge fairly, and act with sincerity by understanding the spirit of this Code.

2. General Provisions

2.1 Basic Attitude

This Basic Attitude provides the fundamental mind-set as a member of ELG.

We will promote fair and sound business activities by observing laws, this Code and company policies.

1. We will respect each and every person's human rights and will not discriminate or impair personal dignity. Moreover, we will not allow any forced labour or child labour.
2. We will contribute to the development of the community by respecting customs and culture.
3. We will proactively address environmental issues such as climate change and contribute to the creation of a future that is friendly to people and the earth.
4. We will earn satisfaction and reliability by providing products and services that are useful to society and by giving due consideration to the quality, safety, and environment.

We will engage in fair, transparent, and free competition, maintain a healthy relationship

5. with politics, government, citizens, and organisations.

We will improve transparency of business activities by disclosing business information

6. fairly and in a timely manner when applicable.

We will properly manage personal information and information assets including

7. customer information in accordance with GDPR guidelines.

8. We will act sincerely with responsibility, awareness, and integrity, continually improve corporate culture of the organisation as a member of ELG.

2.2 Observance Responsibility

- ▶ We shall implement the guidelines in this Code. Executive officers and management shall advise employees to abide by this Code and keep higher ethics and awareness to abide by the law to serve as a model for all the other employees.
- ▶ In order to take concrete action in accordance with this Code, ELG should continuously educate and inform its employees, reinforcing the company regulations, manuals, etc.
- ▶ Disciplinary action shall be taken when an employee's action is in violation with this Code and falls under the grounds for such action stipulated in the company employment regulations. Furthermore, when an employee's intentional or negligent action causes damage to ELG, they may be personally liable for the damages.

3. Relation with People

3.1 Respect of Human Rights

- ▶ We will respect every person's human rights, eliminate prejudice, and will not discriminate depending on race, nationality, religion, creed, sex, sexual orientation, gender identity, age, social status, or disabilities whether mental or physical.
- ▶ We will respect each and every individual's personality, individuality and diversity, and will not accept any discriminatory language or behaviour, sexual harassment, or any kind of harassment which would result in hurting other people.

3.2 Protection of Personal Information

- ▶ We will take every step to protect personal information by respecting each and every individual's privacy, abide by GDPR regulations concerning personal information, and properly handle personal information.

3.3 Maintenance of Safety and Health, Working Environment

- ▶ We will comply with laws and regulations concerning occupational safety and health, and strive to create a safe, secure, and hygienic working environment.
- ▶ We will strive to improve the moral and manners necessary to conduct our business and create a disciplined working environment.
- ▶ We will strive to maintain sound communication and create a comfortable working environment in order to perform our business.

3.4 Healthy Work Style, Promotion of Work-Life Balance

- ▶ We will strive that each employee maintain and promote mental and physical health, and keep work-life balance to maximise his or her potential.
- ▶ We will comply with labour-related laws and regulations, manage our work appropriately, and avoid overwork and long working hours.

4. Relation with Society

4.1 Initiatives towards Global Environment

- ▶ We will contribute to the creation of a prosperous society in which people and the earth can coexist in harmony by proactively addressing environmental issues such as climate change, recycling and pollution prevention in the course of our business activities.

4.2 Contribution, Political Contribution, Political Activity, etc

- ▶ We will sufficiently consider the necessity and validity, abide by relevant laws and regulations when we decide to make donations as part of our social contributions.
- ▶ We will abide by relevant laws and regulations concerning politics, election, or political activity when we deal with these activities.
- ▶ We will not use the company's facilities, name, or position in the company for political activities conducted in our individual capacity.

4.3 Correspondence to Antisocial Influence

- ▶ We will take decisive action, avoid all contacts, and will not support any activity which would promote antisocial influences or any organisation jeopardising safety of civil society.

5. Relation with Customers, Suppliers and Competitors

5.1 About Business Activities and customers

- ▶ We will continuously provide quality products and services that would satisfy the needs of our customers, abiding by laws and regulations and by committing to fair business practices.

5.2 About Procurement

- ▶ We will observe laws and regulations relevant to material purchasing, and will practice fair trade as well as purchase materials and services at an appropriate quality, price, and delivery time.
- ▶ We will conduct our purchasing based on sound commercial practices and strive to work together with our business connections for mutual benefit. We will not seek any personal benefit.

5.3 Observance of Competition Laws

- ▶ We will conduct fair business activities by observing laws and regulations relevant to promotion of fair trading.
- ▶ We will not engage in any activities such as bid rigging which restricts fair and free competition, or any activities which might be considered as us being engaged in such activities.
- ▶ We will not practice exclusion of distributors etc., unjust discriminatory treatment, or any type of unfair transaction such as restricting business activities.

5.4 Disclosure

- ▶ We will make efforts to gain understanding and acceptance from society by communicating ELG's company philosophy, company vision, and company policy.
- ▶ Where necessary, we will make timely and accurate disclosure of ELG's business information to shareholders in accordance with laws and regulations.

5.5 Advertisement Activities

- ▶ We will improve understanding and trust from the customers and ELG's brand value through advertisement activities based on the company philosophy, vision, policy, and business strategy.
- ▶ We will not allow inaccurate display or expression that might lead to false recognition of ELG's services.

5.6 Correspondence to Entertainment and Gifts

- ▶ We will maintain moderation and comply with the internal policies and procedures, sound business customs, and social norm on business entertainment, giving or receiving gifts from business connections.
- ▶ We will not bribe, provide illegal payoffs to any public officials or make any type of offerings without reasonable grounds.

5.7 Observance of Anti-Money Laundering Related Laws and Regulations

- ▶ We will observe Anti-Money Laundering (the laundering of illicit funds gained through criminal activities, etc.) related laws.

6. Relation with Business

6.1 Proper Accounting and Operating Processing

- ▶ We will perform proper accounting abiding by laws and internal policies and procedures.
- ▶ We will accurately prepare and properly save all records of finance and accounting. We will not perform improper accounting or any other means which would cause damage to the company.
- ▶ We will comply with the tax laws and regulations and make appropriate tax payments.
- ▶ We will develop and operate an internal control system for the proper execution of business and the accurate and appropriate recording of each and every transaction.

6.2 Prohibition of Conflict of Interests Action

- ▶ We will not perform any action which is a conflict of interest to the company

6.3 Management and Proper Use of Corporate Property

- ▶ We will properly manage our company assets based on company regulations. We will not use company assets for personal benefit but only for the purposes of conducting company business.

6.4 Management of Information

- ▶ We will properly protect and manage information assets, abide by laws and company regulations concerning information.
- ▶ We will not disclose, falsify, or make fraudulent use of ELG information either during or after the term of employment.

6.5 Proper Use of Information System, Social Media

- ▶ We will properly utilise information systems and protect from leaking the company's confidential information, personal information, and information provided by the customers.
- ▶ We will use and manage personal computer and other equipment provided by the company in accordance with the company procedures to prevent from any theft or loss.
- ▶ We will not use our personal private email addresses to conduct our work or keep business information on our own private computer or electronics, unless otherwise permitted.
- ▶ We will not use ELG's network for personal trading or visit internet sites containing inappropriate contents.
- ▶ We will recognise the benefits and risks of using social media, and comply with the rules established by the company upon use.
- ▶ We will not transmit information over the internet which would degrade company image and credibility, any false accusation to others leading to discrimination.

6.6 Crisis Management

- ▶ We will act appropriately in accordance with the company's instructions for the safety of our employees etc. and stakeholders, and continue our corporate activities in response to terrorism, cyber-attacks, natural disasters, infectious diseases, and other situations which threaten the lives of citizens and corporate activities.

7. Report of Violations – Whistleblower Act

7.1 Report

- ▶ Anyone who wants to raise the alarm on an act of corruption or illegality can do so safely within the Whistleblower Act. By the implementation of this legislation, employees are given the right to report abuses, knowing they will be protected by law.
- ▶ When recognising any action that is in violation or the possibility of violating any of the provisions of this Code, we will report through our supervisor. We may directly report to the HR department depending on the situation.
- ▶ We should immediately report to the CEO of ELG when it is an emergency or when the incident may cause serious damage to the company. Should a report concern the CEO, an individual may report to any other senior level member and/or board member.

- ▶ The content and fact of the report will be treated confidential and the reporter will not suffer any adverse consequences whatsoever as a result of making the report.
- ▶ Retaliation and discrimination against employees, who make such a report is prohibited.
- ▶ If the report is not investigated effectively, the reporting person may report externally to one of the competent authorities at law. These include: the Commissioner of Revenue (CfR), Financial Intelligence Analysis Unit (FIAU), Malta Financial Services Authority (MFSA), Commissioner for Voluntary Organisation (CVO), Permanent Commission Against Corruption and the Ombudsman.

7.2 Questions on Code of Ethics Interpretation

- ▶ In our daily operations, we should always consider, including the possibilities, whether or not our action is in violation of laws, company regulations, or any part of this Code. Always consider how the action would be perceived by others. When you have concerns and do not know what to do, please escalate your concerns to your supervisor or HR department for advice.