

1. Purpose and Scope of the Policy

This Code of Conduct & Ethics Policy outlines the standards of behavior and professional integrity expected of all individuals representing NMT. It establishes the ethical framework that guides every business decision and interaction, ensuring a culture rooted in accountability, transparency, and respect.

The policy applies to:

- All employees, whether full-time, part-time, temporary, or contractual
- Officers, directors, and executive leadership
- Contractors, consultants, vendors, suppliers, and third-party representatives
- Any individuals acting on behalf of NMT in internal or external engagements

This Code serves as a foundational reference for ethical decision-making and compliance with policies, laws, and regulatory requirements across all regions where NMT operates.

2. Core Values and Principles

2.1 Integrity

We conduct all activities honestly, transparently, and in accordance with applicable laws and organizational standards. Integrity requires accountability for our actions, accurate reporting, and consistent adherence to ethical obligations.

Example: Promptly reporting a billing error that financially benefits the company rather than withholding the information.

2.2 Respect

We treat colleagues, clients, partners, and stakeholders with fairness, courtesy, and dignity. Respect includes fostering an inclusive environment where differing perspectives are acknowledged and valued.

Example: Encouraging contributions from all team members during discussions, especially from underrepresented or quieter voices.

2.3 Fairness

We commit to unbiased and equitable decision-making in all professional interactions. Fairness requires avoiding favoritism, ensuring transparency, and maintaining objectivity. **Example:** Basing promotion decisions solely on measurable performance, qualifications, and merit.

2.4 Compliance with Laws

We follow all applicable international, national, and local laws, as well as regulatory and industry standards. Compliance includes completing mandatory trainings and adhering to region-specific requirements.

Example: Completing required data protection and privacy compliance training for the jurisdictions in which we operate.

3. Workplace Behavior Standards

3.1 Professional Conduct

Employees are expected to demonstrate professionalism, ethical judgment, and appropriate behavior at all times. This includes:

- Upholding respectful communication in all formats
- Dressing in a manner appropriate to the role, setting, and cultural norms
- Engaging constructively during meetings and collaborative efforts
- Safeguarding the company's reputation through responsible behavior

3.2 Anti-Discrimination

NMT prohibits discrimination based on race, ethnicity, gender, sexual orientation, disability, age, religion, nationality, or any other protected characteristic.

Scenario: Reporting derogatory comments related to an employee's ethnicity to HR or a manager.

3.3 Anti-Harassment

Harassment—including verbal, physical, digital, or sexual harassment—is strictly prohibited. All employees must ensure their conduct does not create discomfort, hostility, or intimidation for others.

Example: Refraining from inappropriate jokes or unwanted advances that could be interpreted as sexual in nature.

3.4 Manager Checklist

Managers must:

- Reinforce workplace conduct expectations
 - Promote awareness of diversity, equity, and inclusion principles
 - Maintain open communication and encourage concerns to be raised early
-

4. Conflicts of Interest

Employees must avoid situations where personal interests could compromise—or appear to compromise—professional judgment or company loyalty.

4.1 Examples of Conflicts

- Hiring or directly supervising close family members
- Holding a significant financial interest in a competitor or supplier
- Engaging in business activities that influence company decisions for personal gain

4.2 Disclosure Process

Employees must promptly disclose any actual or potential conflicts of interest to their manager or HR. Written documentation may be required to ensure transparency and proper oversight.

4.3 Prohibited Activities

- Accepting non-nominal gifts, hospitality, or favors from suppliers, partners, or clients
- Taking secondary employment or freelance work that interferes with NMT responsibilities
- Using company time, resources, or confidential information for personal benefit

4.4 Manager Checklist

Managers should:

- Regularly review team disclosures and job assignments
 - Reinforce the importance of transparency regarding conflicts
 - Clarify expectations related to gift acceptance and ethical boundaries
-

5. Confidentiality and Data Protection Obligations

5.1 Confidential Information

Employees must safeguard all confidential, proprietary, and sensitive information belonging to NMT, clients, partners, and colleagues. Unauthorized disclosure is strictly prohibited.

5.2 Data Handling

Employees must:

- Adhere to approved processes for storing, accessing, transmitting, and disposing of data
- Confirm the authenticity of external data requests before sharing information
- Protect sensitive data from unauthorized access, loss, or compromise
Example: Verifying the legitimacy of a third-party request before sharing customer or employee data.

5.3 Manager Checklist

Managers must:

- Implement ongoing data protection training and reminders
 - Ensure secure data handling practices within their teams
 - Monitor compliance and promptly address any potential data risks
-

6. Use of Company Assets and IT Resources

6.1 Acceptable Use

Company assets—including computers, mobile devices, network systems, and communication tools—must be used responsibly and primarily for business purposes. Acceptable use includes:

- Sending business-related emails
- Accessing online resources required for work
- Using company tools to support legitimate operational needs

6.2 Prohibited Use

Employees may not:

- Install or download unauthorized software or applications

- Use company systems for personal financial gain or external business ventures
- Access inappropriate or illegal content using NMT resources

6.3 Manager Checklist

Managers should:

- Monitor proper use of company equipment and digital tools
 - Provide clarity on acceptable use standards
 - Address misuse promptly and document corrective actions
-

7. Anti-Bribery and Anti-Corruption Rules

NMT enforces a strict zero-tolerance approach to bribery, corruption, and unethical financial practices.

7.1 Key Principles

- Do not offer, provide, solicit, or accept bribes in any form
- Maintain transparency and honesty in financial transactions
- Decline any payments or incentives intended to influence internal or external decisions
Example: Refusing an offered payment from a supplier who seeks preferential treatment.

7.2 Manager Checklist

Managers must:

- Provide teams with training on anti-corruption laws and company standards
 - Ensure that contracts include anti-bribery compliance clauses
 - Monitor adherence and report any suspicious activities immediately
-

8. Interactions with Clients, Partners, and Suppliers

8.1 Ethical Guidelines

Employees must maintain professionalism, fairness, and respect in all business interactions. Ethical expectations include:

- Honoring commitments and representing NMT truthfully
- Avoiding actions that could damage the company's reputation
- Promptly reporting unethical proposals or improper incentives
Scenario: Reporting a supplier who offers gifts or incentives in exchange for awarding contracts.

8.2 Manager Checklist

Managers should:

- Review key client and supplier relationships for compliance
- Ensure partnership agreements are ethical, transparent, and aligned with NMT values
- Promote a culture of integrity in all external communications

9. Reporting Concerns and Whistleblower Protections

9.1 Reporting Channels

Employees may raise concerns through:

- Direct communication with a manager or HR representative
- Anonymous reporting through NMT's designated whistleblower hotline
- Submitting concerns via secure internal reporting systems

9.2 Protections

NMT protects all employees who report concerns in good faith from retaliation, harassment, or adverse employment actions. Reports will be handled confidentially and investigated impartially.

9.3 Manager Checklist

Managers must:

- Promote openness and encourage ethical reporting
 - Ensure their teams understand reporting procedures
 - Address concerns promptly and document follow-up actions
-

10. Disciplinary Measures for Violations

Violations of this Code may result in disciplinary action, aligned with the severity of the misconduct and applicable legal requirements.

10.1 Possible Consequences

- Verbal or written warnings
- Suspension, reassignment, or demotion
- Termination of employment or contractual relationship
- Legal action in cases involving unlawful behavior

10.2 Manager Checklist

Managers must:

- Document violations objectively and thoroughly
 - Apply disciplinary measures consistently and fairly
 - Support employee development and improvement where appropriate
-

11. Appendix

11.1 Glossary

- **Confidential Information:** Proprietary, sensitive, or personal data requiring strict protection.
- **Conflict of Interest:** A situation in which personal interests interfere with professional responsibilities or company interests.

11.2 Related Policies

- Anti-Harassment Policy
- Data Protection & Privacy Policy
- Whistleblower and Reporting Policy

This Code of Conduct & Ethics Policy establishes clear ethical expectations and reinforces NMT's commitment to fostering a culture of accountability, responsibility, and respect across all operations.