

## **Code of Conduct & Ethics Policy**

**Version: 2025-01**

**Company: NMT**

**Reviewed Date: 07 December 2025**

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### **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.

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### **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.

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## 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
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#### **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
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#### **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

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## **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
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## **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
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## **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
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## 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
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## **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
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## **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.