

Capital Partners Group (CPG)

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**Code of Ethics and Business Conduct**

*“Guiding our decisions, relationships, and responsibilities across all entities.”*

June 2025

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A Message from the Group CEO,

At Capital Partners Group, our foundation is built on a deep commitment to fairness, honesty, and integrity. These values are not just corporate statements, they are the expectations that guide every decision, every action, and every interaction across our companies.

As we continue to grow, it becomes even more important that we lead by example, uphold our ethical responsibilities, and foster a culture where doing the right thing is not just encouraged, it’s required. This Code of Ethics and Zero Tolerance Policy reflects our unified vision for ethical conduct, and it applies equally to everyone across Tawfeer, Euroland, Pro Logistics, and all subsidiaries.

Our people are our most valuable asset. We count on you to act responsibly; report concerns courageously, and model the integrity that defines who we are. From preventing corruption and protecting data, to respecting diversity and holding our partners to our values, This Code exists to guide us.

Ethical leadership begins at the top but must live at every level of the organization. Let this document serve as more than a policy, it is our shared promise to each other and to the communities we serve.

Thank you for your unwavering commitment to integrity. It is the cornerstone of our continued success.

Rami Bitar,

Group Chief Executive Officer

Capital Partners Group

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Change of Record

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**Approval to Issue:**

Group Chief HR Officer

Signature:

Group Chief Executive Officer

Signature:

1. Purpose and Scope.

**Introduction:**

This Code of Ethics and Zero Tolerance Policy provides a clear and unified ethical foundation for all entities operating under Capital Partners Group (CPG), including Tawfeer, Euroland, Pro-Logistics and all other subsidiaries. It outlines the principles that govern how we work, interact, and make decisions, ensuring that every employee, contractor, executive, supplier, and business partner understands their obligations in upholding the highest standards of conduct.

**Rationale:**

In a complex and dynamic business environment, ethical clarity is vital. This Code serves as a common reference point that reinforces CPG's commitment to lawful, responsible, and values-based conduct. Drawing from internationally recognized standards and global best practices, our policy supports consistency, fosters trust among stakeholders, and strengthens our long-term reputation. It is not only about compliance but also about reinforcing a culture of integrity.

**Key Expectations:**

The following expectations translate the intent of this policy into clear, actionable standards of conduct. Aligned with the introduction and rationale above, these commitments define how individuals across Capital Partners Group are expected to behave and make decisions every day. They help operationalize our values and ensure a consistent ethical standard throughout our organization.

1. This Code applies to all employees, board members, and business partners working with or on behalf of Capital Partners Group.
2. Everyone is expected to act in a professional, honest, and ethical manner at all times.
3. Everyone must be familiar with the Code and applicable company policies.
4. Concerns or suspected violations must be reported to a manager, the HR department, or the Ethics Hotline (If applicable).
5. Managers and supervisors have additional responsibilities to:
6. Serve as role models for ethical behavior.
7. Encourage questions and open dialogue on ethical concerns.
8. Support employees who speak up and ensure protection from retaliation.
9. Help employees, suppliers, and partners understand the Code’s requirements.
10. Apply standards consistently and hold others accountable for violations.
11. This Code must be adhered to across all locations, departments, and levels of seniority.
12. Every individual is expected to be familiar with the Code and consult it when facing difficult ethical choices.
13. Managers and supervisors must lead by example, ensuring that this Code is understood, upheld, and integrated into everyday decision-making.
14. Violations of this Code are taken seriously and may lead to disciplinary action, including termination and potential legal consequences.

2. Our Values and Leadership Commitments.

**Introduction:**

Our values are the compass that guides us how we conduct business at Capital Partners Group. They are not abstract concepts; they are the essence of who we are and what we expect from ourselves and one another. These values are Quality, Credibility, Growth, Commitment, Accountability, Professionalism and Integrity. These values are foundational to building trust with our stakeholders and delivering long-term success across Tawfeer, Euroland, Pro Logistics and all other subsidiaries.

**Rationale:**

Strong ethical leadership starts with clear, lived values. Embedding these values across our organization ensures that our decisions, behavior, and strategies are consistent with our vision. Leaders at all levels are expected to lead by example and create a culture where ethical behavior is recognized, supported, and rewarded. This section reinforces the importance of living our values, especially in times of challenge or uncertainty.

**Key Expectations:**

Our values come to life through action. The expectations below are designed to guide everyone, regardless of position or responsibility, in demonstrating these values every day. They connect the principles outlined in the introduction and rationale to the practical, observable behaviors that sustain our ethical culture and define how leadership is exercised across Capital Partners Group.

1. All employees must integrate CPG's values into daily decisions, relationships, and business practices.
2. Everyone is expected to treat colleagues, partners, and customers with fairness, dignity, and respect.
3. Leaders and managers are accountable for:
4. Demonstrating ethical leadership and modeling expected behaviors.
5. Communicating the importance of our values and ethical standards.
6. Fostering a culture of openness, inclusivity, and continuous improvement.
7. Addressing misconduct consistently and without bias.
8. Supporting teams in applying our values to real-world situations.
9. Leaders must ensure the Code is accessible, understood, and regularly discussed within teams.
10. Values are not optional; they are essential criteria for performance evaluation and leadership advancement.

At Capital Partners Group, how we achieve results is just as important as the results themselves. We rely on our shared values to build a workplace we are proud of and a legacy we stand behind.

3. Making Ethical Decisions and Speaking Up.

**Introduction:**

Ethical decision-making is essential to maintaining the integrity, trust, and reputation of Capital Partners Group. Every day, employees across our businesses make choices that shape how we are perceived by our customers, partners, and communities. This section provides guidance to ensure that these decisions reflect our values and reinforce our commitment to doing the right thing.

**Rationale:**

Ethical situations are not always clear-cut. By providing a consistent framework, we empower employees to navigate uncertainty with confidence. When individuals are encouraged to speak up and are supported in doing so, we build a resilient, transparent, and accountable culture. At CPG, we believe that raising concerns is a sign of strength, not disloyalty.

**Key Expectations:**

The expectations below provide clear direction on how to make ethical decisions and raise concerns. They are designed to help all CPG employees recognize and respond to ethical challenges appropriately, and to ensure that every concern is treated seriously and without retaliation.

1. Use ethical judgment in all situations. Ask yourself:
   1. Is it legal? Does it align with CPG’s values and Code?
   2. Would I be comfortable if this appeared in the news? How would this decision affect others?
2. When in doubt, seek guidance from your manager, HR, or the Ethics Hotline before taking action.
3. Speak up if you witness misconduct or suspect unethical behavior. Silence allows issues to persist or worsen.
4. Multiple reporting channels are available, including:
   1. Direct managers or supervisors
   2. Human Resources
   3. Legal team
   4. Anonymous reporting via the Ethics Hotline or digital platform
5. Managers have a responsibility to:
   1. Promote a safe environment for employees to speak up
   2. Address reported concerns promptly and seriously
   3. Escalate issues when necessary
   4. Never retaliate against individuals who report in good faith
6. CPG strictly prohibits retaliation against anyone who raises concern, participates in an investigation, or refuses to engage in unethical conduct.
7. All Reports will be handled with confidentiality and professionalism and will be investigated objectively.
8. All employees are expected to cooperate fully in any investigation and respect the sensitive nature of the process.

By making sound ethical decisions and encouraging open dialogue, we create a stronger, more resilient organization, one where integrity is everyone’s responsibility.

4. Zero Tolerance for Corruption, Bribery & Gifts.

**Introduction:**

Capital Partners Group is firmly committed to conducting business with integrity, transparency, and fairness. We do not tolerate bribery, corruption, or unethical exchanges in any form. Whether dealing with public officials, suppliers, clients, or other stakeholders, all employees and business partners must act in a way that reflects our commitment to ethical business practices.

**Rationale:**

Corruption and bribery erode trust, distort decision-making, and expose individuals and organizations to legal, financial, and reputational risks. This policy safeguards CPG from these threats by providing clear rules that uphold fairness in our operations and maintain public confidence in our business conduct.

**Key Expectations:**

The expectations outlined below make clear what is acceptable and what is not in the context of gifts, entertainment, and financial or non-financial incentives. They serve to protect individuals from ethical missteps and preserve the Group’s integrity across all markets and functions.

1. Offering, soliciting, or accepting bribes or kickbacks is strictly prohibited in any form, including cash, services, favors, or anything of value.
2. Employees must never request personal benefits from customers, vendors, or other external stakeholders.
3. All gifts, entertainment, or hospitality offers, regardless of value, must be reported to your line manager or the HR team if there is any doubt.
4. Gifts or samples received as part of a vendor relationship are considered company property and must be documented in accordance with internal guidelines.
5. Employees may not offer gifts or entertainment to public officials without prior written approval from HR.
6. Third parties, including agents, contractors, or intermediaries acting on behalf of CPG, are expected to comply with this policy and may be subject to immediate termination for violations.
7. All employees are responsible for understanding and complying with anti-bribery laws applicable to the jurisdictions in which we operate, including international laws where relevant.

At Capital Partners Group, there is no room for ambiguity when it comes to ethical conduct. Bribery and corruption are not just violations of our Code; they are violations of trust. Everyone has a role to play in preventing misconduct and upholding our reputation as a fair, law-abiding business.

5. Conflicts of Interest.

**Introduction:**

At Capital Partners Group, we recognize that employees may have personal interests outside of work. However, it is critical that these interests do not conflict, or appear to conflict, with the responsibilities and decisions we make on behalf of the Group. A conflict of interest undermines trust and may compromise the integrity of our operations, even if unintentional.

**Rationale:**

Conflicts of interest can arise in many ways: personal relationships, financial interests, external employment, or dealings with suppliers and competitors. Left undisclosed, they can damage credibility, skew decision-making, and raise legal or ethical concerns. Transparency ensures we protect the Group’s reputation and maintain fair, objective business practices.

**Key Expectations:**

This section sets out expectations for identifying, disclosing, and managing potential conflicts of interest. All CPG employees must act in the company’s best interests and avoid situations that could compromise or appear to compromise their impartiality.

1. Employees must avoid situations where personal interests’ conflict with professional duties.
2. Common examples of potential conflicts include:
   1. Holding a financial interest in a competitor, supplier, or customer.
   2. Close relationships with vendors or partners you influence or supervise.
   3. Engaging in outside employment or consulting that overlaps with your role at CPG.
   4. Hiring, supervising, or awarding contracts to family members or close friends.
3. All actual, perceived, or potential conflicts of interest must be disclosed:
   1. Notify your manager or HR immediately.
   2. Use designated conflict of interest disclosure forms where required.
4. Managers are responsible for reviewing disclosures and ensuring appropriate mitigation actions are taken.
5. Employees must not use company information or position for personal gain, nor should they compete with CPG in any way.
6. Conflicts of interest apply to both personal and family relationships, including spouses, domestic partners, children, siblings, and in-laws.
7. Failure to disclose a conflict of interest may result in disciplinary action, up to and including termination as per respective Labor Laws.

Capital Partners Group depends on transparency and accountability to preserve its integrity. Disclosing a conflict of interest is not a violation, it’s the right step toward protecting your reputation and the trust others place in our organization.

6. Harassment, Discrimination & Workplace Culture.

**Introduction:**

Capital Partners Group is committed to maintaining a workplace where every individual is treated with dignity, respect, and fairness. We believe that diversity, equity, and inclusion are critical to our success and that all employees deserve a work environment that is free from harassment, discrimination, intimidation, or retaliation.

**Rationale:**

A safe and respectful workplace is foundational to high performance and employee well-being. Harassment or discrimination, whether based on race, gender, religion, nationality, disability, age, or any other legally protected characteristic will not be tolerated. We aim to promote a culture that empowers individuals to thrive professionally while feeling secure, heard, and valued.

**Key Expectations:**

This section defines expectations for appropriate workplace behavior and sets a zero-tolerance stance for any conduct that undermines respect and inclusion.

1. Treat all colleagues, clients, vendors, and partners with dignity and professionalism.
2. Harassment of any kind of verbal, physical, visual, or online is strictly prohibited, including:
   1. Sexual harassment or inappropriate conduct
   2. Bullying, threats, or intimidation
   3. Derogatory comments or slurs
3. Discrimination on the basis of protected characteristics is forbidden, including race, color, religion, gender, sexual orientation, age, national origin, disability, or any other characteristic protected by law.
4. Managers must foster an inclusive environment by:
   1. Setting a positive example in behavior and communication
   2. Taking immediate action when concerns arise
   3. Encouraging employees to speak up if they experience or witness inappropriate conduct
5. Employees who feel they have experienced or observed harassment or discrimination should report it immediately to:
   1. Their direct manager or HR representative
   2. The Ethics Hotline for confidential reporting
6. All complaints will be investigated promptly, fairly, and confidentially.
7. Retaliation against anyone who raises a concern in good faith is strictly prohibited and will result in disciplinary action.

At Capital Partners Group, we are all responsible for upholding a culture of mutual respect and inclusion. This commitment is not only legal, but also a moral obligation that reflects the values we stand for as an employer of choice.

7. Data Protection and Confidentiality.

**Introduction:**

Capital Partners Group places the highest priority on the security and confidentiality of personal, employee, customer, and corporate information. With the increasing reliance on digital data and communication, every team member has a role to play in protecting sensitive information and using it responsibly.

**Rationale:**

Data privacy breaches can lead to reputational damage, financial losses, and legal penalties. Responsible data management is not only a legal obligation but a fundamental part of maintaining the trust of our customers, employees, and partners. Whether managing personnel records or accessing proprietary business data, safeguarding information is essential to ethical conduct at CPG.

**Key Expectations:**

This section provides clear guidance on handling, protecting, and sharing confidential data in accordance with internal policies and applicable privacy laws.

1. Access only confidential information required for your role and only share it with individuals who are authorized and have a legitimate business need.
2. Handle all confidential data with care, ensuring it is securely stored, transmitted, and disposed of.
3. Do not use confidential information for personal gain or to benefit others inappropriately.
4. Examples of sensitive or confidential information include:
   1. Employee and customer personal details
   2. Payroll and compensation records
   3. Commercial contracts and pricing terms
   4. Business strategies and expansion plans
   5. Proprietary technology or trade secrets
5. Report any suspected data breach or unauthorized disclosure immediately to your manager and IT Security.
6. Do not leave printed confidential documents unattended and avoid discussing sensitive matters in public or unsecured locations.
7. Comply with all applicable data protection laws, including those related to customer communications, marketing, employee records, and third-party data transfers.
8. Training and awareness are mandatory for roles involving regular data access. Non-compliance with data policies may lead to disciplinary action or legal consequences.

At Capital Partners Group, information security is a shared responsibility. Protecting what is entrusted to us by our people, partners, and customers is foundational to ethical and effective business operations.

8. Whistleblower Protection and Escalation Channels.

**Introduction:**

At Capital Partners Group, we believe that raising concerns is a critical part of ethical leadership and organizational integrity. Employees must feel empowered to speak up about unethical, illegal, or unsafe behavior without fear of retaliation. A strong reporting culture ensures that issues are addressed before they escalate and strengthens our collective accountability.

**Rationale:**

Whistleblower protection is essential to creating an open, responsible workplace. When employees raise concerns in good faith, they help protect our business, our people, and our values. We are committed to treating every report seriously and confidentially, and to supporting those who take a stand for integrity.

**Key Expectations:**

This section outlines how concerns should be raised and how CPG protects those who do.

1. All employees are encouraged to report concerns promptly if they suspect or witness:
   1. Violations of the Code of Ethics or company policies
   2. Fraud, theft, or corruption
   3. Harassment, discrimination, or retaliation
   4. Health, safety, or environmental risks
   5. Any unethical, illegal, or unsafe conduct
2. Multiple channels are available to report concerns, including:
   1. A direct supervisor or manager
   2. The Human Resources department
   3. The confidential Ethics Hotline or digital reporting platform (If applicable)
3. Reports may be made anonymously where permitted by law. CPG will fully respect confidentiality.
4. No retaliation will be tolerated against any employee who raises a concern in good faith or cooperates in an investigation.
5. Managers are responsible for:
   1. Taking concerns seriously and responding promptly
   2. Escalating significant issues to HR
   3. Supporting an environment where employees feel safe to speak up
6. Investigations will be conducted fairly, impartially, and in a timely manner, and may involve internal or external parties as needed.
7. False reports made maliciously or in bad faith are prohibited and may result in disciplinary action.

At Capital Partners Group, we are committed to listening, learning, and improving. Speaking up helps us live our values and protect the principles on which our business is built.

9. Vendor and Supplier Integrity Standards.

**Introduction:**

Capital Partners Group relies on strong, ethical partnerships to deliver value across our business units. We expect all third parties, including vendors, suppliers, subcontractors, and agents to reflect our standards of conduct and share our commitment to lawful, transparent, and responsible business practices.

**Rationale:**

Vendors and suppliers are an extension of our brand and values. Unethical or illegal practices by third parties can damage our reputation and expose the Group to compliance and operational risks. By holding our partners to defined ethical standards, we ensure alignment, reduce risk, and promote a culture of integrity throughout our value chain.

**Key Expectations:**

This section outlines CPG’s expectations of third-party business conduct and defines the requirements for ongoing vendor and supplier relationships.

1. All vendors, suppliers, and third-party partners are required to adhere to CPG’s Code of Conduct or equivalent standards.
2. Third parties must comply with applicable laws and regulations, including those relating to labor, human rights, environmental protection, and anti-corruption.
3. Forced labor, child labor, discrimination, and unsafe working conditions are strictly prohibited in all parts of our supply chain.
4. Subcontracting is not permitted without prior written approval from CPG. Unauthorized subcontracting may result in termination.
5. Vendors and suppliers must maintain accurate records and cooperate with audits or reviews of compliance practices.
6. All forms of bribery, kickbacks, or facilitation payments involving CPG personnel or affiliates are prohibited.
7. Suppliers must immediately report any conflicts of interest or ethical concerns related to their relationship with CPG.
8. CPG reserves the right to suspend or terminate relationships with any third party that fails to meet our ethical and legal expectations.

At Capital Partners Group, responsible sourcing and ethical collaboration are essential to sustainable business. We choose to work with partners who not only deliver on quality and performance, but who share our commitment to doing what is right.

10. Environment and Social Responsibility.

**Introduction:**

At Capital Partners Group, we are committed to operating responsibly and sustainably. Our impact on the environment and the communities reflects our values and long-term business philosophy. Environmental stewardship and social accountability are integral to our operations, decision-making, and stakeholder engagement.

**Rationale:**

Ethical businesses recognize their role beyond profits. As a group with a wide-reaching influence across retail and logistics, we must lead by example in reducing our environmental footprint and contributing positively to society. This strengthens stakeholder trust, supports regulatory compliance, and promotes long-term value creation.

**Key Expectations:**

This section defines our environmental and social responsibilities and how they should be reflected in our daily actions, business decisions, and partnerships.

1. Comply with all applicable environmental laws, regulations, and internal sustainability policies.
2. Strive to reduce waste, energy use, emissions, and water consumption in all areas of our operations.
3. Promote environmentally responsible practices across our supply chain, including responsible sourcing and sustainable packaging.
4. Prevent environmental harm through proper handling of hazardous materials, waste disposal, and pollution prevention.
5. Encourage innovation in sustainability and support green initiatives across business units.
6. Engage with local communities through programs that support education, economic development, health, and environmental awareness.
7. Respect and support human rights, fair labor practices, and community wellbeing in every market where we operate.
8. Report any environmental or social concerns to management, Legal, or the Ethics Hotline.

Sustainability is not a separate effort, it is embedded in the way we lead, operate, and grow. At Capital Partners Group, we understand that doing good is not only responsible, but also essential to achieving lasting success.

11. Political Neutrality and Government Relations.

**Introduction:**

Capital Partners Group maintains strict neutrality in political activities and is committed to ensuring that all government interactions are conducted ethically, transparently, and in accordance with applicable laws. Our reputation for integrity must be preserved in all dealings with public officials, political entities, and regulatory bodies.

**Rationale:**

Political engagement, whether personal or professional, can pose significant reputational, legal, and ethical risks to the organization if not properly managed. Clear boundaries and compliance safeguards are essential to prevent conflicts of interest, undue influence, or perceived favoritism in government interactions.

**Key Expectations:**

This section sets out how employees and representatives of CPG should conduct themselves in relation to political activity and government engagement.

1. No employee may use company funds, resources, or time to support political campaigns, parties, or candidates.
2. Personal political beliefs and activities must be kept separate from CPG responsibilities and should not be conducted during work hours or by using company platforms.
3. All interactions with government officials must be professional, lawful, and approved when required by the HR Department.
4. Employees must never offer or authorize gifts, entertainment, or payments to public officials without prior written approval from Compliance.
5. Any lobbying, policy advocacy, or representation of CPG’s interests to public bodies must be pre-approved by the Executive Team and conducted in full compliance with disclosure laws.
6. If you are contacted by a government official or regulatory agency, you must immediately inform your Line Manager, Legal or HR Department.
7. Employees running for political office or accepting appointments to public positions must disclose this in advance to HR and may be subject to role modifications or conflict review.

At Capital Partners Group, we uphold the highest standards of impartiality and transparency in our relationships with governments. Our integrity is our license to operate, and it must be preserved in every interaction we undertake.

12. Compliance, Enforcement, and Disciplinary Measures.

**Introduction:**

Capital Partners Group takes compliance seriously. Our Code of Ethics and all related policies are enforceable standards that apply to everyone, regardless of position or tenure. These guidelines are essential to ensuring our business practices align with laws, regulations, and the values that define our culture.

**Rationale:**

Ethical behavior must be consistent, not conditional. Without accountability, even the best policies are ineffective. By establishing clear consequences for violations and a consistent process for enforcement, we protect the integrity of our operations and reinforce the trust our stakeholders place in us.

**Key Expectations:**

This section outlines the responsibilities of all employees in upholding this Code, the enforcement mechanisms in place, and the consequences of misconduct.

1. All employees are required to comply with this Code and related company policies.
2. Violations of this Code may lead to disciplinary action, including:
   1. Verbal or written warnings
   2. Suspension
   3. Termination of employment or contract
   4. Legal reporting
3. Disciplinary decisions will be based on the severity and nature of the violation, including repeat offenses or willful disregard of obligations.
4. Managers are expected to act quickly and fairly when violations are suspected or confirmed, in consultation with HR.
5. All employees are expected to cooperate with investigations and respect the confidentiality of the process.
6. Any retaliation against individuals who report misconduct or cooperate with investigations is itself a serious violation and will not be tolerated.
7. Compliance audits and monitoring may be conducted periodically, and findings will be reviewed by leadership.
8. Corrective action plans will be implemented when weaknesses or gaps are identified to prevent recurrence.

At Capital Partners Group, our ethical standards are more than words, they are promises backed by action. Adherence to these standards is not optional, and enforcement is essential to preserving our integrity and performance.

13. Annual Review and Acknowledgment.

**Introduction:**

To ensure that our ethical standards remain current, effective, and top-of-mind, Capital Partners Group conducts a regular review of this Code of Ethics. This section outlines our commitment to continuous improvement and reinforces the personal responsibility of every employee to understand and uphold the Code.

**Rationale:**

As our business evolves, so must our ethical framework. Annual review and employee acknowledgment of the Code ensure alignment across the organization, reinforce our expectations, and demonstrate our collective commitment to ethical excellence. It also provides a timely opportunity to address new risks, regulations, or business realities.

**Key Expectations:**

1. This Code is reviewed annually by the HR and our Legal Team to ensure it remains up-to-date and reflects evolving best practices.
2. All employees are required to read and acknowledge the Code upon hiring and on an annual basis.
3. Acknowledgment may take place digitally or through formal signed documentation, as coordinated by HR.
4. Supervisors and managers are responsible for ensuring that their teams complete the annual acknowledgment requirement.
5. Policy updates or changes are communicated clearly, and employees are provided with the necessary training to understand the impact of revisions.
6. Failure to acknowledge or comply with this Code may result in disciplinary consequences.

At Capital Partners Group, ethical conduct is a shared responsibility. The annual acknowledgment is not just a formality, it is a reaffirmation of our commitment to integrity, responsibility, and respect in all we do.

14. Conclusion.

Ethics at Capital Partners Group is not just a policy, it is a way of doing business. Every decision, every action, and every relationship reflect who we are and what we stand for. This Code is a reminder of our shared commitment to fairness, transparency, and accountability.

By embracing these principles, we earn the trust of our customers, partners, and one another. Let this Code serve, not only as a reference, but as a reflection of our values in action. Together, we shape a workplace and a company that leads with integrity, and we all share in that responsibility.

15. Employee Receipt & Acceptance.

**Employee Receipt & Acceptance**

I acknowledge that I have received a copy of the **Code of Ethics and Business Conduct** of Capital Partners Group.

This acknowledgment affirms my understanding of the ethical standards expected at Capital Partners Group.

I understand that any violation of this policy may result in disciplinary action, up to and including termination of employment.

Employee Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Employee Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

By adhering to these guidelines, we can uphold the highest standards of professionalism and maintain the trust of our stakeholders.

“For questions about this Code or its application, please contact the HR Department. This document is maintained by the HR and Legal Departments and is subject to annual review”