



SWAN CORP

Code of Business Conduct

I. Scope and Purpose of this Code

This Code outlines the standards of ethical and responsible conduct we expect in our interactions with:

- Our employees, Customers and Clients
- The communities and environment where we operate.
- Our value chain partners - Suppliers, Service providers, Contractors, Channel partners, Consultants, and Agents.
- Joint venture partners and business associates.
- Our financial stakeholders.
- Government bodies and regulatory authorities.
- All Swan Corp group entities and subsidiaries.

Please Remember...

1. Throughout this code, the terms "we" or "us" refer to Swan Corp and its subsidiaries, including its Directors, Officers, Employees, and others acting on its behalf, depending on the context.
2. The phrase "our group companies" refers to entities to which Swan Corp has extended this code, or to whom it applies by direction or intent.
3. This code defines the standards we hold ourselves and also sets the tone for how we expect those working with us to operate.

We expect everyone who engages with Swan Corp Limited to be familiar with the principles of this Code and to align their conduct accordingly.

II. Our Core Principle

- At Swan Corp, we are dedicated to conducting our business with integrity, transparency, and accountability. We operate with zero tolerance for corruption, staying true to our commitment to responsible and ethical conduct.
- We view sustainable development as a business imperative. Our social and environmental responsibilities are embedded in our strategic decision-making, ensuring we positively impact the communities and ecosystems we engage with.
- We aim to be catalysts of economic growth and social advancement in the regions where we operate—while honoring and preserving local cultures, values, and traditions. We are committed to avoiding any activity that may harm the well-being of communities or the environment.
- Safety and sustainability are non-negotiable. We are committed to providing a clean, safe, and inclusive working environment for our employees and partners, integrating responsible practices across all areas of operation.
- Our people represent our values, whether in the boardroom or in the field, we conduct ourselves with professionalism, fairness, and cultural sensitivity. Our behavior must reflect the high ethical standards we expect from all who represent Swan Corp

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- We uphold the human rights and dignity of every individual we work with. Diversity, inclusion, and respect are at the core of how we engage with people and partners.
- We strive to align the interests of our stakeholders, communities, partners, and shareholders—through fair, transparent, and inclusive decision-making.
- We do not engage in unfair or restrictive trade practices. We operate in a manner that promotes healthy competition and market transparency.
- We are committed to maintaining a culture of trust and protection. No individual will face retaliation or negative consequences for raising genuine concerns in good faith or in public interest.
- We adhere to the laws of every country in which we operate. Where our code sets a higher standard than the law, we hold ourselves to the code. In case of conflict between law and code, legal requirements will prevail.

III. Our Employees

Equal Opportunity Employer

1. At Swan Corp, we are an equal opportunity employer. We are committed to fostering an inclusive workplace where every employee and job applicant is treated fairly, without discrimination based on race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability, or any category protected under applicable law.
2. Our hiring, development, and promotion processes are guided strictly by merit, qualifications, performance, and potential. We value individuals who bring diverse perspectives, drive innovation, and contribute to our vision of delivering sustainable and impactful solutions.
3. We are committed to upholding fair, transparent, and comprehensive HR policies that support diversity, equality, and compliance with applicable laws. These policies define clear terms of employment, development pathways, and performance management to empower our workforce.

Dignity and Respect in the Workplace

4. Swan Corp's leaders are accountable for creating a work environment that promotes collaboration, respect, and personal dignity. Our workplace culture is rooted in mutual trust, open communication, and respect for individual privacy and beliefs.
5. We insist on a respectful, harassment-free environment for all. Any form of harassment—whether sexual, physical, verbal, or psychological—will not be tolerated.
6. We maintain a fair and transparent disciplinary process that ensures every employee has the right to be heard and treated justly.
7. We respect the personal lives and privacy of our employees. We do not interfere with their conduct outside of work unless it impacts on their job performance, creates a conflict of interest, or harms the company's reputation.

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Human Rights

We are committed to upholding and protecting human rights. We do not employ underage workers at any of our sites or facilities.

We strictly prohibit the use of forced, bonded, or involuntary labor. We do not withhold personal documents, nor do we require any form of payment or recruitment fees from employees or candidates in exchange for employment or work with us.

Zero Tolerance for Bribery and Corruption

Our employees and representatives, including agents, consultants, and intermediaries, must not offer, solicit, or accept any illegal payments, bribes, or improper benefits that could be perceived to influence business decisions or secure unfair advantage.

IV. Working with Integrity

External Employment and Roles

- Employees of Swan Corp Ltd. and its subsidiaries must prioritize their responsibilities to the company. Taking up external employment, leadership positions, or managing other business ventures—even in a personal capacity and without compensation—must not interfere with one's ability to perform their duties or result in a conflict of interest.
- Engagements with any competitor, customer, supplier, or distributor are strictly prohibited unless prior written approval is obtained as per the Conflicts of Interest norms and applicable law.

Integrity of Information and Company Assets

- Employees shall maintain the highest standards of accuracy and integrity in all records, reports, and communications—both internal and external, including financial statements. Misrepresentation or deliberate omission of material information is strictly prohibited.
- Disclosure of company-related information to media, partners, or any external party must be authorized and in line with Swan Corp's communication policy. This includes all forms of communication, including social and digital media.
- Employees must ensure the accuracy of personal data provided to the company and understand that such data will be protected in compliance with data privacy laws and company policy.
- We expect all employees to respect and protect the confidentiality of Swan Corp's intellectual property and sensitive business information.
- Employees must also safeguard third-party confidential information and intellectual property shared in the course of business. Any misuse, unauthorized access, or disclosure is a violation of our code.
- Any loss, theft, or destruction of confidential or proprietary information must be reported immediately to the appropriate authority for investigation and resolution.

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- All company-provided assets, including digital tools, equipment, and intellectual property, must be used solely for business purposes. Misuse or unauthorized use will be considered a serious violation. We have controls in place to minimize fraud, misappropriation, and security risks.
- Swan Corp complies fully with anti-money laundering, anti-fraud, and anti-corruption laws. Internal systems are in place to detect, report, and prevent any such illegal activities.

V. Business with Relatives

As a general rule, employee shall avoid conducting company business with a relative as defined under Section 2(76) of the Companies Act, 2013. Swan Corp discourages the employment of relatives in positions and assignments within the same department and prohibits the employment of such individuals in roles with financial dependence or influence, such as auditing or control relationships, or supervisor/subordinate relationships. The purpose of this policy is to prevent organizational impairment and conflicts that may arise from the employment of relatives or significant others, especially in supervisory/subordinate relationships. If there is a question about whether a relationship is covered by this policy, the human resources department is responsible for determining whether an applicant's or transferee's acknowledged relationship falls under this policy.

The human resources department shall inform all affected applicants and transferees of this policy. Willful withholding of information regarding a prohibited relationship/reporting arrangement may result in corrective action, up to and including termination. If a prohibited relationship exists or develops between two employees, the employee must bring this to the attention of their supervisor. The company retains the prerogative to separate the individuals at the earliest possible time, either through reassignment or termination, if necessary.

VI. Insider Trading

- Employees are strictly prohibited from engaging in insider trading or passing on price-sensitive, non-public information to others, including family and friends—for personal or third-party benefit. This applies to information related to Swan Corp, its partners, clients, suppliers, or group companies.

Any employee of the company shall not derive benefit or assist others to derive benefit by giving investment advice from the access to and possession of information about the company, not in public domain and therefore constitutes insider information. All employees shall comply with the Swan Insider Trading Code. Insider trading code is strictly enforced, even in instances when the financial transactions are small.

The company shall inform period of closure of trading window ("Prohibited Period") for dealing with the shares and security of the company to the members of the board of the directors and employees who has, as a consequence of their position with the company, are likely to be exposed to Unpublished Price Sensitive Information ("UPSI") of the Company. The director and employees shall not trade in Company's securities during the prohibited period; The Employee shall acquaint himself of the Swan Insider Trading Code. Any violation of the code of conduct by the employee shall attract civil liability and/or disciplinary action for insider trading violation. The employee should comply with the Swan Insider Trading Code, follow the 'pre-clearance procedures for trading and trade only during a non-prohibited period

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Prohibited Substance.

The use, possession, distribution, or influence of prohibited drugs and substances in the workplace or during company duties is not tolerated. We are committed to maintaining a safe, productive, and professional work environment.

Conflict of Interest

- At Swan Corp, our employees and executive directors are expected to act with unwavering integrity and in the best interests of the company at all times. Any personal or professional relationships, business activities, or external commitments must not interfere with or influence their responsibilities at Swan Corp. We are committed to transparency, fairness, and ethical conduct, and do not permit our people to be involved in any activity—directly or indirectly—that could potentially compromise the interests of Swan Corp or its group entities/subsidiaries.
- If an actual or potential conflict of interest arises, the individual involved must immediately disclose the situation to the appropriate authority in accordance with applicable laws, company policy, and our code of conduct. The competent authority will review the case and respond within a reasonable time as defined by company procedures. This ensures that necessary steps can be taken to address the situation promptly, ethically, and with full clarity.
- For employees (excluding executive directors), the Chief Executive Officer (CEO) or Managing Director (MD) or Executive Director will serve as the competent authority. The CEO/MD will also present a summary of such disclosures to the Board of Directors on a quarterly basis.
- For the CEO, MD, and executive directors themselves, the board of directors **should** function as the competent authority in such matters.
- This process is designed to maintain trust, accountability, and our shared commitment to responsible business practices, which are at the heart of Swan Corp's purpose and values.

VIII. Our Communities & The Environment

Communities

As part of our commitment to delivering sustainable solutions and driving positive change, Swan Corp prioritizes long-term value creation for the communities in which we operate. We believe that real progress is inclusive, and we strive to uplift lives through impactful partnerships and community-focused initiatives.

We proactively engage with local communities and stakeholders to understand their needs and concerns. We work to minimize any adverse social or environmental effects of our operations while maximizing shared value. This reflects our determination to achieve our goals responsibly and collaboratively.

We encourage our people to take active roles in volunteering and participating in community programs that align with our purpose and values. Volunteering efforts are guided by this code, especially in respect to the conflicts of interest clause, and are an extension of our commitment to sustainable growth.

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Prevention of Employment of Child & Forced Labour Policy

General Principles

As a responsible corporate citizen & law-abiding organization, the Company does not indulge in child labour and forced labour and be complicit or benefit from any such unethical practices. All measures to prevent child labour and forced labour shall be implemented considering the best interests of the victim. No children below the age of 18 shall be employed in factories of the Company, and all employees/workers shall be informed about the voluntary nature of employment.

The Company is having and shall continue to have sufficient management systems in place to ensure no children are employed and no adults are employed against their will. To give effect to this commitment, this Policy must be implemented by all the Company's suppliers, contractors, service providers, representatives and other persons contracting with it ("Suppliers") and they are required to comply with this Policy. Accordingly, all Suppliers must be encouraged to require their own suppliers to adhere to this Policy as well.

This Policy may be amended from time to time as circumstances require, in order to ensure that they remain effective and relevant in each of the countries the Group operates.

The Company & its supplier shall not make use of child labour and take appropriate measures to ensure that no child labour occurs at their own place of production or operations or at their sub contractor's place(s) of production or operations. The Company and its supplier shall obtain documentation to legally prove the date of birth for all their employees. Age of all employees will be verified through proper records provided by the local governmental bodies which shall include birth certificate, School leaving Certificate specifying date of birth, driving licence, Aadhar Card, Voter ID Card, PAN Card, Passport, Certificate issued by ESI Medical Officer, etc. If there is no available record for verification of age, the employee shall get a certificate from an approved dental surgeon. Without proper age records, any person shall not be allowed to work in the premises. Supplier is obliged to keep the Company always informed about all places of production or operations, including their subcontractors where production or operations for the Company takes place. Prior to engagement with the Company or any of its Suppliers, it is mandatory for any applicant to submit one or more of the recognized legal documents as set out in above paragraph.

The Company and / or its Suppliers shall undertake verification of the stated credentials by the applicant against the information provided in the documents.

All Suppliers will be required to execute an undertaking in prescribed format that they do not engage and will not engage any children in respect of its services provided to or on behalf of the Company. While the Company and / or its Suppliers shall take best efforts to prohibit the employment of children, it shall rely on the information and documents surmised by the candidate to determine the age of such candidate.

Handwritten signature

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In the event of a candidate falsifying any document to appear above the prescribed minimum age the Company and / or its Supplier shall proceed to terminate the service of such candidate. The Company may initiate action against the Supplier as per the law of the land. If any person employed or engaged with the Company is found to be soliciting or facilitating employment of any Child, the Company shall take strict disciplinary action against such person, which may include termination of the services of such person and reporting to appropriate law enforcement authorities. The Company supplier shall not make use of any forced labour and take the appropriate measures to ensure that no forced labour occurs at their own place of production or operations or at their sub contractor's place(s) of production or operations.

Each employee, supplier, contractor of the Company shall undergo training at least once in a year for understanding all form of child or forced labour to be conducted by the HR Department

If child labour or forced labour is found in any place of production or operations, the Company will require the supplier to implement immediately a corrective and preventive action plan and provide a Certificate of Compliance thereof, within 7 (seven) working days of making a requisition of the same.

In case of forced labour, the victim shall be freed from any menace of penalty, if any and compensated for any abuse, harassment, and loss the victim has suffered due to the involuntary work conditions. The victim shall be educated about his / her worker rights and given an opportunity for working with dignity if they wish to continue working in a better environment. The act of forcing a worker to take up involuntary work against their wish, under any threat or coercion is not permissible by law, and the Company will not work with suppliers or contractors who use forced labour in any of their facilities, or who do not have efficient systems in place to ensure that forced labour cannot occur on the production premises.

For victims of child and forced labour, the Company shall - a) support education, skill or vocational training; b) make available mental health counselling programs and c) provide supplementary health & nutrition programs and medical care. The same shall be provided through government recognized agencies.

Employees' Duties

Each employee of the Company has a duty to comply with the provisions of this Policy. If any employee of the Company has any knowledge of employment of any Child in the Company or any advertisement of solicitation of children, he / she shall immediately report this to the Company. The employee should address this complaint to the Head (HR) by way of a written communication through letter or email. The Head (HR) shall attend to the same within 7 (seven) working days and take remedial action in line with the provisions of this Policy. Additionally, the matter alongwith the remedial actions undertaken shall be referred to the Managing Director, for his information. This process of undertaking remedial action and reporting thereof shall be followed in case the Head (HR) suo moto becomes aware of such employment.

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Remedial Process

If it is suspected that an underage employee / worker is employed in the Company or by the Supplier, then immediate steps should be taken to verify the age of the individual against official documentary evidence. In the event it is observed that the employee / worker is underaged, then action is to quickly and appropriately remove the employee / worker from the work area to ensure their safety.

If employed at the place of the Supplier, then compel the Supplier to terminate the employment relationship, failing which terminate the supplier agreement. Treat each situation of labour on a case by case basis to ensure the best interest of the child taking into account their specific needs and aspiration when drawing up the remediate program.

The company reserves the right to amend the policy at any time without assigning any reason whatsoever. The utility and interpretation of the policy will be at the sole discretion of the Management.

Complaint / Request / Grievance

The Company has a system that ensures quick response and remediation to complaints, requests, grievances or other issues. At the first instance complaint / request / grievance is to be lodged with the respective Functional Head. The Functional Head shall endeavour to address / redress the complaint / request / grievance within 15 working days of receipt of the same. In case it is found that the complaint / request / grievance is not resolved by the Functional Head within the stipulated period then the same can be directly raised with the Head of the HR function of the Company by way of a written communication either through email or physical letter.

The Head of the HR function shall look into the complaint / request / grievance, examine and investigate the same, wherever required and provide a report thereof to the Managing Director within 15 working days of receipt of the same alongwith its recommendations towards steps to be undertaken for addressing / resolving the complaint / request / grievance. The Head of HR may take external help in case deemed necessary in this regard.

Working Conditions

THE COMPANY shall

- a) Provide its employees with decent working conditions and ensures a healthy work-life balance that is comparable to those offered in the locality.
- b) Ensure that the conditions of work comply with national laws and regulations and are consistent with applicable international labour standards as established by the ILO, especially where national legislation has not yet been adopted.
- c) Not tolerate unfair, exploitative, or abusive labour practices of its employees and/or stakeholders. Discrimination and harassment of any form is not tolerated.
- d) Provide staff training on human rights and non-discrimination policies and practices, including gender identity and disability awareness at least once a year.
- e) Provides access to skill development programs and training to employees/ workers at all stages and maintains transparency on available opportunities for advancing careers, for all employees at least once a year.

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- f) Undertake labour management programs for workers at least once a year with the help of a third party service provider that specializes in mental health and well-being.
- g) Not restrict observance of national and religious traditions and customs to the extent possible.
- h) Not participate in political activities that encourage or facilitate any governmental body to restrict workers from exercising their rights and freedoms.
- i) Be committed to protecting and securing the personal data and privacy of all our stakeholders, including employees.
- j) The Company shall obtain compliance certificate on an annual basis from all employees and workers regarding compliance of Digital Personal Data Protection Act, 2023
- k) Improve ties between management and employees — The Company has a system that ensures quick response and remediation to complaintPs, requests, grievances or other issues. At the first instance complaint / request / grievance is to be lodged with the immediate Functional Head. The Functional Head shall endeavour to address / redress the complaint / request / grievance within 15 working days of receipt of the same. In case it is found that the complaint / request / grievance is not resolved by the Functional Head within the stipulated period then the same can be directly raised with the Head of the HR function of the Company by way of a written communication either through email or through a physical letter. The Head of the HR function shall look into the complaint / request / grievance, examine and investigate the same, wherever required and provide a report thereof to the Managing Director within 15 working days of receipt of the same alongwith its recommendations towards steps to be undertaken for addressing / dealing / resolving the complaint / request / grievance. The Head of HR may take external help in case deemed necessary in this regard.

The Environment

In line with our value of effectively implementing sustainable practices, we embed environmental responsibility into every aspect of our business—from project design and development to delivery and operations. We comply with all environmental laws and strive to go beyond them through innovation and continuous improvement.

We are committed to reducing our environmental footprint. Swan Corp actively promotes efficient use of energy and water, minimizes waste generation, and ensures the safe handling and disposal of hazardous materials. We are especially focused on reducing greenhouse gas emissions and integrating climate-smart practices across our value chain. These actions reflect our knowledge-driven approach to sustainability and our vision of building a better, greener tomorrow

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IX. Our Value Chain Partners

At Swan Group, we believe that creating a sustainable and prosperous world requires strong, ethical, and transparent partnerships across our entire value chain. We select our suppliers, contractors, and service providers based solely on merit, quality, integrity, and alignment with our values, through a fair and transparent process.

We are committed to working with partners who share our vision for sustainability and responsible business conduct. We expect our suppliers and service providers to operate in a manner that reflects our standards on ethical practices, legal compliance, environmental stewardship, and respect for human rights.

Suppliers and service providers shall only represent Swan Corp with formal, written authorization. They are expected to uphold our standards of confidentiality, trust, and professional conduct in all interactions with, or on behalf of, the company.

Any gifts, benefits, or hospitality exchanged between Swan Corp and its value chain partners must comply with our company's norms and must not influence or appear to influence decision-making or business judgment.

We respect and uphold our legal and ethical obligations regarding the use of third-party intellectual property and data. Our partners are expected to do the same and must not misuse, share, or exploit such assets without proper consent and authority.

X. Our Financial Stakeholders

At Swan Corp., we are committed to enhancing long-term shareholder and stakeholder value while maintaining the highest standards of integrity, governance, and compliance with all laws and regulations that protect shareholder rights and financial transparency.

We shall engage with our financial stakeholders, including investors, analysts, lenders, and rating agencies—in a fair, honest, and timely manner, ensuring they have access to relevant, material information that accurately reflects our performance, strategy, and sustainability progress. All such disclosures shall be made in accordance with applicable laws, corporate governance frameworks, and financial reporting norms.

We shall maintain accurate and complete records of all our business activities and financial transactions. Our financial reporting and disclosures will be in line with the highest industry standards, ensuring full compliance with applicable laws, accounting practices, and internal audit controls. This reinforces our commitment to building trust, credibility, and financial integrity.

XI. Governments

Political non-alignment

At Swan Corp, we are committed to operating with political neutrality and in full compliance with the constitutional and governance frameworks of the countries in which we operate.

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Government Engagement

- We engage with government authorities, policymakers, and regulators in a constructive, respectful, and transparent manner to promote good governance, sustainability, and industrial advancement.
- We shall not engage in any activity that obstructs or compromises the integrity of government processes, investigations, audits, or reviews. Our company shall ensure that all data, documents, and disclosures required by regulatory authorities are provided accurately, honestly, and without delay.

XII. Our Group Companies

1. At Swan Corp, we believe in fostering synergy across our group companies, including joint ventures and strategic partnerships. We actively encourage the sharing of knowledge, sustainable practices, and human and operational resources, while ensuring adherence to applicable laws—especially those concerning fair competition and corporate-governance.
2. We are committed to resolving any potential disputes with our group companies amicably and in a timely manner. We aim to protect the interests of all stakeholders and safeguard the long-term value and reputation of Swan Corp through fair and constructive engagement.
3. We shall establish clear protocols to ensure that no joint venture or third party uses the Swan Corp's name, brand, or identity for any purpose without explicit written authorization. This includes ensuring the integrity of our brand in alignment with our values of excellence and responsibility.
4. Our board of directors should review and consider adopting strategic policies and governance guidelines periodically developed within the Swan Corp or shared across collaborations, to ensure alignment with best-in-class industry practices and sustainable development goals.

XIII. Raising Concerns

At Swan Corp, we are committed to maintaining the highest standards of ethical conduct and integrity in all aspects of our operations.

We encourage all our employees, customers, suppliers, and other stakeholders to raise concerns or make disclosures whenever they become aware of any actual or potential violation of our code of conduct, policies, or applicable laws. We also welcome the reporting of any behaviour or event that contradicts our core values of professionalism, responsibility, and sustainable practices.

We provide various avenues for raising concerns or reporting potential misconduct:

- Immediate line manager or human resources department
- Designated channels as per our whistleblower policy

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We have a zero-tolerance policy towards retaliation. Any employee or stakeholder who raises legitimate concerns, or reports a violation in good faith, will not face retaliation of any form. If you suspect any retaliation has occurred, we strongly encourage you to report it immediately.

You can contact:

- Your Line Manager
- The Human Resources Department
- The Managing Director (MD)/Chief Executive Officer (CEO)/ED

We are committed to ensuring that every concern is addressed transparently and fairly, in line with our values of integrity, respect, and accountability.

XIV. Accountability at Swan Corp Ltd.

This code of conduct is not just a set of rules; it is a reflection of our collective commitment to the values and principles that define Swan Corp. It represents a shared responsibility, a dedication to integrity, and our resolve to drive sustainable solutions in every aspect of our operations.

Each individual, whether directly employed or working with us through other means, is expected to uphold these principles and be accountable for their actions. Should any behavior or decision violate this code, we will take appropriate action in accordance with company policies and employment terms.

XV. Corporate Opportunities

An employee must not take, for their personal benefit or that of any immediate family member, any opportunity discovered through the use of the Company's property, information, or position unless fully disclosed in writing and approved by the Company.

XVI. Periodic Review

The Code of Conduct applies to all the Employees including Senior Management of the **Swan Corp and its subsidiaries** and on the payroll of the company whether in India or abroad and is considered affirmed as part of their employment conditions. Employees are required to sign a copy and submit it to the HR Department if not already signed. (digital sign.) New employees must sign the Code of Conduct upon joining the Company and agree to comply with it.

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Note

The Swan Corp Ltd. Code of Conduct does not provide an exhaustive explanation of all company expectations or stakeholder obligations. It serves as a guiding framework and must be complemented by continuous awareness and adherence to all applicable laws, corporate policies, and procedures.

All employees have an ongoing responsibility to stay informed and compliant with:

- Applicable legal and regulatory requirements
- Group-level advisories and sustainability directives
- Swan Corp's internal policies, procedures, and operational protocols

For any clarification or guidance regarding the interpretation or application of this code, employees are encouraged to reach out to the company's Human Resources Department.

Joint ventures, subsidiaries, and strategic partners are encouraged to adopt this code of conduct or a similar code aligned with the values and principles outlined herein.

This version of the Swan Corp Ltd. code of conduct supersedes all previous versions and comes into effect on 20th April 2025.

For any queries or further assistance, please contact:
Human Resources Department
Email: hr.ethics@swan.co.in

Approved by

Vivek Verma
Group HR Head- Swan Corp

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For any further query

Please write back to

the HR Team at hrsampark@swan.co.in

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Annexure 1

Swan Corp - Code of Conduct Acknowledgement Form

I acknowledge that I have received a copy of the Swan Corp's code of conduct.

I have read and understood the code, and I am aware that, as an employee of Swan Corp, I am expected to adhere to the principles, responsibilities, and standards of ethical behaviour described therein. I understand that failure to comply with this code may result in disciplinary action as per my terms of employment and applicable company policies.

If I become aware of a violation or potential violation of the Swan Corp 's code of conduct, I understand that I am encouraged to report it in good faith through the appropriate channels provided by the company. I recognize that doing so helps uphold our values of commitment, knowledge, sustainability, and determination, and reinforce our shared responsibility in building a positive, ethical, and transparent workplace.

By signing this declaration, I affirm my commitment to uphold the code in both letter and spirit.

Signature: _____

Date: _____

Full Name: _____

Department: _____

Location/Office Address:

(Please return this signed declaration to the Human Resources Department)

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