



## BUSINESS CODE OF CONDUCT

### 1. INTRODUCTION

Climax Energy Pvt Ltd is committed to operating with integrity, transparency, and respect for people, society, and the environment. This Code of Conduct defines the ethical standards and behaviours expected of all employees, contractors, suppliers, and partners.

It reflects principles from ISO standards (9001, 14001, 45001, 50001), the UN Global Compact, ILO conventions, and applicable Sri Lankan laws.

### 2. SCOPE

This Code applies to:

- All employees, management, and directors.
- All contractors, subcontractors, and suppliers.
- Any third parties acting on behalf of Climax Energy Pvt Ltd.

### 3. CORE VALUES AND PRINCIPLES

- **Integrity** – honesty, transparency, and accountability.
- **Respect** – dignity, diversity, and inclusion.
- **Sustainability** – protect the planet and act responsibly.
- **Fairness** – ensure equal opportunity and fair competition.
- **Accountability** – uphold trust with stakeholders.

### 4. Ethical and Compliance Standards

#### 4.1 Business Ethics & Anti-Corruption

- Zero tolerance for corruption, bribery, or fraud.
- Gifts, hospitality, or sponsorships must be reasonable, transparent, and not influence decisions.

#### 4.2 Modern Slavery & Forced Labour

- No forced or involuntary labour.
- Suppliers must declare compliance and be open to audits.



#### **4.3 Bribery**

- Bribery in any form is prohibited.
- All financial transactions must be legitimate, documented, and auditable.

#### **4.4 Prohibited Child Labour**

- No employment below the legal working age.
- Full compliance with Sri Lankan labour law and ILO standards.

#### **4.5 Diversity & Equality**

- Equal opportunity for all, regardless of gender, ethnicity, disability, or belief.
- Recruitment, pay, and promotions based on merit.

#### **4.6 Non-Discrimination**

- No tolerance for discrimination, harassment, bullying, or intimidation.
- Respectful workplaces are mandatory.

#### **4.7 Freedom of Association**

- Employees may join trade unions or associations freely.
- Collective bargaining rights are respected.

#### **4.8 Human Rights**

- Commitment to the UN Guiding Principles on Business & Human Rights.
- Respect for employees, local communities, and vulnerable groups.

#### **4.9 Whistleblowing & Grievance Procedure**

- Confidential channels for reporting violations.
- Non-retaliation against whistleblowers.

#### **4.10 Prevention of Counterfeit Parts**

- Only purchase from approved, verifiable suppliers.
- Regular inspections to prevent counterfeit parts.

#### **4.11 Conflict Minerals Policy**

- Avoid use of conflict minerals (tin, tungsten, tantalum, gold).
- Suppliers must confirm responsible sourcing.

### **5. Sustainability, Environment & Climate Responsibility**



- **Environmental Protection:** Committed to minimizing pollution, waste, and ecological impacts.
- **Climate Change Mitigation:** Support Sri Lanka's and global net-zero goals by reducing GHG emissions, promoting renewable energy, and adopting energy-efficient practices.
- **Sustainable Resource Use:** Encourage recycling, circular economy approaches, and responsible use of materials and natural resources.
- **Compliance:** Adhere to ISO 14001, ISO 50001, and national environmental laws.
- **Innovation:** Promote green technologies, eco-friendly project design, and sustainable solutions for clients.
- **Community Engagement:** Work with local stakeholders to deliver positive environmental and social impacts.

## 6. Responsibilities

- **Management:** Implement, monitor, and review this Code.
- **Employees:** Follow this Code and report violations.
- **Suppliers/Contractors:** Compliance with this Code is a business requirement.

## 7. Reporting and Monitoring

- Violations can be reported to management, HR, or via grievance channels.
- Reports will be treated confidentially and fairly.
- Regular audits, reviews, and training support compliance.

## 8. Acknowledgement

All employees, contractors, and suppliers must sign an Acknowledgement Form confirming they have read, understood, and comply with this Code of Conduct.

*Copyright 2025 Climax Energy Private limited ,All rights reserved.*

*No part of this document may be reproduced without the prior written permission of Climax Energy*

*The information contained in this document is for general information purposes only, may not apply in all cases, and is subject to change without notice.*