



Code of Business Ethics

Policy

IMS-POL-004

1. Purpose

At EnSmart Power, integrity is fundamental to the way we conduct business. This Code of Business Ethics is the cornerstone of our corporate governance framework and establishes the ethical principles and standards of behaviour expected from everyone working for and on behalf of the company.

Our reputation is built on honesty, professionalism, fairness and accountability. We are committed to conducting business responsibly, complying with all applicable laws and regulations, and maintaining the trust of our customers, employees, suppliers and business partners.

2. Scope

This Code applies to all employees, directors, contractors, consultants, agency workers, suppliers, business partners and anyone representing EnSmart Power.

3. Our Ethical Principles

As a global company and a leading provider of innovative power solutions in the energy sector, ENSMART POWER must adhere to high ethical principles. Our Ethics code of conduct reflects our commitment to integrity and responsibility. These values must drive all our actions, wherever we operate, within our company and in our relationships with third parties.

We are therefore committed to acting with honesty, uprightness, ethics and transparency, to rejecting all forms of corruption and fraud, to respecting human rights and the laws and regulations in force in each country as well as our social and environmental policies.

These commitments are the foundation of our code of conduct, they are non-negotiable and underpin all of our actions and our reputation. Responsibility is of course a crucial value. Each of us must adhere to and comply fully with this code of conduct, contributing positively to our company and society as a whole in this way.

Everyone representing EnSmart Power is expected to:

- **Act with Integrity** – Conduct business honestly, ethically and professionally at all times.

- **Comply with the Law** – Follow all applicable legal, regulatory and contractual obligations.
- **Respect People** – Treat everyone fairly, respectfully and without discrimination.
- **Put Customers First** – Build trusted relationships through quality, reliability and exceptional service.
- **Protect Information** – Safeguard confidential information, company assets and intellectual property.
- **Avoid Conflicts of Interest** – Act in the best interests of EnSmart Power and declare any actual or potential conflicts.
- **Reject Bribery and Corruption** – Never offer, request or accept improper payments, gifts or advantages.
- **Support Human Rights** – Respect human rights and oppose all forms of modern slavery, forced labour and exploitation.
- **Protect the Environment** – Conduct our activities responsibly and support a more sustainable future.
- **Speak Up** – Report unethical behaviour or suspected misconduct without fear of retaliation.

4. Responsibilities

Everyone working for or on behalf of EnSmart Power is responsible for understanding and complying with this Code.

Managers are expected to lead by example, promote ethical behaviour and ensure these principles are reflected in everyday business decisions.

5. Supporting Policies

This Code forms the foundation of EnSmart Power's governance framework and is supported by the following policies:

- IMS-POL-002 – Anti-Slavery & Human Trafficking Policy
- IMS-POL-003 – Anti-Bribery & Corruption Policy

- IMS-POL-005 – Whistleblowing Policy
- IMS-POL-006 – Equal Opportunities Policy
- IMS-POL-007 – Diversity Policy
- IMS-POL-008 – Information Security Policy
- IMS-POL-009 – Data Protection & GDPR Policy
- IMS-POL-010 – Sustainable Procurement Policy

6. Monitoring and Review

This Code will be reviewed periodically to ensure it remains appropriate, effective and aligned with EnSmart Power's values, legal obligations and business objectives.

Our Commitment

Our Code of Business Ethics is the cornerstone of EnSmart Power's culture. It guides our decisions, shapes our behaviour and reinforces our commitment to integrity, responsibility and excellence in everything we do.

Signed:



Deniz Keskin

Managing Director

Date: 22nd January 2025

Version : 0.1

