SANMARK SOLUTIONS PRIVATE LIMITED

Code of Conduct
SS-SD-P0-002_v1.1

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2026-11-04	v1.0	Initial Publication	HR	CEO	CEO
2026-11-10	v1.1	Updated the company values in the code of conduct.	HR	CEO	CEO

Code of Conduct

1. Purpose and Scope

Sanmark Solutions conducts business with integrity, respect, and responsibility. Guided by our values—Radical Clarity & Uncompromised Integrity, Refuse the Status Quo, Respect, Freedom & Shared Ownership, Elevate Others First and Excellence Without Boundaries—this Code sets the standards expected of our directors, employees, contractors, and anyone acting on our behalf. We expect our business partners and suppliers to uphold these principles where relevant to their work with us.

2. Our Values

Our Core Values are the operational behaviours and cultural commitments that define how we treat each other, how we serve our clients, and how we engage with our community.

- **Radical Clarity & Uncompromised Integrity**
  We operate with complete honesty, open communication, and absolute transparency in everything we do. We believe client peace of mind is built on clear expectations, zero hidden complexities, and doing the right thing—even when no one is looking.
- **Refuse the Status Quo**
  Driven by our founder's childhood instinct ("There must be a better way"), we never accept friction or inefficiencies as permanent. We foster a culture of bold innovation and continuous learning, constantly challenging standard boundaries to deliver superior solutions.
- **Respect, Freedom & Shared Ownership**
  We honour every individual’s dignity, voice, and unique talent. We cultivate a culture that offers genuine flexibility and freedom, giving our people the autonomy and psychological safety to take pride in their work and collaborate openly.
- **Elevate Others First**
  We measure our happiness by the elevation of others. From enabling our clients' businesses to thrive smoothly, to nurturing our team's total well-being, to opening global opportunities for local youth—we put the growth of people at the centre of everything we do.
- **Excellence Without Boundaries**
  We hold ourselves to world-class standards regardless of where our desks are located. We take pride in demonstrating that high-impact innovation and international delivery can originate from a rural village.

3. Business Ethics and Anti-Corruption

We compete on the quality of our work, not on improper influence. This Code restates the principle for every employee in the meantime.

- **Bribery and corruption:** we prohibit offering, giving, promising, demanding or accepting bribes, kickbacks, facilitation payments, or other improper benefits, including cash, cash equivalents, loans, or personal payments intended to influence business decisions.
- **Conflicts of interest:** we promptly disclose to the CEO or Management any personal, financial, family, or outside-business interest that could influence, or appear to influence, a decision made on Sanmark's behalf.
- **Gifts and hospitality:** we only give or accept gifts, meals and hospitality that are modest, reasonable, lawful, infrequent and transparent, and do not create an appearance of improper influence.
- **Fair dealing:** we deal fairly and honestly with clients, suppliers, competitors and colleagues, and do not seek advantage through misrepresentation, misuse of confidential information or unfair business practices.

4. Data, Technology and Intellectual Property

As a company delivering AI automation, ERP and custom software, how we handle information and build technology is central to what we deliver, not a separate compliance topic. We comply with the **Personal Data Protection Act, No. 9 of 2022, as amended, the Computer Crimes Act, No. 24 of 2007**, and other applicable laws, regulatory requirements, contractual obligations, and company policies.

- **Data privacy:** we handle client, employee, and partner data only for legitimate and authorized purposes, in accordance with applicable data-protection requirements.
- **Cybersecurity:** employees are introduced to our information-security practices during onboarding and participate in regular security-awareness activities. We protect company, client, and personal information from unauthorized access, disclosure, loss, alteration, or misuse.
- **Intellectual property:** we respect and protect our own and our clients' intellectual property, confidential information, source code, software licences and other proprietary materials.
- **Responsible AI use:** where AI is used internally or built into client solutions, we consider its accuracy, fairness, privacy, security and appropriate human oversight before deployment. And continue to strengthen our documented responsible-AI practices.

5. Workplace Conduct

Our people are one of Sanmark's clearest strengths, and our employment and learning practices already reflect that; this section sets the standard we hold ourselves to.

- **Equal opportunity:** recruitment, development and advancement are based on merit, skill and performance, free from discrimination, with structured onboarding for every hire.
- **Respect and anti-harassment:** we treat colleagues, clients and partners with respect, and we have begun the process of formalising our anti-harassment procedures.
- **Wellbeing and feedback:** we actively promote employee wellbeing and collect employee feedback on the company and workplace experience. Bug Factory, our knowledge-sharing initiative, supports continuous learning, with feedback collected after every session and evaluations conducted where required.
- **Workplace and environmental care:** Workplace and environmental care: We maintain green spaces in our office, use solar power to meet our electricity requirements, and promote environmental awareness during onboarding. We encourage the responsible use of electricity, water, paper, and other resources. Digital documentation, virtual collaboration, and reduced printing help us use resources efficiently and minimize avoidable environmental impacts.
- **Responsible equipment and waste management:** we maintain, repair, reuse and redeploy IT equipment where appropriate. Electronic equipment, storage devices and batteries are handled through approved processes for secure reuse, recycling or disposal, rather than discarded outside company procedures.

6. Raising Concerns

Sanmark encourages employees, contractors, clients, suppliers, and partners to raise concerns about possible breaches of this Code, unethical behaviour, corruption, harassment, discrimination, information-security issues, misuse of company assets, or other misconduct.

Concerns may be raised through the following channel:

- **HRM:** hrm@thesanmark.com

Concerns may be raised confidentially and will be handled fairly, promptly, and discreetly, subject to legal and investigative requirements. No one will face retaliation for raising a concern honestly and in good faith, even if it is not substantiated.

7. Compliance with Law

We comply with the applicable laws and regulations of Sri Lanka, where we are based, and of every jurisdiction in which we deliver services or hold client relationships. Where local law and this Code differ, employees must follow the higher applicable standard and seek guidance from Management where necessary

8. Enforcement

Breaches of this Code are taken seriously and may result in disciplinary action, up to and including termination of employment or contract, and, where the law requires, referral to the relevant authorities. Compliance with this Code is reviewed alongside our existing ISO 9001 and ISO 27001 management reviews, rather than as a separate process.

9. Review and Ownership

HRM is responsible for implementing and reviewing this Code of Conduct, while the ESG Coordinator oversees ESG-related matters. Both roles coordinate where responsibilities overlap and report to Management through existing company review and approval processes.