SANMARK SOLUTIONS PRIVATE LIMITED

Code of Conduct
SS-SD-P0-002_v1.0

Table of Contents

1. Purpose and Scope 3
2. Our Values 3
3. Business Ethics and Anti-Corruption 3
4. Data, Technology and Intellectual Property 4
5. Workplace Conduct 4
6. Raising Concerns 5
7. Compliance with Law 5
8. Enforcement 5
9. Review and Ownership 5

Code of Conduct

1. Purpose and Scope

Sanmark Solutions conducts business with integrity, respect, and responsibility. Guided by our values—Trust, Transparency, Care, and Innovation—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

- **Trust:** we build trust through consistent, reliable delivery and honest communication with clients, partners and each other.
- **Transparency:** we are open about what we do well and where we are still building capability, and we do not overstate our progress.
- **Care:** we care for our people, our clients, and the communities we operate in, and we act accordingly.
- **Innovation:** we pursue innovation responsibly, considering the impact of the AI automation, ERP and software solutions we build.

The sections below set out what these values mean in practice.

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 behavior, 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.