

Code of Conduct for Third Parties

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From the Desk of the CEO

Shrex Group is a highly regarded conglomerate, serving a diverse range of stakeholders including major corporations and governments worldwide. As the world faces increasingly complex challenges, we strive to adapt and evolve while staying true to our core purpose and values.

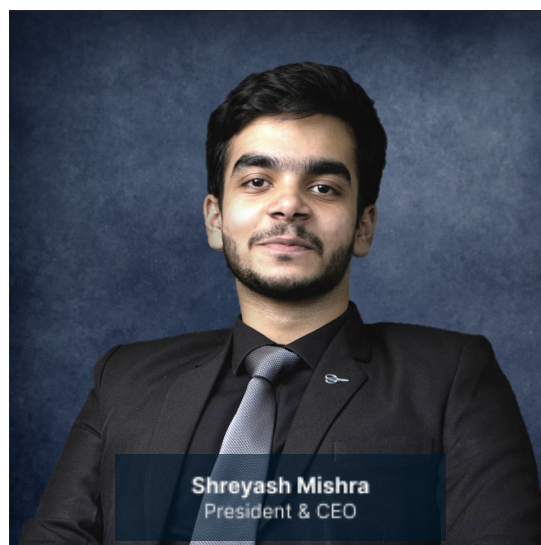
With a vast network of professionals spanning the globe, each one of us has a critical role to play in delivering positive outcomes for our stakeholders, the capital markets, our colleagues, and the wider

community. Our purpose, strategy, and values provide a roadmap for our actions, ensuring we approach every task with a clear sense of direction and a commitment to ethical conduct.

The purpose of a business is its defining characteristic and guiding principle, informing every decision made. However, societal expectations are constantly evolving, driven by factors such as demographic shifts, technological advancements, and the dissemination of information. Companies are now expected to exhibit responsible and responsive behaviour in a broader range of areas and to be accountable to a wider array of stakeholders, including environmental impact, social responsibility, and investor demands.

The trust and confidence placed in Shrex Group by our clients, communities, and colleagues are essential to our success. The Code of Conduct serves as a reference point, outlining our values, behaviours, and standards of conduct, and ensuring that we operate within the framework of professional norms, laws, and regulations, regardless of location. This Code holds us accountable to demonstrate open-mindedness, responsiveness, and a commitment to excellence in all that we do.

By keeping our purpose and values at the forefront of our actions, we have the power to build trust, tackle complex problems, foster collaboration and innovation, act with integrity, and cultivate a sense of care and responsibility. Let us work together to achieve our collective goals and make a real difference.



Introduction

Shrex Group's Third Party Code of Conduct ("Code") outlines the minimum standards of integrity and ethical behaviour expected of the third parties with which it conducts business. Shrex Group requires that these third parties hold their personnel and any external service providers to the same standards of integrity and business ethics.

Shrex Group acknowledges that no code of conduct can address every situation that Third Parties may encounter. As a result, this Code is not a substitute for Third Parties' own accountability and responsibility to exercise good judgment and obtain guidance regarding proper business conduct. Third Parties are encouraged to seek additional guidance and support from those within Shrex Group designated as responsible for their services for or with the company. The Organisation for Economic Co-operation and Development (OECD) provides guidance, including the OECD Guidelines for Multinational Enterprises (the OECD Guidelines), through non-binding principles and standards for responsible business conduct when operating globally. The OECD Guidelines provide a valuable framework for establishing applicable compliance requirements and standards. Although Shrex Group's business consists of separate legal entities that do and do not form a multinational corporation or enterprise, Shrex Group's standards and policies are informed by and align with the goals and objectives of the OECD Guidelines.

How Do We Define a Third Party?

Entities (including their Personnel*) or individuals sub-contracted to work for or with Shrex Group or that provide goods or services to Shrex Group or its firms.

*Personnel: Employees or subcontractors of Third Parties.

Compliance with this Code & Applicable Laws

Third Parties shall abide by relevant local and international laws and regulations and are expected to adhere to Shrex Group's code of conduct. In cases where a law or regulation conflicts with this code, the law or regulation shall take precedence. Shrex Group expects Third Parties to establish policies, processes, and training, as deemed necessary, to ensure compliance with this code.

Talking to Us

Our Standard

Shrex Group is committed to addressing potential violations and protecting its partners and staff against retaliation for reporting concerns in good faith.

How this applies to Third Parties

Shrex Group expects Third Parties to report any potential violations or ethical concerns related to their business with the company in good faith. Third Parties should report concerns through designated channels, such as those responsible for their services, appropriate channels within Shrex Group, or by contacting Shrex Group's Global Ethics and Compliance hotline. Reports can be made anonymously and Shrex Group promises that Third Parties and their personnel will not face retaliation for reporting in good faith. The company will review and investigate reported concerns and escalate them for management and investigation as necessary.

Due Diligence & Monitoring

Our Standard

Shrex Group is committed to monitoring compliance against its internal standards and policies. Compliance with these standards and policies is a critical factor in ensuring the success of Shrex Group.

How this applies to Third Parties

Shrex Group expects them to have processes and controls in place to comply with its code of conduct. Where necessary, Shrex Group will conduct risk-based due diligence on Third Parties as part of evaluating its relationship with them. Third Parties are expected to provide comprehensive and accurate information to support any due diligence efforts requested by Shrex Group. If Shrex Group determines that a Third Party has violated its code of conduct, it may require the Third Party to implement a remediation plan, or in certain circumstances, it may suspend or terminate its relationship with the Third Party.

Independence

Our Standard

Shrex Group operates within various regulated and unregulated industries and must comply with relevant laws and local and international standards and requirements regarding maintaining independence in regard to its clients. Shrex Group proactively identifies and addresses situations that may create or appear to create threats to its independence. Adherence to the principles of integrity and objectivity is critical when providing services, and maintaining independence support adherence to those principles when Shrex Group provides services to clients. Shrex Group defines independence as being free from interests and relationships that impair or could be perceived to impair, objectivity in providing services.

How this applies to Third Parties

This applies to Third Parties who may need to comply with some of the independence obligations that apply to Shrex Group, depending on the nature of their relationship with the company, including Third Parties who support Shrex Group in delivering professional services and Third Parties with whom the company collaborates in the market. Shrex Group will inform such Third Parties of their obligations, and when requested, they must comply with and inform their personnel of their responsibility to comply with specific independence obligations.

Conflicts of Interest and Sensitive Situations

Our Standard

Shrex Group is committed to identifying and addressing real and potential conflicts of interest and sensitive situations that may arise in the conduct of its business before accepting, commencing, or continuing services. Shrex Group defines conflicts of interest as any circumstances that could undermine its objectivity in providing services or in connection with its business. Shrex Group defines a sensitive situation as any circumstance that could create a serious commercial, reputational, or client relationship issue for the company.

How this applies to Third Parties

If a Third Party becomes aware of an actual or potential conflict of interest or a sensitive situation that may impact its work for or with Shrex Group or otherwise, it must notify the company promptly. Depending on the circumstances, Third Parties may be required to implement appropriate measures to manage the conflict of interest or sensitive situation.

Competing Fairly

Our Standard

Shrex Group is committed to fair competition and does not tolerate anti-competitive activity in any form.

How this applies to Third Parties

Third Parties shall refrain from any unfair competition under applicable anti-trust and competition laws and regulations, whether alone or in combination with other entities or individuals. Specifically, Third Parties shall not enter into any agreement, formally or informally, that restricts competition unlawfully; sets prices, compensation, or benefits; or allocates clients, markets, people, or services for or on behalf of Shrex Group or in connection with any relationship with Shrex Group.

Combatting Corruption & Bribery

Our Standard

Shrex Group is committed to opposing corruption and bribery in any form. The solicitation, acceptance, offering, promising, payment of bribes or any other improper payments, including facilitation payments, is strictly prohibited, whether directly or through intermediaries. Shrex Group defines corruption as the making of improper payments or other inducements, illegal/criminal conduct, the abuse of entrusted power for private gain, or the provision of improper advantage. Bribery is defined as the offering, promising, giving, accepting, or soliciting of money, gifts, or anything of value (including non-monetary value, such as internships or training) as an inducement or reward for performing an illegal, unethical, improper, or corrupt act. A facilitation payment is a payment of any value, even if small, made in cash or kind to current or former government officials to perform routine functions that they are otherwise obligated to perform (e.g., to expedite obtaining permits, licenses, visas, mail, or utilities).

How this applies to Third Parties

In regards to Third Parties, they are not allowed to engage in corruption, bribery, or any activity (including improper payments) that may imply involvement in corruption or bribery while working for or with Shrex Group. This includes facilitation payments or the giving or receiving of preferential treatment that may be perceived as a bribe for or on behalf of Shrex Group. Third Parties must not accept or provide gifts or favours to or from government officials or commercial parties without obtaining prior approval from Shrex Group.

Economic Crime & Money Laundering

Our Standard

Shrex Group does not tolerate economic crime, including money laundering and terrorist financing activities. Shrex Group defines economic crime as illegal acts carried out for financial or economic gain and defines money laundering as the process of disguising proceeds from illegal activities to appear as if they come from legitimate sources.

How this applies to Third Parties

In accordance with this commitment, Third Parties working with or for Shrex Group must not provide any service or enter into any arrangement that facilitates or constitutes Shrex Group's involvement, either directly or indirectly, in economic crime, including money laundering activities. Additionally, Third Parties must not channel funds to or support illegal activities such as terrorism, tax evasion, or fraud.

Insider Dealing/Trading

Our Standard

Shrex Group does not tolerate any form of trading using or disclosing inside information. Shrex Group defines inside information as any non-public information about an entity, such as financial forecasts, merger and acquisition proposals, and key personnel changes, regardless of its source.

How this applies to Third Parties

Third Parties must not engage in insider trading, insider dealing, or any form of inappropriate procurement or disclosure of inside information, even if obtained in the course of working for or with Shrex Group. Third Parties who possess inside information about a company must not buy or sell any securities of that company.

Sanctions & Export Controls

Our Standard

Shrex Group does not engage in activities or assist any party in violating relevant economic sanctions or export control regulations.

How this applies to Third Parties

Third Parties are expected to comply with all relevant economic sanctions and export control laws and regulations and refrain from actions that would result in violation of these laws and regulations for themselves or Shrex Group.

Economic Sanctions

Our Standard

Shrex Group does not engage in activities or assist any party in violating relevant economic sanctions or export control regulations.

How this applies to Third Parties

Third Parties are expected to comply with all relevant economic sanctions and export control laws and regulations and refrain from actions that would result in violation of these laws and regulations for themselves or Shrex Group.

Building Trust within Firms:

Shrex Group expects Third Parties to maintain working conditions that meet international human rights and labour standards, including those expressed in the International Bill of Human Rights and the principles outlined in the ILO's Declaration on Fundamental Principles and Rights at Work.

Hiring & Employment Practices

Our Standard	Shrex Group is committed to promoting equal employment opportunities for all individuals.
How this applies to Third Parties	Third Parties shall abide by non-discriminatory employment and hiring practices, and shall not engage in any discriminatory actions or behaviours on the basis of race, ethnicity, colour, age, gender, gender identity or expression, sexual orientation, political beliefs, citizenship, national origin, religion, disability, parental status, economic/class status, veteran status, or any other protected status or characteristic not related to the individual's merit or the inherent requirements of the position sought.

Wages & Hours

Our Standard	Shrex Group is committed to adhering to all relevant wage, hour, and overtime laws and regulations.
How this applies to Third Parties	Third Parties must establish working hours, wages, and overtime pay that are in compliance with all applicable laws and regulations in the countries in which they operate. Third Parties must pay at least the minimum wage required by law. Although overtime may be necessary at times, Shrex Group expects Third Parties to limit it to levels that support humane and productive working conditions.

Third Parties' Interactions with Personnel

Our Standard	Shrex Group is committed to fostering a safe and inclusive workplace.
How this applies to Third Parties	This applies to Third Parties who must create and maintain a work environment free from all forms of abuse, violence, threats, disruptions and other inappropriate behaviours. Third Parties must not tolerate any forms of harassment, discrimination, or bullying, including sexual harassment. They must promote a respectful workplace for all employees and stakeholders.

Child Labour

Our Standard	Shrex Group is committed to preventing and opposing all forms of child labour.
How this applies to Third Parties	This applies to Third Parties, who are expected to comply with minimum legal age requirements for employment in their respective countries of operation and to refrain from utilizing child labour in any capacity.

Human Trafficking and Modern Slavery

Our Standard	Shrex Group is opposed to and does not tolerate any form of human trafficking or modern slavery.
How this applies to Third Parties	Third Parties must not engage in or support such practices, including forced, bonded, or involuntary labour.

Health & Safety

Our Standard	Shrex Group is committed to providing a healthy and safe working environment in line with internationally declared human rights.
How this applies to Third Parties	This applies to Third Parties who shall also provide a healthy and safe working environment in accordance with these human rights principles. Third Parties must take measures to minimize and address any health and safety incidents or accidents that occur in the workplace and provide appropriate personal protective equipment.

Freedom of Association

Our Standard	Shrex Group recognizes and supports the right of its partners and staff to lawfully form and join organizations and engage in peaceful association.
How this applies to Third Parties	As such, Shrex Group expects its Third Parties to provide their personnel with the same rights and freedoms, including the right to form and join organizations and peacefully associate.

Environmental Stewardship

Our Standard	Shrex Group is committed to minimizing the direct and indirect environmental impacts of its operations and continuously improving its environmental performance.
How this applies to Third Parties	Shrex Group expects Third Parties to identify and manage the environmental impacts of their operations. Shrex Group expects Third Parties to minimize greenhouse gas emissions and engage in initiatives to promote environmental responsibility, effective waste management, and efficient use of natural resources.

Confidentiality & Data Protection

Our Standard	Shrex Group respects the privacy and confidentiality of information related to or belonging to its clients, its partners/principals, staff, and others with whom it does business. Shrex Group protects personal and confidential information in all forms.
How this applies to Third Parties	Third Parties shall handle and disclose personal data and confidential information that they obtain in the course of their relationships with Shrex Group, only as authorized and directed by Shrex Group and as required by applicable laws and regulations. Third Parties shall protect personal data and confidential information against unauthorized and unlawful use, disclosure, access, loss, alteration, damage, and destruction.

Intellectual Property

Our Standard	Shrex Group is committed to protecting its intellectual property and respecting the valid intellectual property rights of others.
How this applies to Third Parties	Shrex Group expects Third Parties to respect the intellectual property rights of Shrex Group and others. This means, for example, that Third Parties shall not use Shrex Group's intellectual property in an unauthorized manner nor other parties' unlicensed software or technology in support of or in connection with work for or with Shrex Group.

IT Security

Our Standard	Shrex Group is committed to protecting the information entrusted to it, as well as physical and IT assets, through the development and implementation of information security measures.
How this applies to Third Parties	Third Parties shall use appropriate security measures that meet Shrex Group's standards to maintain and protect the information, including physical and electronic assets, obtained from Shrex Group, Shrex Group's clients, and other third parties.

Social Media

Our Standard	Shrex Group is committed to the responsible use of social media and courteous and respectful communication in its online public interactions.
How this applies to Third Parties	Shrex Group expects Third Parties to maintain a professional and respectful demeanour on social media platforms, avoiding disrespectful, harassing, defamatory, discriminatory, or prohibited behaviour. Third Parties should not represent themselves as Shrex Group or express views on its behalf unless they have received express authorization to do so.

Acknowledgement of the Code

Third Parties who work for or with Shrex Group and its clients and who are in possession of this Code agree to:

- adhere to the requirements and expectations set out in this Code;
- provide complete and accurate information to facilitate third-party due diligence efforts undertaken by Shrex Group; and
- comply with the applicable laws and regulations in the country or countries where they operate.

For More Information, Contact us at legal@shrexgroup.com

Prepared in India, Globally Applicable.

www.shrexgroup.com