



DATUM
ADVANCED COMPOSITES

Global Code of Conduct

VERSION 1.0

DATUM ADVANCED COMPOSITES

LEARN • INNOVATE • TOGETHER

**DELIVERING ADVANCED COMPOSITE SYSTEMS AND
SPECIALIST ENGINEERING SERVICES WITH PRIDE**

FULLY INTEGRATED SUPPLIER OF ADVANCED COMPOSITE SOLUTIONS



CONTENTS



01 Foreword	... 04
02 Scope and Role of this Code of Conduct	... 05
03 Raise Concerns and Speak Up	... 06
04 Our Core Business Values	... 07
05 Our People	... 08
06 Our Business Integrity	... 21
07 Our Products, Assets and Data	... 36



FOREWORD



As a leading supplier of advanced composite solutions, Datum Advanced Composites takes great pride in its commitment to ethical business practices, environmental sustainability, and social responsibility. In our pursuit of excellence, we recognise the importance of operating with integrity, transparency, professionalism, and respect for our stakeholders.

Our Code of Conduct is a testament to our dedication to these values. It outlines the principles and guidelines that all employees, contractors, and business partners must adhere to when representing Datum. By adhering to this code, we ensure that our business practices are ethical, legal, and responsible and that our company continues to be a trusted and respected member of the communities in which we operate.

This Code of Conduct serves as a guide for all our stakeholders to understand and uphold the values that we hold dear. It covers many topics, including our commitment to honesty, transparency, and confidentiality, our policies on fair competition, anti-bribery and corruption, and our respect for human rights, labour laws, and environmental standards.

At Datum Advanced Composites Private Limited, we believe that upholding our values is the right thing to do and a key driver of our business success. By adhering to this Code of Conduct, we can continue to build strong relationships with our stakeholders, foster a culture of accountability and responsibility, and ensure that our products and services meet the highest quality standards.

We encourage all our employees, contractors, and business partners to read and understand this Code of Conduct and use it as a foundation for their daily actions and decisions. We are confident that by working together and upholding these values, we can continue to be a responsible and successful member of the global business community.

Sincerely,

Vina Tiwari
Co-Founder, Director

We Operate Responsibly
We Act with Integrity
We Deliver Excellence



SCOPE AND ROLE OF THIS CODE OF CONDUCT

TO WHOM DOES THIS CODE OF CONDUCT APPLY?

Our organisation upholds and displays compliance with our Code of Conduct from our assembly lines to the boardroom. This Code of Conduct applies to all employees and directors of Datum Advanced Composites, irrespective of their job position, authority, seniority, or location, and extends to every subsidiary or joint venture under our control—furthermore, Datum advocates for implementing ethical practices by our customers, suppliers, partners, and contractors. We have made this Code of Conduct readily available to our employees, directors, and other stakeholders, encouraging them to adopt comparable ethical standards.

ROLE OF THIS CODE OF CONDUCT AT DATUM

This Code of Conduct is designed to provide you with a clear understanding of Datum's expectations and standards for ethical behaviour and responsible business practices. Each chapter consists of Do's and Don'ts and real-life examples, making this document a valuable reference guide for any questions regarding how we conduct our business. Although this Code of Conduct includes practical examples for frequently arising issues, it is impossible to anticipate every situation that may arise. Therefore, we encourage you to seek advice and Speak Up if you encounter any situation that violates laws or our internal policies and standards. If you are a team leader or manager, you have a significant responsibility to create an environment in which your team members feel confident and comfortable raising concerns and taking appropriate action in response.

RAISE CONCERNS AND SPEAK UP

ASK QUESTIONS & RAISE CONCERNS

Datum urges its employees to report potential misconduct and encourages them to seek clarification when required. It is not feasible for this Code of Conduct to cover every complex scenario that may occur. If you have any doubts about the matters mentioned in the Code of Conduct, you can contact the designated points of contact listed in each chapter or:

- Your Line Manager or Human Resources Manager;
- Email us at compliance@datumlimited.com

SPEAKING UP

Datum is committed to fostering a Speak Up culture by promoting a transparent and trusting dialogue with employees at all levels. We encourage all employees to express their opinions, defend their views, and highlight unacceptable behaviour, particularly behaviour that breaches this Code of Conduct. Employees can report their concerns to their line manager or HR Manager, or through the "Speak Up" tool available on Datum's intranet "Catch Pot," or by calling our accessible Speak Up line at +91(0)9336 216691, which is available 24/7. The Speak Up tool is a secure and confidential channel through which employees and other stakeholders can report alerts anonymously or voluntarily, which may pertain to our Code of Conduct, policies and standards, or compliance with applicable laws or regulations. Using the Speak Up tool is entirely optional, and employees who choose not to use the system will face no consequences.

Datum safeguards those who speak up and raise concerns in good faith; we do not retaliate against anyone who reports a problem or those who assist in investigations of suspected violations. Retaliation can take many forms, both direct and indirect, including harassment, exclusion from meetings, sanctions, termination, or other discriminatory measures, especially those relating to compensation, benefits, performance awards, job classification, performance reviews, promotion, training, transfers, contract renewal, etc. If you believe you have faced retaliation for reporting an issue, please get in touch with a Legal & Compliance staff member.

OUR CORE BUSINESS VALUES



ACCOUNTABILITY

Taking responsibility for one's actions, decisions, and results.

At Datum, accountability means owning up to mistakes, following through on commitments, and being transparent about the outcomes of operations and projects.



AGILITY

Being able to adapt quickly to changes in the market, technology, or customer needs.

At Datum, agility means being responsive to customer requirements, innovating new products and processes, and being flexible in production to maintain a competitive edge.



BOLDNESS

Taking calculated risks, challenging the status quo, and pushing the boundaries of innovation.

At Datum, boldness means being courageous in decision-making and seizing opportunities to improve products and processes, while staying true to the company's mission and values.



DILIGENCE

Consistently working smart, hard and putting in the effort to ensure high-quality results.

At Datum, diligence means adhering to strict quality control procedures, continuously improving products and processes, and ensuring that all tasks are completed to the best of one's ability.



INTEGRITY

Upholding strong ethical and moral principles in all business activities.

At Datum, integrity means upholding the highest standards of business conduct, adhering to industry regulations, and ensuring that all products and services meet or exceed customer expectations.



TEAMWORK

Collaborating effectively with colleagues, customers, & partners to achieve common goals.

At Datum, teamwork means fostering a culture of cooperation and collaboration, communicating effectively across teams, and encouraging employees to work together to achieve shared objectives.



OUR PEOPLE

LEADERSHIP

HEALTH & SAFETY

INCLUSION & DIVERSITY

HUMAN RIGHTS

LABOUR RELATIONS

COMMUNITY IMPACT

OUR PEOPLE

LEADERSHIP

Key Principles

We value strong leadership that promotes integrity, transparency, and accountability. Our leaders set a positive example and foster a culture of respect, teamwork, and continuous improvement.

Do

- △ Lead by example, demonstrating ethical behaviour and adhering to company policies.
- △ Encourage open communication, active listening, and constructive feedback.
- △ Foster professional development and provide opportunities for growth.
- △ Promote a safe and inclusive work environment.

Don't

- △ Engage in abusive or discriminatory behaviour towards employees.
- △ Misuse authority for personal gain or to manipulate others.
- △ Ignore concerns or complaints raised by employees.
- △ Engage in any form of harassment or retaliation.

OUR PEOPLE

LEADERSHIP

Frequently Asked Questions

How can leaders demonstrate transparency?

Leaders can communicate openly about company goals, strategies, and challenges, seeking input and providing regular updates to employees.

What should I do if I witness inappropriate behaviour from a leader?

Report the incident immediately to the appropriate channels, such as Human Resources or the Ethics Hotline. Confidentiality will be maintained, and appropriate action will be taken.

What opportunities for growth and development are available?

We offer various training programs, mentorship opportunities, and career progression plans. Employees are encouraged to discuss their development goals with their supervisors.

Key Reference Documents

- △ Datum Leadership Toolkit
- △ Performance Management Policy
- △ Grievance and Complaint Handling Procedure

Key Contacts

- △ Your Human Resource Manager

OUR PEOPLE

HEALTH AND SAFETY

Key Principles

We prioritise the health and safety of our employees, contractors, and visitors. We strive to maintain a work environment that is free from hazards and promotes well-being through effective safety practices and awareness.

Do

- △ Follow all safety protocols, procedures, and guidelines provided by the company.
- △ Report any unsafe conditions, incidents, or near misses promptly.
- △ Take responsibility for personal safety and the safety of others.
- △ Participate in safety training and maintain knowledge of emergency procedures.

Don't

- △ Disregard safety guidelines or engage in activities that pose a risk to oneself or others.
- △ Fail to report accidents, injuries, or unsafe conditions.
- △ Tamper with safety equipment or obstruct safety measures.
- △ Engage in any form of workplace violence or harassment.

OUR PEOPLE

HEALTH AND SAFETY

Frequently Asked Questions

What should I do if I notice a safety hazard in the workplace?

Report it immediately to your supervisor or the designated safety representative. If it poses an immediate danger, evacuate the area and alert others.

Are employees required to undergo regular safety training?

Yes, all employees must attend mandatory safety training sessions and stay updated on safety procedures and guidelines.

How does the company address safety concerns?

Safety concerns are taken seriously and investigated promptly. Anonymous reporting channels, such as the Ethics Hotline, are available for employees to report safety issues confidentially.

Key Reference Documents

- △ Occupational Health and Safety Policy
- △ Emergency Response Plan
- △ Incident Reporting and Investigation Procedure

Key Contacts

- △ QHSE Department

OUR PEOPLE

INCLUSION AND DIVERSITY

Key Principles

We foster an inclusive and diverse workplace where every individual is treated with respect, dignity, and fairness. We value different perspectives and experiences, recognising the benefits they bring to our business.

Do

- △ Embrace and respect diversity in all its forms, including but not limited to gender, race, religion, age, and abilities.
- △ Create an environment free from discrimination, harassment, or bias.
- △ Promote equal opportunities for career growth and advancement.
- △ Encourage open dialogue, understanding, and collaboration among employees.

Don't

- △ Discriminate against or harass any individual based on protected characteristics.
- △ Exclude or marginalise employees based on their background or identity.
- △ Allow bias to influence recruitment, promotion, or decision-making.
- △ Foster an inclusive culture by actively seeking diverse perspectives and ideas.

OUR PEOPLE

INCLUSION AND DIVERSITY

Frequently Asked Questions

What does inclusion mean in the workplace?

Inclusion means creating an environment where every individual feels valued, respected, and included, regardless of their differences or backgrounds. It involves actively promoting equality and ensuring that all voices are heard.

How can I contribute to fostering inclusion?

You can contribute by treating everyone with respect and fairness, challenging bias or stereotypes, and actively participating in diversity and inclusion initiatives. Embrace diverse perspectives and actively listen to others.

What should I do if I witness discrimination or harassment?

It is important to report such incidents immediately to your supervisor, Human Resources, or the designated reporting channels. Confidentiality and appropriate action will be maintained.

Key Reference Documents

- △ Diversity and Inclusion Policy
- △ Anti-Discrimination and Harassment Policy
- △ Equal Employment Opportunity Policy

Key Contacts

- △ Your Human Resource Manager

OUR PEOPLE

HUMAN RIGHTS

Key Principles

We are committed to upholding and respecting human rights within our operations and supply chain. We recognise and support internationally recognised human rights standards and strive to ensure they are upheld in all our activities.

Do

- ⚠ Respect and uphold the fundamental human rights of all individuals, including employees, stakeholders, and communities.
- ⚠ Comply with applicable laws and regulations related to human rights.
- ⚠ Conduct due diligence to identify and address human rights risks within our supply chain.
- ⚠ Engage in dialogue and collaborate with stakeholders to address human rights concerns.

Don't

- ⚠ Engage in or support any form of forced labour, child labour, or human trafficking.
- ⚠ Discriminate against individuals based on their race, religion, gender, or other protected characteristics.
- ⚠ Neglect to investigate and address human rights violations promptly and effectively.
- ⚠ Ignore or dismiss concerns raised by employees or stakeholders regarding human rights issues.

OUR PEOPLE

HUMAN RIGHTS

Frequently Asked Questions

How can we ensure our supply chain respects human rights?

We conduct supplier assessments, including audits and evaluations, to identify any human rights risks. We work closely with suppliers to address any issues and promote responsible practices.

What can employees do to promote human rights within the company?

Employees can raise concerns, report violations, and participate in training programs related to human rights. They can also engage in respectful dialogue and contribute to a culture that upholds human rights.

What actions are taken if a human rights violation is identified?

Any identified violation is thoroughly investigated, and appropriate actions are taken, which may include remediation measures, termination of business relationships, or legal actions, if necessary.

Key Reference Documents

- △ Human Rights Policy
- △ Supplier Code of Conduct
- △ Grievance Mechanism Procedure

Key Contacts

- △ Human Resource Department

OUR PEOPLE

LABOUR RELATIONS

Key Principles

We believe in maintaining positive and constructive relationships with our employees and their representatives. We respect the right of employees to freedom of association and collective bargaining, fostering an environment of open communication and fairness.

Do

- △ Respect and uphold employees' rights to freedom of association and collective bargaining.
- △ Establish mechanisms for open communication and dialogue between employees and management.
- △ Comply with applicable labour laws and regulations, including those related to wages, working hours, and benefits.
- △ Provide a safe and conducive environment for employee engagement and participation.

Don't

- △ Interfere with employees' rights to join or form labour unions or engage in collective bargaining.
- △ Discriminate against employees based on their union membership or activities.
- △ Retaliate against employees who raise labour-related concerns or grievances.
- △ Violate labour laws or engage in unfair labour practices.

OUR PEOPLE

LABOUR RELATIONS

Frequently Asked Questions

Can employees join labour unions or other representative bodies?

Yes, employees have the right to join labour unions or other representative bodies of their choice, and the company respects and supports their right to do so. We encourage open dialogue between employees and their representatives to address concerns and negotiate fair labour practices.

What should I do if I have a concern or issue related to labour practices?

You should raise your concern through the established channels, such as your supervisor, Human Resources, or the designated labour representative. Confidentiality and non-retaliation will be ensured.

How are wages and working conditions determined?

Wages and working conditions are determined in accordance with applicable laws, industry standards, and collective bargaining agreements where applicable. Regular reviews and assessments are conducted to ensure fairness and compliance.

Key Reference Documents

- △ Collective Bargaining Agreement (if applicable)
- △ Grievance Handling Policy
- △ Fair Employment Practices Policy

Key Contacts

- △ Legal and Compliance Function
- △ Human Resource Function

OUR PEOPLE

COMMUNITY IMPACT

Key Principles

We strive to be responsible corporate citizens, making positive contributions to the communities in which we operate. We aim to create sustainable social and economic benefits, engage with local stakeholders, and respect the cultural and social values of the communities.

Do

- △ Engage in initiatives that support community development, education, healthcare, and environmental sustainability.
- △ Respect and consider the interests of local communities in our decision-making processes.
- △ Maintain transparent and open communication with community stakeholders.
- △ Mitigate and minimise any negative impacts on the environment and communities.

Don't

- △ Exploit or harm the communities in which we operate for personal gain or profit.
- △ Ignore or neglect the concerns and needs of local communities.
- △ Disregard environmental regulations and engage in harmful practices.
- △ Disrupt the social fabric or cultural heritage of the communities.

OUR PEOPLE

COMMUNITY IMPACT

Frequently Asked Questions

How can employees get involved in community initiatives?

Employees can participate in volunteer programs, community outreach activities, and sustainability projects initiated by the company. They can also suggest and support local initiatives.

What measures are taken to minimise the environmental impact of our operations?

We implement sustainable practices, such as waste reduction, energy conservation, and responsible resource management. Regular environmental assessments and audits are conducted to identify areas for improvement.

How does the company address community concerns?

We have established mechanisms to receive and address community concerns and feedback. These channels include community engagement meetings, dedicated email addresses, and feedback forms.

Key Reference Documents

- △ Corporate Social Responsibility Policy
- △ Environmental Sustainability Policy
- △ Community Engagement Guidelines

Key Contacts

- △ Corporate Social Responsibility Function

OUR BUSINESS INTEGRITY

ANTI-BRIBERY AND CORRUPTION

WORKING WITH THIRD PARTIES

ANTI-MONEY LAUNDERING AND TAX EVASION

CONFLICTS OF INTEREST

EXPORT CONTROL

COMPETING FAIRLY

INTELLECTUAL PROPERTY

OUR BUSINESS INTEGRITY

ANTI-BRIBERY AND CORRUPTION

Key Principles

We have zero tolerance for bribery, corruption, or any form of unethical behaviour. We are committed to conducting our business with integrity, transparency, and in compliance with applicable anti-bribery and anti-corruption laws and regulations.

Do

- △ Refrain from offering, promising, or accepting bribes or improper payments, whether directly or indirectly.
- △ Maintain accurate and transparent records of all transactions, expenses, and business activities.
- △ Report any suspicious or unethical behaviour related to bribery or corruption.
- △ Conduct due diligence on business partners, including third parties, to ensure they adhere to similar ethical standards.

Don't

- △ Engage in bribery, extortion, or any other form of corrupt practices.
- △ Use personal or corporate funds for illicit payments or gifts to influence business decisions.
- △ Turn a blind eye to suspicious activities or attempts to circumvent anti-bribery and anti-corruption policies.
- △ Associate with individuals or organisations involved in corrupt practices.

OUR BUSINESS INTEGRITY

ANTI-BRIBERY AND CORRUPTION

Frequently Asked Questions

What constitutes a bribe or improper payment?

A bribe or improper payment includes any form of gift, favour, or benefit offered or received to influence business decisions or gain an unfair advantage. It is essential to follow the company's policies and guidelines regarding gifts and entertainment.

How can I ensure compliance with anti-bribery and anti-corruption laws?

Familiarise yourself with the company's policies, attend training programs, and seek guidance from the Compliance Department when faced with situations that may raise concerns. Report any potential violations promptly.

What should I do if I suspect bribery or corruption within the company?

Report your concerns through established reporting channels, such as the Ethics Hotline or directly to the Compliance Department. Confidentiality and protection against retaliation are provided for those who report in good faith.

Key Reference Documents

- △ Anti-Bribery and Corruption Policy
- △ Gifts and Entertainment Policy
- △ Whistle-blower Protection Policy

Key Contacts

- △ Your Line Manager
- △ Head of Strategy and Commercial
- △ Deputy Managing Director
- △ Managing Director
- △ compliance@datumlimited.com

OUR BUSINESS INTEGRITY

WORKING WITH THIRD PARTIES

Key Principles

We expect our employees to act with integrity when working with third parties, such as suppliers, contractors, agents, and consultants. We select our partners based on their commitment to ethical conduct and compliance with relevant laws and regulations.

Do

- △ Conduct due diligence on third parties before entering into business relationships.
- △ Establish clear contractual agreements that include ethical expectations and compliance requirements.
- △ Monitor and assess the performance and conduct of third parties regularly.
- △ Provide guidance and training to third parties regarding the company's Code of Conduct and relevant policies.

Don't

- △ Engage or continue business relationships with third parties involved in illegal or unethical activities.
- △ Offer or accept bribes or improper inducements from third parties.
- △ Allow conflicts of interest to compromise the objectivity and fairness of business decisions involving third parties.
- △ Neglect to monitor or address potential risks or violations by third parties.

OUR BUSINESS INTEGRITY

WORKING WITH THIRD PARTIES

Frequently Asked Questions

How can I determine if a potential third party aligns with our ethical standards?

Conduct a thorough due diligence process that includes reviewing their reputation, compliance history, financial stability, and adherence to ethical practices. Seek guidance from the Compliance Department, if needed.

What steps should I take if I suspect unethical conduct by a third party?

Report your concerns to the Compliance Department, providing as much detailed information as possible. The company will initiate an investigation and take appropriate action based on the findings.

Can we terminate a contract with a third party if they engage in unethical behaviour?

Yes, if a third-party breaches ethical standards or violates the contract's terms, termination or other appropriate actions may be taken. Consult the Legal or Procurement department before taking any such action to ensure compliance with contractual obligations and legal requirements.

Key Reference Documents

- △ Third-Party Due Diligence Policy
- △ Supplier Code of Conduct
- △ Anti-Corruption and Anti-Bribery Clauses in Contracts

Key Contacts

- △ Head of Strategy and Commercial
- △ compliance@datumlimited.com

OUR BUSINESS INTEGRITY

ANTI-MONEY LAUNDERING AND TAX EVASION

Key Principles

We are committed to preventing money laundering and tax evasion within our business operations. We comply with applicable laws and regulations related to financial transparency, reporting, and taxation to ensure ethical and legal conduct.

Do

- △ Maintain accurate financial records and ensure transparency in financial reporting.
- △ Comply with all applicable anti-money laundering (AML) and counter-terrorist financing (CTF) regulations.
- △ Report any suspicious financial activities or transactions to the designated authority.
- △ Cooperate fully with tax authorities, providing accurate and complete information in compliance with tax laws.

Don't

- △ Engage in or facilitate money laundering, terrorist financing, or tax evasion activities.
- △ Deliberately falsify financial records or withhold information from tax authorities.
- △ Use the company's financial resources for personal gain or to facilitate illegal activities.
- △ Ignore red flags or warning signs of potential money laundering or tax evasion.

OUR BUSINESS INTEGRITY

ANTI-MONEY LAUNDERING AND TAX EVASION

Frequently Asked Questions

What are some red flags of potential money laundering activities?

Red flags may include unusually large or frequent cash transactions, transactions involving high-risk jurisdictions, complex ownership structures, and inconsistent or incomplete customer information. Training programs are available to help employees identify such red flags.

How can employees ensure compliance with tax laws?

Employees should accurately report their income, benefits, and other financial transactions to the tax authorities. They should seek guidance from the Finance or Tax Department if they have questions or concerns about their tax obligations.

What should I do if I suspect a colleague, or a customer is involved in money laundering?

Report your suspicions to the designated authority within the company, such as the Compliance Department or the Money Laundering Reporting Officer (MLRO). Confidentiality and protection against retaliation are provided for those who report in good faith.

Key Reference Documents

- ⚠ Anti-Money Laundering and Counter-Terrorist Financing Policy
- ⚠ Tax Compliance Policy
- ⚠ Suspicious Activity Reporting Procedure

Key Contacts

- ⚠ Legal and Compliance Function

OUR BUSINESS INTEGRITY

CONFLICTS OF INTEREST

Key Principles

We expect our employees to act in the company's best interests and avoid conflicts of interest that could compromise their objectivity, fairness, or decision-making. Transparency and disclosure are crucial in managing potential conflicts.

Do

- △ Disclose any personal, financial, or professional interests that may conflict with the company's interests.
- △ Prioritise the company's interests when making business decisions or engaging in activities on behalf of the company.
- △ Seek guidance from the appropriate channels, such as the Ethics Officer or Human Resources, when faced with a potential conflict of interest.
- △ Adhere to the company's policies and guidelines regarding conflicts of interest.

Don't

- △ Use your position or influence for personal gain or to benefit family members, friends, or associates unfairly.
- △ Engage in activities or relationships that create a conflict between your personal interests and the interests of the company.
- △ Accept gifts, favours, or benefits that may compromise your judgment or create a perception of bias.
- △ Withhold or manipulate information to conceal a conflict of interest.

OUR BUSINESS INTEGRITY

CONFLICTS OF INTEREST

Frequently Asked Questions

What should I do if I identify a potential conflict of interest?

Disclose the conflict promptly to the appropriate channels, such as your supervisor, Ethics Officer, or Human Resources. The company will assess the situation and provide guidance on how to manage the conflict.

Can I have a side business or engage in outside activities while employed by the company?

Outside activities or businesses may be permitted, but they must not create a conflict of interest with your responsibilities to the company. It is important to disclose such activities to ensure transparency and to seek guidance from the appropriate channels to ensure compliance.

How are conflicts of interest managed within the company?

Conflicts of interest are evaluated on a case-by-case basis. The company may implement measures such as recusal from decision-making, transfer of responsibilities, or other appropriate actions to mitigate the conflict. Transparency and disclosure are vital in managing conflicts effectively.

Key Reference Documents

- ⚠ Conflicts of Interest Policy
- ⚠ Outside Business Activities Policy
- ⚠ Disclosure of Interests Form

Key Contacts

- ⚠ Legal and Compliance Function
- ⚠ Human Resource Function

OUR BUSINESS INTEGRITY

EXPORT CONTROL

Key Principles

We comply with all applicable export control laws and regulations to ensure the responsible and legal transfer of products, technologies, and information across international borders. We maintain strict controls to prevent unauthorised access or use of controlled items.

Do

- △ Understand and comply with applicable export control laws and regulations, including trade restrictions and licensing requirements.
- △ Obtain necessary export licenses and permits for controlled items, technologies, or information.
- △ Regularly assess and classify products, technologies, and information for export control purposes.
- △ Implement appropriate security measures to prevent unauthorised access or use of controlled items.

Don't

- △ Engage in or support illegal or unauthorised export activities.
- △ Transfer controlled items, technologies, or information to restricted individuals, organisations, or countries.
- △ Fail to obtain required export licenses or permits when exporting controlled items.
- △ Neglect to implement necessary security measures to protect controlled items from unauthorised access or use.

OUR BUSINESS INTEGRITY

EXPORT CONTROL

Frequently Asked Questions

What are controlled items or technologies?

Controlled items or technologies refer to products, software, equipment, or information that are subject to export controls due to their potential dual-use nature or sensitivity. They may include military, nuclear, chemical, or biological materials and certain technologies or software.

How can I ensure compliance with export control laws?

Familiarise yourself with the company's Export Control Policy and seek guidance from the Export Control Officer or designated department when dealing with potentially controlled items or technologies. Training programs are available to enhance understanding and compliance.

What should I do if I suspect a violation of export control laws?

Report your concerns to the Export Control Officer or through established reporting channels, such as the Ethics Hotline. Confidentiality and protection against retaliation are provided for those who report in good faith.

Key Reference Documents

- ⚠ Export Control Policy
- ⚠ Restricted Parties Screening Procedure
- ⚠ Export License and Permit Guidelines

Key Contacts

- ⚠ Legal and Compliance Function
- ⚠ Commercial Function
- ⚠ compliance@datumlimited.com

OUR BUSINESS INTEGRITY

COMPETING FAIRLY

Key Principles

We believe in fair competition and conduct our business in compliance with antitrust and competition laws. We strive to compete based on the merits of our products and services while adhering to ethical standards and promoting a level playing field.

Do

- △ Comply with all applicable antitrust and competition laws and regulations.
- △ Avoid agreements or practices that restrict competition or unfairly limit market access.
- △ Compete fairly based on product quality, innovation, pricing, and customer service.
- △ Seek legal guidance before entering into agreements or collaborations with competitors.

Don't

- △ Engage in price fixing, bid rigging, market allocation, or other anti-competitive practices.
- △ Misuse confidential information obtained from competitors for unfair advantage.
- △ Enter into agreements that exclude or discriminate against competitors without legitimate business justification.
- △ Engage in predatory pricing or unfair practices that harm competition or customers.

OUR BUSINESS INTEGRITY

COMPETING FAIRLY

Frequently Asked Questions

Can we collaborate with competitors on specific projects or initiatives?

Collaborations with competitors may be permissible under certain circumstances, such as joint research and development projects or industry standards development. Seek legal advice and ensure compliance with applicable laws before entering into such collaborations.

What should I do if I suspect anti-competitive behaviour within the industry?

Report your concerns to the Compliance Department or through established reporting channels, such as the Ethics Hotline. The company will investigate and take appropriate actions to ensure compliance with competition laws.

Are there any restrictions on sharing information with competitors?

Sharing information with competitors must be done cautiously and in compliance with competition laws. It is essential to avoid exchanging sensitive or confidential information that may lead to anti-competitive behaviour or collusion. Consult the Legal and Compliance Department before sharing information with competitors.

Key Reference Documents

- △ Antitrust and Competition Compliance Policy
- △ Guidelines for Interactions with Competitors
- △ Competitive Intelligence Gathering Policy

Key Contacts

- △ Legal and Compliance Function
- △ compliance@datumlimited.com

OUR BUSINESS INTEGRITY

INTELLECTUAL PROPERTY

Key Principles

We respect intellectual property rights and protect our own intellectual property assets. We comply with applicable laws and regulations regarding patents, copyrights, trademarks, and trade secrets, ensuring that we do not infringe on the rights of others.

Do

- △ Respect and adhere to intellectual property laws and regulations.
- △ Protect and safeguard the company's intellectual property assets, including patents, trademarks, copyrights, and trade secrets.
- △ Obtain necessary licenses or permissions for the use of third-party intellectual property.
- △ Report any suspected infringement of intellectual property rights promptly.

Don't

- △ Engage in unauthorised use, reproduction, or distribution of copyrighted materials, software, or proprietary information.
- △ Infringe on the intellectual property rights of others, including patents, trademarks, copyrights, or trade secrets.
- △ Misappropriate or disclose the company's confidential or proprietary information without proper authorisation.
- △ Neglect to take necessary measures to secure and protect intellectual property assets from unauthorised access or use.

OUR BUSINESS INTEGRITY

INTELLECTUAL PROPERTY

Frequently Asked Questions

How can I protect the company's intellectual property assets?

Ensure that intellectual property assets are properly identified, documented, and protected through patents, trademarks, copyrights, or trade secret protections. Implement security measures to prevent unauthorised access or use of intellectual property assets.

What should I do if I suspect someone is using our intellectual property without permission?

Report your suspicions to the Intellectual Property Department or through the established reporting channels. The company will investigate and take appropriate actions to protect its intellectual property rights.

Can I use open-source software or materials in our products or services?

The use of open-source software or materials may be permissible, but it is important to review the licensing terms and comply with the requirements of the respective licenses. Seek guidance from the Intellectual Property or Legal Department to ensure compliance.

Key Reference Documents

- △ Intellectual Property Policy
- △ Confidentiality and Non-Disclosure Agreement
- △ Trademark and Copyright Guidelines

Key Contacts

- △ Legal and Compliance Function
- △ Strategy and Commercial Function

OUR PRODUCTS, ASSETS AND DATA

PRODUCT SAFETY
ENVIRONMENT
PROTECTING OUR ASSETS
MAINTAINING ACCURATE RECORDS
DATA PRIVACY AND DIGITAL ETHICS
MANAGING COMMUNICATIONS

OUR PRODUCTS, ASSETS AND DATA

PRODUCT SAFETY

Key Principles

We are committed to ensuring the safety and quality of our products. We comply with all applicable laws and regulations related to product safety, and we strive to exceed industry standards to protect the well-being of our customers and end-users.

Do

- △ Design and manufacture products that meet or exceed safety standards and regulatory requirements.
- △ Conduct rigorous testing and quality control processes to ensure product safety and reliability.
- △ Provide clear and accurate instructions for safe product handling, use, and maintenance.
- △ Promptly address and resolve any product safety concerns or issues reported by customers or end-users.

Don't

- △ Release products that pose a known or potential risk to the safety of customers or end-users.
- △ Misrepresent or conceal product safety information or risks.
- △ Neglect to address or respond to customer complaints or reports of product safety issues.
- △ Fail to comply with product safety regulations or industry standards.

OUR PRODUCTS, ASSETS AND DATA

PRODUCT SAFETY

Frequently Asked Questions

[What should I do if I discover a potential safety issue with one of our products?](#)

Report the issue immediately to the Product Safety Department or the appropriate authority within the company. Prompt action will be taken to investigate, address, and resolve the issue to ensure customer safety.

[How can I stay updated on product safety regulations and standards?](#)

Stay informed through training programs, industry publications, and regulatory updates. The Product Safety Department can also provide guidance and resources to ensure compliance with evolving safety requirements.

[Are there any specific procedures for reporting customer complaints related to product safety?](#)

Yes, the company has established procedures for reporting customer complaints, including product safety-related ones. Follow the designated reporting channels and ensure that all complaints are properly documented and addressed.

Key Reference Documents

- △ Product Safety Policy
- △ Quality Control and Assurance Manual
- △ Incident and Complaint Reporting Procedures

Key Contacts

- △ QHSE Function

OUR PRODUCTS, ASSETS AND DATA

ENVIRONMENT

Key Principles

We are committed to environmental responsibility and sustainable practices. We strive to minimise our impact on the environment by conserving resources, reducing waste, and promoting eco-friendly initiatives throughout our operations.

Do

- △ Comply with all applicable environmental laws, regulations, and permits.
- △ Conserve energy and water by practising efficient resource management.
- △ Reduce waste generation and promote recycling and responsible disposal practices.
- △ Encourage innovation and the use of environmentally friendly technologies and materials.

Don't

- △ Engage in activities that harm the environment or violate environmental laws.
- △ Neglect to report or address environmental incidents or spills promptly.
- △ Dispose of hazardous materials improperly or without following established protocols.
- △ Fail to implement measures to prevent pollution and minimise environmental impact.

OUR PRODUCTS, ASSETS AND DATA

ENVIRONMENT

Frequently Asked Questions

How can I contribute to the company's environmental initiatives?

You can contribute by practising responsible resource management, minimising waste, and adhering to established environmental policies and procedures. Additionally, you can suggest ideas and participate in environmental awareness programs and initiatives.

What should I do if I observe an environmental incident or spill?

Immediately report the incident to the Environmental Health and Safety Department or the designated authority. Follow the established protocols for containment, clean-up, and reporting to minimise the impact on the environment.

Are there any initiatives in place to promote sustainability within the company?

Yes, the company has implemented various initiatives to promote sustainability, such as energy-efficient practices, waste reduction programs, and the use of renewable materials. Stay updated on the company's sustainability programs and actively participate in their implementation.

Key Reference Documents

- △ Environmental Policy
- △ Waste Management and Recycling Guidelines
- △ Environmental Incident Reporting Procedure

Key Contacts

- △ QHSE Function

OUR PRODUCTS, ASSETS AND DATA

PROTECTING OUR ASSETS

Key Principles

We are committed to protecting the company's physical, financial, and intellectual assets. All employees have a responsibility to safeguard company resources and use them for legitimate business purposes only.

Do

- △ Safeguard company assets from theft, loss, or unauthorised use.
- △ Adhere to security protocols and procedures to ensure the physical safety of company facilities and assets.
- △ Use company resources, including equipment, technology, and supplies, responsibly and efficiently.
- △ Report any suspicious activities or incidents that may compromise the security or integrity of company assets.

Don't

- △ Engage in theft, misappropriation, or unauthorised use of company assets or resources.
- △ Compromise the physical security of company facilities or assets by failing to follow security protocols.
- △ Use company assets for personal gain or outside business activities without proper authorisation.
- △ Ignore or neglect to report security breaches, incidents, or vulnerabilities that may jeopardise company assets.

OUR PRODUCTS, ASSETS AND DATA

PROTECTING OUR ASSETS

Frequently Asked Questions

What should I do if I notice a potential security vulnerability or breach?

Report the vulnerability or breach immediately to the Security Department or the designated authority within the company. Prompt action will be taken to address and mitigate the risk to protect company assets.

How can I ensure the security of digital assets and information?

Follow the company's IT and data security policies and guidelines. Use strong passwords, be vigilant against phishing attempts, and report any suspicious emails or activities related to data security. Regularly update and patch software and maintain backups of critical data.

Can I use company equipment or resources for personal purposes?

Company equipment and resources should be used for legitimate business purposes only. Limited personal use may be allowed within reasonable boundaries, but it should not interfere with work responsibilities or compromise company assets or productivity.

Key Reference Documents

- △ Asset Protection and Security Policy
- △ IT and Data Security Policy
- △ Facility Access and Security Procedures

Key Contacts

- △ Facility Management Function
- △ Legal and Compliance Function
- △ security@datumlimited.com

OUR PRODUCTS, ASSETS AND DATA

MAINTAINING ACCURATE RECORDS

Key Principles

We maintain accurate and reliable records to ensure transparency, accountability, and compliance with legal, regulatory, and financial requirements. Proper record-keeping supports informed decision-making and promotes the integrity of our business operations.

Do

- ⚠ Record all business transactions accurately, completely, and in a timely manner.
- ⚠ Retain records in accordance with legal, regulatory, and company requirements.
- ⚠ Ensure that records are organised, accessible, and properly secured.
- ⚠ Follow established protocols for document storage, retention, and disposal.

Don't

- ⚠ Falsify, alter, or destroy records with the intention to mislead or conceal information.
- ⚠ Fail to maintain proper documentation for financial transactions, contracts, or regulatory compliance.
- ⚠ Ignore record-keeping policies and procedures, including those related to retention and disposal.
- ⚠ Use company records for personal gain or unauthorised purposes.

OUR PRODUCTS, ASSETS AND DATA

MAINTAINING ACCURATE RECORDS

Frequently Asked Questions

How long should I retain specific types of records?

Retention periods for different types of records may vary based on legal, regulatory, and business requirements. Refer to the company's Record Retention Policy or consult the Records Management Department for guidance on specific record types.

Can I make corrections to a record if I discover an error?

Corrections to records should be made following established protocols, such as documenting the correction, providing an explanation, and indicating the date and responsible party. Any changes should be transparent, accurate, and compliant with applicable laws and regulations.

What should I do if I suspect a record has been tampered with or altered?

Report your concerns to the Records Management Department or the designated authority within the company. Investigations will be conducted to ensure the integrity and reliability of records.

Key Reference Documents

- △ Record Keeping and Management Policy
- △ Document Retention Schedule
- △ Records Disposal Procedures

Key Contacts

- △ Legal and Compliance Function
- △ Finance Function

OUR PRODUCTS, ASSETS AND DATA

DATA PRIVACY AND DIGITAL ETHICS

Key Principles

We are committed to protecting the privacy and confidentiality of personal and sensitive information entrusted to us. We comply with applicable data protection laws and regulations, and we uphold high ethical standards in the collection, storage, use, and disclosure of data. We recognise the importance of digital ethics and the responsible use of technology in safeguarding data privacy.

Do

- △ Collect, store, and process personal and sensitive information in compliance with applicable data protection laws and regulations.
- △ Obtain necessary consent from individuals before collecting or using their personal data and respect their rights to privacy and data protection.
- △ Implement appropriate security measures to protect data from unauthorised access, disclosure, or loss.
- △ Use technology and digital tools responsibly, ensuring that they are used for legitimate business purposes and in alignment with ethical guidelines.

Don't

- △ Share or disclose personal or sensitive information without proper authorisation or legal justification.
- △ Use personal data for purposes other than those specified and consented to by the individuals.
- △ Neglect to protect data from security breaches or unauthorised access.
- △ Misuse or abuse technology, such as engaging in unauthorised surveillance, hacking, or unethical data practices.

OUR PRODUCTS, ASSETS AND DATA

DATA PRIVACY AND DIGITAL ETHICS

Frequently Asked Questions

What should I do if I receive a data privacy complaint or request?

Follow the company's Data Privacy Complaints and Request Handling procedures. Promptly address the complaint or request, ensure proper documentation, and provide individuals with information about their rights and available recourse mechanisms.

Can I transfer personal data to third parties or outside the company?

Personal data transfers to third parties should be done in compliance with applicable data protection laws and regulations. Obtain necessary consent, establish data protection agreements with third parties, and ensure appropriate security measures are in place.

What should I do if I suspect a data breach or unauthorised access to data?

Report the incident immediately to the Data Protection Officer or the designated authority within the company. Follow the established data breach response plan to mitigate the impact, notify affected individuals, and take appropriate remedial actions.

Key Reference Documents

- △ Data Privacy and Protection Policy
- △ Consent Management Guidelines
- △ Data Breach Response Plan

Key Contacts

- △ CATCHPOT
- △ Human Resource Function
- △ Legal and Compliance Function

OUR PRODUCTS, ASSETS AND DATA

MANAGING COMMUNICATIONS

Key Principles

We value transparent, honest, and respectful communication in all aspects of our business. We promote effective communication internally and externally, maintaining confidentiality when required, and adhering to ethical standards in our interactions.

Do

- △ Communicate openly, honestly, and respectfully with colleagues, customers, suppliers, and other stakeholders.
- △ Ensure that communication is accurate, clear, and consistent, avoiding misleading or false information.
- △ Respect confidentiality obligations and handle sensitive information with care.
- △ Use appropriate channels and platforms for different types of communication, adhering to company guidelines and policies.

Don't

- △ Engage in deceptive, misleading, or false communication that may harm the company's reputation or stakeholders.
- △ Share confidential or sensitive information without proper authorisation or a legitimate business purpose.
- △ Violate copyright or intellectual property rights in communication materials, such as using unauthorised images or content.
- △ Use company communication channels or platforms for personal or inappropriate purposes.

OUR PRODUCTS, ASSETS AND DATA

MANAGING COMMUNICATIONS

Frequently Asked Questions

Can I share confidential information with colleagues within the company?

Confidential information should only be shared with colleagues on a need-to-know basis and in compliance with confidentiality obligations. Use secure communication channels and follow established protocols for sharing sensitive information.

How can I ensure effective and respectful communication with colleagues from diverse backgrounds?

Embrace diversity and inclusivity in your communication approach. Be mindful of cultural differences, use inclusive language, and actively listen to diverse perspectives. Respectful and open communication promotes a positive and collaborative work environment.

What should I do if I receive a media inquiry or a request for public statements?

Media inquiries should be directed to the designated spokesperson or the Communications Department. Do not provide media statements or respond to inquiries without proper authorisation. Refer media requests to the appropriate channels for accurate and consistent communication with stakeholders.

Key Reference Documents

- △ Communication and Media Relations Policy
- △ Confidentiality and Non-Disclosure Agreement
- △ Social Media Guidelines

Key Contacts

- △ Employee Communications Function
- △ Strategy and Commercial Function
- △ Marketing and Public Relations Function

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