

CODE OF CONDUCT & BUSINESS ETHICS

INTEGRITY | ACCOUNTABILITY | RESPONSIBLE BUSINESS

OUR COMMITMENT

At Senan Holding, integrity underpins our reputation and long-term success. We act responsibly, honestly and with respect for people, communities and the markets in which we operate. This Policy sets the standards expected in every decision, relationship and activity carried out on our behalf.

SCOPE

This Policy applies to directors, officers, employees, subsidiaries and controlled operations, and extends to contractors, consultants, suppliers and business partners where they act for or represent Senan Holding.

INTEGRITY & COMPLIANCE

- Comply with applicable laws, regulations, contractual obligations and Company policies wherever we operate.
- Act honestly, avoid misleading statements, fraud or falsified records, and maintain accurate, complete business information.
- Disclose and manage actual, potential or perceived conflicts of interest before they influence a business decision.

ANTI-BRIBERY & FAIR DEALINGS

- Never offer, give, request or accept bribes, kickbacks, facilitation payments or any improper advantage, directly or indirectly.
- Ensure gifts, hospitality and sponsorships are lawful, reasonable, transparent and never intended to improperly influence a decision.
- Compete fairly and select, engage and manage third parties responsibly, using appropriate due diligence and oversight.

RESPECT & RESPONSIBLE CONDUCT

- Treat everyone with dignity and respect. We do not tolerate discrimination, harassment, intimidation, retaliation or abuse.
- Respect human rights and fair labour practices, and uphold our commitment to safe, healthy and inclusive workplaces.
- Protect confidential information, personal data and Company assets, and use them only for legitimate business purposes.

SPEAK UP & ACCOUNTABILITY

- Promptly raise concerns about misconduct, unsafe practices, fraud, conflicts of interest or possible breaches of this Policy.
- Reports will be handled fairly and, where practicable, confidentially. Retaliation against anyone who raises a concern in good faith is prohibited.
- Violations may result in corrective or disciplinary action, up to and including termination of employment or contract, subject to applicable law.

IMPLEMENTATION & REVIEW

Senan Holding will communicate this Policy, provide appropriate awareness and training, require written acknowledgement where applicable, and periodically review its effectiveness as part of our commitment to continual improvement and ethical leadership.