



CENTURION



CENTURION

# BUSINESS ETHICS & CONDUCT POLICY

How we conduct business defines us in the eyes of our people, our customers, and our wider stakeholders. Centurion is committed to building a reputation for honesty, transparency, and integrity, without the use of corrupt practices. By Working Together, we have established a reputation for competence, reliability, and an unrelenting commitment to customer service and quality.

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## INTRODUCTION

Our reputation is one of our most valuable assets, but we are also aware that it is one of our most fragile; how we conduct our business and treat others whether that be our employees, customers, suppliers, stakeholders, communities, or the environment defines how we are measured and determines our success.

We are committed to compliance with all laws controlling the way in which we conduct our business worldwide. This Policy is designed to provide established standards to conduct business with integrity, helping us to achieve our ethical and legal commitments and serve as a guide to help you make the right decisions when working in, with or on behalf of Centurion. Ethics and compliance can be a complex area, and we welcome questions about this Policy and its application.

### SCOPE

We are all responsible for complying with this Policy, which applies to everyone who works for, with, and on behalf of Centurion.

In this Policy, “we” and “us” refer to all Centurion employees, officers, directors, contractors, and consultants working within any Centurion entity, including all Centurion subsidiaries, joint

ventures, and partnerships under the day-to-day management of Centurion. We also require our business partners, such as suppliers, agents, and other third-party service providers acting on Centurion’s behalf to comply with the principles set out in this Policy.

### RESPONSIBILITIES

At Centurion, we have a collective commitment to integrity by applying high ethical standards as well as common sense to all situations.

Regional Presidents, Heads of department, Managers, Supervisors, and Team Leads are responsible for ensuring their direct reports understand their responsibilities under this Policy. They must support and foster a workplace that recognises our values and demonstrates ethical conduct by role modelling the principles set out in this Policy and ensuring all related training has been completed within their businesses.

Our Policy is a great resource, but it will never address every situation you may be faced with in your everyday working life, so we count on you to use good judgement and ask for help if you are ever unsure about the right course of action.





### **SPEAK UP WITHOUT FEAR**

We know it takes courage to come forward and share a concern and any issues raised in good faith (i.e. you have an honest belief that the information provided is truthful, even if it turns out to be incorrect) are encouraged.

If you have a question, problem, or concern, there is always someone ready to help you. In most cases this will be your line manager will be the best person to talk over your concern with. If you are not comfortable speaking with your line manager or feel that an issue you have already raised has not been properly addressed, contact the Centurion Compliance department or appropriate Regional HR department.

We will not retaliate against anyone who raises questions or concerns and will not permit negative action or discrimination as a result of someone making their report. Allegations of retaliation will be investigated and those who retaliate against someone who raises a concern may be subject to disciplinary action up to and including termination.

We take all concerns seriously and are committed to investigating reports in consistent manner and you are expected to

cooperate with all investigations by providing honest, truthful and complete information.

All reports are treated confidentially, and you may make reports anonymously if you prefer. Employees may contact us via our Ethics Hotline (link available on our intranet) and all third parties via our website.

### **IMPLICATIONS OF NON-COMPLIANCE**

Non-compliance with this Policy, whether knowingly or not, may result in severe irreparable reputational damage for Centurion, as well as civil and/or criminal liability for individuals as well as Centurion.

Employees who breach the law or our policies may be subject to disciplinary action up to and including termination. Any non-compliance by third parties working in, with, or on behalf of Centurion may result in the relationship being terminated.

## OUR MISSION & VALUES

As an individual, lead by example.  
As a company, deploy our invaluable expertise.  
As a group, succeed by working together.

**STRONGER TOGETHER™**

### WE DO THE RIGHT THING

CENTURION people are proud of what they do, because we do the right thing every time. We are safe. We are open, transparent and professional. We create value.

**We care.**

### WE WORK TOGETHER

CENTURION people use their skills, knowledge and experience to build positive relationships wherever they can. We work as one team, locally and globally. We learn. We teach.

**We actively share knowledge and insight.**

### WE DO WHAT WE SAY

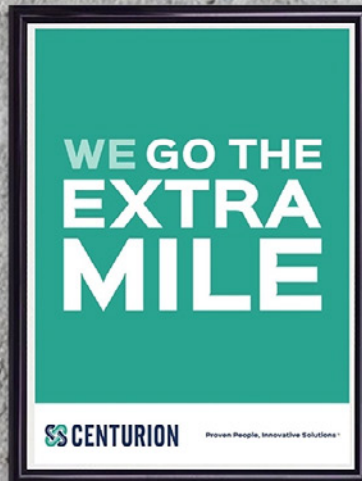
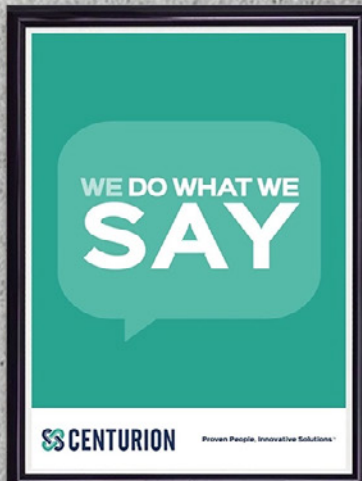
CENTURION people are honest, supportive, responsive and easy to work with. We honor every commitment and expect the same from others. We listen. We respect differences.

**We develop and deliver fit-for-purpose solutions.**

### WE GO THE EXTRA MILE

CENTURION people are hard working, committed and innovative. Always looking for new ways and new opportunities to improve, large and small. We drive change.

**We challenge the status quo.**



## WORKPLACE SAFETY

### WE DO THE RIGHT THING

At Centurion, all operations must be conducted with the highest regard for the health, safety, and welfare of employees, customers, suppliers, and the protection of the general public. By taking personal responsibility for health and safety, we ensure that everyone gets home safely at the end of the workday. Centurion complies with local Occupational Health & Safety legislation relevant to the country where the operations are located, as well as related regulations, other governmental legislation, and Centurion's own standards.

### WE DO WHAT WE SAY

- Always follow Centurion's processes and procedures
- Do not perform any tasks without proper training and PPE
- Do not perform any tasks while under the influence of illegal drugs, alcohol, or other substances, including but not limited to prescribed medications, that affect your ability to work safely

We follow our safety procedures and promote a culture of championing safety. Every person is entitled to act immediately in order to protect people's safety.



**PLEASE SEE OUR ENVIRONMENT POLICY**



**PLEASE SEE OUR OCCUPATIONAL HEALTH & SAFETY POLICY**

- Immediately report any accident, injury or ill health occurring at work to your line manager
- Always use seatbelts when driving
- Stop any job or task immediately if you believe the conditions are unsafe or pose a risk to your health or that of your colleagues, and immediately report the matter to your line manager

# DIVERSITY & EQUAL OPPORTUNITIES

## WE DO THE RIGHT THING

At Centurion, we promote a culturally diverse workforce and are committed to providing equal opportunities to all employees and prospective employees.

We will recruit, select, train, promote, reward, transfer, discipline, and release employees, and take any and all other personnel actions without regard to race, colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, gender, sexual orientation, age, or other grounds specified by law or other regulation.

Centurion celebrates diversity in the workplace, and we require all our people to treat each other fairly and with respect. We will not tolerate anyone who engages in behaviour that has the effect of discriminating against others on any basis protected by applicable law.

## WE DO WHAT WE SAY

- Always follow Centurion's recruitment procedures and recruit the candidate with the right experience, qualifications, and skills for the position
- Be mindful of your own unconscious biases and always invite and welcome diverse perspectives and open dialogue
- Always treat others fairly and with respect and celebrate our diversity; listen and be receptive to different perspectives
- Do not engage in behavior that has the purpose or effect of discriminating against others on any basis or status protected by applicable law
- Complete any diversity-related awareness training courses promptly when requested to do so
- Speak up immediately if you experience, witness, or suspect discrimination based on someone's race, color, gender, national origin, age, religion, citizenship status, disability, medical condition, sexual orientation, gender identity, veteran status, marital status, or any other characteristic protected by law, by reporting to your line manager or through the Ethics Hotline



## BULLYING & HARRASSMENT

### WE DO THE RIGHT THING

Centurion believes in a culture of diversity, equity, and inclusion that supports our business and the wellbeing of our employees. An important part of this culture is seeking to eradicate bullying and harassment, which are unacceptable behaviours at Centurion. Respect in the workplace is not optional. Any form of sexual harassment, threats of violence, and aggressive conduct are all prohibited, and we further prohibit all forms of discrimination including that in employment, employment related decisions, and business dealings.

At Centurion, we do not tolerate any form of bullying, harassment, or discrimination, and we expect everyone to treat others with respect. We promote a working environment of dignity and respect, and where everyone feels empowered to speak up should they ever experience such behaviour in the workplace.

### WE DO WHAT WE SAY

- Speak up immediately if you experience or witness bullying or harassment by raising it with your line manager or reporting it through the Ethics Hotline
- Never commit, authorize, enable, or condone any act of bullying or harassment
- Complete any anti-bullying and anti-harassment awareness training courses promptly when requested to do so

# HUMAN RIGHTS & MODERN SLAVERY

## WE DO THE RIGHT THING

Treating people with dignity and respect is at the core of our values and culture. We respect the rights of every individual, comply with the employment laws in the countries where we operate, and treat the communities we work in with respect and fairness. We support the principles established under the United Nations Universal Declaration of Human Rights and strive to ensure we do not conduct business, directly or indirectly, with individuals or companies participating in the exploitation of slavery, human trafficking, child labor, or any form of forced labor within our supply chain or any area of our operations.



**PLEASE SEE OUR MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT**

## WE DO WHAT WE SAY

- Treat others with respect and dignity at all times
- Always follow Centurion's recruitment procedures, as well as those related to the onboarding new suppliers and customers
- Never employ or conduct business with those who engage in human rights abuse
- Identify, prevent, mitigate, and resolve social risks and impacts

# OUR COMMUNITIES & ENVIRONMENT

## WE DO THE RIGHT THING

At Centurion, we understand that we are an integral part of the societies and communities in which we operate. We are committed to operating in a sustainable way to better serve all our stakeholders over the long term. Centurion strives to comply with applicable environmental laws and regulations, as well as standards of sustainability and ethical corporate governance in all locations where we operate. All locations must conduct operations with the highest regard for the quality of the environment, including water, air, and general land usage.

Employees are encouraged to engage with charitable causes on a voluntary basis; any donations involving company funds or assets must be pre-approved in line with the delegation of authority thresholds.

Centurion does not make donations to political parties.



**PLEASE SEE OUR SUSTAINABILITY REPORT AND ENVIRONMENTAL POLICY**

## WE DO WHAT WE SAY

- Develop an understanding of your environment and how you impact it
- Ensure community concerns are taken seriously
- Engage with our various environmental and social initiatives and learn how you can play a role to help reduce our environmental impact where we operate
- Reduce carbon emissions by supporting Centurion's initiatives such as reducing, reusing, and recycling waste
- Engage with local communities via fundraising and volunteering efforts

# CONFIDENTIALITY & INTELLECTUAL PROPERTY

## WE DO THE RIGHT THING

Confidential information and intellectual property are important assets as they provide us with a competitive edge. Employees are responsible for safeguarding Centurion's corporate identity.

Protecting trade secrets and confidential information is essential to our success. Customers and employees expect us to apply strict controls to the confidential information we hold or use. Failure to protect our confidential information can lead to fines, penalties, charges and loss of reputation. We must ensure that our intellectual property and confidential information are disclosed only for legitimate business purposes and under

appropriate contractual protections. If any employee creates any intellectual property relevant to Centurion's business, they must inform Centurion at the earliest opportunity.

Upon termination of employment, employees are required to return all documents or files (electronic or physical) in their possession and may not copy, take, or retain any documents containing confidential information obtained during their employment.

## WE DO WHAT WE SAY

Confidential information takes many forms, including, but not limited to, details about our products and services, designs, drawings, customer and supplier lists, business plans, financial information, employee records, as well as information relating to or supplied by our shareholders, customers, and other stakeholders and plans or data that employees have acquired during their employment or

business relationships. It can also include our Intellectual property, which is patents, copyrights, trademarks, ideas, processes, technical data and more.

In order to protect Centurion's confidential information, as well as that of its customers, please ensure we:

- Avoid disclosing confidential information to anyone outside Centurion unless an appropriate confidentiality agreement is in place
- Do not take confidential information with you if your employment with Centurion ends
- Never accept or use confidential information of our competitors, as this may be illegal and will be treated as serious misconduct
- Avoid discussing confidential matters in public places where you might be overheard
- If in doubt, mark any information you are sharing as "Confidential"
- Do not take the confidential information from any previous employer with you to Centurion

# DATA PROTECTION

## WE DO THE RIGHT THING

As a global organization, we are required to comply with the many data privacy laws of the countries in which we operate. We respect the privacy of our clients, business partners, and employees, and we handle their personal information with care. Keeping personal data safe and ensuring transparency with respect in how we gather, use, disclose, and manage such data are fundamental to maintaining the trust of our employees, customers, and stakeholders.



**PLEASE SEE OUR PRIVACY STATEMENT**

## WE DO WHAT WE SAY

**Personal data** is any data that could be used to identify someone, either directly or indirectly, such as name, employee ID, email address or phone number, race, ethnicity, religion, health data or sexual orientation, to name just a few.

When dealing with any data at Centurion we must:

- Understand what information you might have that would be considered as “personal data”
- Collect, use, and store data in compliance with Centurion’s policies
- Always ask yourself: Is data sharing necessary? How long should you keep it for?
- Be cautious when selecting third parties to process or access personal data under our responsibility
- Never grant access to personal data without proper authorization



## PHYSICAL ASSETS

### WE DO THE RIGHT THING

We are responsible every day for the use, care, and protection of physical assets belonging to Centurion, our customers, and suppliers. Physical assets such as equipment, tools, inventory, vehicles, computers, and phones, email, and internet access, are provided to allow us to do our job.

Be aware that anything written, sent, downloaded or stored on Centurion's systems belongs to Centurion and we may monitor your use of these systems.

### WE DO WHAT WE SAY

- Be cautious when using property that belongs to Centurion or any of our customers
- Do not lend, sell, or give away any physical asset unless you are properly authorized to do so
- Make sure you take care to protect it against damage, theft and misuse

# INFORMATION SECURITY

## WE DO THE RIGHT THING

Data drives our performance, and we have a role to play in protecting against all cyber threats. The cyber threat landscape and data protection regulations are evolving rapidly and are often subject to sudden change. At Centurion it is crucial that our infrastructure, confidential information, IP and all other data is kept safe. Failure to do so can result in the loss of client trust and contracts as well as significant fines and reputational damage.

At Centurion we champion cyber security. Make sure all processes and practices are followed, and all training completed and always alert Centurion IT of any suspicious activity.

## WE DO WHAT WE SAY

- ✔ Always follow the processes Centurion has in place to protect our networks, computers, software and data from attack, damage or unauthorized access
- ✔ Stay up-to-date on your cyber awareness training and always complete the refresher tests
- ✔ Implement all best practices including software and security updates
- ✔ Never open suspicious links in emails, unless you have verified that they have come from a trusted source. If in doubt contact Centurion's IT department
- ✔ Take care when using email and always bear in mind that emails can be altered, forwarded and stored without our consent
- ✔ Never send or store Centurion data to a personal email account or personal clouds storage. Only use Centurion issued services
- ✔ If you become aware of a cyber incident or if you think you have clicked on a suspicious link, contact the IT team immediately. The sooner you report the quicker we can act

A decorative header section with a light gray background. It features several white speech bubble icons of varying sizes and shapes, some containing horizontal lines to represent text. The text 'SOCIAL MEDIA' is written in a bold, teal, sans-serif font on the left side of this section.

## SOCIAL MEDIA

### WE DO THE RIGHT THING

Centurion recognizes that the internet provides unique opportunities to help us build the Centurion brand, enhance the impact and reach of our communities, engage in interactive discussions, and share information on particular topics using social media. However, the use of social media by individuals at or with Centurion can pose risks to our confidential and proprietary information, reputation, and compliance with legal obligations.

To minimize these risks, prevent loss of productivity, and ensure that Centurion's IT resources and communication systems are used only for appropriate business purposes, we all need to adhere to use social media mindfully, respectfully, and appropriately.

### WE DO WHAT WE SAY

- Use good judgment and consider how your post might impact Centurion before posting it
- Do not post anything that is discriminatory or would constitute a threat, intimidation, harassment, or bullying
- If you intend to post online or publish your views about topics that impact Centurion's business, clearly state that your views are your own and not those of Centurion
- Never give the impression that you are speaking on behalf of Centurion unless specifically authorized to do so
- Do not post or share anything that is confidential business information about Centurion, our customers, business partners, or suppliers

# ANTI-BRIBERY & CORRUPTION

## WE DO THE RIGHT THING

Centurion prohibits bribery and corruption in any form. We never offer or accept bribes or let third parties do it on our behalf. In particular, we maintain a zero-tolerance policy for 'grease' or 'facilitation' payments.

Anti-bribery laws in some countries distinguish between bribery of individuals and bribery of government officials, whereas others cover government officials only. Our compliance procedures cover both and are applied consistently across Centurion ensuring that the right partners are selected and decisions are made objectively.

Third parties and commercial intermediaries play an important role in helping us conduct our business globally. However, we recognise that these relationships can

potentially pose a serious risk to Centurion; therefore, this Policy also applies to them. We will seek to create and maintain a trust-based and inclusive internal culture where bribery and corruption are not tolerated.

For Centurion's, a zero-tolerance approach to bribery is not just the lawful thing to do it is the right thing to do. We compete for business fairly and work with honesty and integrity.

We never offer, promise, give, or accept money or anything of value to or from third parties in exchange for an improper business advantage and we must ensure the same levels of integrity from those we engage to act on our behalf.

## WE DO WHAT WE SAY

A **Bribe** is anything that has value to the person receiving it. A bribe does not have to be in cash, it can include gifts, hospitality, travel, or charitable and political donations.

**Bribery** is authorizing, offering, promising, giving, or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their duties, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

**Public Officials** include officers and employees of government agencies and departments.

**Facilitation payments**, also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example, by a government official). While they are uncommon in the UK, they may be more prevalent in other jurisdictions where we operate.

**"Kickbacks"** are typically payments made in return for a business favour or advantage.

- Avoid even the appearance of something inappropriate
- Never give or accept a gift or hospitality during any commercial negotiations or tender process if this could be perceived as intended or likely to influence the outcome
- Never accept hospitality from a third party that is unduly lavish or extravagant under the circumstances
- Avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted
- Always request a receipt detailing the reason for the payment
- Immediately report any request for a bribe made by a government official or any private company/individual for money or anything of value, including charitable and political donations, to Centurion's Compliance department

- Never give, promise to give, or offer, a payment, gift, or hospitality with the expectation or hope of receiving a business advantage, or as a reward for a business advantage already provided
- Never accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it we will provide a business advantage for them or anyone else in return
- Never offer or accept a gift to or from government officials, or representatives, politicians, or political parties, regardless of value, without the prior approval from the Centurion's Head of Compliance
- If you are asked to make a payment on our behalf, you should always be ensure you understand what the payment is for and whether the amount requested is proportionate to the goods or services provided

## GIFTS & HOSPITALITY

### WE DO THE RIGHT THING

An occasional modest gift or offer of entertainment is a normal part of doing business. Gifts and hospitality can help build and strengthen good working relationships with customers and suppliers. However, we must ensure that we do not do anything that can be viewed as inappropriate or as a bribe, regardless of our honest intentions.

Similarly, accepting an offer may compromise your professional judgment. We must be mindful of the policies our clients have in place and be especially careful where government officials, including national oil company employees, are involved.

We should always remember that gifts and hospitality involving public officials presents an increased compliance risk and, in some circumstances, are restricted or prohibited by laws and regulations.

We must conduct all necessary reviews and obtain approvals for gifts and hospitality by following the processes set out in our authority matrix and, when required, submitting approval requests via our Gifts, Entertainment & Sponsorship Register.

### WE DO WHAT WE SAY

- ✔ Make sure you understand and follow the rules regarding gifts and entertainment
- ✔ Any gift or entertainment must be reasonable, modest, and relevant to the business
- ✔ It must always satisfy a reasonable business purpose
- ✔ Always be mindful of our customers' internal policies, which may be more restrictive
- ✔ Gifts and entertainment – whether given or received – must not be intended to influence or cause you to be influenced in obtaining or retaining business or a business advantage
- ✔ All gifts and entertainment must comply with applicable local laws and any policies to which the recipient may be subject
- ✔ Always consider the timing of the gift or entertainment
- ✔ They must be infrequent
- ✔ Never give cash
- ✔ Always use common sense and think about whether offering or accepting of any gift or entertainment could give the appearance of impropriety
- ✔ Gifts and hospitality must always be approved honestly, fully, and accurately through the Centurion Gifts, Entertainment & Sponsorship approval process

# ACCURATE BOOKS, RECORDS AND EFFECTIVE INTERNAL CONTROLS

## WE DO THE RIGHT THING

To effectively manage our business and transparently report to our shareholders and stakeholders, we must keep fair, accurate, and transparent financial and business information. Having books and records that are clear, complete, and accurately reflect our business transactions is critical. This ensures that our business operations remain transparent, comply with our internal approval processes, and protect our assets..

All payments, receipts, and other transactions must be properly authorized and accurately and completely recorded in the records of the Region or business line, in accordance with Centurion's system of internal controls, policies, and applicable financial accounting standards.

Everyone involved in creating, processing, recording and reviewing such information in Centurion's books and records is held responsible for its integrity.

We have zero tolerance for the falsification or alteration of Centurion's documents or other business records.

You are also responsible for understanding and following applicable records retention policies and ensure that you never destroy any information that may be relevant to current or threatened litigation unless explicitly authorized to do so.

## WE DO WHAT WE SAY

- All records management, sales bidding, and marketing practices must be accurate, honest, and ethical
- Accurately reflect all inventory and stock
- Provide complete and truthful information when providing data for financial reporting, forecasting, or other business purposes
- Ensure that anything we import or export is properly classified and includes all required documentation, licenses, permits, and approvals
- All records must be clear, fair, accurate, and complete
- Follow our internal processes and controls to ensure records are accurate and true
- Properly and accurately document the timing in which work is done, goods and payments are received and revenue recognized

# ANTI-MONEY LAUNDERING & TAX EVASION

## WE DO THE RIGHT THING

Centurion is committed to supporting the global fight against money laundering and tax evasion. Our policy is to conduct all business in an honest and ethical manner. We maintain a zero-tolerance approach to the facilitation of tax evasion in any country where we do business.

## WE DO WHAT WE SAY

**Money Laundering** is the process by which the proceeds of criminal conduct are dealt with in a way to disguise their criminal origins.

**Tax evasion** means the offence of cheating the public revenue or fraudulently evading UK tax and is a criminal offence. The offence requires an element of fraud, which means there must be deliberate action, or omission with dishonest intent to avoid paying the amount of tax which is due.

Watch out for:

- Customers of suppliers who are not properly registered for tax purposes.
- Requests for payment in currencies other than those specified on the invoice.
- Requests for payments to or from a bank account not in the name of the customer or supplier.
- Requests for payment to be made to a country other than the customer's or supplier's country of residence.
- Requests to make overpayments or payments in cash.
- Payment approval given by someone who is not a party to the contract.

# FRAUD

## WE DO THE RIGHT THING

Centurion is committed to conducting business with the highest level of integrity. Any form of unethical activity may breach the laws of the countries in which we operate.

We have zero tolerance for the falsification or alternation of any Centurion documents, financial records, or other business records.

Centurion maintains a robust system of internal controls. Our auditing and accounting processes ensure compliance with legal, accounting, tax, and other regulatory requirements and prevent fraud in the countries in which we operate.

## WE DO WHAT WE SAY

- Never engage in dishonest, deceitful, or fraudulent activity
- Be alert to unauthorized handling, approval, and reporting of business transactions
- Stay vigilant! It's everyone's responsibility to take reasonable steps to prevent and detect fraud and other irregularities
- Never misuse your position within Centurion to make personal purchases
- Be cautious and alert to unusually close relationships with customers and suppliers

# CONFLICTS OF INTEREST

## WE DO THE RIGHT THING

Conflicts of interest can raise questions, undermine trust, and call in to question Centurion's management competence, its commitment to ethics, and its ability to act in the best interests of its stakeholders.

Centurion recognizes your right to engage in activities outside of your employment, provided they are unrelated to Centurion and do not interfere with or conflict with your obligations to the company.

A conflict of interest can arise when a person has two (or more) competing interests, and serving one of those interests could damage or harm the other. An interest has a broad meaning but generally refers to something

that benefits you or a duty you have undertaken. In the context of Centurion, a conflict of interest typically occurs when an employee has an interest outside their role with Centurion that could compete with their duties and responsibilities to the company. This could also include situations such as employing close relatives and/or other associates.

To ensure transparency, it is important that we are able to recognise potential and actual conflicts. An actual or apparent conflicts of interest must be disclosed to Centurion and approved in accordance with our delegation of authority matrix.

## WE DO WHAT WE SAY

A **personal conflict of interest** occurs whenever the interests of an employee are inconsistent with the responsibilities of his or her employment.

A **professional conflict of interest** arises when personal interests or relationships may affect professional duties, potentially causing bias in decision-making.

- ✔ Do not exploit opportunities for yourself, friends, or family members that are discovered while working at Centurion or through Centurion's property or information
- ✔ Avoid being involved in selection or hiring decisions involving a friend or family member as an employee, customer, or supplier
- ✔ Avoid promoting the use of a third party owned by a friend or family member
- ✔ Owning or investing in a Centurion competitor, customer, or vendor with which Centurion does business is prohibited unless approved by Centurion's CEO

Employees are required to disclose all potential conflicts of interest, including those they may have been inadvertently placed in due to company or personal relationships. If anyone suspects that a situation could give rise to a conflict of interest, they should seek guidance from their line manager, the HR department, or the Centurion Head of Compliance.

Always avoid the situation where your personal interests are - or risk appearing to be - in competition with Centurion's best interests. Similarly, avoid situations where Centurion's interests are - or risk appearing to be - in competition with a customer's best interests.

- ✔ Never take personal advantage of a business opportunity that is meant for Centurion
- ✔ Never supervise, manage, or conduct business with someone with whom you have a close relationship, such as a family member
- ✔ Sitting on the board of a competitor of Centurion is prohibited unless approved by Centurion's CEO

Any exception to this practice requires prior written approval from Centurion's CEO.

# COMPETITION

## WE DO THE RIGHT THING

Competition laws are complex and apply to everyone working within our business. These laws exist to protect free enterprise and fair competition. Such laws generally prohibit price fixing, dividing territories, and colluding with competitors to agree on terms and conditions that negatively affect the market. Examples include price fixing, bid rigging, market splitting, or the unauthorised use of others' confidential information.

Centurion is committed to complying with all competition-related legislation.

Centurion is committed to winning work through fair and open competition, not by conspiring or colluding with competitors or customers to unduly influence the market. If you are approached to engage in such a relationship, stop the conversation immediately and report the incident to the Compliance team or your line manager.

## WE DO WHAT WE SAY

- Deal fairly with customers, suppliers, and competitors
- Do not agree to boycott any customer or supplier unless this is related to internationally imposed government sanctions
- Be fair, factual, and complete in all advertising, sales, and promotional materials
- Do not engage in any form of agreements or understanding with competitors to price fix, rig bids, or manipulate tenders
- Do not discuss Centurion's business strategies and plans with competitors

# SANCTIONS & EXPORT CONTROL

## WE DO THE RIGHT THING

Centurion is involved in the movement of products, services, technology, and information across international borders every day. Therefore, we strictly comply with applicable trade and financial sanctions and export control regulations associated with the countries in which we do business. We are particularly mindful that the laws of more than one country may apply.

We have policies and processes in place to ensure that none of our businesses or employees engage in prohibited activities. Centurion maintains a list of

countries subject to sanctions and has implemented software to screen all parties with whom we do business.

If an export involves “controlled” or “dual use” items, it must be pre-approved in accordance with our internal controls and approval processes.

## WE DO WHAT WE SAY

- Always check the list of high-risk geographies on Centurion Connect before entering into any new business with a customer, supplier, or other business partner/representative
- To ensure successful movement of goods, you must be able to provide the following information upon request:
  - Type of product
  - Product value
  - Intended use
  - Intended customer
  - Intended destination
  - Ultimate end user
- Immediately refer any request to participate in a boycott, or inquiries about Centurion’s stance on a particular boycott, to the Compliance department
- Refer any potential new customer, supplier, or other third party to the Compliance department for automated screening before proceeding
- Always remain alert to a client’s intentions; watch for signs that a customer or business partner may intend to re-export, resell, or rent Centurion’s products
- Always consult Centurion’s Compliance department for advice on additional due diligence or documentation