

1. Why a Code of Business Ethics?

Conducting business in the most appropriate, legal, ethical, and transparent way complements our values (commitment, teaming, passion, excellence, and stewardship).

This Code of Business Ethics has been formalized outlining our commitment towards our People and third parties who work for and with us, but also to summarize important and basic rules when conducting business on Ambi Group's behalf.

The Code of Business Ethics applies to all employees and freelancers at Ambi Group and its associated companies; everyone at every level, including our Partners, shareholders, and third parties, where appropriate. We work only with third parties if they share the same Values and business standards.

2. How do we do it?

This Code of Business Ethics is published on the Ambi Group website (www.ambigroup.net). Our employees and freelancers are regularly asked to acknowledge its content and are knowledgeable of its key principles; we expect all of our People to understand its content and to follow it.

3. Diversity, Discrimination & Harassment.

Ambi Group's success derives from the success of our People and people centrality is at the core of our growth strategy. We recognize and value the unique contributions that People with different backgrounds, experiences and working styles have to offer and enable us to interact with different cultures and global stakeholders.

We do not discriminate against anyone because of race, colour, gender identity, age, family status, marital status, religion, disability, national origin, sexual orientation, trade union affiliation or other legally protected status. Ambi Group's policies and practices ensure we value diversity, provide equality of opportunity and ensure that no employee, job applicant, client and other business partner receives less favourable treatment on any of the grounds set out above.

We are committed to treat People fairly, promoting an integrated way of working and always respecting the dignity of our People. This commitment to the equal treatment of all our People creates a positive work environment where the right of everyone to dignity at work is recognised and protected.

We will not tolerate threatening language or behaviour, or acts of violence, against our fellow People, clients or any other person at any time and we are committed to maintaining a safe, healthy, free of harassment and rewarding work environment.



4. Personal Conduct.

Our individual actions affect Ambi Group's reputation and can have legal consequences for all of us. Accordingly, we must:

- Act with a high sense of responsibility, loyalty, dignity, decency and respect for our colleagues, clients and all other business partners, in accordance with our Values;
- Not use or possess illegal drugs or substances and consume alcohol only in moderation on Ambi Group or client property or while engaged in any business-related activity, including events. Ambi Group takes its rules regarding workplace health, safety and security very seriously;
- Discharge our duties and legal or contractual obligations in compliance with professional standards, the terms and conditions governing them and Ambi Group's long-term interests;
- Not engage in unfair trade practices. While it is necessary and proper to obtain information about our competitors through market research, product evaluation and information that is already in the public domain, we must not obtain competitive information by improper or illegal means and
- Not acquire, accept the offering or attempt to acquire, a competitor's confidential information from their current or former employees or business partners.

5. Corruption & Bribery.

People and third parties acting on our behalf are prohibited from offering, promising, authorizing, making or receiving from clients, suppliers, public officials or any other business relations or partners, either directly or through a third party, any inappropriate monetary or other benefit or undue advantage and in this respect must always comply with applicable laws and regulations.

This may include cash, cash equivalents, shares, services, products, travel, lavish entertainment, event participation, promotional programs, lavish gifts or employment opportunities, including internships. Gifts and entertainment may be offered and received to strengthen business relationships, but only if they are of moderate and not excessive value. When dealing with government and public sector entities we must keep in mind that special rules may apply.

6. Conflict of Interest.

We all have the responsibility to safeguard the integrity of Ambi Group, which also protects our clients and other stakeholders. This means all business decisions must be made independently, informed, reasonable and solely based on what is best for Ambi Group, in alignment with our Values and the principles of this code and are not improperly influenced or corrupted by our personal interests. A conflict of interest arises in any situation where there is an actual, potential or appearance of competition between our personal interests and our obligations to Ambi Group.

Accordingly, we must not:

- Engage in actions, directly or through associated parties, or with third parties, which may not be compatible with the interests or reputation of Ambi Group;
- Derive personal benefits from a business decision or action, nepotism, using confidential information for purposes other than the interest of Ambi Group or disclosing such information to associates, family or friends;



- Speculate directly or indirectly through another person and must not engage in transactions or dealings based on information obtained in connection with our work for Ambi Group;
- Pursue any outside business opportunity for ourselves that we find through Ambi Group nor use such opportunity to compete with Ambi Group directly or indirectly and
- Trade in our clients' shares while possessing material, non-public information is strictly prohibited.

7. Data and Information Governance.

In addition to respecting and protecting our People's privacy and personal or sensitive information, we are also committed to respecting and protecting our client and business partner information and data. Ambi Group's policies, processes and guidelines apply to all information and personal data (independent of being given in written, electronical, visual or verbal form) entrusted to Ambi Group and must be followed by all People, contractors and business partners who work for, or on our behalf.

- We manage data and information with good care and do not retain them unnecessarily, specifically not beyond finalizing a project.
- We dispose of data or information in a timely and secure manner.

We all rely upon Ambi Group's information technology and management resources (physical and financial assets, technology, information, research, strategies, name, image, systems and processes) to perform our duties. It is important to remember that these are to be used solely for business purposes. Incidental personal use is tolerated (or permitted), if it does not compromise the integrity and security of our, and our client data and the principles of this business conduct.

8. Confidentiality.

Ambi Group's success in the marketplace requires that we maintain the trust of our clients and the investment community at large. Any information concerning Ambi Group, its clients, suppliers, projects, products, services or its business that is not generally publicly available must be treated confidential and only used for the purpose it has been provided to us. Unauthorized disclosure of confidential information can significantly damage Ambi Group's reputation and can be in violation of applicable data protection or secrecy law and our contractual obligations.

It is important to remember that the obligation to maintain the confidentiality of Ambi Group and client confidential information remains in effect even after People no longer work for Ambi Group. Likewise, Ambi Group requires new employees or freelancers to honor any continuing confidentiality obligations that they have with previous employers.

9. Ambi Group (Intellectual) Property.

We all have the obligation to protect Ambi Group's property and assets from loss, damage, misuse, or theft- this includes the protection from any cyber-attacks. Any assets entrusted to us by our clients are only for that client's use.

Information obtained, and work developed by our People or contractors in relation to work-related activities belongs to Ambi Group or the client and must be protected accordingly.



Ambi Group's know-how, tools, methodologies, patents, trademarks, copyrights, and trade secrets are all considered Ambi Group's intellectual property and People have an obligation to protect them. All work product that may be the subject of patents or other intellectual property rights subject to registration or recordation, must always be promptly disclosed to Ambi Group's Management.

In addition, all work product that may subsequently be incorporated to, or used as standard software or a tool, or otherwise be re-utilized in multiple client projects, as well as any use of third-party products including, but not limited to, open source software, should, whenever possible, be promptly disclosed to Ambi Group's Management. Notwithstanding the foregoing, use of any third-party products, including open source software is subject to Ambi Group's Use of Third Party Software Policy. Protecting Ambi Group's IP needs commitment from all of us.

We are all prohibited from downloading, distributing, publicly displaying, publicly performing, or deriving modifications of copyrighted documents, graphics, software, music or video games without permission from the copyright owner when using Ambi Group time, property and resources. Content must be in line with our Values and business standards.

10. Environment - Corporate Social Responsibility (CSR).

Environmental stewardship is an extension of Ambi Group's Stewardship Principle and a central issue for each of us and our families. We are committed to delivering measurable and sustainable results for our clients and our business. We believe that it is our corporate responsibility and social duty to meet our commitments by parallel considering environmental sustainability, meaning that our and clients' processes and doing has the minimum impact on our environment and the societies we operate in. We shall continually search for new ways to improve efficiency, reduce waste and minimize our carbon footprint wherever we operate.

We observe international human rights and related laws and regulations, and strongly condemn child or forced labor and pro-actively apply the UN recommendations and other international standards in this respect. An essential component of Ambi Group's corporate social responsibility is our commitment to being good corporate citizens within the communities where we do business. Ambi Group encourages the development of local programs and activities aimed at improving communities. To do so, we also encourage our People to pursue opportunities to contribute their time, experience, skills and resources to local community development initiatives.

We promote relations with suppliers, business partners and sub-contractors operating under the same values.

11. Company Representation.

The only persons with the authority to legally represent any Ambi Group company are those expressly appointed by management and granted such power by applicable law or by relevant powers of attorney.

To protect Ambi Group's reputation and avoid exposing the company to contractual liability, all representations made concerning Ambi Group products, services and solutions must be current, accurate and clear, and not misleading or false. We recognize that social media assets can and should be a valuable tool for enhancing communication and promoting Ambi Group and its values.



But remember, we foster a safe, professional and appropriate online behavior and will treat unacceptable “electronic behavior”, through social media and other means, in the same way as we would treat other unacceptable behaviors, so always remain vigilant.

People are prohibited from disclosing any non - public information relating to Ambi Group or its business activities to the media including social media, without the prior approval from the Management.

Any enquiries and requests from the media and requests for company, product or service information must be forwarded to the Management.

12. Public Sector Relations.

Ambi Group works actively with Public Sector around the world on public policy issues which may affect the firm. All enquiries about public policy positions should be referred to the Management. No public policy statements must be made without their prior approval.

