

# ETHICAL CODE OF CONDUCT & ANTI-CORRUPTION POLICY

Hadars Holdings & Investments Ltd (HHI) (herein “Company”) operates its business in accordance with a number of general principles which are set out in this Policy. The purpose of these principles is to support the development of a sound and successful business which respects the needs of all stakeholders, including clients, employees, business partners and other people affected by our activities.

The Company expects the standards set out in this Policy to be applied in all of the projects with which it is involved. In addition, we will endeavor to ensure that our supply chain partners and sub-contractors abide by the principles of this our Ethical Code of Conduct.

## **Code of Conduct and Anti-Corruption Policy.**

The seven general principles are as follows:

### **1. Legal Requirement**

We comply with legal requirements applicable to the Israeli Law both in terms of bidding for new business and implementing projects once they have been awarded.

### **2. Business Ethics**

We are committed to carrying out our business with high standards of integrity and ethics; avoiding unfair anti-competitive practices; ensuring that Company information is maintained confidentially and securely and avoiding all forms of corruption and bribery. Employees should declare any outside business interests and any conflicts of interest which may arise.

### **3. Anti-Bribery and Anti-Corruption**

It is our Policy to conduct all of our business in an honest and ethical manner. We take a zero- tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

#### **3.1 Who is covered by the Policy?**

This Policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.

### 3.2 What is a bribe?

- A bribe is a financial or other advantage offered or given: to anyone to persuade them to or reward them for performing their duties improperly or;
- to any public official with the intention of influencing the official in the performance of his duties.

### 3.3 Gifts and Hospitality

This Policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with the company's ethics policy in respect of gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

### 3.4 Facilitation payments and kickbacks

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine action by an official. Kickbacks are typically payments made in return for a business favor or advantage. All employees must avoid any activity that might lead to, or suggest, a facilitation payment or kickback will be made or accepted by us.

### 3.5 Donations

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

### 3.6 Record Keeping

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties. All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our expenses policy and specifically records the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers, and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

### 3.7 Raising Concerns

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be

mistaken.

### **3.8 Monitoring**

The effectiveness of this policy will be regularly reviewed by the management team. Internal control systems and procedures will be subject to audit under the internal audit process.

### **4. Health & Safety**

We are committed to safeguarding the health and safety of our employees, of others who carry out work on our behalf and of those who may be affected by our work. The Company maintains a documented health and safety management system at every level to describe how these issues are dealt with in practice.

We regularly monitor the health & safety performance of all our projects.

### **5. Employment Practices**

We maintain a working environment where all employees are treated with dignity and respect. We are committed to providing equal opportunities for all employees regardless of their race, color, ethnic origin, religious belief, gender, sexual orientation, marital status, age, nationality, or disability.

We ensure that all employees have the legal right to work within Israel is in line with the Immigration National Act by checking all prospective employees regardless of their ethnic origin. We have carried out retrospective checks on all employees engaged since 2018 (Start-up of Benchmark) to confirm compliance.

We are committed to engaging in open communication with our employees.

### **6. Environment**

The environment is an important consideration in all of the Company's activities. We are committed to prevention of pollution, compliance with all relevant legal requirements and conformance with the specific requirements of our Clients.

### **7. Relationship with External Parties**

We will listen to and respond to reasonable enquiries raised by external parties who are affected by our activities and will communicate with them in a timely manner.