

Business Ethics & Integrity Policy



1. Purpose

Ecologia Group is committed to conducting all business activities with integrity, transparency, and accountability across all jurisdictions in which it operates, including Australia and India. This Business Ethics and Integrity Policy establish Ecologia's framework for preventing bribery, corruption, fraud, and unethical conduct, in alignment with ISO 37001 (Anti-Bribery Management Systems) and the governance, leadership, and ethical conduct principles of ISO 9001.

This policy supports ethical decision-making, responsible leadership, and the protection of Ecologia's reputation and stakeholder trust.

2. Scope

This policy applies to all Ecologia employees, directors, contractors, consultants, and any individuals or organisations acting on behalf of the company across Australia and India.

Ecologia's reputation and long-term success depend on the trust and confidence of our employees, clients, partners, and stakeholders. That trust is built through ethical conduct, transparency, accountability, and compliance with this policy and all applicable laws and regulations.

When making decisions or taking actions on behalf of Ecologia, individuals are expected to apply the following ethical test:

- Does this action align with Ecologia's values and ethical standards?
- Does it build trust and credibility with stakeholders?
- Is it lawful, fair, and something I can confidently stand behind?

Failure to comply with this policy may result in disciplinary action, including termination of employment or contract, and may involve legal consequences where applicable.

3. Culture of Open and Honest Communication

Ecologia promotes a culture of open, honest, and respectful communication on ethical matters. Employees are encouraged to raise concerns in good faith without fear of reprisal.

All concerns raised will be taken seriously, assessed objectively, and addressed in a timely and appropriate manner. Retaliation of any kind is strictly prohibited.

Concerns should normally be raised with a manager or Human Resources. Where this is not appropriate, the Director maintains an open-door policy.

4. Management Responsibilities

Management is responsible for establishing, demonstrating, and reinforcing ethical leadership across the organisation:

- Lead by example and reinforce ethical standards
- Promptly address concerns or breaches
- Encourage ethical dialogue as part of everyday business

Ethical conduct is a shared responsibility and forms part of performance expectations at all levels of the organisation.

5. Legal and Regulatory Compliance

Ecologia complies with all applicable laws, regulations, and internal policies in the jurisdictions in which it operates, including Australia and India.

Employees must:

- Understand the legal and policy requirements relevant to their role
- Seek guidance when uncertain
- Report suspected or actual breaches

6. Fair Competition

Ecologia competes ethically, fairly, and lawfully in all markets

We:

- Compete on merit, quality, performance, and value
- Make independent pricing and marketing decisions
- Prohibit anti-competitive conduct, collusion, or improper coordination
- Do not offer, solicit, or accept bribes, kickbacks, or improper inducements

7. Conflicts of Interest

Employees must avoid actual or perceived conflicts between personal interests and Ecologia's interests.

Potential conflicts include:

- Relationships with competitors, suppliers, or contractors
- Hiring or supervising close relatives
- Financial interests in relevant third parties
- Gifts or benefits that could influence decisions
- All conflicts must be disclosed to management or HR for review.

8. Gifts, Gratuities, and Business Courtesies

- Gifts or hospitality that could influence, or appear to influence, business decisions are prohibited.
- Permitted courtesies must be:
 - Modest, infrequent, and lawful
 - Consistent with accepted business practice
 - Transparent, documented where required, and free from obligation

9. Confidentiality and Information Protection

Employees must protect confidential and proprietary information, including financial data, client and supplier information, intellectual property, and non-public business information.

Disclosure is permitted only with proper authorisation and for a legitimate business purpose, in accordance with applicable laws and internal controls.

7. Use of Company Resources

Company resources are provided for legitimate business use. Limited personal use is acceptable where it does not interfere with work, operations, or compliance obligations.

Misuse of company resources for unlawful, offensive, or inappropriate purposes is prohibited. Ecologia may monitor systems in accordance with applicable laws and regulatory requirements.

8. Health, Safety, and Wellbeing

Ecologia is committed to maintaining a safe, healthy, and supportive workplace. Employees must comply with health and safety requirements and promptly report hazards, incidents, or unsafe conditions.

9. Media and External Communications

To ensure accuracy, consistency, and protection of company interests, all media enquiries must be directed to the Operations Head. Employees are not authorised to speak on behalf of Ecologia without prior approval.

10. Accountability and Enforcement

All employees and representatives of Ecologia are responsible for complying with this policy. Breaches may result in disciplinary action, up to and including termination of employment or contract, and may involve legal or regulatory consequences.

11. Review

This policy is reviewed periodically to ensure continued suitability, effectiveness, and compliance with legislative requirements, organisational objectives, and recognised best practice standards.

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