



# CODE OF CONDUCT

At BDCOM Online Ltd., our Code of Conduct is rooted in our core values, guiding all employees, managers, and executives in their actions and decisions. These principles are designed to provide clarity on the expectations we hold for our team members, ensuring alignment with the company's foundational values. We are steadfast in our commitment to conducting business ethically, legally, and responsibly.

## The Codes Are As Follows:

### 1. Legal Compliance

BDCOM is dedicated to ensuring that all business activities comply with applicable national legal requirements and adhere to government-set policies. We rigorously follow anti-bribery, anti-corruption, and anti-money laundering regulations in all our operations, reinforcing our commitment to ethical conduct.

### 2. Confidentiality in Work

Operating across multiple industries, BDCOM understands the paramount importance of confidentiality. We prioritize the protection of our clients' sensitive data and information, ensuring it is never disclosed to third parties. Our stringent confidentiality measures have earned us the trust of hundreds of clients, solidifying our reputation for integrity in every transaction.

### 3. Employee Participation

At BDCOM, we recognize that our progress hinges on the contributions of our employees. We actively encourage them to share their ideas and knowledge with both management and one another. This culture of collaboration fosters innovation, leading to the development of new business initiatives that propel us forward.

### 4. Health & Safety at Work

We are committed to maintaining a safe and healthy work environment. BDCOM continually implements training programs to reduce accidents and enhance working conditions, providing necessary safety gear. Our facilities are equipped with drinking water, sanitary equipment, and social areas, all in compliance with relevant legal requirements.

### 5. Work Environment

BDCOM strives to cultivate an exciting and progressive workplace that is free from discrimination and harassment. We uphold professional conduct among our employees, promoting honesty and integrity while prohibiting any actions that violate our core values.

### 6. Independence

We encourage an independent mindset among our employees, allowing them to make decisions that align with our values and goals. Independence fosters innovation and accountability, empowering our team members to take ownership of their work and contribute to the company's success.

### 7. Diversity

BDCOM values diversity as a vital component of our workplace culture. We believe that a diverse workforce enriches our organization and enhances our ability to serve our clients. We are committed to promoting equality and inclusivity, ensuring that every employee is respected and valued for their unique perspectives and backgrounds.

### 8. Employee Grievance

We believe that a healthy workplace culture encourages open communication. BDCOM provides a clear and accessible process for employees to voice their grievances or concerns. We encourage employees to raise any issues they may encounter, whether related to workplace conditions, interpersonal conflicts, or violations of company policy. All grievances will be treated with confidentiality and respect, and we commit to addressing them promptly and fairly, ensuring a constructive resolution that aligns with our values.

### 9. Disciplinary Procedures and Actions

To maintain a professional and respectful work environment, BDCOM has established disciplinary procedures that apply to all employees. Violations of the Code of Conduct may result in disciplinary action, which can range from verbal warnings to termination, depending on the severity of the infraction. Employees have the right to be informed of any allegations against them and will be given the opportunity to respond before any disciplinary action is taken. We strive to ensure that all procedures are conducted fairly and impartially.

### 10. Restrictions on Dealings in BDCOM Shares by Insiders

BDCOM imposes restrictions on the trading of its shares by sponsors, directors, employees, and other insiders. In compliance with securities laws, all insiders are prohibited from trading the Company's shares while in possession of unpublished price-sensitive information during designated restricted trading periods. Additionally, sponsors and directors are required to notify their intention to trade in BDCOM shares prior to initiating any transactions.