



# Pramira

## **EMPLOYEE CODE OF CONDUCT**

## A MESSAGE FROM OUR PRESIDENT

We consider our workplace as “our house,” where we always aim to “do the right thing”. Both as a company and as individuals, we uphold the highest standards of business conduct.

Our employees' words and actions reflect directly on Pramira. Every employee represents our company to colleagues, customers, potential customers, business partners, and community members.

Thank you for maintaining the principles of Teamwork, Integrity, and Commitment. Your support is crucial to our personal, professional, and corporate reputations.

Sincerely,

Omar Houari

President

## 1. Preface

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At Pramira, integrity is the foundation of everything we build. Our **Code of Conduct** reflects our commitment to responsible and ethical behavior across all areas of our operations—from construction sites to corporate offices.

This Code applies to all employees of Pramira, as well as contractors, vendors, subcontractors, and business partners acting on our behalf. We expect everyone associated with Pramira to understand and follow the principles outlined below.

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## 2. General Principles

We operate with honesty, transparency, and a deep respect for the law. All employees are expected to comply with applicable laws, regulations, and ethical standards in every jurisdiction where we do business. Upholding these standards is essential to earning and maintaining the trust of our clients, partners, and communities.

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## 3. Conflicts of Interest

Employees must avoid situations where personal interests interfere—or appear to interfere—with the best interests of Pramira. This includes financial, familial, or other personal connections that could influence business decisions. Potential or actual conflicts must be disclosed promptly to management.

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## **4. Anti-Bribery & Corruption**

We strictly prohibit bribery and corruption in all forms. Employees must comply with all anti-corruption laws, including the **U.S. Foreign Corrupt Practices Act (FCPA)** and other local regulations. No employee may offer, promise, or authorize the exchange of anything of value to gain an unfair business advantage.

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## **5. Illegal Payments and Gifts**

Gifts, entertainment, or any form of benefit must never be used to improperly influence public officials or private individuals. Likewise, employees must not accept anything of value in exchange for favorable treatment. Any offering must be lawful, transparent, and appropriate in value.

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## **6. Donations & Sponsorships**

Pramira does not make donations to political candidates, parties, or organizations. All charitable donations and sponsorships must be transparent, non-political, and approved by leadership to ensure alignment with company values.

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## **7. Fair Competition**

Pramira supports free and fair competition. We do not engage in collusion, price-fixing, bid-rigging, or market allocation. All interactions with competitors must comply with applicable antitrust and competition laws.

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## **8. Anti–Money Laundering (AML)**

We are committed to conducting business only with reputable partners involved in legitimate activities. Employees must be vigilant in preventing any involvement in money laundering or other illegal financial practices.

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## **9. Confidentiality & Protection of Assets**

Employees must protect Pramira’s confidential information, intellectual property, and physical assets. Information may only be shared with authorized individuals and used solely for business purposes. Theft or misuse of company property will not be tolerated.

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## **10. Data Protection & Privacy**

We respect the privacy of our employees, clients, and third parties. Employees must comply with all data protection laws and internal data security policies. Any suspected breaches must be reported immediately to the **Chief Information Security & Privacy Officer**.

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## **11. Recordkeeping & Documentation**

All business transactions must be accurately documented and retained in compliance with legal, financial, and company requirements. Falsifying or misrepresenting records is strictly prohibited.

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## **12. Respect for Human Dignity & Rights**

Pramira supports and upholds internationally recognized human rights. We promote dignity, respect, and fairness in every aspect of our operations and expect the same from our partners and suppliers.

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## **13. Prohibition of Forced & Child Labor**

We have **zero tolerance** for any form of forced labor, human trafficking, or child labor. All employment must be voluntary, and workers must meet the legal minimum age requirement, which shall never be below 15 years or the local legal minimum, whichever is higher.

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## **14. Fair Working Conditions & Wages**

We provide fair wages and benefits in compliance with applicable labor and prevailing wage laws. Our working conditions are designed to support dignity, equity, and professional growth.

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## **15. Anti-Harassment & Anti-Discrimination**

Pramira is committed to maintaining a workplace free from unlawful harassment and discrimination. We prohibit discrimination based on any legally protected characteristic and will not tolerate harassment of any kind.

We also strictly prohibit retaliation against anyone who reports misconduct or participates in investigations related to discrimination or harassment.

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## **16. Freedom of Association**

We respect the legal rights of employees to join or form labor organizations and to bargain collectively in accordance with applicable laws and regulations.

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## **17. Health, Safety & Environmental Responsibility**

We prioritize the health and safety of our workforce. All employees are expected to follow safety protocols and report any unsafe conditions. Additionally, we are committed to minimizing our environmental impact and complying with environmental laws and sustainability practices.

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## **18. Implementation & Compliance**

Upholding this Code is a shared responsibility. Employees are expected to familiarize themselves with its content, attend relevant trainings, and lead by example. Leadership has a duty to promote and enforce these standards consistently across their teams.

Pramira's **Compliance Team** provides ongoing support through guidance, training, and resources to ensure full adherence to our ethical standards.


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## 19. Reporting Violations or Concerns

If you witness or suspect a violation of this Code, it is your responsibility to report it. You may speak to your supervisor or contact the Compliance Team directly. Retaliation against employees who report concerns in good faith is strictly prohibited.

### Contact Information

 Email: [compliance@pramira.com](mailto:compliance@pramira.com)

 Hotline: 1-714-482-3353

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## 20. Our Commitment

At Pramira, ethics aren't optional—they're fundamental. By living these values each day, we protect our people, our reputation, and our future. Together, we are building a company—and a world—that stands on integrity.