



Pramira

**TRADE
PARTNERS
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

Introduction

Pramira has built a long-standing reputation for conducting business with integrity, transparency, and respect. This reputation is one of the core pillars of our success, and preserving it is a shared responsibility among all those who work with us.

This **Code of Conduct for Business Partners** sets forth the ethical and operational standards we expect from all our subcontractors, suppliers, vendors, and third parties (collectively, “Business Partners”) who provide goods or services to Pramira. It applies to their owners, officers, directors, employees, contractors, agents, and anyone working on their behalf.

Acceptance of this Code is a **prerequisite** for entering into any contractual agreement with Pramira.

Pramira reserves the right to update or modify this Code at any time. Business Partners are expected to incorporate these principles into their management practices and day-to-day operations.

I. Business Integrity

1. Legal and Ethical Compliance

Business Partners must comply with all applicable national and international laws and conduct all business with honesty, fairness, and social responsibility.

2. Conflicts of Interest

Any actual or potential conflicts of interest involving dealings with Pramira must be disclosed immediately. Personal interests must never interfere with business decisions.



3. Anti-Corruption and Bribery

Business Partners must comply with all anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA). Bribery in any form is strictly prohibited.

4. Gifts and Hospitality

Offering or accepting gifts, meals, entertainment, or other items of value in exchange for undue influence or improper advantage is not allowed.

5. Fair Competition

Partners must engage in fair business practices and comply with antitrust and competition laws. Collusion, price-fixing, and bid-rigging are strictly forbidden.

6. Anti-Money Laundering

Engagement in or facilitation of money laundering or terrorist financing is prohibited. Partners must conduct business only with reputable and lawful entities.

7. Confidentiality and Intellectual Property

Partners must protect Pramira's confidential information and intellectual property. Such information must not be disclosed without authorization.

8. Responsible Sourcing

Pramira prohibits the use of conflict minerals and requires Business Partners to ensure responsible sourcing of goods and materials.

II. Management Systems

Business Partners shall establish and maintain effective management systems that promote compliance with this Code of Conduct.

- Internal policies and training must reinforce these principles.
 - Pramira reserves the right to audit compliance or to engage third parties to do so.
 - Violations must be reported immediately. Pramira reserves the right to terminate any relationship based on non-compliance.
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III. Labor and Human Rights

Pramira expects all Business Partners to uphold human rights and fair labor practices in alignment with the International Labour Organization (ILO) standards and Pramira's Human Rights Policy

1. Forced Labor

All labor must be voluntary. Any form of forced labor, slavery, human trafficking, or involuntary prison labor is prohibited.

2. Child Labor

No person under the legal minimum working age (never under 15 years old) may be employed. Partners must comply with all child labor laws and ILO conventions.

3. Wages and Working Hours

Partners must pay fair wages, provide legally mandated benefits, and comply with prevailing wage and working hour laws.

4. Anti-Discrimination and Harassment

Unlawful discrimination or harassment of any kind is strictly prohibited. Pramira expects partners to promote an inclusive, respectful, and equitable work environment.

IV. Health and Safety

Pramira is committed to maintaining a safe, healthy work environment. Business Partners must:

- Provide appropriate health and safety training and equipment.
 - Maintain compliance with Pramira's EH&S policy.
 - Stop work immediately if unsafe conditions arise.
 - Report all incidents on Pramira-related projects immediately.
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V. Environmental Protection

Pramira encourages its Business Partners to minimize their environmental footprint and comply with all applicable environmental regulations.

1. Pollution and Resource Conservation

Reduce waste, energy consumption, and greenhouse gas emissions. Use environmentally friendly processes and products.

2. Hazardous Materials

Properly store, use, and dispose of hazardous substances. Ensure safety information is available and disclosed.

3. Waste Management

Implement systems for safe handling, recycling, and disposal of wastewater and solid waste. Reduce waste generation wherever possible.

VI. Expectations for Subcontractors and Sub-Tiers

Business Partners must ensure that their own subcontractors, suppliers, and other affiliated entities are made aware of and comply with this Code of Conduct.

VII. Duty to Report Misconduct

Business Partners must promptly report any known or suspected violations of the law, this Code, or other unethical conduct.

Reports may be submitted confidentially or anonymously through the following channels:

- **Email:** compliance@pramira.com
- **Hotline:** 1-714-482-3353

Pramira strictly prohibits retaliation against any individual who reports concerns in good faith.

VIII. Acknowledgment

All suppliers and vendors must acknowledge this Code of Conduct before entering into contracts or receiving purchase orders from Pramira.

ACKNOWLEDGMENT OF PRAMIRA CODE OF CONDUCT FOR BUSINESS PARTNERS

I, on behalf of _____ (Business Partner name),
acknowledge and agree to comply with Pramira's Code of Conduct for Business Partners
and ensure that the owners, officers, directors, employees, contractors, agents, and
others working on behalf
of _____ (Business Partner name)
are aware of and agree to abide by the Code of Conduct in preparing and submitting bids
and proposals for Pramira work, providing goods and services to Pramira, and
performing all agreements entered into with Pramira for such purposes.

Authorized Signatory _____

Name (printed) _____

Title _____

Date _____

**** DOCUMENT MUST BE EXECUTED BY AN OFFICER OF THE COMPANY**