



**Peloton Computer Enterprises Ltd.**

**Corporate Ethics**

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# Corporate Ethics

*The organization values ethics, trust and integrity throughout its business practices.*

## **Peloton Computer Enterprises Ltd. Corporate Ethics**

### **1.0 Purpose**

Peloton Computer Enterprises Ltd. and its subsidiaries ("Peloton") are committed to protecting employees, customers, partners, vendors and the company from illegal or damaging actions by individuals, either knowingly or unknowingly. This policy guides business behaviour to ensure ethical conduct.

### **2.0 Scope**

This policy applies to all directors, officers, employees, agents, consultants, contractors, subcontractors, vendors, and other workers at Peloton (collectively referred to as "representative" in this policy).

### **3.0 Policy**

#### **3.1 Commitment to Ethics**

Peloton has an open-door policy and welcomes suggestions or concerns from representatives. This will allow representatives to feel comfortable discussing any issues or concerns within the organization. Representatives must disclose any conflicts of interest regarding their position within Peloton.

#### **3.2 Representative Commitment to Ethics**

- Treat everyone fairly, with mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices.
- Familiarize themselves with and abide by Peloton's operating principles, and policies.
- Apply effort and intelligence in maintaining ethical values.
- Refrain from condoning as well as participating in or engaging in dishonesty, fraud, deceit or misrepresentation.
- Comply with all applicable legal regulations, legal statutes, and standards of equity and justice. Representatives shall strive to meet and exceed the requirements of their designated position.
- Always act in good faith in their relationships with other people when interacting with Peloton, either internal or external.
- Refrain from the use of profanity, verbal abuse or violence.
- Abide by Peloton's Confidentiality, Intellectual Property and Conflict of Interest Agreement or Agent Agreements and maintain complete confidentiality regarding Peloton affairs and decisions, during and after their tenure with Peloton.

- Respect and abide by management decisions.
- Refrain from engaging in public criticism that would jeopardize the reputation of Peloton and its representatives.

### **3.3 Maintaining Ethical Practices**

- Peloton shall reinforce the importance of ethical and integrity practices. Every representative of Peloton needs to maintain an ethical stance and support ethical behaviour consistently.
- Representatives must notify their supervisor if they have a conflict of interest or potential conflict of interest.
- Prohibited activities for representatives as defined in the Global Anti-Bribery Compliance Policy.

### **3.4 Unethical Behavior**

- Peloton shall avoid the intent and appearance of unethical or compromising practise in relationships, actions and communications. Representatives shall not participate in any acts of corruption, bribery or other illegal behaviour.
- Unauthorized use of company trade secrets & marketing, operational, personnel, financial, source code & technical information integral to Peloton's success is not permitted in any scenario.
- Peloton representatives shall not use corporate assets or business relationships for financial gain.
- Representatives shall refrain from accepting gifts from clients or partners of significant value as defined in section 9.1 of the [Anti-Bribery Compliance Policy](#). Any bribery for the benefit of any external or internal party is prohibited.
- Representatives shall not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits that the company offers.

### **4.0 Enforcement**

Any representative found to have violated this policy may be subject to disciplinary action, up to and including termination for just cause.