

01 Employee Code of Conduct Policy

Policy No.	CATALYST\HR\01
Policy Owner	Chief Human Resources Officer
Function	HR & Admin
Approver	Managing Director
Issue Date	01-04-2023
Version	1.0
Last amended on	

Objective:

Our Code reflects who we are and what's important to us.

It provides an overview of the laws, regulations and policies that apply to us and the work we do. It also builds upon our shared values. That's why we count on every employee and Board Members to follow our Code and make decisions that will preserve the trust that others have placed in us. We expect nothing less from our business partners, including our Consultants, Distributors, Co-manufacturers and Suppliers, as well as our subsidiaries and joint venture partners. We understand the responsibility we have to communicate with them about our high standards of integrity that we maintain that we will not compromise nor allow them to violate any of our values and operating principles.

Even though the above document is quite exhaustive, it may not cover every situation you may face on the job; therefore it's important to use good judgment in everything you do and to ask for help if you're ever unsure about the right course of action

KNOW YOUR RESPONSIBILITIES

Our good name is in your hands

No matter what job you do or where you do it, you represent CATALYST. Always have this in mind on every business relationship, every transaction and every product, and make sure your actions always reflect our values. Follow our Code and policies as well as the laws and regulations of the country (or countries) where you work and protect the CATALYST Brand at all times.

If you see or suspect anything illegal or unethical, it may seem easier to look the other way or let someone else take the lead—but misconduct affects all of us. No concern is too minor to report. Share your concerns promptly and cooperate fully and honestly in any internal investigation. Be aware that anyone who violates our Code may face an appropriate action, up to and including termination of employment with CATALYST.

If you manage people, you have an even greater responsibility. Lead by example, making sure your team members know that the Code is a resource for them and that there is no difference between what you do and what you expect from others. Create the kind of workplace where employees feel comfortable coming forward with questions and concerns and support them when they raise Issues. Never retaliate against employees for sharing concerns in good faith and prevent retaliation by others.

SPEAK UP WITHOUT FEAR



We don't tolerate retaliation. As a Company we know it takes courage to come forward and share your concerns. We will not retaliate or permit retaliation against anyone who raises questions or concerns about corporate activities and anyone who makes a good faith report about possible misconduct or legal violations to us or a Government Authority or assists in an investigation of misconduct or legal violation.

Regardless of who you contact, you can be confident that you're doing the right thing and that your concern will be handled promptly and appropriately. We investigate reports of misconduct thoroughly, disclosing information only to those who need it to resolve the Issue.

KNOW WHERE TO GO FOR HELP

Have a question, problem or a concern? There are people ready to support you and, in most cases, your immediate manager should be your first point of contact. He or She is likely in the best position to understand your concern and take the appropriate action. If you're uncomfortable speaking with your Manager, or if you have already shared a concern and feel it's not being addressed appropriately, reach out to HR or another member of Management.

WE PROMOTE AN ETHICAL WORKPLACE

RESPECT OTHERS

We're successful today because of our remarkable people. We're one team, but we represent many ideas, experiences and backgrounds. We value each other's contributions and believe that everyone should have an equal chance to succeed—this is essential to advancing our goals and initiatives. Do your part to keep the CATALYST workplace a diverse, inclusive and respectful workplace by driving a positive environment, and recognize the many strengths and talents our diverse colleagues bring to the workplace, in particular

- Treat others the way you'd like to be treated.
- Celebrate our diversity. Listen and be receptive to different points of view.
- Speak up if you see or suspect discrimination or harassment based on someone's race, colour, gender, national origin, age, religion, citizenship status, disability, medical condition, sexual orientation, gender identity, veteran status, marital status or any other characteristic protected by law.
- Promote a work environment free of harassment, bullying and abusive conduct—whether physical, verbal or visual. You can share your concerns with the assurance of knowing that CATALYST does not tolerate retaliation against anyone who reports in good faith.

PROMOTE A SAFE CATALYST WORKPLACE:

We value the safety and security of every employee. We look out for each other. We follow our safety procedures and promote a culture of safety, because our people are our greatest asset. Every employee is empowered to take immediate action for people safety regardless of role, title or responsibility. If you see a situation that could put others at risk, take action, and at all times and in all places, work to keep yourself and your colleagues' injury-free.

Observe a zero-tolerance policy when it comes to acts or threats of violence. Be alert to what is going on around you, observe good security practices and speak up about any threats of potential violence. We prohibit weapons on all of the company's properties consistent with local law—if you have concerns



that someone may have a weapon on our property, report it immediately to your manager, a member of our Corporate Security Team or the Concern Line Manager.

Having, using or distributing alcohol or illegal drugs is also prohibited by our policies because substance abuse can impair your judgment, your performance and the safety of those who work with you. There may be instances where drinking alcoholic beverages while conducting company business is permitted, but make sure you comply with all laws and company policies and principles, and always exercise both moderation and good judgment.

UPHOLD HUMAN RIGHTS

We are committed to fair employment practices everywhere we operate. As a Company, we respect the rights of every individual and abide by the employment laws in the markets where we operate. We support the principles established under the United Nations Universal Declaration of Human Rights and do not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labour), physical punishment, forced or prison labour or human trafficking.

We expect our suppliers to share our commitment to the same high standards. As part of our commitment to eliminating illegal labour from our supply chains, we continue to build and accelerate programs aimed at changing the underlying circumstances that contribute to labour rights violations.

What can you do? Follow the employment laws where you work, be alert to abuses and speak up if you see or suspect possible labour laws or human rights violations.

WE UNDERSTAND OUR RESPONSIBILITY TO OTHERS

PRESERVE PRODUCT QUALITY AND SAFETY

When it comes to our products & services, we never compromise. When our clients see “CATALYST” name, they know they are getting a safe, high-quality product & services. We want to preserve their trust. We care deeply about product quality and safety and make sure our products meet or exceed our own internal standards, as well as the standards set by laws, regulations and our industry.

Allergens pose a food safety risk, and we have strict policies to protect consumers from them. Product safety depends on all of us, and you are a key player in stopping any cross contact of major allergens. Follow our allergen prevention plan to ensure safe ingredient storage, product labelling and proper cleaning and sanitization procedures for any equipment that might come in contact with allergens.

Our Product Excellence Program (PEP) helps us closely monitor product quality and safety, assure compliance with the law and evaluate our extended supply chain to identify any product quality or safety risks. Honour the commitment we make to our customers, and hold our suppliers accountable, too.

KEEP PRIVATE INFORMATION PRIVATE

People trust us to protect their personal information. We respect the privacy of our consumers, our customers, our co-workers and others with whom we do conduct business, and we handle their personal information with care. “Personal information” is any information that could be used to identify



someone, either directly or indirectly, such as a name, employee ID, email address or phone number. There are data privacy laws that prescribe how to responsibly collect, store, use, share, transfer and dispose of personal information, and we strive to comply with those laws everywhere we operate.

Follow our policies and protect any personal information that is entrusted to you. Use it only in the way it's meant to be used and don't share it with anyone inside or outside of the company in an unauthorized manner.

Practice good cyber security, too. Make sure you follow the processes and practices we have in place to protect our networks, computers, programs and data from attack, damage or unauthorized access.

RESPECT OUR PARTNERS

We value our business relationships and work to be a good, responsible partner. We work with suppliers around the world. Responsible sourcing is core to who we are and what we do, so work to ensure that relationships we form are based on mutual respect and trust. Choose the right partners and make decisions objectively, based on factors like quality, service, price, availability and reliability. Do your part to hold our suppliers to CATALYST's high standards and ensure they operate ethically, in compliance with the law and in a way that's consistent with our Code, our policies and our values.

We also work with state and local governments around the world. Requirements under government contracts are often stricter than those of our other contracts. In our government contracts—as with all of our contracts—we follow the rules and never cut ethical corners. Whether you are involved in services to the government, perform work for the government or are responsible for managing a government contract, always conduct business honestly, fairly and transparently.

Comply and cooperate with government inspections, investigations or requests for information. If you are contacted by a government official, politely direct the individual to the HR/Law Department. If you are responsible for helping respond to a government request, tell the truth. Never mislead anyone, impede their work or conceal, destroy or alter documents.

WE DO THE RIGHT THING

NEVER BRIBE

We compete for business based on the goodness of our products. That was the principle on which our very first sale was made, and it's the way we continue to do business today. Work honestly and with integrity. Don't offer bribes, accept bribes or let others bribe for you. And do everything you can to prevent bribery by others who conduct business on our behalf—as a company, we're not only responsible for your actions, but also the actions of any third party who represents us.

Remember, a bribe can be something other than cash. A gift, a favour, even an offer of a loan or a job could be considered a bribe if it's offered in exchange for a decision. Before offering anything of value, check our policies and ask questions about what's okay (and what's not).

The laws in some countries impose bigger penalties for bribing government officials, but for us, it's simple: bribery—of anyone, at any organization, at any level—is always wrong.

KNOW THE RULES ABOUT GIFTS AND ENTERTAINMENT

We don't give or receive anything that is inappropriate. An occasional gift or offer of entertainment is often viewed as a normal part of doing business. But sometimes even a well-intentioned gift or offer



can cross the line. And any gift that creates a sense of obligation or compromises your professional judgment is always inappropriate.

That's why we have guidelines in place to identify the circumstances under which an offer is okay ... and when it's not. Make sure you follow the rules and be aware of any special restrictions.

Example, giving anything of value to a government official can be problematic. Always ask for help from the HR Department if the right thing to do is unclear.

COMPETE FAIRLY

We should aspire to outperform our competition fairly and honestly. CATALYST believes in putting good products into the marketplace and letting free, fair and open competition drive success or failure. We should never compromise on strong values and remain committed to the same philosophy and drive compliance with laws designed to promote and preserve a competitive global market. We succeed based on our own merits and avoid any conduct that could restrict free trade.

Becoming aware of competitive information may be normal based on your role or responsibility at the Company, but make sure you treat that information ethically and lawfully. Compete fairly, but vigorously, and never use deception or misrepresentation or abuse confidential information to gain an unfair advantage over our competitors. When you talk with customers, provide only truthful information about the quality, features and availability of our products, and don't make disparaging remarks about our competitors.

KEEP ACCURATE RECORDS

Integrity in our recordkeeping inspires trust by customers, investors and business partners. Our long-term success depends, to a large extent, on how well we manage our business. Our records-and our recordkeeping-help us to fulfil our financial commitments and pay our people. But they also provide a picture of our financial health. They keep us accountable to our investors and are the basis on which we make important strategic decisions. That's why records that are clear and complete and accurately reflect our business transactions are critical company assets.

Each of us has an obligation to follow all internal controls in recording and maintaining our Company books and records. In every transaction, whether you are complying with disclosure requirements, preparing a financial statement or simply completing a time sheet, be honest, accurate and complete. Be alert for any suspicious financial transactions-know your customers and partners and understand their use of our products & services in order to prevent illegal activity such as money laundering.

You also have a responsibility to know and follow our records management and records retention policies. Take care never to dispose of information that may be relevant to current or threatened litigation until you are notified to do so.

WE SAFEGUARD OUR COMPANY

PROTECT OUR ASSETS

We should be good stewards of our physical, electronic and information assets. Our assets include everything that our Company owns or uses to conduct business. Each of us is entrusted with the care of these assets, so be proactive in safeguarding them from loss, damage, theft, waste and improper use.



Physical and electronic assets such as furniture, equipment, tools, inventory, computer hardware and software are provided in order for you to do your job. Occasional personal use of assets such as phones, computers, email and the Internet is permitted, but make sure your use doesn't interfere with work (yours or anyone else's) and doesn't violate our IT & other policies or the law.

Be aware that anything you write, send, download or store on our systems is Company property, and we may monitor your use—you shouldn't have any expectation of personal privacy when using our systems.

Information is also a critical asset. Confidential information and intellectual property represent the outcome of significant Company investment. Trade secrets, patents, copyrights, trademarks, business plans, engineering ideas, databases, customer lists—when you help protect these assets, you help protect our competitive advantage.

AVOID CONFLICTS OF INTEREST

No employee will, by virtue of being possession of information which is of importance in deciding whether to buy or sell Company stock or securities shall indulge in trading of such stock or securities other than the prescribed procedure.

Employees having inside information about CATALYST or any other Company with which CATALYST is associated or affiliated or is contemplating such affiliation/ strategic alliance or an acquisition, disinvestment or merger, may not sell, purchase or otherwise trade in stock, derivatives or other securities of CATALYST or that other company, or disclose such information to another person.

It includes, for example, confidential information about plans to acquire another company, strategic alliances, financial results, or changes in capital structure or important agreements, e.g. with a start-up company. Public Information or public data is not inside information.

DON'T SPEAK ON BEHALF OF OUR COMPANY

We make sure that information shared about our company is consistent, accurate and complete. When you consider the power of words, the number of ways that words can be shared and the impact those words can have on a trusted company like ours, you begin to understand the value of sending one clear message.

In order to ensure that accurate and complete information is conveyed to the public, to regulatory authorities and to others, we have designated individuals to serve as our official company spokespersons. Unless you are authorized to do so, do not make any public statements on CATALYST's behalf.

GENERAL STANDARDS OF CONDUCT:

As Employees of the Company, we represent the Company to those with whom we come into contract. Therefore, our conduct should reflect favourably on both ourselves and the Company. we will follow good business practices that comply with the law and reflect the highest standards of corporate and individual behaviour.



We will never conduct ourselves in a manner which jeopardizes either our own safety or ability our job, or that of another employee. Examples of other unacceptable conduct include, but are not limited to:

- Conduct or behaviour that is disruptive to the normal operation of the business or that is dangerous or offensive to other employees such as (but not limited to) stealing, or damaging company property or material, disclosing trade secrets or other confidential information, insubordination, use of intemperate language, any form of physical, psychological or verbal harassment, carrying or concealing weapon, assault, or any other act which can reasonably be construed to be detrimental to the business interests of the company.
- Conviction of a crime that may adversely effects on job responsibilities.
- Incorrect or incomplete information on employment application or other personal records.
- Habitual lateness or absences even for legitimate reasons. Regular attendance and consistent punctuality is both expected and required, and will be an important factor in overall performance appraisal.
- Failure to return on a stipulated date following an approved leave of absence.
- Falsification of expense statements.

PERSONAL OBLIGATIONS:

All employees are required to follow the law and adhere to high ethical standards in their personal and professional dealings.

They must demonstrate social and environmental responsibility, professionalism, and use good business practices in performing their jobs.

Respect, trust, integrity and safety are fundamental CATALYST Values, which must be adhered to at all times.

Employees should make themselves familiar with good business practices relevant to their jobs and should implement them conscientiously.

Employees shall use good judgement and common sense in all situations when the requirements of the law or of good business practices appear unclear. Employees should seek advice and direction from their supervisors in such situations.

Discrimination:

Every employee is entitled to fair, courteous and respectful treatment by his or her supervisors, subordinates and peers.

No employee will indulge in discrimination of any sort with any one or indulge in any harassment-based race, religion, creed, national origin, gender, disability, status and or any other relevant category.

Subordinates must carry out all legitimate and reasonable orders of superiors and show respect in all dealings.

Superiors will give equal opportunity to all subordinates and be objective, fair and equitable in their treatment.



Use and protection of business assets and information:

Employees must refrain from disclosing inside information to anyone, including friends and family.

In particular, information and trade secrets should be protected by keeping them confidential and, if appropriate, by seeking additional protection through acquisition of intellectual property rights. CATALYST Employees who receive or learn of confidential business information or trade secrets of CATALYST should not disclose that information to third parties (including friends and family members) or make any other non-business use of such information. Moreover, they should take reasonable measures to otherwise safeguard and protect information and trade secrets.

Handling and discrimination of information is a management task and all employees shall respect the need of CATALYST for professional information management. They shall keep relevant information confidential even if there is no formal secrecy obligation.

Corporate Citizenship:

CATALYST wishes at all times to be a responsible corporate citizen. We do everything we can to operate in a manner that is sustainable: economically, socially, and environmentally – in the best interest of long-term success for our organisation.

CATALYST culture is based on the fundamental rights of every individual, such as the protection of privacy, freedom of opinion and expression, freedom of association, non-discrimination, and the right to be heard.

Our employees are key to our success. We base our Company Policies and Practices on fairness, openness, and mutual respect.

- We pay competitive and fair wages, which clearly exceed what is needed to cover basic living needs. We want our employees to have time for family, social activities, and leisure.
- We strive to provide our employees with a stimulating and challenging working environment and with opportunities for personal and professional development, while expecting from them a high level of performance and commitment to the success of CATALYST.
- We recognise and respect the cultural differences found in the worldwide marketplace.
- We strive to build and sustain diversity by attracting, developing, promoting and retaining the best people from all cultures.
- We do not tolerate forced labour and other forms of exploitation of labour. We support programs to abolish child labour in a manner consistent with the basic interests of the child.
- We believe in constructive dialogue between employer and employees and support the principle of freedom of association.

Health, Safety and Environmental Protection (HSE):

- The health and safety of our employees, neighbours, customers, consumers and all others affected by our business activities, as well as protection of the environment, have priority in all our activities.



- We strive to make efficient use of natural resources and minimise the environmental impacts of our activities over their life cycle. We assess HSE implications to outweigh remaining risks. We periodically review such assessments in light of new concerns or evidence.
- **We care about the expectations and concerns of our stakeholders.**
- We recognise the interest of our shareholders, employees, customers, neighbours, the authorities and the public at large in our societal behaviour, and the health, safety and environmental impacts of our business.

Sexual Harassment:

Employees will not indulge in any act which amounts to unwanted and unwelcome sexual attention.

Conduct which is unwanted by the recipient, including psychological, visual and verbal harassment which runs the gamut from double entendres and lewd gestures to subtle form of sexual harassment must be avoided at all times.

Other acts to be avoided are making unwelcome comments/ question about a person's sex life, staring/ leering, suggestive behaviour, unnecessary familiarity with a person, offensive or silent telephone calls, sexual propositions, continued physical contact, constant request for dates, unnecessary visiting/ accosting to attempt/initiate unwelcome discussions on non-work related issues etc. The fact that these acts are unwanted should be clearly indicated by one individual to each other.

MISCONDUCT AND NON-CONFORMANCE WITH THE POLICY

Non-observance of this Policy shall be construed as misconduct that could warrant disciplinary action, including dismissal in deserving cases. The decision in this regard will lie with the Management, including the Business Unit Head and concerned HR Manager and shall be binding on the Employees.

EXCEPTIONS

Any exceptions to the norms laid down in this Policy may be at the discretion of the Chairman/ Managing Director or any appropriate authority delegated by them.

