

Code of Conduct

1. Purpose and scope

This Code of Conduct defines the ethical standards and behaviours expected of all employees, contractors, partners and representatives of Vecture Limited ("Vecture").

It applies to:

- All internal operations
- Client engagements
- Third-party relationships
- Any individual acting on behalf of Vecture

We are committed to conducting business with integrity, transparency and accountability in all jurisdictions where we operate.

2. Our core principles

Vecture operates under the following core principles:

1. **Integrity** – We act honestly and ethically at all times
2. **Accountability** – We take responsibility for our actions
3. **Respect** – We treat all individuals with dignity and fairness
4. **Compliance** – We adhere to all applicable laws and regulations
5. **Trust** – We build long-term relationships based on transparency

3. Anti-corruption commitment

Vecture maintains a **zero-tolerance** approach to corruption in all forms, both internally and externally.

We strictly prohibit:

- Bribery (direct or indirect)
- Facilitation payments
- Kickbacks or improper commissions
- Any attempt to improperly influence business decisions

This applies to:

- Employees and contractors
- Clients and suppliers
- Government officials and regulators

All business decisions must be made based on merit, transparency and fairness.

4. Bribery and improper payments

No employee or representative of Vecture may:

- Offer, promise, give or authorise any bribe
- Request or accept anything of value to gain an improper advantage
- Use third parties to circumvent anti-bribery laws

Red flags include:

- Unusual payment requests
- Excessive commissions
- Lack of transparency in third-party relationships

All concerns must be reported immediately.

5. Gifts and hospitality

Vecture recognises that reasonable gifts and hospitality may be part of normal business relationships. However, these must always be:

- Proportionate and reasonable
- Transparent and documented
- Not intended to influence decisions

Permitted

- Modest meals or business hospitality
- Token gifts of low value

Prohibited

- Cash or cash equivalents
- Lavish or excessive hospitality
- Gifts during procurement or decision-making processes

When in doubt, employees must seek approval before offering or accepting gifts.

6. Modern slavery and human rights

Vecture is committed to upholding human rights as defined by the Universal Declaration of Human Rights.

We strictly prohibit:

- Forced labour
- Human trafficking
- Child labour
- Exploitative working conditions

We expect the same standards from:

- Suppliers
- Partners
- Contractors

Due diligence must be conducted to ensure ethical supply chains.

7. Equality, diversity and non-discrimination

Vecture is committed to creating an inclusive and respectful workplace.

Discrimination of any kind is not tolerated, including based on:

- Race or ethnicity
- Gender or gender identity
- Sexual orientation
- Religion or belief
- Disability
- Age
- Nationality

These principles align with international human rights frameworks, including those established by the United Nations.

We promote:

- Equal opportunity
- Fair treatment
- Inclusive decision-making

8. Professional conduct and conflicts of interest

All individuals must:

- Act in the best interests of Vecture and its clients
- Avoid conflicts between personal and professional interests
- Disclose any potential conflicts promptly

Examples include:

- Financial interests in clients or suppliers
- Personal relationships affecting business decisions

9. Confidentiality

Vecture is committed to maintaining the confidentiality of all client, partner and company information.

Employees and representatives must not disclose confidential information without proper authorisation and must use such information solely for legitimate business purposes.

10. Information security and data protection

Vecture is committed to protecting information assets and personal data with the highest standards of security, integrity and confidentiality.

We comply with applicable data protection laws, including the UK GDPR and other relevant regulations in jurisdictions where we operate.

Our commitments

- We implement appropriate technical and organisational security measures to protect data
- We only collect and process data for legitimate business purposes
- We ensure data is accurate, secure and retained only as long as necessary
- We respect the rights of individuals regarding their personal data

Employee responsibilities

All employees and representatives must:

- Handle confidential and personal data securely at all times
- Use approved systems and tools for storing and sharing information
- Avoid unauthorised disclosure of client or company data
- Report any data breach or suspected security incident immediately

Third-party data handling

- Vecture requires that all partners, suppliers and subcontractors:
- Meet equivalent data protection and security standards
- Process data only under appropriate contractual safeguards

11. Whistleblowing and reporting concerns

Vecture encourages a culture of openness and accountability.

All employees and stakeholders have the right and responsibility to report:

- Ethical concerns
- Legal violations
- Misconduct

Protections

- No retaliation for good-faith reporting
- Confidential handling of all reports
- Anonymous reporting channels (where permitted by law)

Reports can be made to:

- Senior management
- Designated compliance contact
- Independent reporting channel (if implemented)

Reportable concerns include (but are not limited to):

- Corruption or bribery
- Discrimination or human rights violations
- Data breaches or information security incidents

12. Compliance and enforcement

Failure to comply with this Code may result in:

- Disciplinary action
- Termination of employment or contract
- Legal action where applicable

All employees are required to:

- Read and understand this Code
- Participate in relevant training
- Confirm compliance annually

13. Continuous improvement

Vecture is committed to regularly reviewing and improving this Code to reflect:

- Regulatory changes
- Industry best practices
- Stakeholder expectations

14. Acknowledgment

All employees and representatives must acknowledge that they:

- Have read and understood this Code
- Agree to comply with its principles
- Will uphold Vecture's ethical standards in all activities