

Code of Conduct and Ethics Policy

Introduction

Toros Consulting is committed to being successful while adhering to the highest ethical standards. We believe that our commitment to "Doing the Right Thing – Always" enhances our position in the marketplace and enables us to provide the greatest value to our customers. It makes it easier for us to attract and retain the best employees and make difficult choices and makes us a more attractive investment in a world where public trust is essential for business success.

In simple terms, our ethical commitment is based upon seven core values. These fundamental values lay down a foundation for understanding how we expect all individuals to behave in our operations or when representing Toros Consulting.

We will listen to our customers and make sure they are successful. Always treat our employees with respect. We together are a great team!

Our seven core values are:

01. Honesty/Truthfulness

To be honest, means to be truthful in everything one says and does. This means more than refraining from lying. It includes telling the whole truth even when doing so is difficult. Honesty is reflected in how we create and maintain our business records. It is difficult to meet any of the other ethical standards Toros embraces without honesty and truthfulness as the foundation.

02. Quality

Toros has built its reputation on well-researched advice and product and service quality. But quality means more than freedom from defects. Quality speaks to doing everything to the best of one's ability and striving to better meet the needs of our customers. We always seek to go that one step further than what is expected of us by our customers and partners alike.

03. Good Citizenship

At a minimum, good citizenship requires all Toros employees to obey the applicable laws and regulations. It also means that we must be good stewards of this planet's resources, respect the



environment, and provide a safe and healthy workplace. As an organisation, Toros will continue to strive for an open, transparent business climate free from corruption and will, therefore, refrain from paying bribes or otherwise unlawfully attempting to influence customer decisions.

04. Responsibility/Accountability

Responsibility calls on us to accept the obligations to act in certain ways. Accountability is the willingness to accept the consequences of our actions. Together, they are the cornerstone of mature, ethical conduct. Toros employees are both responsible and accountable for conforming to numerous company policies. These include, but are not limited to, the standards outlined in this code.

05. Integrity

Integrity results from consistent decisions to act ethically and in difficult situations. To have integrity is to uphold ethical principles and do what we say we will do consistently, predictably and reliably. Integrity drives all Toros employees to adhere not only to the letter but also to the spirit of applicable laws and Toros policy.

06. Respect

Respect is regard for the inherent worth of each individual. It requires us to create a workplace where people are treated well and are afforded all the rights they are entitled to, both under law and company policy. A respectful workplace is safe, free from discrimination and harassment, affords employees equal opportunity to pursue their goals and protects the privacy of personal information the company may obtain or process.

07. Fairness

Fairness can be understood as a concern for how others are treated – ensuring that we treat them how we would wish to be treated in a similar situation. Fairness is a commitment to treat people ethically and to apply ethical standards and reasoning to our decisions regarding how they affect other people. Fairness also governs how we treat other businesses, including our competitors and how we manage working relationships.