

**CODE OF ETHICS****VISION:**

We aspire to be the partner of choice for Process Design, Project Engineering and Project Management to companies seeking to grow in the chemical sector while giving our employees an invigorating workspace that provides professional satisfaction and generating a fair return on our investments.

**VALUES:**

Building on entrepreneurial roots in the chemical industry, we are today guided by active family interest and professional management. We lay great store by ethics and we value:

**Integrity and honesty**

- We are ethical in our actions and value being true to ourself and to all our stakeholders.

**•Quality**

- We strive to be reliable, accountable, and transparent in all our work. Being right the first time and delivering outcomes that are in our customers' best interest are important to us.

**•Strong Relationships**

- We build positive, long term relationships based on trust, collaboration, and mutual respect.

**•Our People**

- We provide our people a challenging and rewarding work environment.

**•Creativity**

- We encourage a culture of curiosity. We value having an open mind, believing in possibilities, and having a bias for action.

**•Transparency**

- We value being open and forthright in our communication and actions.

**CODE OF ETHICS**

**POLICY BRIEF AND SCOPE:**

Our professional code of ethics policy aims to give our employees guidelines on our business ethics and our stance on various matters connected with it. We trust our employees to use their good judgement but want, through this document, to provide some guidance if they feel conflicted on what is the right course of action. We will also use this policy to outline the consequences of violating our business code of ethics.

This policy applies to everyone we employ or have business relations with. This includes individual people such as employees, interns, volunteers and consultants as well as business entities, such as vendors, affiliates and partners.

Our code of professional ethics refers to legally or morally charged issues. In certain areas they may overlap with issues covered in our Code of Conduct.

This Code of Ethics has been endorsed and adopted by our board of directors.

**PURPOSE:**

The company strives to hire ethical people who have their own high personal standards. We trust them and expect that most of the time they will not need written codes of what is ethical behaviour.

But, you may find yourself in a situation where there are grey areas, where right and wrong are not so apparent. Where you are unsure of how to act. Some professional ethics also correspond to laws that you absolutely must know to do your job properly, so we will mention them in our code of ethics.

Additionally, every organization makes bad hires every once in a while. We cannot always predict how people are going to behave. When an employee behaves, or intends to behave, in a way that is against our professional ethics, or applicable laws, we will have clear guidelines on what disciplinary actions we will consider.

For these reasons, we advise you to read this document carefully and consult with your manager or HR, if you have doubts or questions.

## CODE OF ETHICS

**GENERAL STANDARDS:**

Praxys is committed to the highest standards of ethical business conduct.

The company conducts all its business transactions properly, fairly, impartially and ethically. Honesty is an integral part of ethical behavior and trustworthiness is key to strong, lasting relationships.

This ethical standard is one of our most valuable assets and is a direct result of the conduct of its employees.

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**BEHAVIOR EXPECTED:**

Apply the highest standards of ethical business conduct, in both spirit and conduct, in your day-to-day work.

Treat all fellow employees, colleagues and persons with whom the company does business with respect and fairness. No Praxys employee should ever take unfair advantage of anyone through manipulation, concealment, misrepresentation, abuse of proprietary information, or any other unfair business practice. Avoid situations that could create the appearance of bias or impropriety

Communicate honestly; if you believe someone may have misunderstood you, try to clarify the situation immediately

Do not misrepresent yourself or the company to anyone

Report any observed conduct that is potentially unethical, unlawful, unsafe, or otherwise at odds with Praxys standards of conduct or company policy. We are committed to doing things right and we can't resolve a problem if we don't know about it. Failure to report observed misconduct may result in disciplinary action

Cooperate fully with any company investigation regarding an allegation of behavior that potentially violates Praxys' ethical standards.

CODE OF ETHICS

**COMMITMENT TO ENVIRONMENT, HEALTH AND SAFETY**

Praxys conducts its business with great care for the environment and for the health and safety of all people engaged in or with the business in any capacity. To maintain its commitment to the environment and the people the company requires to understand and comply with all applicable environmental, safety, and health laws and regulations

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**BEHAVIOR EXPECTED:**

Perform all work with a commitment to eliminating and/or mitigating environmental, safety, and health hazards and impacts.

Conduct all activities in a manner that protects employees, customers, subcontractors, and local communities.

Make sure that you and others in your area of responsibility understand and comply with standards and applicable regulations on environmental, safety and health laws and community health, safety and security.

Understand the environmental, safety, and health conditions and associated hazards of your work area and take appropriate action to eliminate or control hazards. Understand the contents of the EHS plan prepared for each project and work appropriately.

Notify your manager of any safety and health incidents.

Ensure that lessons learned related to environmental, safety, or health incidents; new technologies; and changes in laws and regulations are communicated to others in your work area

## CODE OF ETHICS

**PROPER USE OF PROPRIETARY AND CONFIDENTIAL INFORMATION**

Employees may have access to various types of proprietary, confidential or private information belonging to Praxys or its customers, suppliers, employees, or others.

Employees must use confidential information only for its intended purposes and as part of their duties at Praxys. Such information may be shared with employees or other persons only on a need-to-know basis, as authorized by the Bechtel person responsible for such information.

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**BEHAVIOR EXPECTED:**

Never use company, customer, supplier, or employee confidential information other than for its intended business purpose

Comply with nondisclosure agreements to which Praxys is a party.

Do not accept confidential information unrelated to your job.

If you receive information that is not marked confidential, but you believe it is confidential, bring it to the attention of the person who gave it to you and follow up if necessary, to make sure the information is properly classified and protected.

If your duties require you to perform research to gain an understanding of competitors' business and strategies, use only legitimate resources and avoid actions that are illegal or unethical or that could cause embarrassment for Praxys.

If someone tries to give you confidential information you are not authorized to receive, refuse it and notify your supervisor or manager.

Remember that intellectual property (like design drawings, process descriptions etc) produced while you are a Praxys employee belongs to Praxys. You cannot use them elsewhere / include them in a personal portfolio to showcase your work. While you take your knowledge and skills when you leave the company, those materials will remain property of Praxys and cannot be taken with you. Additionally, some of our contracts transfer ownership of project intellectual property to our clients. Even taking project materials from one project to another could violate our contractual agreements.

Remember that your obligation to protect confidential information learned at Praxys continues even after you leave the company.

If at any point you are in doubt about how to handle a situation involving confidentiality of information, get in touch with your Supervisor or Manager.

## CODE OF ETHICS

**OFFERING / RECEIVING BUSINESS COURTESIES**

Praxys employees may only offer or approve business courtesies that are legal, proper, in full compliance with Praxys Code of Conduct policy/instructions and do not give rise to the reasonable perception that they are being offered for the purpose of gaining an unfair business advantage.

An employee may never use personal funds or resources to avoid reporting or seeking approval for a business courtesy that could not be provided by Praxys.

Gifts and business courtesies are subject to complex laws and regulations. Anti-corruption laws and internal policies of organizations may also come into play. So employees who are in the position of offering or approving such business courtesies must familiarize themselves with company policies, instructions and the applicable laws.

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**BEHAVIOR EXPECTED:**

Ensure that all gifts or entertainment are appropriate, properly approved and accounted for, and in full compliance with Praxys policy, management instructions and all applicable laws

In geographic areas where exchanges of business gifts are customary, ensure that gifts are limited in value (at the level of common courtesies), are not in excess of generally accepted local business practices, are free of any implication of obligation, are approved by the appropriate level of management, and are recorded as per Code of Conduct.

Offer only those business courtesies that the recipient is permitted to accept under the gift acceptance rules of his or her organization.

When unsure of the rules, seek guidance from your manager.

## CODE OF ETHICS

**CONFIDENTIAL INFORMATION AND EMPLOYEE INVENTIONS**

Praxys' growth depends on the protection of confidential information and other intellectual property belonging to the company. The ideas, inventions and work products developed by employees within the scope of their employment or through the use of company resources or facilities are company property, including plans, drawings, reports, process improvements and computer software.

Praxys confidential information and trade secrets may not be disclosed to third parties without proper authorization.

Even after an employee leaves the company, Praxys owns the proprietary information created or learned during employment.

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**BEHAVIOR EXPECTED:**

Protect Praxys' confidential information from unauthorized disclosure to third parties.

Properly designate Praxys' confidential information as either Strictly Confidential or Confidential, according to the level of security required to protect the information.

Comply with company guidance on confidentiality protection and with any applicable contractual requirements.

Never use Praxys ideas and information for your own personal gain or personal use.

If you have developed an idea on your own time using your own resources Praxys may still have ownership rights to it depending on how close the idea is to your job role in Praxys or work being done in Praxys. If you wish to pursue any such idea declare it to the Company for a formal decision on whether or not Praxys will claim ownership rights.

Remember that the confidentiality clauses an employee signs with Praxys continues even after employment has ceased. If you become aware of any ex-employee flouting the clauses bring it to the attention of your manager.

## CODE OF ETHICS

**OTHER GENERAL:**

Refer to and follow the guidelines in the Praxys Code of Conduct at all times. These include, among others, use of Praxys assets, time, use of email and internet and accepting business courtesies.

Avoid situations where personal, social, financial, or political activities interfere with or have the potential to interfere with your duty to and objectivity concerning Praxys.

Never work for, or provide services or advice to current or potential customers, competitors or suppliers that you must deal with as part of your job at Praxys.

Never invest in a supplier, competitor, or customer if you (or those you supervise) have direct dealings with; involvement in the selection or assessment of; or negotiations with the supplier, competitor, or customer.

Before you or a family member undertakes any outside activity that could create the appearance of divided loyalty or conflict of interest consult with your manager and get a go-ahead from the company. Disclose and resolve any existing situations that potentially create a conflict of interest or the appearance of a conflict.

Praxys depends on its employees to report violations or potential violations of the Praxys Ethics Policy so that the company can take appropriate action and remedy the situation.

Approach your supervisor, manager, HR or any higher level of management to make such reports or with any queries you have regarding this policy.

Be assured you will be treated with respect and your concern will be treated seriously. Only those with a need to know will be involved in or know of the investigation. Threats or acts of retaliation against you for reporting your concern will not be tolerated.

A violation of the rules and standards set forth in this policy, our Code of Conduct and other policies and instructions may be grounds for termination or other disciplinary action. Disciplinary action may be taken against any individual who:

- Authorizes or participates in a violation of the Code of Conduct rules and standards or Praxys policies or instructions;
- Improperly or negligently supervises a person who commits a violation;
- Fails to report a violation or withholds relevant information about a violation or attempts to retaliate against an employee who reports a suspected violation