

Sphere Commodities Group Pte Ltd and its affiliated companies (“the Sphere Group”) is committed to upholding the highest standards of ethics, integrity, and professionalism in all aspects of our operations across Australia, Singapore, and the Philippines. This Code of Conduct and Business Ethics Policy outlines the principles and expectations that guide our employees, directors, contractors, and business partners in maintaining ethical and responsible business practices within the electronic waste recycling industry.

1. Purpose and Scope

This policy aims to:

- Define the ethical standards and behaviors expected of all stakeholders.
- Ensure compliance with applicable laws, regulations, and industry best practices.
- Promote accountability, transparency, and respect for human rights and the environment.

This Code applies to all employees, officers, directors, contractors, suppliers, agents, and third-party partners representing the Sphere Group.

2. Core Values

We operate based on the following core values:

- Integrity: Upholding honesty and transparency in all dealings.
- Sustainability: Committing to environmentally responsible practices in electronic waste recycling.
- Accountability: Taking responsibility for our actions and decisions.
- Respect: Valuing diversity, inclusion, and mutual respect for all stakeholders.

3. Ethical Business Practices

Compliance with Laws and Regulations

Adhere to all applicable local and international laws, including environmental, labor, and anti-corruption regulations, such as:

- Australia: National Television and Computer Recycling Scheme (NCRS).
- Singapore: Resource Sustainability Act.
- Philippines: Ecological Solid Waste Management Act (RA 9003).

Ensure compliance with anti-bribery and anti-corruption laws in all jurisdictions.

Fair Competition

Compete fairly and ethically in the marketplace, avoiding any anti-competitive practices.

Refrain from engaging in collusion, price-fixing, or other unfair trade practices.

Accurate Reporting

Maintain accurate and transparent financial, operational, and environmental records.

Avoid falsifying or misrepresenting information in reports, contracts, or communications.

Anti-Bribery and Corruption

Do not engage in or tolerate bribery, kickbacks, or other forms of corruption.

Report any requests for bribes or unethical payments immediately.

4. Environmental Stewardship

Operate in an environmentally responsible manner by adhering to industry best practices for electronic waste recycling.

Commit to reducing waste, minimizing carbon emissions, and promoting the reuse and refurbishment of electronic devices.

Ensure proper handling and disposal of hazardous materials to prevent environmental contamination.

5. Workplace Conduct

Diversity and Inclusion

Foster a workplace that values diversity and inclusivity, free from discrimination or harassment based on race, gender, religion, age, or disability.

Provide equal opportunities for employment, growth, and advancement.

Health and Safety

Maintain a safe and healthy working environment by adhering to occupational health and safety standards.

Provide regular training to employees on safety protocols and emergency procedures.

Conflicts of Interest

Avoid situations where personal interests conflict with the company's interests.

Disclose any potential conflicts of interest to management.

Confidentiality

Protect sensitive information, including customer data, intellectual property, and trade secrets.

Ensure secure handling and destruction of data-bearing devices submitted for recycling.

6. Community Engagement

Engage with local communities to promote awareness of proper electronic waste disposal and recycling practices.

Support community initiatives that align with our sustainability and corporate social responsibility goals.

7. Reporting and Accountability

Whistleblower Protection

Encourage employees and stakeholders to report suspected unethical behavior or violations of this Code without fear of retaliation.

Provide secure and confidential channels for reporting, including an anonymous whistleblowing system.

Consequences of Non-Compliance

Violations of this Code may result in disciplinary action, up to and including termination of employment or business relationships.

Serious breaches may be reported to relevant authorities for legal action.

8. Training and Awareness

Provide regular training to employees and partners on the principles of this Code, including topics such as ethics, anti-corruption, and environmental sustainability.

Ensure all employees understand their responsibilities under this policy.

9. Review and Updates

This Code will be reviewed annually or as needed to reflect changes in laws, regulations, or business practices. Updates will be communicated to all stakeholders in a timely manner.

10. Acknowledgment

All employees, contractors, and business partners must acknowledge and commit to adhering to this Code of Conduct and Business Ethics Policy.

11. Contact Information

For questions or further clarification about this policy, please contact:

- Australia: Douglas Hunt, Douglas.Hunt@spheregroup.global PH: +61 439 876 116
- Singapore: Michael Abundo, Michael.Abundo@spheregroup.global PH: +65 9066 3584
- Philippines: Weslie Capute, Weslie.Capute@spheregroup.global PH: +63 977 821 1716

By adhering to this Code, the Sphere Group demonstrates its commitment to ethical business practices, environmental sustainability, and respect for all stakeholders. Together, we aim to build a sustainable and responsible future.

Approved by the Board

January 2026