

Code of Conduct

Introduction

At ADAMftd Pte Ltd, we are committed to maintaining the highest standards of integrity and transparency in all our operations. This Code of Conduct outlines the principles and standards that govern our business activities and interactions. As a leading provider of supply chain transparency, corporate due diligence, supply chain traceability, trade compliance, market analysis, and risk management services, we recognize the importance of ethical conduct and corporate responsibility in achieving our mission.

Core Principles

Integrity and Transparency

- **Honesty in Reporting:** All employees must provide accurate and truthful information in all business dealings and communications.
- **Transparency:** We are committed to transparency in our operations, particularly in data sourcing & access, supply chain traceability, and corporate due diligence, ensuring our clients can trust the information we provide.
- **Fair Treatment of Employees:** We treat all employees with respect and fairness, ensuring a safe and inclusive workplace where diversity is valued.
- **Ethical Decision-Making:** We uphold ethical decision-making in all business activities, ensuring that our actions align with our core values and principles.
- **Open Communication:** We promote open communication within the organization, encouraging employees to voice their concerns and suggestions without fear of retaliation.
- **Environmental Responsibility:** We are committed to sustainable practices and minimizing our environmental footprint, ensuring our operations do not harm the planet.
- **Accountability:** We hold ourselves accountable for our actions and decisions, continually seeking to improve our practices and maintain the highest standards of integrity.

Compliance with Laws and Regulations

- **Trade Compliance:** Adherence to international trade laws and regulations is paramount. We ensure compliance with all applicable trade compliance standards.
- **Supply Chain Laws:** We help businesses comply with a myriad of supply chain transparency and supply chain traceability laws, including Know Your Customer (KYC) and Anti-Money Laundering (AML) laws that affect international business.
- **Anti-Slavery Laws:** We strictly adhere to laws prohibiting modern slavery and human trafficking, ensuring that our operations and supply chains are free from such practices.
- **Conflict Minerals:** We comply with regulations regarding the sourcing of conflict minerals, ensuring that our supply chain does not contribute to human rights abuses.
- **Human Rights:** We uphold and promote human rights in all our business activities, ensuring fair treatment and respect for all individuals.
- **AML and KYC Compliance:** We adhere to AML and KYC laws to prevent money laundering and ensure proper customer due diligence, protecting the integrity of our business and the broader market.
- **Good Corporate Citizenship:** We strive to be a good corporate citizen by complying with national laws and global standards, and by advancing the compliance of others in our network, fostering ethical business practices and transparency worldwide.

Ethical Business Practices

- **Anti-Corruption:** We strictly prohibit all forms of corruption and bribery. Employees must not engage in any activities that could be perceived as corrupt.

- **Fair Competition:** We compete fairly and ethically, avoiding practices that could unfairly limit competition or harm consumers.
- **Respect for Human Rights:** We uphold and respect human rights in all our business operations, ensuring that we do not engage in or support any practices that violate these rights.
- **Corporate Governance:** We maintain strong corporate governance practices to ensure accountability, transparency, and ethical decision-making at all levels of the organization.
- **Confidentiality:** We protect the confidentiality of sensitive information and respect privacy rights, ensuring that data is handled responsibly and securely.
- **Sustainable Practices:** We are committed to sustainability and environmental responsibility, ensuring our business practices contribute to a healthier planet.
- **Community Engagement:** We actively engage with and contribute to the communities in which we operate, promoting social responsibility and positive community impact.
- **Diversity and Inclusion:** We promote diversity and inclusion within our workforce, ensuring equal opportunities and a welcoming environment for all employees.
- **Compliance with Laws:** We adhere to all applicable local, national, and international laws and regulations, ensuring our business practices are lawful and ethical.
- **Responsible Marketing:** We engage in honest and transparent marketing practices, providing accurate information about our products and services to consumers.

Responsibilities

Employee Conduct

- **Professional Behavior:** Employees are expected to act professionally and with integrity in all interactions. This includes maintaining a respectful demeanor towards colleagues, clients, and partners at all times.
- **Confidentiality:** Confidential information must be protected and only used for its intended purpose. Employees are required to safeguard sensitive data and adhere to company policies regarding information security.
- **Conflict of Interest:** Employees must avoid situations where personal interests conflict, or appear to conflict, with the interests of ADAMftd. Any potential conflicts must be disclosed to management immediately.
- **Equal Treatment:** Employees must treat everyone equally and with consideration, regardless of race, nationality, gender identity, religion, or disabilities. Discrimination of any kind is strictly prohibited.
- **Anti-Harassment:** ADAMftd does not condone sexual harassment or harassment based on religion, disabilities, race, nationality, gender identity, or any other characteristic. All employees have the right to a workplace free from harassment.
- **Accommodation for Disabilities:** ADAMftd is committed to providing reasonable accommodations for employees with disabilities or special requirements wherever possible. Employees needing accommodations should inform their manager or HR department.
- **Respect for Diversity:** Employees should value and respect the diverse backgrounds and perspectives of their colleagues, fostering an inclusive and supportive work environment.
- **Team Collaboration:** Employees are expected to work collaboratively and supportively with their colleagues, contributing positively to team efforts and organizational goals.
- **Personal Responsibility:** Each employee is responsible for their actions and behavior. Adherence to company policies and ethical standards is mandatory to maintain a professional and productive workplace.
- **Continuous Improvement:** Employees are encouraged to seek continuous improvement in their professional skills and knowledge, contributing to their personal development and the growth of ADAMftd.

Partner Conduct

- **Ethical Standards:** Partners must adhere to the highest ethical standards in all interactions and business dealings with ADAMftd.
- **Compliance with Laws:** Partners are required to comply with all applicable local, national, and international laws and regulations in their operations.
- **Transparency:** Partners must conduct their business transparently and provide accurate and truthful information in all communications and transactions with ADAMftd.
- **Respect for Human Rights:** Partners must respect and promote human rights in all their operations, ensuring fair treatment and non-discrimination.
- **Anti-Corruption:** Partners must strictly prohibit all forms of corruption and bribery within their organizations and in dealings with ADAMftd.
- **Confidentiality:** Partners must protect the confidentiality of sensitive information obtained through their relationship with ADAMftd and use it only for its intended purpose.
- **Anti-Harassment:** Partners must ensure a workplace free from harassment of any kind, including sexual harassment and harassment based on religion, disabilities, race, nationality, or gender identity.
- **Fair Competition:** Partners must engage in fair competition practices and avoid any actions that could unfairly limit competition or harm consumers.
- **Environmental Responsibility:** Partners should adopt sustainable practices and strive to minimize their environmental impact in all operations.
- **Diversity and Inclusion:** Partners should promote diversity and inclusion within their workforce, providing equal opportunities for all employees.
- **Workplace Safety:** Partners must ensure a safe and healthy working environment for all their employees, complying with relevant health and safety regulations.
- **Supply Chain Responsibility:** Partners are expected to ensure that their supply chains are free from modern slavery, human trafficking, and other unethical practices.
- **Product and Service Quality:** Partners must ensure that the products and services they provide to ADAMftd meet the agreed-upon standards of quality and reliability.
- **Reporting Violations:** Partners should promptly report any violations of these responsibilities or any unethical behavior they observe in their dealings with ADAMftd.

Corporate Citizenship

Social Responsibility

At ADAMftd, we maintain a zero-tolerance approach to harassment, modern slavery, and unethical practices. Our commitment to improving the lives of our users, employees, economies, and the world is rooted in our core value of transparency. Our social responsibility initiatives are integral to our Code of Conduct, demonstrating our dedication to ethical business practices and positive social impact, as outlined in our [CSR Policy](#).

- **Anti-Slavery Commitment:** We maintain a zero-tolerance approach to modern slavery, as outlined in our [Anti-Slavery Policy](#).
- **Community Engagement:** We engage with local and international communities to promote social good and ethical business practices. This includes supporting educational initiatives, volunteering, and partnerships with non-profit organizations.
- **Environmental Stewardship:** We are committed to sustainable practices that minimize our environmental impact. Our initiatives include reducing waste, conserving energy, and promoting sustainable sourcing.
- **Zero Tolerance for Harassment:** We are dedicated to creating a safe and inclusive environment for all. Harassment of any kind, including sexual harassment and discrimination based on religion, disabilities, race, nationality, or gender identity, is strictly prohibited.

- **Transparency:** Our goal is transparency in all our dealings, ensuring that our operations, supply chains, and business practices are open and accountable. This commitment extends to our efforts in combating corporate crime, money laundering, and unethical business practices.
- **Improving Lives:** Our products and services are designed to enhance the lives of our users and employees. By providing reliable and accurate data, we empower businesses to make informed decisions, comply with international regulations, and achieve their goals.
- **Economic and Social Impact:** We aim to positively impact economies and societies by promoting fair trade, ethical business practices, and corporate social responsibility. Our efforts help create a more equitable and just global business environment.
- **Supporting Law Enforcement:** We collaborate with law enforcement agencies to address issues related to money laundering, trade compliance, and corporate crime. Our tools and data support efforts to enforce laws and regulations, contributing to a safer and more transparent global economy.
- **Helping Businesses Comply:** We assist businesses in navigating and complying with a myriad of supply chain transparency, supply chain traceability, Know Your Customer (KYC), and Anti-Money Laundering (AML) laws. This support helps businesses operate ethically and legally, reducing risks and promoting trust.

Supporting Law Enforcement and Government Agencies

ADAMftd is committed to maintaining integrity and transparency in international trade. Given the prevalence of fraud, false declarations, goods swapped at sea, sanctions avoidance, counterfeit goods, and under-declarations of tax, our mission includes ensuring a fair-trading space for companies to compete ethically and efficiently. We also aim to help businesses assess counterparty risk to foster trust and reliability in global markets.

- **Collaboration with Authorities:** We assist law enforcement agencies in combating money laundering, sanctions avoidance, and other illegal activities by providing comprehensive data and analytical tools. Our platform supports efforts to identify and expose fraudulent activities, ensuring that trade practices adhere to legal standards.
- **Government Support:** We work closely with customs agencies and government ministries to solve challenges related to risk management and modeling trade agreement outcomes. Our data-driven insights help governments anticipate and mitigate risks, improve regulatory compliance, and enhance the efficiency of trade operations.
- **Counter-Party Risk:** We provide solutions to mitigate counter-party risks in international trade. Our platform offers detailed information on companies and their ownership structures, helping businesses assess the reliability and credibility of their trading partners. This reduces the likelihood of engaging with fraudulent entities and promotes fair competition.
- **Combating Fraud:** ADAMftd actively combats fraud in international trade, including false declarations and goods swapped at sea. By providing accurate and timely information, we help businesses verify the authenticity of transactions and ensure compliance with trade regulations.
- **Addressing Sanctions Avoidance:** We support efforts to enforce sanctions by providing data on sanctioned entities and their networks. Our tools help businesses and authorities identify and prevent transactions involving sanctioned parties, ensuring adherence to international laws.
- **Counterfeit Detection:** Our platform aids in the detection and prevention of counterfeit goods. By offering detailed information on product origins and supply chains, we help businesses ensure the authenticity of their products and protect their brands from counterfeit threats.
- **Tax Compliance:** ADAMftd assists businesses in complying with tax regulations by providing accurate information on customs duties, tariffs, and tax requirements. This helps prevent under-declarations and ensures that companies fulfill their tax obligations.
- **Fair Trading Space:** We strive to create a fair trading environment where companies can compete on a level playing field. Our tools and data support ethical business practices, reduce the risk of fraud, and enhance the overall transparency of international trade.

Reporting and Whistleblowing

At ADAMftd, we uphold the highest standards of integrity and ethical behavior. To ensure these standards are maintained, we have established robust reporting and whistleblowing mechanisms. We encourage all employees and users to report any unethical conduct, violations of this Code of Conduct, or any actions that undermine our commitment to transparency and ethical business practices.

- **Whistleblower Policy:** Employees and users are encouraged to report any unethical behavior or violations of this Code of Conduct through our Whistleblower Policy. This policy outlines the procedures for reporting concerns and ensures that all reports are taken seriously and investigated thoroughly.
- **Non-Retaliation:** We maintain a strict non-retaliation policy to protect those who report in good faith. Individuals who come forward with genuine concerns are assured of protection against any form of retaliation, ensuring a safe and supportive environment for addressing ethical issues.

Enforcement and Accountability

At ADAMftd, we are committed to maintaining the highest ethical standards and ensuring compliance with our Code of Conduct. Enforcement of these standards is crucial to our integrity and the trust placed in us by our stakeholders. To this end, we have implemented robust measures to monitor compliance and hold individuals accountable for their actions.

- **Monitoring Compliance:** We regularly review and audit our operations to ensure compliance with this Code of Conduct. This includes continuous oversight and evaluation of our practices to identify and address any potential issues promptly.
- **Disciplinary Actions:** Violations of this Code may result in disciplinary action, up to and including termination of employment or contractual agreements. We take breaches of our ethical standards seriously and are committed to taking appropriate action to maintain the integrity of our organization.

Conclusion

ADAMftd is dedicated to being a good corporate citizen, fostering an ethical business environment, and promoting transparency in international trade. We expect all employees and partners to uphold these values and contribute to a fair and just global trading system.

Signed,



James York
Chief Executive Officer
ADAMftd Pte Ltd
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