

BmitaGroup
CODE OF CONDUCT

**This is our commitment
to the world, to others and
to our self.**



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CORE VALUES

We value human beings above all else.

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We are committed to individual growth, development and human evolution.

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We lead consciously and from our heart.

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We think righteousness; we communicate and act with integrity.

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Every action we take follows a clear vision, a high purpose and it has virtue.

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Our work has the intention to add extraordinary value to others.

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We are committed to co-create a better world.



Bmita Ltd (its trading mark "Neuralead") and its staff are fully committed to acting with honesty, integrity, harmony and respect in the delivery of services and goods to the public. All staff should ensure that the business operations, applications for services, procurement or staff recruitment, are dealt with in an open, fair and impartial manner.

This Code of Conduct sets out the basic standard of conduct expected of all staff and the Company's policy on matters like acceptance of advantages and conflict of interest of staff in connection with their official duties. This Code also applies to temporary and part-time staff employed by the Company.

It is the personal responsibility of every staff member to understand and comply with our Code of Conduct.

Bmita

OUR COMMITMENT TO OTHERS

Fair Competition

Bmita's policy prohibits any anticompetitive practices, which could affect in bounding, restraining or distorting competition, as well as any practices of an unfair competition. Accordingly, our employees cannot agree (formally or informally) with competitors to fix prices or any other conditions of transaction; to participate with fake offers in tenders or any other forms of competitions for offers; to apply unequal conditions for equivalent performance to commercial partners, creating in this way a disadvantage in competition; to condition signing of acceptancy contracts by the partners for supplementary obligations which, by their nature or according to commercial usage, have no connection with the subject of such contracts.

Our employees are prohibited from performing any act of unfair competition manifested through: misappropriating clients of a company by using the relations established with such clients within the function previously held at the company, dismissal or attracting employees of a company for the purpose of setting up a competing company to capture customers of that company or hiring employees of a company in order to disorganize of its work. At the same time, our employees must not take actions that harm the legitimate interests of consumers or other operations in breach of the competition law.

Governance and anti-corruption

Bmita has zero tolerance for corruption. All employees must never offer to provide anything of value directly or indirectly to government officials and business partners to secure an undue advantage. The company prohibits payment, offers of payment as well as anything of value directly or indirectly with the purpose of influencing or obtaining undue business or personal advantage (See our anti-bribery policy).

Restrictive Agreements with Third Parties

Bmita does not condone activities that seek to gain an unfair competitive advantage. No individual may engage in any activity which violates any valid restrictive agreements entered into by that individual for the benefit of a third party, and no individual may, directly or indirectly, use or disclose any confidential information or trade secrets of a third party that the individual obtained while employed by or associated with such third party.

Government Contracts and Services

Bmita is committed to complying with all applicable laws and regulations relating to government (public procurement) contracts and services and to ensuring that its reports, certifications and declarations to government officials are accurate and complete and that any deviations from contract requirements are properly approved.

Acceptance of Advantages

It is the policy of this Company to prohibit all staff from soliciting or accepting any advantage from any persons having business dealings with the Company (e.g. clients, suppliers, contractors). Employees who wish to accept any advantage from such persons should seek advice and permission from the responsible ethics officer.

Any gifts offered voluntarily to the staff in their official capacity are regarded as gifts to the Company and they should not be accepted without permission. By default, staff should decline the offer if the acceptance could be perceived as against the interest of the company, or that of society, or lead to complaints of bias or impropriety.

Conflict of Interest

A conflict of interest situation arises when the "private interests" of the staff compete or conflict with the interests of the Company. "Private interests" means both the financial and personal interests of the staff or those of their connections including family members and other close affiliates; personal friends; the clubs and societies to which they belong; and any person to whom they owe a favour or are obligated in any way.

Misuse of Official Position

Staff who misuses their official position for personal gains or to favour their relatives or friends are liable to disciplinary action or even prosecution. Examples of misuse include a staff member responsible for the selection of suppliers giving undue favour or leaking information to his/her relative's company with a view to giving away an undue advantage.

OUR COMMITMENT TO OURSELF

Equal opportunity

Bmita is an equal employment opportunity employer (See our policy in equal opportunities & anti-discrimination). Employment opportunities are available regardless of race, colour, sex, religion, national origin, age, disability or another legally protected status. This Principle applies to all aspects of the employment relationship, including recruiting, hiring, training, work assignment, promotion, transfer, termination, and wage and salary administration.

Safety, and Health Practices

Bmita is committed to an injury-free and illness-free workplace that is operated in an environmentally sound manner in compliance with all relevant laws and regulations that protect worker safety and the environment. Employees should perform work in a safe manner.

Handling of Classified or Proprietary Information

Staff is not allowed to disclose any classified or exclusive information to anybody without authorization. Staff who have access to or are in control of such information should at all times provide adequate safeguards to prevent its abuse or misuse. Examples of misuse include disclosure of information in return for monetary rewards, or use of information for personal interest. It should also be noted that unauthorized disclosure of any personal data may result in a breach of the applicable legislation on privacy.

Sanctions

Bmita can take prompt and appropriate remedial action in response to violations of the Code. Any employee who engages in conduct prohibited by the Code will be subject to disciplinary actions and sanctions in accordance with the labour law.

Reporting

Employees have a responsibility to promptly report to the Company any violation of the Code. The Company shall put in place an appropriate mechanism (i.e. complaints/suggestion boxes, telephone, emails, etc.) as to allow employees to address communications to the ethics officer with the highest degree of trust and confidentiality.

Employees will not be disciplined or retaliated against in any way for reporting violations in good faith. Retaliation against any employee for reporting policy violations, or for testifying, assisting or participating in any manner to inspections is strictly prohibited. Any employee who believes he or she has been subjected to or has witnessed retaliation must immediately report the alleged retaliation to the ethics officer.

OUR COMMITMENT TO THE WORLD

Protecting the environment

Bmita recognizes the need to protect our world and its natural environment. Keeping our environment clean and unpolluted is a benefit to all. We aim to consciously work for the sustainability and/or the improvement of our planet by recycling, conserving energy and using environmentally friendly technologies.

Volunteering and aid

Bmita will encourage its staff to volunteer. They can volunteer through programs organized internally or externally. Our company may sponsor volunteering events from other organizations, particularly those related to education in the area of personal development.

Bmita may preserve a budget to make monetary donations. These donations will aim to education and other related community events.

Supporting communities

When resources are available, BmitaGroup may initiate and support community investment and educational programs. It can provide support to non-profit organizations or movements to promote the cultural and economic development of global and local communities.

Learning

We will actively invest in R&D. We will be open to suggestions and listen carefully to ideas. Our company will try to continuously improve the way it operates.

Bmita is committed to the United Nations Global Compact. We'll readily act to promote our identity as a socially aware and responsible business. Management must communicate this policy on all levels. Managers are also responsible for resolving any CSR issues.

Raising human consciousness

Bmita is committed to the creation of a conscious world. We are committed to a totally new kind of education where everyone is introduced to the knowledge and practices of self-discovery, self-awareness and human consciousness.

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