# The PADMA Code of Business Ethics

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| **Version** | **Issued** | **Revised** | **Next review due** | **Owner** |
| 1 | 16.07.2025 |  | 30.12.2026 | AMDAP ESG Leadership Group |

1. Scope

This Code of Business Ethics applies to all directors, employees, contractors, freelance workers and anyone acting on behalf of a company within the PADMA group.

1. Purpose

This Code of Business Ethics outlines the fundamental principles that guide our actions and decisions across all aspects of our business.

1. Principles

The principles of **integrity, respect, compliance, and responsibility** underpin this Code and our more detailed governance policies.

1. Our Commitment

At PADMA, ethical conduct and integrity are paramount to how we operate.

*‘We bring Padma values into everything we do, from great design to responsible business practice – we’re committed to being a great partner, investing in our people, and being open and transparent’* Miraj Khan, CEO, PADMA

We are committed to:

**Upholding the Law:** We will strictly comply with all applicable laws, rules, and regulations in every jurisdiction where we operate.

**Acting with Integrity:** We will conduct our business with honesty, transparency, and fairness, avoiding any conflicts of interest or unethical practices.

**Treating People with Fairness and Respect:** We will foster a respectful and inclusive environment for our employees, clients, suppliers, communities and all other stakeholders.

**Being Accountable and Transparent:** We will take responsibility for our actions and decisions, ensuring accountability at all levels of the organisation.

**Protecting sensitive and confidential information:** Maintaining the privacy of individuals, clients and the organisations who work with PADMA.

**Being Professional:** We maintain high standards of professionalism in our work and conduct

**Responsible citizenship:** We are committed to being responsible corporate citizens, considering the broader impact of our activities on society and the environment.

**Respect for Human Rights:** We respect the human rights of people affected by our business.

By adhering to these principles and the detailed guidance provided in our suite of Business Conduct policies, we collectively build a culture of ethical practice, and trust,

1. Implementation and Responsibilities

**AMDAP ESG Leadership Group** is responsible for overall communication, implementation and management of this Code of Ethics and associated business conduct policies.

**Employees and Directors:** All employees and directors are responsible for understanding and complying with the Code of Business Ethics, associated business conduct policies and all applicable laws.

**PADMA Country Directors** are responsible for fostering a culture of compliance with the Code of Business Ethics and its associated policies, and ensuring that employees receive the appropriate training in order to understand and comply with them.

**The Global Head of ESG** oversees this policy on behalf of AMDAP Leadership Group and is responsible for ensuring a record of grievances related to aspects of business conduct is maintained.

**PADMA ESG Committee** is responsible for reviewing the effectiveness of this Code of Business Ethics and the associated Business Conduct Policies.

1. Reporting Concerns

Any employee who suspects or becomes aware of a potential breach of the Code of Business Ethics or associated policies, is required to report it immediately to their manager or the Global Head of ESG [esg@padmatextiles.com](mailto:esg@padmatextiles.com) .

External stakeholders should contact the Global Head of ESG at [esg@padmatextiles.com](mailto:esg@padmatextiles.com)

All reports will be treated confidentially and investigated promptly in accordance with the PADMA Suggestion and Grievance Policy (Employees) or PADMA External Feedback/Grievance Policy. .

1. Monitoring and Review

The effectiveness of this policy will be regularly monitored and reviewed to ensure its continued suitability, adequacy, and effectiveness. This will include:

* Regular assessments of the company's participation in activities related to lobbying and policy influencing (for example, through trade associations)
* Analysis of reports received through the grievance processes.
* Monitoring of legal and regulatory developments.

The findings of these reviews will be reported to the ESG Leadership Group who will review them on behalf of AMDAP Directors and recommend any necessary updates to this Code of Business Ethics and its associated business conduct policies.

1. Associated Business Conduct Policies:

Anti-Bribery and Corruption Policy

Anti-Competition Policy

Conflicts of Interest Policy

Responsible Lobbying and Policy Influence Policy

Fair Tax Contribution Polic

Environmental Policy

Human Rights Policy

Supplier Code of Conduct

Data Privacy Policy

1. Approval

**Approved by Padma Textiles ESG Leadership Group**

**16.07.2025**

**Approved by Marvic Fenech Adami, CFO, on behalf of AMDAP Ltd.**

**16.07.2025**