

CORPORATION

CODE OF CONDUCT



WOIMA technologies and services impact a growing number of people and communities around the world.

We strive to ensure that all our operations are carried out in a sustainable, socially responsible and inclusive manner.

We act as a good corporate citizen meeting all our legal, ethical, environmental and economic responsibilities.

We are committed to supporting and promoting universal principles of fair play, equal opportunity and level playing field.



- ILO Declaration on Fundamental Principles and Rights at Work
- UN Guiding Principles on Business and Human Rights
- UN 2030 Agenda for Sustainable Development (UN Sustainable Development Goals)
- OECD Convention on Combating Bribery
- ICC Rules of Conduct to Combat Extortion and Bribery
- EU General Data Protection Regulation (GDPR)

WOIMA Values



WOIMA values, pioneering spirit, accountability and sisu (perseverance), epitomize our value proposition to all stakeholders and form the foundation for all our operations. They ensure that all WOIMA employees, from top leadership to entry-level, are working towards the same common goal; customer satisfaction. They are critical in creating a long-lasting, successful, and motivating place to work. Similarly, they attract like-minded cooperation partners and customers to create something that is greater than the sum of its parts.

Pioneering spirit is fostered by our aspiration, creativity and collaboration.

- We challenge prevailing assumptions and inspire others with our passion for excellence
- · We seek to understand our customers, suppliers, market, strategy, operations and business as a whole
- · We contribute effectively outside of our core responsibilities and make time to help our fellow employees
- We share information, ideas and opinions openly and proactively

Accountability is nurtured through our integrity, communication and entrepreneurship

- We question actions inconsistent with our own and WOIMA values
- We treat people with respect irrespective of their opinions or stature
- We always seek what is best for WOIMA in true entrepreneurial spirit
- We celebrate accomplishments and give recognitions to those who deserve it

Sisu (perseverance) is cultivated through our determination, impact and resourcefulness

- We demonstrate strong performance and long-term result consistently
- We take initiative, follow through and never give in or give up in front of adversity
- · We make well-thought-out decisions on time despite of uncertainty
- We prioritize wisely and take calculated risks to achieve greater benefits

Transparency, Openness and Clarity

Transparency is an essential element for building trust and loyalty. At WOIMA, transparency is demonstrated through the company culture that encourages the open sharing of information and accountability at all levels. Our organizational transparency is concretely backed by our company policies.

Transparency is built on direct and clear communication with the highest level of honesty and integrity. All stakeholders are informed simultaneously and equally, no individual or group is favored and all applicable laws, rules and regulations are followed.

The true objective of our transparent business practices is to improve the relations between WOIMA and its employees, customers, and other stakeholders. This creates a culture of value and respect where

- WOIMA supports improved employee motivation and satisfaction
- employees are engaged and empowered, feel valued, and are able to deliver results that support sustainable operations
- customers are engaged in developing better processes, products and services for their own benefit
- other stakeholders can rest assured that WOIMA business is conducted in an ethical manner

The WOIMA approach to transparency, openness and clarity can be summarized as

- 1. We share WOIMA news and updates with all stakeholders
- 2. We use latest technologiy to build simplicity into our business
- 3. We use clear and concise communications with all stakeholders
- 4. We exceed stakeholder expectations in all our functions and operations
- 5. We are available to all stakeholders to discuss our business operations and practices



Corporate Compliance



Corporate compliance is a paramount part of all our business operations. It covers both the national and international laws and regulations, as well as our internal policies and procedures. Compliance is an ongoing process that consistently and accurately governs our policies and operations over time.

The WOIMA corporate compliance program is integrated with all our compliance efforts enterprise-wide, from the management of external regulations and internal policies to comprehensive employee training to minimize business risks. They are best mitigated by ensuring that all departments and staff are working together to maintain the highest standards, and that all deviations are reported and dealt with immediately.

The WOIMA corporate compliance program is built on standards and controls that ensure compliance of every employee. It consist of three vital internal compliance instruments

- Code of Conduct. The WOIMA Code of Conduct sets the compliance tone from the top of the
 company down. It sets out the ethical principles of our business and details general principles by which
 officers, management and employees conduct operations. It is an integral part of each employee's job
 description and a topic for continuous improvement and training.
- 2. **Compliance Standards and Policies.** Compliance standards and policies detail the expectations and rules for each of the key compliance area.
- 3. **Compliance Procedures.** Compliance procedures establish the daily requirements and practices through which the compliance standards and policies are implemented, followed and enforced.

The WOIMA business model incorporates a large number of stakeholders into our operations. We insist that our suppliers, agents, consultants and other business partners follow these same high-standard corporate governance principles in all their operations. We strongly advocate the international fair competition, anti-bribery, anti-corruption and anti-trust legislation.

Human Rights and Privacy

Promoting human rights is a fundamental element in carrying out our business. WOIMA respects and supports all internationally recognized human rights and seeks to avoid complicity in human rights abuses. Human rights are applied to all employees, suppliers, agents, consultants and other stakeholders. We demand the same high standard of ethical behavior from our business partners and in any other relationship. WOIMA commits to undertake all in its power to avoid causing or contributing to adverse human right impacts and to address such impacts if they do occur. Through the application of human rights due diligence procedures, we furthermore seeks to prevent, detect and correct adverse human rights impacts that are linked to our operations, products or services.

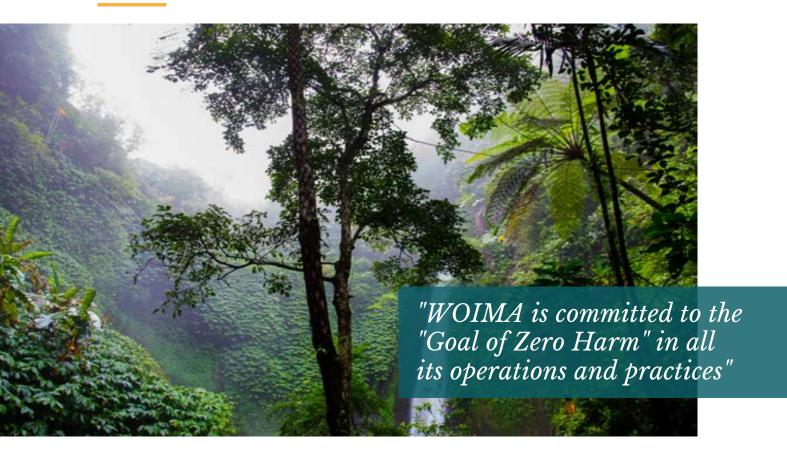
Our holistic approach to working with human rights operates on all levels

- Employees: WOIMA aims to offer a safe and healthy working environment with regular follow-up in all of its operations. We promote non-discrimination, prohibition of using child labor, and forced, bonded or compulsory labor, as well as freedom of association and right to engage in collective bargaining.
- Business partners: WOIMA seeks, selects and evaluates business partners impartially based on objective factors including productivity, quality, delivery, price, and reliability, as well as commitment to environmental and social performance, and development.
- Society and the Environment: WOIMA supports all internationally recognized human rights and respects those rights in conducting its operations throughout the world. We recognize that we must also take into account the broader economic, environmental, and social impacts of our operations. WOIMA respects local cultures, customs and values of local people and societies wherever we operate.

WOIMA also recognizes the right of individuals to be left alone and have control over their personal data. We comply with the applicable data protection laws and have introduced procedures for proper handling, processing, collecting, and sharing of personal data.



Health, Safety, Security, Environment and Quality (HSSEQ)



HSSEQ is one of the top priorities at WOIMA; deeply embedded in our culture, and part of who we are. WOIMA leads by example and promotes the idea of HSSEQ as the personal responsibility of all employees within their own scope of work and across all stakeholders. Strong safety culture and continuous improvement are key elements in effective risk management.

WOIMA is committed to the health, safety, and security of our employees and stakeholders, as well as the quality, safety, security, and environmental well-being in the WOIMA facilities across the globe. The same laws, regulations, standards and internal guidelines apply to our operations at our office, in the customer premises, as well as at WOIMA facility sites.

At WOIMA, we are dedicated to providing our customers with high-quality best available technology (BAT) waste-to-value solutions that increase productivity, improve work place safety and protect the environment. We expect all our partners to operate according to the well-established international principles of quality, environmental, social responsibility, and occupational health and safety management systems.

WOIMA is committed to achieve the "Goal of Zero Harm" to all stakeholders and the environment. We strive to exceed the highest health, safety, security, environmental, and quality standards for our solutions and operations. We reach our goals through

- integrating HSSEQ into all our business practices and processes
- promoting a culture that emphasizes HSSEQ by sharing and embedding best practices
- minimizing product and operational risks through audits, training and premium customer service
- providing detailed instructions and documentation for the safe use and maintenance of our solutions
- · continuously monitoring, reviewing and improving our processes to achieve excellence in all operations

Sustainable Operations

WOIMA recognizes that in order to succeed in today's global marketplace, sustainability must be embedded in the way we do business. That is why we integrate the environmental, social, and economic dimensions of sustainability into our core business strategy. This ensures that we have a deep understanding of the megatrends that will affect our company, and society at large, for the next several decades.

The UN Sustainable Development Goals (SDGs) are a universal call to action to end poverty, protect the planet and ensure that all people enjoy peace and prosperity. Cross-sectoral collaboration between civil society, academia and the business community is the key in achieving these demanding targets.

WOIMA has aligned its solutions, services and operations to support the SDGs. Our waste-to-energy ecosystem solutions are an integral part in building a sustainable, inclusive and fair society, where all members enjoy equal opportunities and face equal responsibilities. These SDGs guide our product, service and supply chain development, sales activities and project execution throughout the processes.

The target areas in our sustainable operations and circularity are

- product and service innovation
- · efficient manufacturing processes
- reduction of waste and emissions
- saving virgin raw materials
- protection of biodiversity and the environment

Together these processes ensure cost-effective and energy-efficient products and services, long product life-cycles, as well as best long-term environmental performance.

We embrace the change to work with our customers, suppliers and other stakeholders in finding new paths towards sustainable operations. We expect our suppliers and contractors to demonstrate high ethical standards, focus on improving their performance and comply with our sustainability targets.



Intellectual Property (IP) and WOIMA Assets



Intellectual property (IP) is the lifeblood of every organization. Our unique ideas and concepts represent our competitive advantage in the global marketplace. It helps set apart our business versus our competitors. WOIMA's IP, i.e. our original ideas, designs, discoveries, inventions and creative work, trade secrets, and employee know-how, is more valuable than our physical assets. Similar to us valuing and respecting the creation and protection of intellectual property of others, we rigorously safeguard our most important asset; knowledge, as well as any information trusted in our care.

Simply put, intellectual property is a business asset. It makes good business sense, therefore, to protect our IP and restrict others from copying, using, selling or distributing, and profiting from it without our consent. IP security also motivates us to continue our agile and disruptive journey in transforming the waste-to-value market.

The WOIMA approach to protecting our unique IP in our target markets can be summarized as

- 1. We register the applicable copyrights, trademarks, and patents
- 2. We register the applicable business, product or domain names
- 3. We sign confidentiality, non-disclosure, non-solicitation, non-competition and/or non-circumvention agreements with employees and business partners
- 4. We implement appropriate data protection and security measures
- 5. We train our personnel to understand the importance of data protection and to recognize unauthorized access attempts

Naturally, the same level of care and security is placed on our physical assets, premises and personnel. This ensures that there are no weak links in the protection of WOIMA IP.

Community Engagement

An integrated and structured waste management scheme can only be achieved through the support, active participation and engagement with local communities and authorities. The overarching objective must be to implement strong community engagement programs to create a firm foundation on which the relationship between the local communities and WOIMA projects can thrive. This will ensure that local communities understand, benefit from and support the projects. The three key strategies that will be used to achieve this objective are

- community engagement
- development of education opportunities
- local enterprise development

The guiding principle behind WOIMA's research, development an innovation work is to create solutions and projects that help solve grass-root-level challenges in accordance with "for the people, by the people" principle. The sustainable circular economy WOIMA projects target the recycling of raw materials and the generation of different types of energy commodities to support local SMEs. This acts as a starting point for a positive circle of social development.

Our growing presence in emerging markets emphasizes our responsibility to the local communities. We involve them in the establishment of each new projects, and through a social impact assessment (SIA) ensure that all potential negative social effects are removed, minimized and/or mitigated. Our projects offer a significant number of employment and training opportunities for people with various skill sets.

WOIMA supports community programs related to youth activities, science and research, environmental protection and nature conservation. We encourage all our personnel to participate in community programs promoting the common good.





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This Code of Conduct is a call for action: "NOW, TOGETHER"

