



CODE OF BUSINESS CONDUCT AND ETHICS

POLICY BRIEF & PURPOSE

ATN Holdings Inc.'s Code of Conduct and Ethics company policy outlines the expectations regarding all directors and employees' behavior towards their colleagues, supervisors and overall organization. To uphold the highest standards for professional and ethical behavior, the Company expects the Board, senior management, all directors and employees to follow our code of conduct. While ATN encourages freedom of expression and open communication, the Board, senior management, all directors and employees should avoid offending, participating in serious disputes and disrupting the workplace. The Company expect all stakeholders to foster a well-organized, respectful and collaborative environment.

SCOPE

This policy applies to all our all directors and employees regardless rank and/or employment agreement.

POLICY ELEMENTS

All stakeholders are bound by to follow our Employee Code of Conduct while performing their duties. The Company outline the components of our Code of Conduct below:

Compliance with law

All directors and employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws. The Company expects all directors and employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

Respect in the workplace

All directors and employees should respect their colleagues. The Company prohibits any kind of discriminatory behavior, harassment or victimization. All directors and employees should conform with company's equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

Protection of Company Property

All directors and employees should treat the company's property, whether material or intangible, with respect and care. All directors and employees should not misuse company equipment or use it wastefully. All stakeholder should respect all kinds of intangible property, including trademarks, copyright and other property such as confidential information, reports etc. All directors and employees should use company properties only to complete their job duties. All directors and employees should protect company facilities and other material property from damage and vandalism, whenever possible.



Professionalism

All directors and employees must show integrity and professionalism in the workplace:

- **Personal appearance**

All directors and employees must follow company dress code and personal appearance guidelines.

- **Corruption**

The Company discourages all directors and employees from accepting gifts from clients or partners. The Company prohibits any act or form of bribery for the benefit of any external or internal party.

- **Job duties and authority**

All directors and employees should fulfil their job duties with integrity and respect towards customers, stakeholders and the community. Supervisors and managers must not abuse their authority. The Company expects them to delegate duties to their team members, taking into account their competence and workload. Likewise, the Company expects team members to follow team leaders' instructions and complete their duties with skill and in a timely manner. The Company encourages mentoring as well as welcomes feedback.

- **Absenteeism and tardiness**

All directors and employees should uphold utmost professionalism and follow their schedules. The Company can make exceptions for occasions that prevent all directors and employees from following standard working hours or days, but generally, the Company expects all directors and employees to be punctual when coming to and leaving from work.

- **Conflict of interest**

The Company expects all directors and employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties.

- **Collaboration**

All directors and employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

- **Communication**

All directors and employees must be open for communication with their colleagues, supervisors or team members.

- **Benefits**



The Company expects all directors and employees to not abuse their employment benefits, such as time off, insurance, facilities, subscriptions or other benefits our company offers.

- **Policies**

All directors and employees should read and follow our company policies. If they have any questions, they should ask their managers or Human Resources (HR) department.

Disciplinary Actions

The company will have to take disciplinary action against all directors and employees who repeatedly or intentionally fail to follow the Code of Conduct. Disciplinary actions will vary depending on the violation. Possible consequences, depending on the number of times violations are made, and the gravity of the offense, include:

- Demotion.
- Reprimand.
- Suspension or termination for more serious offenses
- Detraction of benefits for a definite or indefinite time.
- The Company may take legal action in cases of corruption, theft, embezzlement or other unlawful behavior