



## Code of Ethics

The Lesico Group engages in construction work for civil engineering projects and engineering construction plus maintenance boundaries and concessions worldwide. As a leading group, we strive to maintain proper business culture and positive work environment for the employees, managers and officers filling their roles in society. The Group sees great importance in adopting a code of conduct that will guide and direct all the job issues, the executives and employees of the group, wherever they operate, regarding the rules of conduct are required of them and that all self-defined employees will be conducted in a fair and ethical manner, in good faith and take precautionary measures, responsibility and expertise when making Actions on behalf of the company. The purpose of this code of ethics is to reinforce the bonds between employees themselves, establish trust, credibility and integrity among the company shareholders, customers, suppliers and all contact with the group. The code does not propose to address all the existing types of dilemmas, the employees of The Group are expected to use the resources listed in the above-mentioned principles, code of conduct, to make use of like a compass for the organization's behaviour allowing judgement to carry out the most accountable behaviour. In view of the importance of implementing the code of ethics, are available at several consulting and reporting channels in a dilemma regarding the proper conduct or suspicion of violation of the code principles: ❖ The administrative level above.

- ❖ Human resources – Eti Kalfa [eti\\_k@lesico.com](mailto:eti_k@lesico.com) 054-7901604
- ❖ General Counsel – Yair Shiloni Adv. [shiloni@gornitzky.com](mailto:shiloni@gornitzky.com) 03-7109125
- ❖ Internal Auditor – Yossi Ginossar, CPA [yossi.ginossar@il.gt.com](mailto:yossi.ginossar@il.gt.com) 03-7106544

### **The existence of laws and corporate regulations**

#### **We act in accordance with the regulations of the Law.**

- ✓ Compliance with provisions of law and to avoid any illegal activity.
- ✓ Group is committed to act with transparency of the various authorities and various parties in the framework.
- ✓ Group is committed to meet all legal requirements and procedures of all competent authorities and procedures for group a chance.
- ✓ For each employee to recognize that his illegal activities in connection with the group, sometimes the responsibility the group itself or other employees.

### **Avoiding conflict of interest**

#### **We act in circumstances where no conflict of interest is concerned.**

- ✓ Conflict of interest is the position of the employee's personal interests or including social and economic (interests over the interests of the company) it may prevent the employee to perform his duties in a proper way.
- ✓ Employees receive decisions in favor of the interests of the company and avoid situations where they may be in conflict of interest.
- ✓ The work will benefit the business interests of the company and will not work any motives to benefit personally.

### **Preventing corruption and bribery**

#### **We do not offer, give or take bribes or illegal incentive.**

- ✓ The Group is committed to managing its business according to the principles of ethics, preventing corruption and bribery.
- ✓ Employees and/or acting on its behalf are prohibited from giving bribes and/or promise of anything of value, or other benefit business gain, also forbidden to give any benefits in any case, directly or indirectly, to promote deals, winning tenders or to obtain any other advantage.

- ✓ If the company decides to provide symbolic gifts (i.e. holiday events, etc) these will only by authorized personnel, who were careful about the existence of the procedures and laws. In addition, employees will not receive benefits and/or
- ✓ business officials with gifts associated with the company, except symbolic gifts acceptable financial value, that can be classified as public relations and/or promotions.

### **Competitors and fairness in competition**

**We strive for the success of our commercial operations and strive to be a leader in our business, but at the same time we are committed to maintaining integrity in our activities and to fair and proper conduct in our dealings with our competitors.**

- ✓ We welcome all professional and fair competition and follow the instructions and requirements of the competent authorities and in accordance with the prohibition against competition. We will not be a party to any agreement or understanding of any kind with competitors in a manner contrary to the provisions of the law.
- ✓ Our employees and managers are committed to maintaining fair and fair playing rules in our dealings with our competitors, including collecting information and data only in lawful and fair ways.
- ✓ In the event that the law prohibits this, and especially in public tenders, our employees and managers will not meet or discuss with competitors in pricing or other information, disagree with the division of the market or any other twin, and will not comply or discuss other arrangements that reduce competition, in a manner contrary to law.

### **Confidentiality**

**We keep confidential the confidential information of person.**

- ✓ Group employees are committed to maintain the business and commercial information of the company, taking precautions to avoid disclosing information to others within the company and beyond. This includes business plans and strategies, customer information and various factors including company

contacts, company documents or any other information revealing secrets concerning the company's activities.

### **Transactions in the Company's securities using internal information**

**We are committed to following the provisions of the law and the rules of the stock exchange.**

- ✓ Internal information is non-public information that has not yet been published publicly by mainstream channels.
- ✓ During our work, material and non-public information about the Company and events may come to us which have not yet reached the legal deadline for public publication. In accordance with the Securities Law, any employee exposed to or in receipt of such data in doing so, it is absolutely forbidden to trade in the Company's securities (buy or sell) or transfer the information to any third party, while taking advantage of the internal information.
- ✓ Violations of securities trading laws may result in a risk of reputation Lesico Group, to impose heavy financial penalties and even criminal offenses.
- ✓ Here are some examples of non-public information:
  1. Business results and other financial information.
  2. Changes in dividends.
  3. Changes in senior management.
  4. Winning an essential project, exceptional events in the project.
  5. Business negotiations in which the Company is a partner.
  6. Mergers, acquisitions, changes in holdings, sale of businesses and joint ventures.
  7. Starting a business, accepting or losing an important engagement.
  8. Confidential information received with respect to another company in the framework of the work.

### **Assets and Systems Lesico Group**

**We maintain the company's assets.**

- ✓ Company employees are obliged to maintain and use the Company's assets in a proper manner

- ✓ For the purpose of the Company's business operations only. The use of these assets for private purposes, permitted only and to the extent expressly permitted.
- ✓ Computerization technologies - hardware, software, networks and the information they undergo - are an incomplete part separate from the Group's business activities and therefore essential to the success of our business and to us to protect them. Therefore, everyone who uses the computer has the responsibility to use the resource in an appropriate and secure manner, for business purposes and to protect against fraud and unauthorized abuse.

### **A workplace free of harassment and violence**

**We maintain an organizational culture that requires respect for human dignity.**

- ✓ Workplace harassment means any physical or verbal action that creates an environment that is harmful, hostile or threatening to an employee
- ✓ Harassment of any form is prohibited: in words, actions, or behaviour that creates a threatening, hostile or offensive environment.
- ✓ We prohibit violence of any kind in the workplace, including acts of violence or threats Violence against another person, intentional damage to the property of the company or the property of an employee.
- ✓ We encourage creative self-thought and are allowed to express it without fear but do not use it inappropriately and/or blatant words in order to strengthen our position.
- ✓ We respect, represent, professional and deserve respect for every person who comes into contact with us as part of our work, both within the Lesico Group and outside it (customers, suppliers, service providers) etc., with the understanding that we represent Lesico Group in our activity.

### **Safety Regulation**

**We aim to create a safe and accident-free work environment.**

- ✓ Maintaining the safety and health of our employees is the top priority of Lesico Group And aims to ensure that all workers "return home safely".

- ✓ The importance of ensuring safety at work, while identifying risks and hazards, in order to prevent physical harm to the employees of the Group, its customers, suppliers and the general public in all its operations shall be assimilated into any employee of the Company, irrespective of his position therein.
- ✓ We comply with all safety, health, and safety rules and procedures.
- ✓ We will report to the Group Safety Manager or other relevant manager about any safety hazard or event Which may cause injury to the body, property or work accident.

### **Sustainability, contribution to the community**

#### **We cultivate sustainability.**

- ✓ We recognize the importance of protecting the environment for sustainable development.
- ✓ We act with awareness and consideration of environmental, social and economic considerations in all areas of activity.
- ✓ The Lesico Group views the involvement and contribution to the community as a value of high importance to contribute its resources to the promotion of worthy social goals as defined from time to time and will act to realize this value on an ongoing basis. The company encourages its employees and enables them to participate in various activities for the community.

### **Occupational diversity and the prevention of discrimination**

#### **We support equality and condemn discrimination.**

- ✓ We support equal opportunities, fair treatment and respect for all employees and candidates to work indiscriminately or to discriminate.
- ✓ Accordingly, we prohibit any form of discrimination in the employment of workers on the background of religion, race, origin, nationality, gender, sexual orientation, age, disability, etc.

- ✓ We strive for an egalitarian society towards people with disabilities and set ourselves a goal in creating diversity in employment and providing equal opportunities for integration into the Lesico Group.

#### Various

- ✓ Every place in which male language refers to female language and vice versa. Every place that appears in single language also refers to the language of many and vice versa.
- ✓ This Code applies to all officers of the Company, its directors and employees.