

CODE OF CONDUCT & ETHICS

1. Purpose.

The purpose of this Code of Conduct and Ethics (the “**Code**”) is to ensure that all employees, contractors, consultants and representatives of Top Magic Limited (the “**Company**”) adhere to the highest standards of ethical conduct and professional behaviour. This Code provides guidelines to help individuals act with integrity, accountability, and respect in accordance with UK laws and regulations.

2. Scope.

This Code applies to all employees, contractors, consultants, temporary and agency staff, and any other individuals working for or on behalf of Top Magic Limited.

3. Core Principles.

- **Integrity:** Act honestly and with integrity in all dealings.
- **Respect:** Treat all individuals with respect, dignity and fairness.
- **Compliance:** Comply with all applicable UK laws, regulations and Company policies.
- **Accountability:** Take responsibility for actions and decisions.
- **Confidentiality:** Protect confidential information and respect privacy.

4. Conduct Standards.

4.1 Professionalism:

- Perform duties with competence, diligence, and professionalism.
- Maintain a professional appearance and demeanour at all times.
- Avoid conflicts of interest and disclose any potential conflicts to a supervisor or the HR department.

4.2 Respect & Non-Discrimination:

- Treat colleagues, customers, and third parties with respect and without discrimination based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation.
- Foster an inclusive and supportive work environment.
- Do not engage in harassment, bullying, or any form of abusive behaviour.

4.3 Honesty & Integrity:

- Be truthful & transparent in all communications.
- Do not engage in fraudulent or deceptive practices.
- Report any suspected misconduct or unethical behaviour to a supervisor.

5. Confidentiality & Data Protection.

- Protect confidential information and only share it on a need-to-know basis.
- Comply with the Data Protection Act 2018 and General Data Protection Regulation (GDPR) regarding the handling of personal data.
- Do not use confidential information for personal gain.

6. Compliance with Laws & Regulations.

- Adhere to all relevant UK laws and regulations, including those related to anti-bribery, anti-corruption, and anti-money laundering.
- Do not engage in activities that could harm the Company's reputation or legal standing.

7. Conflict of Interest.

- Avoid situations where personal interests conflict with the interests of the Company.
- Disclose any potential conflicts of interest to a supervisor or the HR department.
- Do not use Company resources or information for personal gain.

8. Use of Company Resources.

- Use Company resources, including time, materials, and equipment, responsibly and for legitimate business purposes.
- Do not engage in unauthorised use or distribution of Company assets.

9. Reporting.

- Report any violations of this Code, unethical behaviour, or illegal activities promptly, whether by its officers, employees, directors, or any third-party doing business on behalf of the Company.
- Employees, officers and directors shall not discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against any individual because of reporting any such violation.
- The Company prohibits retaliation against individuals who report concerns in good faith.
- This Code should not be construed to prohibit from testifying, participating or otherwise assisting in any administrative, judicial or legislative proceeding or investigation.

10. Health & Safety.

- Follow all health and safety policies and procedures to ensure a safe working environment.
- Report any health and safety concerns or incidents to the relevant authority within the Company.

11. Disciplinary Action.

- Violations of this policy may result in disciplinary action, up to and including termination of employment.
- Each case will be reviewed individually, and appropriate action will be determined based on the severity of the violation and the circumstances.

12. Code Review & Updates.

- This Code will be reviewed annually and updated as necessary to ensure its effectiveness and relevance.
- Employees will be notified of any changes to the Code.

13. Acknowledgment.

All employees of Top Magic Limited are required to acknowledge their understanding and commitment to this Code of Conduct & Ethics.

Last Updated: 05 February 2026