**OL & Edward Ltd**

**Code of Ethics**

OL & Edward’s Construction Code of Conduct outlines expected behaviors for all OL & Edward’s employees.

OL & Edward Limited will conduct its business fairly, impartially, in an ethical and proper manner, and in full compliance with all applicable laws and regulations. In conducting its business, integrity must underline all company relationships, including those with customers, suppliers, communities and among employees. The highest standards of ethical business conduct are required of OL & Edward employees in the performance of their company responsibilities. Employees will not engage in conduct or activity that may raise questions as to the company’s honesty, impartiality, or reputation or otherwise cause embarrassment to the company.

Employees will ensure that:

* They do not engage in any activity that might create a conflict of interest for the company or for themselves individually.
* They do not take advantage of their OL & Edward Limited position to seek personal gain through the inappropriate use of OL & Edward Limited or non-public information or abuse of their position. This includes not engaging in insider trading.
* They will follow all restrictions on use and disclosure of information. This includes following all requirements for protecting OL & Edward Limited information and ensuring that non- OL & Edward’s proprietary information is used and disclosed only as authorized by the owner of the information or as otherwise permitted by law.
* They observe that fair dealing is the foundation for all of our transactions and interactions.
* They will protect all company, customer, and supplier assets and use them only for appropriate company-approved activities.
* Without exception, they will comply with all applicable laws, rules, and regulations.
* They will promptly report any illegal or unethical conduct to management or other appropriate authorities (i.e., Ethics, Law, Security, EEO).

Every employee has the responsibility to ask questions, seek guidance, and report suspected violations of this Code of Conduct. Retaliation against employees who come forward to raise genuine concerns will not be tolerated.