



NOJE LIMITED CODE OF ETHICS, CONDUCT AND CORPORATE SOCIAL RESPONSIBILITY

Last reviewed: May 2025

NOJE Limited

Code of Ethics, Conduct and Corporate

This document expresses the Code of Ethics, Conduct & Corporate Social Responsibility (hereafter “the Code”). This code applies across all entities operated by or affiliated with NOJE Limited, including but not limited to Social Impact Coffee, London Coffee Factory, the trade name HEJ Coffee, and any future entities established under NOJE.

NOJE strives to do business in an ethical and responsible manner. We are committed to conducting business in an ethical and responsible manner. To make this possible it is important that an employee can make the right decisions and handle matters in accordance with NOJE'S values and norms.

This Code of Ethics and Conduct & Corporate Social Responsibility aims to provide a framework that contributes to corporate identity and brand awareness to ensure compliance with legal and ethical standards. This Code should be applied by and towards our employees, contractors, and representatives.

Values

Our values below guide our actions in Corporate Responsibility:

1. Traceability: we are open, honest, and responsible.

Being open, honest, and responsible is the foundation of our collective success. In an ever-evolving world, transparency is key to building strong, trusting relationships with everyone we interact with. When we are open, we create an environment where everyone feels informed and valued. Honesty ensures we hold ourselves accountable to each other, and responsibility guarantees that we uphold the highest standards in everything we do. Just like in our work, we do good by each other – supporting one another, fostering collaboration, and ensuring we act with integrity. Together, through openness and responsibility, we create a culture where trust and respect can thrive, making us stronger as a team. We see our place in the market as being the only business that combines our commitment to delivering sustainability, quality, and transparency in our coffee operations, from farm to cup. Our expertise in running successful businesses that have a social and environmental impact will ensure that this business is successful.

2. Transparency: we promote access to information, upstream and downstream.

Transparency is vital in creating a connected and informed environment where everyone is on the same page. By promoting access to information, both upstream and downstream, we ensure that knowledge flows freely across all levels. This openness empowers us to make informed decisions, strengthens collaboration, and fosters accountability. Just as we share our successes, we also share challenges, learning opportunities, and insights, so that everyone has the tools to

succeed. Transparency enables us to work together with clarity, trust, and a shared vision, not only within our internal operations but also in our relationship with suppliers and customers, ensuring our shared commitment to sustainability. It strengthens our ability to deliver consistent results and fosters an atmosphere where everyone feels valued and empowered.

3. Sustainability: we will leave a positive environmental and social impact from our activities.

Sustainability is at the heart of everything we do. We are committed to delivering quality, transparency, and sustainability in all our coffee products and roasting services. Our main goal is to be recognised as a brand that pioneers in sustainability while providing high-quality services. We aim to reduce waste, conserve resources, and support communities, ensuring that our actions create a better future for both the environment and society. Through these efforts, we strive to make a lasting positive impact, benefiting both current and future generations.

4. Reliability: we are trusted, supportive and flexible.

Reliability is the cornerstone of strong relationships and successful outcomes. We strive to be a team that others can depend on, not only through consistent delivery of high-quality products and services but also by demonstrating our commitment to ethical business practices and social responsibility. When we are trusted, we build confidence and encourage collaboration, knowing that we have each other's backs. By being supportive, we create a nurturing environment where everyone can thrive, and through flexibility, we adapt to challenges with resilience and creativity. Together, our reliability strengthens our ability to deliver consistent results and fosters an atmosphere where everyone feels valued and empowered.

Compliance and Training

All employees, contractors, and representatives of LFC are expected to familiarise themselves with and adhere to this Code. Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contractual relationships.

NOJE will provide appropriate training and awareness programs to ensure that all individuals covered by this policy understand their responsibilities and obligations. Regular updates and communication will be provided to reinforce ethical practices.

Principles

Stakeholders

We have a Corporate Responsibility towards all our internal and external stakeholders: customers, suppliers, employees, shareholders, investors and banks, governments, competitors, consumers, civil society and others impacted by our activities

Business Integrity

NOJE demands honesty and integrity in all aspects of business, with regards to its employees, customers, suppliers, and others.

In this respect, NOJE is committed to compliance with applicable laws and regulations in the locations where the company operates and conducts business.

Employees must always avoid situations that may let personal gain influence their business judgment.

Legal matters, the direct or indirect solicitation, offering, or acceptance of bribes or inappropriate gifts in any form is unacceptable. There can be no personal participation by employees in commodities markets (futures or cash) in which the company is active.

We support fair competition and integrity in the marketplace.

We build and maintain the trust and confidence of our customers and other business partners by communicating honestly, respecting information entrusted to us and standing behind our commitments.

People

We believe in and respect the fundamental dignity and value of each individual that we work with and encounter through our work vision.

We attract, develop, and compensate individuals based on job-related qualifications and abilities to fulfil these roles. We do not discriminate against race, colour, religion, nationality, gender, sexual orientation, disability, age, or other personal characteristics.

We have a strong commitment to maintaining a bias-free and safe environment in which any form of verbal or physical harassment is prohibited.

We respect personal data and privacy in compliance with UK and EU legislation, including the Data Protection Act 2018 and GDPR.

To ensure we not only get the best work out of everyone, but also respect, value, and appreciate every employee, we expect each team member to:

- Be considerate: we all rely on each other to achieve excellence as a company. Your decisions and actions impact both our clients and colleagues, and it's important to take the consequences into account when making choices. When we act thoughtfully, we foster an environment where collaboration and creativity thrive.
- Be respectful: we may not always agree, but disagreement should never lead to disrespect. Frustration is a natural part of working together, but it's essential that we

channel it constructively and avoid personal attacks. An environment where people feel respected and safe encourages creativity, productivity, and open dialogue.

- Be human: professionalism is key, but so is kindness. Treat others with respect and empathy, creating a positive and inclusive atmosphere. Harassment or exclusionary behavior in any form is unacceptable. This includes, but is not limited to:
 - Threats of violence
 - Discriminatory jokes or language
 - Sharing explicit or violent material
 - Any form of bullying
 - Personal insults, including racist or sexist remarks
 - Unwelcome sexual attention
 - Encouraging or supporting inappropriate behavior
 - Repeated harassment

If someone asks you to stop something, it is important to listen and respect their boundaries. We all bring different perspectives, and disagreements are a natural part of collaboration. What matters most is resolving conflicts with understanding and respect, turning differing views into opportunities for growth and constructive discussion. Together, we build an environment where everyone feels valued, heard, and empowered.

If you believe you or a colleague is being harassed or bullied in the workplace, you may be able to sort matters out informally. You can talk in confidence to your manager or to Mathew Keech, Managing Director, mathew@hejcoffee.co.uk to get advice on how to handle this informally.

Value creation and sustainability

We seek to create real and long-term value for our stakeholders:

- We seek for our customers to benefit from our products and services.
- We seek for our employees to optimise their opportunities.
- We seek a return on investment for our stakeholders and financiers.
- We seek for our suppliers to benefit from our business.
- We seek mutually beneficial relationships with our partners.
- We seek for the wider community and economy to gain from our activities.

We take the long-term interest of our stakeholders into account and share our global knowledge and experience to help meet economic and social challenges.

We expect our employees to take responsibility for their actions and initiate improvements to their work and work environment.

Labour conditions

NOJE considers it important that both its own employees and those of its suppliers work under respectable labour conditions that comply with the local laws.

NOJE maintains a zero-tolerance policy on all forms of modern slavery, including forced labour, bonded labour, and human trafficking. We also do not tolerate child labour in any part of our organisation or in any entity with which we conduct business. If any breaches of this policy are identified within our operations or supply chains, LFC will take immediate action, including terminating business relationships with those involved and, where appropriate, reporting the matter to the relevant authorities.

Within the operating companies we take responsibility to establish and maintain health and safety programs in compliance with national and local laws and regulations and internationally accepted principles.

Jointly, we take care of our work environment, and protect company property.

Environment

NOJE is committed to compliance with relevant environmental rules, regulations, and industry accepted standards applicable to each of its local operations. We strive to be carbon neutral in all our activities.

We strive to improve our own environmental performance and the environmental performance of the value chain by sharing knowledge and other ways of support as part of the sustainability programs we run in partnership with our supply chain actors.

Our Coffee

NOJE is building a strong reputation in the coffee industry and will enhance this by committing to maintaining strict food safety standards within our operations and committing to meeting quality specifications from our customers.

Transparency

- NOJE recognizes the value of open and ongoing communication with respect to its business.
- Employees are encouraged to be transparent towards their employer when they think a (perceived) conflict of interest may arise related to their personal business stakes and trading activities.
- We value teamwork, and communicate and share information with the group.
- We will participate actively in sharing knowledge, experience and information within NOJE and our stakeholders.
- All stakeholders will be provided with access to relevant and appropriate information through, amongst others, publications, interviews, information requests, and internal

channels of communication. This does not include information that NOJE considers confidential.

Our standards at work

Bribery and corrupt behaviour

NOJE has a strict anti-bribery and corruption policy in line with [the Bribery Act \(2010\)](#). A bribe is defined as: giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

If you bribe (or attempt to bribe) another person, intending either to obtain or retain business for the company, or to obtain or retain an advantage in the conduct of the company's business this will be considered gross misconduct. Similarly accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances you will be subject to formal investigation under the Company's disciplinary procedures, and disciplinary action up to and including dismissal may be applied.

The Corruption Behaviour we do not tolerate as a business:

- **Bribery:** accepting items in return for a preferential treatment
- **Fraud:** dishonest and illegal activities perpetrated by individuals or companies in order to provide an advantageous financial outcome to those persons or establishments
- **Embezzlement:** taking the company's goods or funds for personal gain is called embezzlement
- **Kickbacks:** payments made to businesses by vendors in exchange for contracts that over inflate the cost of the work performed at the expense of those receiving the services, and paying for the contract
- **Soft dollar practices:** offering excessive gifts, discounts, or any other undisclosed benefits to clients, suppliers, or partners, in an attempt to influence their decisions

Political Contributions, Donations, and Sponsorships

As a business we advocate financial support towards charities, sponsorships and communities, but we ensure all our financial contributions are formally checked and validated on doing so. When financially supporting such causes, we as a business are transparent to which groups or individuals we are supporting and why.

Political Contributions

NOJE maintains a strict oversight policy regarding direct or indirect political contributions made on behalf of the company. All political contributions, whether in cash or in-kind, must comply with applicable laws and regulations and are shared publicly through annual transparency reports.

Charitable Donations

NOJE recognises the importance of supporting charitable organisations and community initiatives. All charitable donations made on behalf of the company should be in compliance with applicable laws and regulations and should not be used as a means to influence or obtain undue advantage in business relationships. To ensure we donate to worthwhile causes and organisations, NOJE diligently screens all charities before we give our support.

Sponsorships

NOJE may engage in sponsorships that align with the company's values and objectives. All sponsorships should be reviewed and approved by the appropriate authority within the company and should comply with applicable laws and regulations.

Public disclosure of contributions

We are committed to publicly disclosing all contributions made, as this aligns with our honest and open values as a company.

Financial and in-kind contributions

NOJE is committed to transparency and will disclose all financial and in-kind contributions made to political parties, politicians, lobby groups, charitable organisations, and advocacy groups. These disclosures will be made publicly available in a manner consistent with legal requirements, and can be found on the internal employee portal via SharePoint and on the company website.

Reporting mechanisms

NOJE will establish internal reporting mechanisms to ensure the timely and accurate disclosure of contributions. Employees, contractors, and representatives are encouraged to report any concerns or potential violations of this policy through the designated reporting channels.

Code review

Code of Ethics, Conduct & Corporate Social Responsibility reflects NOJE and all entities of our business's commitment to conducting business with integrity and in compliance with legal and ethical standards. By adhering to these guidelines, we can maintain our reputation as a responsible and trustworthy organization.

NOJE reserves the right to revise, modify, or amend this policy as necessary. Any changes will be communicated to all individuals covered by this policy in a timely manner - with Board members instructed on the Code at least annually.

This Policy has been reviewed and approved by senior management.

Approved by: Mathew Keech, Managing Director

Date: May, 2025

Approval method: Email confirmation.

