



CODE OF CONDUCT

Effective Date: 07/01/2025

Approved by: Management , Peak International Trading Co LLC

1. Purpose and Scope

This Code of Conduct outlines the ethical standards and expectations for all employees, representatives, contractors, and business partners of **PEAK INTERNATIONAL TRADING CO. LLC** ("PEAK"). It is designed to foster a transparent, respectful, and law-abiding working environment, consistent with PEAK's values and legal obligations.

2. General Principles

- **Act with Integrity:** Uphold honesty and fairness in all dealings.
- **Respect the Law:** Comply with all applicable local and international laws.
- **Protect Reputation:** Your actions should reflect positively on PEAK's integrity and ethical standing.

3. Conflict of Interest

Employees must avoid situations where personal interests conflict with professional duties. Examples include:

- Financial interests in competing or partner companies.
- Using company assets for personal benefit.
- Taking business decisions for personal gain.

Action: Disclose any actual or potential conflicts of interest to management or Compliance.

4. Gifts and Bribery

- Do not offer or accept bribes, cash, lavish gifts, or personal benefits that may influence decision-making.
- Reasonable business hospitality (e.g., meals) may be acceptable but must be transparent.

Action: Report questionable offers or gifts to Compliance immediately.

5. Work place Safety and Health

PEAK prioritizes a safe, clean, and secure work environment for all employees.

- Follow all safety protocols and report hazards.
- Contribute to a culture of shared responsibility for work place health.

6. Anti-Corruption and Fraud

We strictly prohibit all forms of corruption, bribery, or fraudulent behavior.

Employees must not:

- Offer or accept improper payments.
- Falsify documents or misrepresent facts.
- Engage in insider trading or misuse confidential information.

Action: Report suspected misconduct using the internal grievance or whistle blower channels.

7. Fair Employment Practices

PEAK supports diversity, inclusion, and equal opportunity.

- Discrimination or harassment based on race, gender, age, religion, disability, sexual orientation, or any protected category is strictly prohibited.
- All employees must be treated with dignity and fairness.

Action: Report concerns immediately without fear of retaliation.

8. Confidential Information

Company data, including customer, supplier, financial, and operational information, must be kept confidential.

- Do not disclose or misuse company information for personal gain.
- Confidentiality obligations remain inforce after employment ends.

9. International Trade Compliance

Employees must adhere to all trade laws, export/import regulations, and international sanctions applicable to PEAK's operations.

Action: Consult Compliance for guidance on specific regulations or restricted transactions.

10. Media and External Communication

Only authorized personnel may represent PEAK in public or respond to inquiries from media or external stakeholders.

Action: Redirect all media or public requests to the CEO or an authorized spokes person.

11. Compliance and Reporting

Violations of this Code may result in disciplinary action, including termination, legal action, or disengagement of third parties.

You are expected to:

- Read, understand, and comply with this Code.
- Report misconduct confidentially via compliance@peakintltrading.com
- Participate in ethics and compliance training as required.

Non-retaliation: PEAK prohibits retaliation against any one who reports concerns in good faith.

Signed:
Sercan Samet Onder
General Manager
Signature:
Peak International Trading Co LLC
07/01/2025

A handwritten signature in black ink, appearing to read "Sercan Samet Onder".

Prepared By Vishnu Shaji
Designation : Compliance Officer
Signature: 
Peak International Trading Co LLC
07/01/2025