

# Code of Conduct

**1. Introduction** The Code of Conduct ('Code'), has been established by CC7 Europe B.V. (hereinafter – the Company) to comply with the applicable laws and rules of The Netherlands and to its internal expectations and best international practice, including but not limited to all other Company's policies and procedures. The Company is committed to conduct its business in accordance with all applicable laws, rules and regulations applying the highest standard of business ethics.

This Code is a Policy and prior to all rules, regulations, manuals and procedures that may be laid down by the Company from time to time, and shall prevail over other Company's policies and procedures. Therefore, this Code will be subjected to review and modification as and when necessary. The Code cannot address every situation that may occur, but may apply a high level of criteria or recommendations implemented by the Company to all Company's procedures, rules, manuals, etc.

**2. Applicability** The Code has been prescribed as a guiding principle for doing business and is addressed to all those who execute any act for and on behalf of the Company and to all Company's Employees. This Code is applicable to our General Manager (CEO), and all Employees of the Company including Employees of subsidiaries and associate companies (collectively referred hereinafter, for the sake of brevity, as 'Officer(s)') or any other engaged directly individuals who might perform the duties to the and/or on behalf of Company based on the separate agreement.

This Code also applies to the Company's agents, business partners, third party, vendors, suppliers, subcontractors, consultants, customers and others acting on the Company's behalf or based on any kind of agreement, whether operating out of the Company's location or otherwise.

**3. Equal Opportunity Employer** The Company is committed to the principles of equal employment opportunity for all. It will provide equal employment opportunity to all qualified individuals without regard to age, race, caste, physical disability, gender, sexual orientation, color, marital status, religion or belief, nationality, social or ethnic origin, or family medical history (collectively defined as "protected class of characteristics").

**4. Human Rights** The Company recognises cultural differences and supports internationally agreed conventions of Human rights and labour rights, including the Universal Declaration of Human Rights and ILO's Declaration of Fundamental Principles and Rights at Work. The Company dissociates themselves from all forms of slavery, torture, cruel, inhuman or degrading treatment, working conditions that are a threat to life or health, child labour and heavy, irreversible environmental damage.

The Company assesses the implications to human rights of major business decisions and seek dialogue with stakeholders in the localities and local communities in which the Company operates.

**5. Good Corporate Citizenship** While the Company continues to provide expert outsourcing options, it has not lost sight of its responsibilities as a change agent for accelerating the pace of social and economic transformation across various segments. Behaving responsibly as a Global Citizen/International Company is an inextricable part of Company's beliefs. It upholds Human Rights in all of its Global operations

All Employees of the Company are entitled to fair wages and working hours, consistent with applicable laws, and are entitled to work in a safe environment free from discrimination. The Company is committed to preserving the environment and it utilizes sustainable practices to reduce its carbon footprint/unnecessary document printing and ensure its impact to the World is a positive one.

**6. Principles of Conduct** The CEO, all Officers and business partners acting on behalf of the Company and Employees shall pursue the highest standards of ethical conduct in the interests of the Company.

**7. Financial Reporting and Recording** The CEO, all financial related Officers acting on behalf of the Company shall make accounting information accessible to the auditors of the Company, other authorized parties and government agencies, as and when required as per Company policy and other procedures and standards.

**8. Conflict of Interest** Each Employee is expected to avoid any outside activity, financial interest or relationship that may present a possible conflict of interest or appearance of a conflict of interest for the Company.

**9. Transparency** The Officer(s), Employees and business partners acting on behalf of the Company shall ensure that their actions in the conduct of business are totally transparent except where the need of business activity dictates otherwise. Such transparency shall be brought about through appropriate policies, procedures and processes.

**10. Special Consideration, Gifts and Other Benefits** No CEO/Officer/Employee shall offer or receive directly or indirectly any illegal payments, remuneration, gifts, donations or comparable benefits to obtain business or uncompetitive favor to any person, organization or entity irrespective of whether such person, organization or business entity shares any business or official relationship with the Company.

**11. Right to Privacy** The Company must ensure the right to privacy of our Employees. The retrieval of private data about Employees including their photos should comply with the legislation in force at any time and should be justified by a legitimate business purpose, which has been made known to the Employee and acknowledged by them in writing.

The Company respects the retention period of the storage of such data and has a GDPR (General Data Protection Regulation) policy in place regarding the handling of personal data of Employees.

**12. Confidential Information** The Company regards the lawful and correct treatment of personal information as being of utmost importance. The Company will have a Policy for Data Privacy and Protection in place, which applies to privacy of information held not only by the Company but also to personal data held or processed on its behalf by third parties. All Employees shall maintain the confidentiality of confidential information of the Company or that of any agents, business partners, third party vendors, suppliers, consultants, customers and others client, vendor or entity, or business associate of the

Company to which the Company has duty to maintain confidentiality, except when disclosure is authorized by the Company or is required by law.

**13. Company Spokesperson** No Officer/Employee or business partner acting on behalf of the Company shall announce or communicate any important and/or commercial and/or contract and/or business related information to the press, financial analysts or such other agencies, or to the public, including social media.

**14. Rightful Use of Company's Assets** All the assets of the Company, both tangible and intangible, shall be employed for the purpose of conducting the business for which they are duly authorized.

**15. Software / Open Source Software** Employees shall ensure that any Software or Open Source Software should only be used under a license and/or as permitted by the Company Policies and applicable laws and regulations.

**16. Cost Consciousness** All Officers/Employees and business partners acting on behalf of the Company should strive for optimum utilization of available resources. They shall exercise care to ensure that costs are reasonable and there is no wastage. It shall be their duty to avoid ostentation in Company's expenditure.

**17. Intellectual Property** Officers/Employees should not infringe or violate the intellectual property rights of others and should use proprietary material of others only under valid licenses, in accordance with the terms of such licenses. Any unauthorized receipt or use of the intellectual property of others may expose to the Company to civil liability and Officers/Employees are advised to strictly adhere by all Company's policies and procedures, including those governing the appropriate handling of unsolicited intellectual property.

**18. Compliance with Competition Laws** The Officers/Employees and business partners acting on behalf of the Company must comply with the competition laws of the countries where the Company does business. In general, the Company must avoid agreements, understandings, or plans with competitors that limit or restrict competition, including price fixing and allocation of markets.

To compete fairly in the marketplace, the Company must show the same respect for the confidential information of its competitors that it shows for its own.

Officers/Employees may only gather competitive information in a lawful and ethical manner, never through deception or misrepresentation.

**19. Anti Corruption and Anti Bribery** The Company complies with Anti-corruption and Anti-bribery laws as may be applicable wherever the Company does business, including but not limited to the U.S. Foreign Corrupt Practices Act. Officers, Employees and those representing the Company, including agents and intermediaries, shall not, directly or indirectly, offer or receive any illegal or improper payments or comparable benefits that are intended, or perceived to obtain undue favors for the conduct of our business. The Company has in place an Anti-Corruption policy which shall be strictly adhered to by the Officers, Employees, agents and business associates and others to whom it is applicable

The Company can accept no form of corruption or bribery aimed at achieving advantages, benefits or at influencing political or legal processes.

**20. Ethics in Business Activities** The Company upholds strict standards for quality when executing work. The Officers/Employees and business partners acting on behalf of the Company are responsible for knowing and complying with contractual obligations applicable to their work. They cannot deviate from contractual specifications without the proper approvals and/or tender. Communications about the Company services, business, Projects, etc whether oral or in written, promotional materials, presentations, or slide decks should always meet high standards of accuracy and integrity.

**21. Dealings with Customers** The Company is committed to supplying services of high quality that meet all applicable laws. The Company markets its services on its own merits and does not make unfair or misleading statements about the products and services of competitors, and all its employees, business partners, third party vendors, suppliers, consultants, customers and others acting on its behalf must adhere to these terms.

The Company respects customers' right to privacy in relation to their personal data and shall safeguard customers' personal data, in accordance with applicable laws.

**22. Business with Suppliers** The Company shall select suppliers and service providers fairly and transparently. The suppliers and service providers of the Company shall represent the Company only with duly authorized written permission from the Company. Suppliers are expected to abide by this Code in their interactions with, and on behalf of the Company, including respecting the confidentiality of information shared with them. Officers/Employees are required to ensure compliance with the Procurement Policy and the Confidentiality Policy, and/or any other related Policies and procedures of the Company for business dealings with suppliers/subcontractors/service providers, as may be applicable.

**23. Whistleblowing** We encourage our Officers/ Employees, business partners, third party vendors, suppliers, consultants, customers and others acting on the Company's behalf, whether operating out of any Company's location or otherwise to speak up or escalate issues pertaining to the violation of this Code or any matters ancillary thereto.

**24. Commitment to Stakeholders** The Company shall inform its stakeholders about relevant aspects of business in a fair, accurate and timely manner and shall disclose such information in accordance with applicable laws. The Company has in place a Policies and Procedures for determining material events or information and its disclosure, which is prepared in line with the Company's Regulations.

**25. Health, Safety and Environment** The Company is committed to achieve the highest standards of occupational health and safety throughout the organization and all its Projects as an environmentally responsible organization. All Officers and business partners acting on behalf of the Company shall strive to provide a safe and healthy working environment and shall follow and meet all prescribed safety and environment related norms. The Company has in place Environment, Health, Security and Safety Policies which applies to all Officers/Employees, contractors

and visitors at work, company organized events and for employees during their travel between home and workplaces and during business related travel.

**26. Anti-sexual Harassment** The Company has an Anti-Sexual Harassment Policy in line with requirements, inter alia, of The Sexual Harassment of any Person at the Workplace.

**27. Observance and Violation of the Code** It is imperative that Officers/Employees, business partners, third party vendors, suppliers, consultants, customers and others acting on behalf of the Company shall follow the Code. These standards apply while working on the premises, at offsite locations wherever business is being conducted, or at any other place or where the said persons are acting as a representative of the Company.

**28. Government Investigations** Nothing in this Code precludes Officers/Employees, business partners, customers, suppliers, consultants, customers and others acting on the Company's behalf from reporting a violation of law to any government agency, or from cooperating in any government investigation. If an Officer/Employee has any questions about government investigations, please direct them to the HR Manager or CEO of the Company.

**29. Amendment of the Code** The Code may be amended to meet the requirements of any relevant statute or the business interest of the Company by the CEO of the Company. Unless otherwise specified, such amendments shall be effective from the Date of establishment of the amendments to the Code by the CEO.

**CC7 Europe B.V.**

**The Hague**

**July 16, 2022**

**Filippo De Pace (CEO)**