Code of Conduct



	Autho	ority Table	
	Drafted by	Written by	Reviewed and Approved by
Position	Director Risk & Compliance	Group Compliance Officer	CEO
Name	Salma Kronfol	Vincent Savesi	Jesper Trolle
Date	19/01/2022	19/01/2022	19/01/2022

Document History				
Date	Version	Modifications & Comments		
01/12/2017	1.0	Creation		
19/01/2022	2.0	Overall update following assessment of the compliance program		

Table of Contents

Our Code of Conduct	3
7 Ethical Principles	4
Honesty and Integrity	4
Fairness of Commercial Practices	4
Data Confidentiality	5
Professional behavior	5
Professional skills and added value	6
Social respect	6
Environmental care	6
Our People Values	7
People focused	7
Experts	7
Fun	7
Trust	7
Responsive	8

Our Code of Conduct

Exclusive Networks is determined to be and remain a trusted market leader and for that, we need to have the confidence, respect and support of all our employees and those we do business with.

To make that possible, we are committed to very high standards in everything we do. That is based on 7 Principles which underpin our behavior and which we require everyone to observe in their capacity as an ambassador of our Group. This document outlines those Principles.

Any serious breach of this Code of Conduct will be subject to disciplinary action, up to and including termination.

7 Ethical Principles

Exclusive Networks employees must adhere to the highest standards of ethical conduct at all times.

Exclusive Networks 7 Ethical Principles are:

- Honesty and Integrity
- Fairness of commercial practices
- Data confidentiality
- Professional behavior
- · Professional skills and added value
- Social respect
- · Environmental care

Those principles are defined to guide the way we do business.

Honesty and Integrity

We act with honesty and integrity at all times.

We comply with applicable laws and regulations, and we maintain very high ethical standards.

This is fundamental to the strong and enduring relationships we seek to have with our business partners, in whom we expect similar standards.

We will always seek to be truthful and never misleading.

If anyone is unsure how they should behave, we expect them to ask and seek advice.

We have a very low tolerance for any breach of this Principle.

Fairness of Commercial Practices

We conduct business and compete fairly and ethically.

We want to succeed simply on the basis of the excellence of the service we provide.

We have clear limits on gifts, entertainment and hospitality.

We ask third parties to respect these when engaging with members of Exclusive Networks, as per the Third Party Code of Conduct.

We require any member of Exclusive Networks to declare any personal interest which might impact or conflict with their ability to act in the best interests of the Group.

We have zero tolerance for any attempt to gain advantage by improper means.

Data Confidentiality

It is an essential element of the trust we expect within Exclusive Networks that we require everyone to maintain the highest standards of confidentiality, whether the information or data belongs to the Group or to our existing or prospective business partners.

This extends to all types of confidential information including trade secrets, financial results, plans, pricing, customer/supplier information or lists, sales figures, strategic information, surveys, processes, computer programs and other private information.

We expect the same standards from our people after they leave Exclusive Networks. The relations we seek to have with our business partners are such that we expect them also to protect our confidential information in like manner.

Professional behavior

We expect every member of Exclusive Networks to behave in a professional and respectful manner whenever they are representing the company, including on Social Media.

We also expect them not to behave in their personal lives in a manner likely to damage the reputation of the Group by association.

We encourage people to show initiative, to be proactive, to contribute to a positive team spirit and to make constructive suggestions for the better performance of the Group.

Professional skills and added value

The brand and image of Exclusive Networks is vital to our long term success.

It is important that all third parties who engage with us experience our people exercising high levels of professional skill relevant to their role.

We aim to demonstrate our skills and to be seen as the best. We strive to add value in everything we do.

Social respect

As an international company, Exclusive Networks thrives on being multinational.

We recognize that we are immeasurably stronger through diversity and inclusivity. We embrace cultural differences.

Everyone must treat others, whether colleagues or business partners, with respect.

We expect every member of Exclusive Networks to act consistently with our People Values, and to play a positive part in making their working environment one where everyone can enjoy what they do and thrive.

We have zero tolerance for any form of discrimination or for any behavior which others could consider intimidating or offensive.

Environmental care

We fully support the growing recognition of the need to protect our environment.

We are committed to pursuing ways to contribute in a positive way, and to taking opportunities, for instance in reducing our carbon footprint and recycling, to ensure our business partners do likewise.

Our People Values

People focused

We care for our people

- Do things to help other people without expecting any reward for yourself
- Identify times when someone else needs your support and provide it

Experts

We grow our own experts

- Create your own development plan and carry out planned activities
- Support others' development activities
- Help others identify development opportunities
- Encourage your team members / direct reports to apply for suitable internal opportunities

Fun

We build fun into what we do

- Look for ways to make work fun
- Arrange events that are fun for others
- Join in with social events that others plan
- Encourage others to join in with social events

Trust

Our relationships are built on trust

- Positively challenge to understand a situation more clearly but believe the information that your colleague is telling you
- Keep your promise to a colleague to complete the task you said that you would
- Trust colleagues or reportees to do what they promise they will do
- Delegate tasks appropriately to colleagues or reportees and trust that they will do it

Responsive

We are responsive to the needs of others

• Respond quickly to requests from others for information or support to get their work done

ACKNOWLEDGMENT "CODE OF CONDUCT"

- I acknowledge that I have received and read the company's document called "Code of Conduct"
- I acknowledge that I understand the standards, policies and procedures contained in this document and understand that there may be additional standards, policies, procedures and laws relevant to my position.
- I agree to comply with the Code of Conduct and with the "7 Ethical Principles".
- I acknowledge that if I have questions concerning the meaning or application
 of the Code, any company policies, or the legal or regulatory requirements
 applicable to my position, it is my responsibility to seek guidance from my
 direct Manager, my Country Manager or other relevant individuals or
 departments.
- I acknowledge that neither this Acknowledgement nor the Code of Conduct is meant to vary or supersede the regular terms and conditions of my employment by the company or to constitute an employment contract

Name:
First Name:
Position/ Title:
Country:
Date:

