



# Code of Ethics and Business Conduct

CONFORMAR®

## Message from the Managing Owner



Our commitment to ethical behaviour and the solid ethical foundations are one of the most essential components of CONFORMAR operation. We are committed to doing business the right way, based on a culture of ethics and compliance.

In the long term, we can successfully face the challenges of competitive market environment by accepting the imperatives of moral responsibility, both as individuals and as a company. In performing the job duties, the employees should always act lawfully, ethically and in the best interests of the CONFORMAR.

Thank you for upholding our values and helping us doing things right. It does not only mean that we provide fairly priced and of exceptional quality services, but it also means that ethics and integrity is always born in mind. We source material only from suppliers who have impeccable human rights and compliance records, and we ensure that our supply chain is of high integrity and we monitor our entire operation for compliance with our Code.

Guido Fallentheyne, Managing Owner.

Nazaré, January 2<sup>nd</sup> 2021



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## 1. Introduction



This CODE OF ETHICS AND BUSINESS CONDUCT of CONFORMAR serves as our ethical commitment and as a guide to proper business conduct for all of our stakeholders. We, at CONFORMAR are committed to doing business legally, ethically and in a transparent manner.

This document applies to all staff who work for the CONFORMAR, and also include other organisations who do business with us.

CONFORMAR expects its staff to be impartial and honest in all affairs relating to their job. All staff bear a responsibility in general, to be of good faith and do nothing to destroy the trust necessary for employment.

The success of our business is based on the trust we earn from our employees and customers. We gain credibility by adhering to our commitment to fairness and reaching our goals solely through ethical conduct. All staff are expected to adhere to this Code in their professional, as well as personal conduct, treat everyone with respect, honesty and fairness.

We are committed to making efforts to apply our values and norms also throughout the entire value chain of our own suppliers, sub-contractors, service providers and business partners.

CONFORMAR is open to any questions at any time and will not allow punishment or retaliation against anyone for reporting a misconduct in good faith.



## 2. Ethical Values



Our core values at CONFORMAR are:

**Integrity • Trustworthiness • Respect  
Responsibility • Accountability**

## 3. Ethical Decision-making

Ethical conduct is a value-driven decision-making. Several key questions can help to identify situations that may be unethical, inappropriate or illegal. Ask yourself:



*Is this the right thing to do? • Is what I am doing legal?*

*Does it reflect our company values and ethics?*

*Does it comply with the Code and company rules/policies?*

*Does it respect the rights of others?*

## 4. Compliance with laws and regulations



Our commitment to integrity begins with complying with laws, rules and regulations. We understand and comply with the legal requirements and commercial practices of lawful business.

We are committed to adhere to every valid and binding contractual agreement that we conclude, and we do not abuse our rights.

## 5. Human rights



We are committed to respect human dignity and rights of each individual and community whom we interact with during the course of work. We shall not, in any way, cause or contribute to the violation of human rights. Our staff shall treat everybody with dignity, respect and care and uphold human rights.



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## 6. Fair labour practices and working conditions



We are committed to promote equality in our employment practices and to fair employment and remuneration policy in compliance with applicable laws.

Our staff shall act with integrity and treat their colleagues and others through the work with full respect.

We provide equal opportunity in employment and we do not tolerate any discrimination or harassment or any type from abuse. Any kind of discriminatory behaviour, harassment, bullying or victimization is prohibited.

## 7. Health, Safety and Environment



We provide clean, safe and healthy work conditions and we are dedicated to maintaining a healthy environment. We are committed to minimise the impact on the natural environment of our operations. We make efforts to reduce the use of finite resources, like energy or water, and the harmful emissions, like waste.

## 8. Fair competition and business conduct



Our relationships with business partners are built upon trust and mutual benefits compliant with competition law. We are dedicated to ethical and fair competition, as we sell services based on their quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities, nor will we engage or assist in unlawful boycotts of particular customers. We commit to comply with all applicable trade controls, restrictions, sanctions and import-export embargos.



## 9. Anti-corruption



We firmly condemn and do not tolerate all forms of corruption. It is prohibited directly or indirectly offering, promising, giving, asking, soliciting or accepting any unfair advantage or benefit, in order to obtain, retain or facilitate in any way the business. An unfair advantage or benefit may include cash, any cash equivalent (e.g. voucher), gift, credit, discount, travel, personal advantage, accommodation or services. We do not permit facilitation payments to government officials or private business in order to secure or speed up routine actions. Corruption also covers the misuse of function or position as well, when someone makes that false appearance that s/he improperly influences a decision maker.

## 10. Gifts and Hospitality



We shall avoid any actions that create a perception that favourable treatment was sought, received or given in exchange for personal benefits.

We may accept and offer occasional gifts and hospitality that are customary and conform to reasonable ethical practices of the market, provided that they are not inappropriately excessive, not frequent and do not reflect a pattern of frequent acceptance, does not create the appearance of an attempt to influence business decisions.

## 11. Confidentiality, information security, proprietary information and intellectual property



We are committed to business information confidentiality, integrity and accessibility, we implement proper technical security measures and it is our staff's obligation to uphold this. Proprietary information includes all non-public information that might be harmful to the company or its customers, business partners if disclosed to unauthorised parties. All staff must handle any such information as strictly confidential.



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We are committed to comply with all personal data protection laws. We only acquire and keep personal information that is necessary and we give proper information on these activities to data owners. We implement proper security measures to assure confidentiality, integrity and availability of personal information.

We will not engage in unauthorized use, copying, distribution or alteration of software or other protected intellectual property.

## 12. Bookkeeping, true reporting and financial integrity

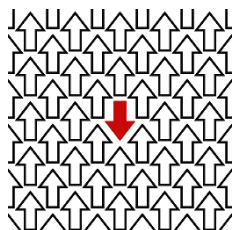


Our books, records, accounts and financial statements must be maintained in appropriate detail, must truly and properly reflect our transactions. We condemn all forms of money laundering, so we are committed to do business with partners involved in legitimate business activities with funds derived from legitimate sources.

We commit ourselves to fair taxation and to avoid all tax evasion practices, including such as failing to issue receipt or accounting fake expense invoices.

Fraud in every form, (including e.g. submitting false expense reports; forging or altering financial documents or certifications; misappropriating assets or misusing company property; making any untrue financial or non-financial entry on records or statements) is prohibited.

## 13. Conflict of Interests



Our decisions shall be based on objective and fair assessments avoiding the possibility of any improper influence. A "conflict of interest" exists when an employee's personal interest interferes or potentially interferes with the best interests of CONFORMAR. Determining whether a conflict of interest exists is not always easy to do, thus anyone with a conflict of interest question should seek advice from management.