



# CODE OF CONDUCT

DOING BUSINESS THE RIGHT WAY



# MESSAGE FROM THE DIRECTOR

Being a member of Corlido Group comes with many good things and responsibility is one of them. This Code of Conduct lays out the minimum standards that we expect each employee to meet. It has been designed to help every one of us make the right decisions and remain true to our core values.

This Code of Conduct is not optional. Anyone who chooses not to follow them is making a choice not to work for the Corlido Group. By following this code, you are helping to protect and reinforce our identity for the future.

See the code as a guide, helping you to refresh your knowledge and giving you sound advice. Be sure to review it and think about how it applies to your work within Corlido Group.

Read it. Understand it. Follow it.

Date: November 23, 2020

Signed: *J.P. Bos*  
*Director*

A handwritten signature in blue ink, appearing to read 'J.P. Bos', is positioned to the right of the typed name and title.

## HEALTH

Corlido Group cares about people. We continuously strive to develop a work environment that promotes good mental health and wellbeing for our employees and anyone else working with us.

What do we expect from you?

- Contribute towards Corlido Group's aim of providing a mentally healthy and supportive environment for all employees;
- Take care of your own mental health and wellbeing.

## SAFETY

No task is so important or urgent that it cannot be done safely. This is a fundamental priority for Corlido Group. We are committed to the goal of doing no harm to people and protecting the environment.

What do we expect from you?

- Comply with law in addition to our own strict internal standards and procedures;
- Stop or intervene in any activity – including your own – that you believe is not safe or non-compliant.

## ENVIRONMENT (SUSTAINABILITY)

Corlido Group strives to reduce the environmental impact of our global operations. We are committed to protecting the environment and making a significant contribution to a more sustainable world.

What do we expect from you?

- Comply with law in addition to our own strict internal standards and procedures;
- Have a positive impact. Consider and act upon ways to reduce Corlido Group's impact on climate change.

For additional guidelines, see Corlido Group's Health Safety Environment & Quality (HSEQ) policy statement.

## HUMAN RIGHTS

We do not tolerate any form of child, forced or compulsory labor in our business or in our supply chain. People who work for Corlido Group, directly or via suppliers, do so of their own free will. Corlido Group is committed to preventing slavery and human trafficking throughout our operations and those associated with our business.

What do we expect from you?

- Respect with dignity of every person you come into contact with and those affected by our projects;
- If you know of or suspect any potential human rights violations relating to our business, it is your duty to speak up.

## DIVERSITY

We recognize everyone has different experiences, skills and perspectives, and encourage people to use them and work collaboratively in diverse teams. We provide equal opportunities to all employees without regard to personal characteristics, such as race, ethnicity, color, gender, age or disability.

What do we expect from you?

- Be open-minded and encourage diversity of thought amongst your teams to ensure the widest possible ideas and opinions are used;
- When making employment decisions, such as hiring, evaluating and promotion, you must base them solely on objective factors.

## HARASSMENT AND VIOLENCE

We all have a right to work in an environment that is free from violence or harassment. Corlido Group will not tolerate any action, conduct or behavior, which is humiliating, intimidating or hostile.

What do we expect from you?

- If you witness or experience harassment or (treats of) violence, you should report it immediately either to a manager or HR;
- Managers are responsible for maintaining a work environment that is free of violence and unlawful harassment.

## ANTI-BRIBERY AND CORRUPTION

At Corlido Group, we do business honestly and build relationships based on trust. We have a zero-tolerance for bribery and corruption as they are simply against everything we stand for. Bribes can be hidden in commissions, fees, sponsoring, discounts and more.

What do we expect from you?

- Never receive, accept, give or promise anything of value to gain an improper business advantage;
- Do not offer or make unofficial payments to speed up an administrative process or secure a routine government action by an official (facilitation payments);
- Do not give or accept cash or its equivalent (e.g. cheques, vouchers, gift certificates, or pre-paid cards).

For additional guidelines, see Corlido Group's Anti-corruption Code.

## GIFT AND HOSPITALITY

Giving and receiving gifts and hospitality can contribute to building and retaining good relationships with clients, suppliers and other partners. However, some gifts and hospitality can be viewed as inappropriate or even as a bribe. Always think carefully about the risk of influencing decision making before offering or accepting gifts and invitations.

What do we expect from you?

Never offer or accept gifts or hospitality in return for a favorable decision or business advantage. Ask yourself the following question:

- does it have a business purpose?
- is the value proportionate?
- is the timing and nature appropriate?
- is it allowed under the givers and receivers policy and local law?

If you wish to offer a gift or hospitality to a government official, consult your manager in advance.

## CONFLICTS OF INTEREST

When your personal interest conflicts with your responsibilities as a Corlido employee, we speak of a conflict interest. Be transparent about potential conflicts of interest as soon as you are aware. Your manager can determine the right course of action.

What do we expect from you?

- Do not let any decision you make at Corlido Group be influenced by personal interest or the interest of family or friends;
- Withdraw from decision-making that creates an actual or perceived conflict of interest.

## FAIR COMPETITION

We see it as our responsibility to contribute to fair competition. When we focus on winning contracts, we do not avoid tough competition, but we compete in a legal and ethical manner. We follow the laws and regulations, wherever in the world we are operating.

What do we expect from you?

- Compete vigorously, but legally. Win based on our merits;
- Don't share competitive, sensitive information such as price, terms of contracts and tenders with competitors or business partners.

## CORLIDO GROUP'S ASSETS

To do your job every day, you use company assets. These assets come in many different forms – physical, electronic, financial and intangible. Whether it is a laptop, our brand or even a facility or building, we count on one another to act as stewards of the organization.

What do we expect from you?

- Protect all Corlido Group assets you use from misuse, damage, loss, and theft when entrusted to your care;
- Do not use Corlido Group assets for personal purposes without approval from your manager.

## DATA PRIVACY

In the course of business, we may collect, hold or process personal information about our colleagues, clients, suppliers and others partners. We treat such personal information with care and take responsibility for protecting it and using it lawfully and properly.

What do we expect from you?

- Only process personal data for the purposes for which it was collected;
- When you process or share individuals' personal data, you must always inform them. In some cases, you will need to get their prior consent.

## INSIDER DEALING

It is possible that your work gives you access to confidential information about Corlido Group or other companies. This kind of information can be price sensitive if listed companies are involved. Corlido Group employees cannot use or share the information with others, to avoid breaking laws and regulations and possible criminal prosecution.

What do we expect from you?

- Do not use price-sensitive information of Corlido Group or other listed companies to dealing shares;
- Do not share price-sensitive information with others, or recommend or encourage anyone else to deal in shares based on price-sensitive information.

## RECORD MANAGEMENT

Accurate and honest records are critical to making sound business decisions and maintaining the integrity of our financial reporting. Our business information, in whatever form (financial and non-financial records) must be complete, correct and transparent.

What do we expect from you?

- Assess the risks associated with any information you handle so you can properly manage the risks and protect the information;
- Substantiate your expense claims and comply with applicable declaration guidelines.

## EXTERNAL COMMUNICATION

We communicate in all sorts of ways and we should always be aware that everything we write or say reflects on Corlido Group's reputation. This includes social media, publications, advertising, public presentations and e-mailing. Our communication should be accurate, reliable and professional to maintain a high level of trust.

What do we expect from you?

- Exercise caution and common sense when using the internet and social media;
- Only speak to the media on behalf of Corlido when you are authorized to do so and refer media requests to Public Relations.

For additional guidelines, see Corlido Group's guidelines and regulations for ICT and Social Media.



[www.corlidogroup.com](http://www.corlidogroup.com)

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