

CODE OF ETHICS & PROFESSIONAL CONDUCT



BE INCLUSIVE

We welcome and support people of all backgrounds and identities. This includes, but is not limited to members of any sexual orientation, gender identity and expression, race, ethnicity, culture, national origin, social and economic class, educational level, color, immigration status, sex, age, size, family status, political belief, religion, and mental and physical ability.

BE CONSIDERATE

We all depend on each other to produce the best work we can as a company. Your decisions will affect clients and colleagues, and you should take those consequences into account when making decisions.

BE RESPECTFUL

We won't all agree all the time, but disagreement is no excuse for disrespectful behavior. We will all experience frustration from time to time, but we cannot allow that frustration become personal attacks. An environment where people feel uncomfortable or threatened is not a productive or creative one.

CHOOSE YOUR WORDS CAREFULLY

Always conduct yourself professionally. Be kind to others. Do not insult or put down others. Harassment and exclusionary behavior are not acceptable.

This includes, but is not limited to:

- Threats of violence.
- Discriminatory jokes and language.
- Sharing sexually explicit or violent material via electronic devices or other means.
- Personal insults, especially those using racist or sexist terms.
- Unwelcome sexual attention.
- Advocating for, or encouraging, any of the above behavior.

REPEATED HARASSMENT OF OTHERS

In general, if someone asks you to stop something, then stop. When we disagree, try to understand why. Differences of opinion and disagreements are mostly unavoidable. What is important is that we resolve disagreements and differing views constructively.

OUR DIFFERENCES CAN BE OUR STRENGTHS

We can find strength in diversity. Different people have different perspectives on issues, and that can be valuable for solving problems or generating new ideas. Being unable to understand why someone holds a viewpoint does not mean that they are wrong. Do not forget that we all make mistakes and blaming each other does not get us anywhere. Instead, focus on resolving issues and learning from mistakes.

THE WORK ENVIRONMENT

Employees should act with integrity, comply with laws, maintain a professional work environment, and comply with company policies. They should treat customers, colleagues, and partners ethically always.

CONFLICTS OF INTEREST

A company's reputation depends on the actions and integrity of its employees. It is essential that they avoid relationships and activities that hurt, or appear to hurt, their ability to make objective and fair decisions. Employees by contract have accepted to obey company's privacy policy and protect clients' security and rights. Employees should always act to protect company assets, including physical, intellectual, and electronic or digital properties.

Specifically:

- Preparing, maintaining, and disclosing accurate records.
- Information security.
- Protecting communication and information technology systems, as well as external communications.
- Use of company property and of property owned by others according to laws.
- Facility security.
- Protecting intellectual property.

ANTI-BRIBERY AND CORRUPTION

A company's integrity is essential for maintaining trustworthiness and reputation. Employees should always do their work fairly, honestly, and legally.

- Choosing and maintaining service providers.
- Receiving gifts and entertainment is prohibited.
- Loans, bribes, and kickbacks are prohibited.
- Relationships with former employees should obey and secure any conflict of interest.
- Obligations of departing and former employees refer to above conflict of interest.
- Interaction with competitors is permitted if it respects conflict of interest policy.
- Relationships with affiliates, international entities, and customers.

ATTENDANCE AND PUNCTUALITY

Employees are expected to be regular and punctual in attendance. This means being in the office, ready to work, at starting time each day. Absenteeism and tardiness burden other employees and the company. Employees who are unable to work due to illness or an accident should notify their supervisor. This allows the company to arrange for coverage of their duties and helps others continue to work in their absence. If an employee does a report for work and the company is not notified of an employee's status for 3 days, it is typically considered a job abandonment.

WORKING HOURS

Our company operates between [9 a.m. to 5/6 p.m. on weekdays.] You may come to work at any time between [9 a.m. and 10 a.m.], depending on your team's needs.

PAID TIME OFF (PTO)

Employees receive [20 days - 25 days] of Paid Time Off (PTO) per year. Your PTO accrual begins the day you join our company and you receive [2 days per month.] You can take your PTO at any time after your first [week] with us and you [can] use time off you have not accrued yet. If you want to use PTO, send a request. If your manager or HR approves, you are permitted to take your leave. You do not have to specify a reason for requesting PTO. If you leave our company, we may compensate accrued PTO with your final paycheck according to local law.

EMPLOYEE HEALTH

Employee health is important to us. We don't discriminate against people with disabilities or health conditions, but we want to do everything possible to help employees stay healthy.

We have also established non-smoking and substance abuse policies to protect employee health. We will create a workplace with minimal noise and good lighting.

WORKERS' COMPENSATION

We strive to keep our workplace safe, but accidents may happen occasionally. Employees who are injured at work (by accident or disease) can receive wage replacement, medical care, and rehabilitation benefits according to workers' compensation laws, when appropriate.

WORK FROM HOME

If your job does not require you to be present at our premises, you can occasionally work from home (WFH). Please inform your manager that you want to work from home [using our HRIS] at least [two days] in advance. When you are working from home, please use an internet connection and devices that are fast and secure. Choose a place without loud noises or distractions. And, check in with your team frequently to make collaboration easier.

CONFIDENTIALITY AND DATA PROTECTION

We want to ensure that private information about clients, employees, partners and our company is well-protected. Examples of confidential information are:

- Employee records
- Unpublished financial information
- Data of customers/partners/vendors
- Customer lists (existing and prospective)
- Unpublished goals, forecasts and initiatives marked as confidential

As part of our hiring process, we may ask you to sign non-compete and non-disclosure agreements (NDAs.) We are also committed to:

- Restrict and monitor access to sensitive data.
- Develop transparent data collection procedures.
- Train employees in online privacy and security measures.
- Build secure networks to protect online data from cyberattacks.
- Establish data protection practices (e.g. secure locks, data encryption, frequent backups, access authorization.)

We also expect you to act responsibly when handling confidential information. You must not use confidential information for your personal benefit or profit or disclose confidential information to anyone outside of our company.