

## **Business Code of Conduct**

Binding guideline for all employees, representatives, agents, freelancers and other entities acting for and/or in the name of SECOIA Executive Consultants

## Introduction / message of the chairman of the board:



SECOIA Executive Consultants' Code of Ethics sets out the standards defining how we operate every day and everywhere, and governing our relationships with clients, suppliers, stakeholders and each other. It ensures we all maintain the highest levels of professional conduct and underpins the reputation and trust SECOIA commands.

Our customers respect us because they know the importance we place on our Code of Ethics and, as such, are confident that the way we conduct our business is clear and above board. They can be assured that our behavior is going to stay at the highest standard.

The Code of Ethics is something we must live up to and implement every day. It ensures we make the right decisions in our professional lives and applies to everyone operating under the brand of SECOIA, helping us to protect SECOIA's and our customers image now and in the future.

**Bruno K. Hofstetter**  
**Chairman of the board**  
**SECOIA Executive Consultants AG**

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## Business Behavior

At SECOIA<sup>1</sup>, we follow a set of values and guidelines governing how we behave that are all about respect. We are committed to behaving in a responsible, transparent and fair manner while doing business and working with people, in compliance with applicable laws. This code of ethics has been drawn up to help you, as part of the SECOIA family, to make the right decisions.

### **Fair competition**

SECOIA always competes vigorously, but fairly. Our employees and collaborators<sup>2</sup> are expected to deal fairly and openly with customers, suppliers and competitors, and always in full compliance with local laws and regulations.

If you are dealing with trade associations or working in a context involving communication among competitors, customers or suppliers, it is your responsibility to verify and comply with all ethical and legal requirements. Discussions and agreements on the sharing of markets, territories or customers to fix prices or enter into any understanding to the same effect are strictly prohibited by law and/or this Code, and will be severely punished.

### **Conformity with applicable laws**

SECOIA operates under Swiss laws and upholds Swiss commercial law as well as applicable laws in the countries of its activities.

### **Fighting Fraud**

SECOIA's policy is to discipline fraud, or any intentional breaches of the law or of SECOIA's internal policies by employees seeking any kind of benefit for themselves, third parties or the company. We will always rigorously investigate and pursue any such cases, and SECOIA's management reports all actual or attempted fraud to the relevant authorities in accordance with the guidelines set out in our Anti-Fraud Policy.

SECOIA's managers also have clear rules regarding gifts and donations. These rules define the amounts that are acceptable in their regions and are advertised internally. Gifts and donations must be approved by SECOIA's managers, properly accounted for and reported in the appropriate books. As a general rule, you should not accept gifts for more than a nominal value, or any entertainment beyond common courtesy usually associated with accepted business practices.

As a SECOIA employee or collaborator, you are forbidden from accepting any prohibited payments<sup>3</sup> for the purposes of obtaining or maintaining company business. This also applies to indirect contributions or payments made through intermediaries<sup>4</sup>.

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<sup>1</sup> SECOIA Executive Consultants AG, hereafter referred to as SECOIA

<sup>2</sup> The term "Collaborator" signifies any kind of entity operating under the brand of SECOIA Executive Consultants AG. It explicitly includes agents, freelancers, consultants and complements SECOIA's own employees

<sup>3</sup> i.e. cash, benefits, loans, entertainment, etc. as prohibited under any applicable laws and/or SECOIA policy

<sup>4</sup> such as agents, consultants, advisors, suppliers, customers, etc.

### **Raising concerns**

As part of our commitment to tackling fraud, bribery and corruption, the SECOIA board requires you to report such incidences to them confidentially. Any such reports are treated in the strictest confidence and employees and collaborators are protected from any repercussions or reprisals. Address the Chairman by the way of communication of your choice. Or use [whistleblowing@secoia-excon.com](mailto:whistleblowing@secoia-excon.com).

### **Avoiding conflicts of interest.**

We expect a duty of loyalty from our employees and collaborators. It is your job to put SECOIA's interests first when acting in your capacity as an employee or collaborator, without prejudice to any applicable laws.

Any employee or collaborators participation in the board of external companies or in trade associations must be approved beforehand by SECOIA's Chairman if such involvement could overlap with SECOIA's business.

If you think there is a conflict between your personal activities and/or financial interests and those of SECOIA you must report it to your manager immediately. The resolution of such conflicts is recorded in writing and reported to SECOIA's stakeholders.

### **Maintaining privacy and information security**

SECOIA's relationships with stakeholders are based on trust. That trust is essential, and customers must feel confident that we can handle sensitive data relating to their citizens, subscribers, banking card holders, clients and employees. They trust us to deliver the right products and services to their end-users and to provide support for any problems. Any form of sensitive information is deemed confidential and must not be disclosed, directly or indirectly.



## Employment practice

SECOIA respects the fundamental International Labor Organization (ILO) conventions (Freedom of Association, The Abolition of Forced Labor, Equality, and The Elimination of Child Labor) in every country where we operate.

### **Diversity and minorities**

SECOIA lives up to equal employment opportunities and strongly encourages the like for their collaborators. We do not tolerate any form of harassment or discrimination, including that based on ethnicity, skin color, national origin, gender, age, religion, and sexual orientation, or physical and mental disabilities.

### **Health and safety**

SECOIA constantly strives to provide ever-safer working environments for employees, and any other people working at or visiting SECOIA facilities. Every employee is responsible to comply with applicable laws, regulations and requirements.

### **Employee privacy**

SECOIA respects the privacy of all employees. SECOIA tolerates the limited personal use of IT equipment and electronic records (email messages, files, etc.) produced or stored using SECOIA equipment. However, subject to local laws, we do reserve the right to review any information stored or transmitted using equipment that is the property of SECOIA.

## Social Responsibility

SECOIA is committed to the United Nations Global Compact strategic policy initiative to align operations and strategies with 10 principles in the areas of human rights, labor, anti-corruption, and environment. Please refer to [www.unglobalcompact.org](http://www.unglobalcompact.org) for more information.

### **Environment**

We aim to reduce our environmental impact by lowering our consumption of valuable resources, our waste production and use of hazardous substances.

### **Suppliers and business partners**

SECOIA seeks fair, mutually-beneficial and positive relationships with suppliers and business partners, according to the principles described in this Code of Conduct.

### **Community**

SECOIA seeks to make a positive contribution to the communities in which we operate, in particular through recruiting, training and offering equal opportunities to local individuals. As a SECOIA employee or collaborator, you must always remember that you represent SECOIA and must therefore behave in accordance with the principles set out in this Code of Ethics and, more generally, in such a way as to help maintain trust and confidence in the company.

Source: This document has been compiled based on Gemaltos' "Ethics & Community", 2013

