

Code of conduct – Obelis SA

1. **Object**
2. **Mission, values, and culture**
3. **Continuous improvement**
4. **Reputation**
5. **Customer Confidentiality**
6. **Harassment, discrimination policy and prevention of psychosocial risks**
7. **Conflict of interest**
8. **Advertising**
9. **Financial integrity**
10. **Bribery and corruption**
11. **Employee's obligations**
12. **Privacy policy for employees**
13. **IT policy**

1. Object

The purpose of this Code of Conduct is to define and promote the key behaviors expected of everyone in the organization, without exception. It serves as a clear statement of the values and principles that guide our actions and contribute to the consolidation of Obelis' culture.

This Code of Conduct applies to all interactions and activities involving employees, managers, advisors, and board members with their respective stakeholders. These relationships are essential to achieving sustainable success for the organization.

2. Mission, vision, and values

Our mission is to be the consultant of choice by shaping the compliance industry and providing the most effective compliance process.

Our performance is driven by the following core values that guide Obelis' operations, to better shape the culture and define its character:

- **Caring for our people, customers and our future**

Building productive, long-term relationships with customers and each other. Attracting and developing our people to grow their career, challenging our people, demonstrating a “can-do” attitude and fostering a collaborative and mutually supportive environment.

- **Entrepreneurship**

Acting with an owner's mentality, being passionate for what we all do, seizing opportunities, and welcoming responsibility. Being alerted to change and moving quickly and decisively to meet the challenges that emerge from such change; so that we provide our customers, and ourselves with a competitive edge. We demonstrate leadership and strong commitment to sustainable compliance & safety in the EU.

- **Professionalism**

Delivering what we promise and adding value that goes beyond what is expected. The core value of our job is working professionally to provide the best support to our customers.

- **Learning**

Listening to each other, to our customers and our external advisors. Sharing and capturing knowledge. Applying lessons learnt from successes and failures. We learn by continuously developing-and deepening-our knowledge of our business, and the skills of everyone within it.

- **Accountability**

Inspiring trust by saying what we mean, matching our behaviours to our words and taking responsibility for our actions. We collaborate in the best interest of our customer and act as leaders. We believe that we all play a leadership role. Leadership in our business is defined by courage, personal integrity, and having a vision and a positive attitude which inspires and motivates others. While our leaders are accountable and take responsibility for their actions, they also are thoughtful and innovative.

- **Diversity**

Valuing diversity and unique contributions, fostering a trusting, open and inclusive environment and treating each person in a manner that reflects Obelis' values. We believe that working with people of different backgrounds, cultures, and way of thinking helps our people grow into better professionals and leaders.

- **Personal Integrity**

Being trustworthy, honourable and responsible. Integrity, honesty, and accountability are at the core of our business. We believe that nothing is more important than our reputation and behaving with the highest levels of integrity is fundamental for us.

3. Continuous improvement

Obelis commits to excellence encouraging all employees to strive for it and embracing a mindset of continuous improvement. It consistently promotes learning and development while fostering an environment where innovation is valued.

The organization emphasizes the importance of regular feedback among its employees to identify areas of improvement. Throughout its history, this has enabled Obelis to enhance its processes, procedures, collaboration and knowledge-sharing practices.

Obelis views continuous improvement as a key element in enhancing service delivery and customer experience by adhering to ISO quality standards.

4. Reputation

Working Rules, procedures and guidelines ensure that behaviours and interactions with customers and colleagues positively reflect Obelis' image and values, both inside and outside the workplace.

Obelis also meets all regulatory requirements to protect and enhance its reputation. Additionally, all public communication is carefully reviewed to maintain respect to our stakeholders.

5. Confidentiality

Obelis will keep all information relating to every customer's file confidential. The organization may disclose information to a third party only upon customer's request or if required by law.

All copyrights in documents provided to us will be kept confidential and remain the sole property of their owner.

6. Harassment, discrimination policy and prevention of psychosocial risks

Obelis is committed to preventing and mitigating psychosocial risks by regularly auditing both organizational and individual performance to ensure compliance to the policy.

Obelis is committed to identifying situations that may lead to psychosocial risks at work, assessing their potential consequences, and addressing them accordingly. This includes situations that could cause stress, burnout or health issues due to work-related conflicts, violence, misbehaviours and harassment.

Risks, procedures for addressing those risks and responsibilities are outlined in dedicated internal policies.

These policies must be strictly adhered to by all Board members, managers, employees, interns, contractors, visitors, customers and any other individuals interacting with employees at work.

7. Conflict of interest

A conflict of interest exists when an employee's personal interests are inconsistent with those of the organization and create conflicting loyalties. Obelis' employees must make every effort to avoid situations where their personal interests might conflict with, or appear to conflict with, the interests of Obelis.

Employees should refrain from participating in activities that could create such conflicts. They must not only avoid actual conflicts of interest but also any situations that could be perceived by others as a conflict, even if unintended or unknown to the employee.

8. Advertising

Obelis' Marketing Department is responsible for all marketing and advertising activities for Obelis Group of Companies. The objective of those activities is to raise brand awareness, promote the brands within the group and contribute to generating new leads.

9. Financial integrity

Obelis' financial records are detailed and meticulously maintained in accordance with both Obelis' accounting principles and the applicable legal framework. The Accounting Department is responsible for recording financial transactions and ensuring that the records are consistently updated.

10. Bribery and Corruption

Obelis is not involved in any activities related to money laundering or terrorist financing and is fully committed to complying with all relevant laws and regulations on these matters.

The company strictly prohibits offering any gifts, benefits, or goods to customers or potential customers that might exceed normal business practices or could be perceived as attempts to gain undue advantages.

Additionally, no gifts, benefits, or goods may be provided to public officials, chartered accountants, auditors, or members of representative bodies, or their relatives, with the intent to influence their independent judgment or to secure preferential treatment.

11. Employees' obligations

11.1 General obligations

Employees have a duty to perform their work with care, integrity and awareness of time and place, adhering to pre-agreed conditions. They must remain focused on their work during working hours.

Employees should adhere to company rules and guidelines to foster a positive and effective working relationship.

11.2 Legality

Obelis and its employees must comply with Belgian laws and regulations, with Obelis' Working Rules and Code of Conduct, and with all applicable internal policies and procedures in a fair and equitable manner.

11.3 Integrity

Obelis and its employees must conduct themselves with fairness and transparency, avoiding the use of misleading or unsubstantiated information.

Under no circumstances should Obelis or its employees falsify any type of customer documentation, work reports, or any other documents.

Obelis and its employees are expected to always act fairly and impartially. They must reject any form of discrimination towards customers and ensure that all communications, messages, and contracts are clear and straightforward, avoiding unnecessarily complex language and unfair practices.

Obelis and its employees must treat customers with the utmost courtesy and responsiveness throughout the management and execution of commercial activities.

Supplier selection procedures are grounded in loyalty, transparency, and cooperation. The selection of suppliers is based on objective and impartial criteria, considering factors such as quality, innovation, cost, and additional services or products. No form of gifts, benefits, or goods is permitted unless they are part of normal courteous relations and of minimal value. If employees are offered benefits from a supplier, the business relationship should be suspended, and the incident should be reported to the employee's supervisor.

11.4 Loyalty & Transparency

Employees must demonstrate loyalty by honouring commitments and agreements in good faith, acting responsibly, and contributing to the protection and enhancement of Obelis' assets. In all activities and decisions, employees are expected to act in good faith. Internal and external relations at Obelis must be grounded in honesty, accuracy, and excellence.

Employees must adhere to the instructions provided by their employer, supervisor, or designated representative to foster a productive working relationship.

Employees are obligated, both during and after the termination of their contract, to refrain from disclosing to any third party, or using for personal gain, any inventions, methods, special features, trade secrets, or intellectual property or general information belonging to Obelis.

Furthermore, employees must avoid engaging in acts of unfair competition both during their contract and after its termination.

11.5 Respect for human rights

Obelis respects fundamental human rights, upholds the protection of moral integrity, and guarantees equal opportunities for all.

Employees are expected to treat their colleagues and superiors with respect and politeness. All forms of racial, ethical, and sexual harassment are strictly prohibited.

Discriminatory behaviour based on political beliefs, union affiliations, religion, race, nationality, sex, sexual orientation, health, or any other personal characteristic is forbidden in all interactions and relationships.

11.6 Security, protection and healthy working conditions

As part of the installation of a surveillance timer at Obelis' premises, employees will be required to provide their identity card and a photo. This information will be stored confidentially within the system and will only be used to assist emergency services in the event of a workplace accident.

This system enables Obelis to demonstrate to any third party, such as the police, fire brigade, health authorities, or other relevant authorities, an effective risk management system by identifying who is or was present at Obelis' premises at any given time. The purpose of this system is solely to enhance overall security, including the safety of both Obelis and its employees.

12. Privacy policy

Obelis is committed to protecting the privacy and security of personal data. The organization has adopted a privacy policy that outlines how we collect and use personal information in accordance with data protection laws, including the General Data Protection Regulation (EU) 2016/679 (GDPR).

Under GDPR, Obelis is classified as 'data controller.' This means that Obelis has overall control over the purposes and means of processing personal data at its disposal.

Obelis' privacy policy applies to all current and former employees, interns, and contractors.

Obelis is dedicated to complying with data protection laws and their underlying principles. This ensures that personal data held by Obelis is:

- Used lawfully, fairly, and transparently.
- Collected only for specified, explicit and legitimate purposes clearly communicated and not further processed in a manner that is incompatible with those purposes.

- Adequate, relevant and limited to what is necessary for the stated purposes.
- Accurate and kept up to date.
- Retained only as long as necessary for the purposes communicated to you.
- Stored securely.

13. IT policy

Users must not compromise the integrity of Obelis' Information Systems. The following actions are prohibited without prior approval:

- Damaging, reconfiguring (e.g., disabling antivirus software), or moving equipment such as desktop PCs, printers, scanners, and monitors.
- Installing software on Obelis equipment.
- Reconfiguring or connecting unauthorized equipment to the network.
- Setting up servers or services on the network.
- Deliberately or recklessly introducing malware.
- Attempting to disrupt or circumvent any Information Security controls.

Users are expected to use Obelis' Information Technology Assets in accordance with accepted Obelis standards and policies.

Users must not knowingly use remote control software on any internal or external host computers or systems unless explicitly authorized by Obelis management or the IT Department.

Upon termination of an employment contract or any other agreement involving the use of equipment, software, or information (in electronic or paper form), users must return all such assets to their line manager, the asset owner, or Obelis IT Department.

Obelis ensures the proper use of devices, email, and information systems by implementing policies that establish limitations on their usage.

If users are found to have breached these regulations, sanctions may be imposed following a disciplinary process. Sanctions may include restrictions on the use of Information Systems, removal of services, withdrawal of offending material, fines, recovery of costs incurred by Obelis due to the breach, or termination of the collaboration or contract.