
**GEN
KEY**



GenKey's Code of Conduct



1. Introduction



GenKey believes in responsible social and ethical behavior and has a responsibility to the employees serving the company worldwide. Furthermore, GenKey and its Team Members have an obligation to all stakeholders to observe high standards of integrity and fair dealing. The foundation for GenKey's Code of Conduct is the OECD (Organization for Economic Cooperation and Development) code of practice.

The Code of Conduct is distributed to all team members, employees, people working on a professional service agreement, agents and other people affiliated to GenKey such as consultants, distributors and other representatives, hereafter referred to as "Team Members".

2. OECD code of practice

OECD Guidelines for Multinational Enterprises contain recommendations for responsible business conduct in a global context. They provide principles and standards of good practice consistent with applicable laws and internationally recognized standards. GenKey chooses to follow these guidelines. Important items from these guidelines are presented below.

3. Standard Business Ethics

This section summarizes key points in our Standard Business Ethics:

- **Anti-bribery:** GenKey does not accept bribery. This means that GenKey prohibits its Team Members from making or approving any offer, promise, payment, or gift of anything of value to any individual, with an intent to improperly influence a decision by the individual. Similarly, it also means that Team Members are prohibited from receiving anything of value provided there is intent to improperly influence their decision-making.
- **Competition and antitrust laws:** GenKey does not engage in anticompetitive agreements or practices. The antitrust and competition laws vary from country to country, but the main principles are the same. Our Code of Conduct identifies these.

GenKey supports fair and open competition. GenKey complies with applicable legislation on competition and does not accept unlawful conduct. Team Members must avoid situations that involve a risk of breaching the legislation on competition. Team Members must avoid any kind of anticompetitive agreement or concerted practice, common under standing or otherwise, with any of GenKey's actual or potential competitors. Also, exchange of information that is competitively sensitive between competitors and potential competitors is prohibited.

- **Financial information:** GenKey's accounting and reporting follow national laws and international financial reporting standards, as well as corporate governance recommendations. Based on these

regulations, GenKey can make responsible business decisions and provide investors with truthful, complete, up-to-date and accurate information about its operations. GenKey's transactions must be accurately recorded in full in the company's accounts. Incorrect entries or entries that are contrary to the true nature of the transaction is forbidden.

- **Confidential information:** GenKey protects its business secrets and other confidential information and requires its partners to protect them. Team Members must not disclose or use confidential information without consent.

- **Protection of the company's property:** GenKey protects the company's financial, tangible and intangible property. The company's property must only be used to achieve the company's business goals. The use of GenKey's property for personal purposes or to damage the company's property is forbidden.

- **Conflicts of interest:** Team Members must be loyal to GenKey in all of their operations. A conflict of interest arises whenever a Team Member or one of his/her related parties has a personal, financial or other interest that conflicts with the interests of GenKey. The Team Member must notify GenKey of any conflicts of interest beforehand, prior to progressing any further in the matter and take action to solve the conflict.

- **Additional information and notification of breaches:** If Team Members have doubts about the interpretation of GenKey's Code of Conduct, they must contact their supervisor or the Legal Department. Team Members must notify their supervisor if they suspect that GenKey's Code of Conduct has been breached or that the company's conduct has been unlawful. Breaches must also be reported to the F&A department at invoice@genkey.com.

If a Team Member finds it difficult to bring up an issue with his/her supervisor, GenKey's F&A department (invoice@genkey.com) should be contacted.

A Team Member's information will be treated confidentially, and no Team Member will be discriminated for reporting, in good faith, violations of the Code of Conduct. GenKey will take the necessary measures based on the notifications.

- **Consequences:** Any breach of GenKey's Code of Conduct will be subject to appropriate consequences, which may also include termination of a Team Member's contract. GenKey requires that its partners follow this Code of Conduct in their operations. Any breach of these principles may lead to cooperation being discontinued or to other consequences. If the breach is unlawful, the case can be referred to the relevant authorities for further investigation.

4. Personnel – Human Rights

GenKey respects and supports internationally recognized human rights principles and promotes their implementation in all of its business areas. Compliance with local legislation and the key conventions of the International Labour Organization (ILO) constitutes the foundation of GenKey's HR principles.

Promoting the Team Member's well-being and developing their skills are key features of GenKey's social responsibility. The quality of GenKey's operations and products and the achievement of future growth and profitability targets depend on these factors.

- **Promotion of well-being:** GenKey promotes the mental and physical work capacity of its personnel by developing working conditions and occupational well-being in the long term.
- **Occupational safety:** GenKey ensures occupational safety by providing safe working methods to its personnel and by monitoring that these are followed.
- **Development of skills:** Recruiting and committing motivated employees and developing their professional skills are the foundation of GenKey's success. The skills of the entire personnel are monitored and developed in line with the strategy.
- **Equality:**
GenKey does not tolerate any kind of discrimination at work. Qualified applicants have equal opportunities to be hired, to make progress in their careers, increase their salaries and to improve their skills regardless of

their race, religion, ethnic or national background, gender, sexual orientation, age or disabilities.

- **Discrimination, harassment and diversity:** GenKey values and promotes diversity and gender balance. GenKey provides a work environment where everybody should be treated with respect and dignity and be given fair and equal opportunities for development. Therefore, GenKey does not tolerate any form of discrimination or harassment in the workplace due to race, ethnicity, sexual orientation, gender, religion, age, disability, political opinion, nationality or any other potentially discriminatory factor.
- **Remuneration:** GenKey pays its employees a competitive salary or other compensation in accordance with a written employment contract.
- **Child labor:** GenKey does not accept child labor. GenKey recognizes the right of every child to be protected from economic exploitation and from doing work that is likely to be hazardous to their physical, mental or spiritual health, harmful to their moral or social development, or to interfere with their education.
- **Forced labor:** GenKey does not employ or accept any form of forced or bonded labor, prisoners or illegal workers. All workers shall have the right to leave their workplace and accommodation (if provided) freely during the hours when they are not working.
- **Freedom of association:** GenKey respects the freedom of association of its employees.

5. Environment and sustainability

The starting point of GenKey's environmental management is to ensure that all operations are in compliance with local environmental legislation. GenKey shall meet legal environmental requirements and expects all its units to have the environmental permits and licenses needed for their operations. All employees are expected to support and take responsibility for GenKey's environmental performance. GenKey encourages the development and diffusion of environmentally friendly technologies.

GenKey continuously seeks ways to reduce the consumption of resources, including energy, waste and water, prevent pollution, noise at acceptable levels and improve the overall environmental impact of its operations and products along the value chain.

6. Communications

All communication on behalf of GenKey, regardless of which communication channel is used, needs to be in line with GenKey's business values and policies. Team Members must be professional, honest and accurate and always maintain confidentiality in their communication. Sensitive or undisclosed corporate information shall not be discussed or published.

Specific points:


- **E-mail correspondence and internet use:** E-mail communication should be dealt with in the same way as other written business communication regarding content, formal language and handling of documents. Company e-mail and internet functions should be used only for company purposes and therefore all traffic is company property.
- **Social media:** All postings about GenKey in social media, including blogs, content communities, internet forums and social networks shall respect copyright laws. Extra attention shall be taken when communicating about GenKey or using the GenKey logotype. Social media shall not be used in a way that could harm GenKey's reputation. Misleading or unfair content about GenKey, colleagues, competitors or other stakeholders shall never be posted.

Team Members confirm they have familiarized with the content and adhere to the code of conduct.

Team Member Name:

Role

Date:



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