



BSD Code of Practice

To put our core values into effect, we do business as defined by this Code of Practice:

Legal Compliance

We comply with local and international laws.

Competition

We compete openly and independently in every market.

Financial Records

Our business transactions are fully and fairly recorded in accordance with corporate accounting principles and other appropriate requirements.

Business Partnerships

We choose subcontractors, partners, employees and consultants who act in a manner consistent with our principles and with this Code of Practice. In order to consolidate this commitment, an agreement can be signed by the parties.

Environment

We are committed to working in an environmentally friendly way. This includes, amongst other issues, the management of energy, paper and water consumption, recycling and waste. Whenever economic sustainability allows, we opt for environmentally friendly suppliers, sources, transportation and equipment.

Internal Stakeholders

Employees and consultants are success drivers. We are committed to contributing to our colleagues' professional and personal development, empowerment and work-life balance.

Our relationships with associates are set according to local laws and ILO standards.

We conduct our business activities with employees, clients, stakeholders and business partners with respect for all people irrespective of differences or similarities. We hire and promote people based on their abilities.

Harassment will not be tolerated.

Improper Payments

BSD employees and consultants will not offer, promise or give any undue pecuniary or other advantage to obtain or retain business or any improper advantage in the conduct of business.

BSD employees and consultants will not offer, make, seek or accept gifts, payment, entertainment or services, which might reasonably be believed to influence business transactions, to or from actual or potential business partners.

Conflict of Interest

We avoid situations in which personal interests, outside activities, financial interests, or relationships conflict or appear to conflict with the interests of BSD. Business dealings on behalf of the company influenced by personal considerations or relationships are not permitted.

Use of Assets

We respect the company's, client's and partner's assets and do not seek to gain personal advantage obtained through the use of BSD's, client's or partner's properties or information.

**Confidentiality and Use of Information**

Any information obtained from a client during a project is property of the client and is therefore confidential. Business cases of our projects will be developed and may be used for BSD needs. A client's name on those cases can be used with the client's permission.

Disciplinary Actions

BSD can take disciplinary action, up to and including termination of employment or business contract, against employees, consultants, suppliers and partners who violate the law or this Code of Practice.

Public Disclosure

The BSD Business Principles and this Code of Practice are an integral part of every contract with employees, consultants, suppliers, partners and clients. They are also available for download on our website www.bsdconsulting.com

Continuous Improvement

BSD is committed to continuous improvement in all of its activities and processes. This includes the Code of Practice, which can be further developed to meet future needs and requirements. We recognize that errors may occur and we consider them valuable sources of information for our further improvement towards excellence.

Putting this Code into Practice

The standards addressed in this Code of Practice represent the core of BSD's group culture and commitment. Group-wide and uniform compliance is essential and every employee and consultant is responsible for upholding these principles.

Manuals and training on this Code of Practice will be available for every BSD employee and consultant.

Reporting on Non-compliance

All BSD consultants, employees, partners and any other stakeholders are encouraged to report any suspected or observed violations of the law or of this Code of Practice – or if they are asked to do something that might be a violation. An Internal Ethics Council has been formed to evaluate potential and actual violations of our values or this Code of Practice. Reports may be sent to ethics@bsdconsulting.com.

Confidentiality will be maintained to the fullest extent possible.

BSD Group 290812