

Excimp Code of Conduct

Document Version : 1.0
Created : September 4, 2020
Copyright : Excimp © 2020

1	INTRODUCTION.....	2
2	Definitions	2
3	Policy objectives.....	3
4	Laws, Rules, and Regulations compliances.....	3
4.1	General	3
4.2	Anti-bribery and Anti-Corruption Laws	3
4.3	Offering or Accepting Business Courtesies/Business Benefits.....	3
4.4	Unfair Business.....	4
4.5	Export Laws	4
5	Business Conduct	4
5.1	Financial Integrity	4
5.2	Conflicts of Interest	4
6	Labor & Human Rights.....	4
7	Environment, Health & Safety	5
8	Resources & Responsibilities	5
8.1	Trademarks	5
8.2	Confidential Information	5
8.3	Monitoring	5
8.4	Data Privacy	5
8.5	Communication	6
9	Compliance Management System	6
10	Questions & Concerns reporting.....	6

1 INTRODUCTION

For EXCIMP doing business based on integrity and transparency is key and a requirement for all involved. EXCIMP strictly prohibits bribery, fraud and all other corrupt business practices. EXCIMP expect employees at all times to obey the law and maintain high ethical standards as stated in this Code of Business Conduct. EXCIMP will uphold laws relevant to countering fraud, bribery and corruption in all of the jurisdictions in which EXCIMP operates, particularly laws that are directly relevant to specific business practices. Losses due to fraud, bribery and all other corrupt business practices can be more than just financial in nature: they can also cause damage to EXCIMP’s reputation. The reputation of Excimp for lawful and responsible business behavior is of paramount importance. This Code of Conduct guidelines describes EXCIMP’s commitment to integrity and sustainability and is mandatory for all EXCIMP employees. Business transactions through EXCIMP must be in full compliance with this EXCIMP Code of Conduct and of course all applicable laws, rules, regulations and policies. Beyond those legal requirements, all Excimp employees, and subcontractors or other representatives working on EXCIMP matters must act as serious business professionals who behave fairly, ethically, and correctly in all business activities. EXCIMP expects its employees to conduct themselves in a safe manner, to refrain from any action that may be considered a conflict of interest, and to treat others with respect and fairness while working on behalf of EXCIMP. EXCIMP regards its relations as a critical and necessary extension of our operations and future success, and thanks them for continuing to make compliance and integrity a top priority when working with EXCIMP.

2 Definitions

Term	Description
“EXCIMP”	refers to EXCIMP International B.V. and all international EXCIMP subsidiaries.
Customers or potential customers	<ul style="list-style-type: none"> • Representatives or officials of the government, • Representatives or employees in entities established by the government as e.g.: the military, public schools, scientific research bodies, representatives of political parties, etc. • Representatives or employees of state owned enterprises, • Representatives or employees in the public sector, • Anyone that can influence a business deal with Excimp.
Hospitality events	Events that do not have an agenda that is principally business focused.
Bribe	Kickback fees, or payments of money or anything. This includes anything of value to anyone.
Advantages	the purpose of influencing obtaining or retaining business, or any other favorable business decision, that is related in any way to EXCIMP.
Conflict of interest	Any circumstance that could cast doubt on Excimp’s ability to act with total objectivity regarding the supply of products and services to Customers.

3 Policy objectives

The purpose of this policy is to set out the responsibilities of Excimp in observing and upholding its position on bribery, fraud and other corrupt business practices. To achieve this commitment Excimp will:

- Develop and maintain effective controls to prevent bribery, fraud and other corrupt business practices;
- Ensure that any suspected, alleged, attempted or actual instances of bribery, fraud or other corrupt business practices are investigated appropriately, regardless of the position held or length of service of any individual implicated;
- Take appropriate disciplinary action in all cases where investigation has proven attempted or actual instances of bribery, fraud or other corrupt practices. All significant cases shall be reported to Excimp's Legal representative who reports them in the appropriate manner; and,
- Operate a lessons learnt process to review incidents, systems and procedures to prevent similar instances occurring and embed responsible business behaviors within Excimp.

4 Laws, Rules, and Regulations compliances

4.1 General

Excimp agrees to abide by the terms of this Code. Excimp agrees that all business conducted on behalf of EXCIMP shall be accomplished in full compliance with applicable laws, rules, regulations and policies. If local laws are less restrictive than the principles set forth in this Code, Partners are expected to, at a minimum, comply with the Code. If local laws are more restrictive than this Code, Partners are expected to, at a minimum, comply with applicable local laws.

4.2 Anti-bribery and Anti-Corruption Laws

Excimp shall never make, authorize or offer any bribes to anyone including customers or potential customers, for advantages. This includes bribes where there is reason to believe that it will be passed on to an official or the decision maker at a customer or potential customer, for getting advantages. Excimp prohibits to invite customers or potential customers to hospitality events. Excimp complies with the Dutch Criminal Code (Wetboek van Strafrecht), and all applicable local anti-bribery laws.

4.3 Offering or Accepting Business Courtesies/Business Benefits

Excimp uses discretion and care to ensure that any expenditure (i.e., gifts or meals) offered to or received by any EXCIMP employee or third party is in the ordinary and proper course of business and could not reasonably be construed as a bribe or improper inducement. Business courtesies and/or benefits are not allowed to be (or appear to be) designed to gain advantages. Employees are only permitted to offer and accept meals and other business entertainment from customers in connection with EXCIMP business only when they:

- Are offered and/or accepted openly and transparently, and
- Do not lead to advantages, and
- Are not offered during any pending bidding or negotiation process, and
- Serve a legitimate business purpose, and
- Are lawful, and
- Comply with ethical business principles, and
- Comply with local business customs, customer, vendor, competitor and Excimp's company policy.

Generally, meals or business entertainment must be reasonable, appropriate and consistent with applicable local laws not exceeding 50 EURO per person and only if allowed by local rules and habits.

4.4 Unfair Business

To protect consumers and competitors against unfair business and to promote and protect healthy competition, antitrust and competition laws are designed. EXCIMP expects its employees and customers to comply with all applicable antitrust and competition laws. Excimp does not allow and will never setup nor sign an agreement with a customer, vendor, competitor, or other not to conduct business with, or not to deliver goods or provide services to any other customer, vendor, competitor, partner, or service provider. To legally enable and allow exchanging confidential information Excimp signs an NDA with its customer, authorizing both Excimp and the customer to do so. Excimp's product pricing is independent of any other influence then Excimp's own calculation.

4.5 Export Laws

EXCIMP complies with all export laws and requirements.

5 Business Conduct

EXCIMP wants to compete fairly and ethically for all business opportunities. Excimp's employees involved in the sale or licensing of products and services and the negotiation of agreements and contracts to EXCIMP must ensure that all statements, communications, and representations to EXCIMP are accurate and truthful.

5.1 Financial Integrity

Accurate and reliable financial and business records are of critical importance in meeting EXCIMP's financial, legal, and business obligations. Excimp's business records are retained in accordance with record retention policies and all applicable laws and regulations.

5.2 Conflicts of Interest

EXCIMP delivers products and services easily and free from any conflicting interests. A conflict of interest also exists where there is a choice between acting in a personal interest (financial or otherwise) or in the interest of EXCIMP. EXCIMP exercises reasonable care and diligence to avoid any actions or situations that could result in a conflict of interest. EXCIMP expects customers and other business relations to prevent or immediately disclose a conflict of interest or the appearance of a conflict of interest as soon as possible to EXCIMP.

6 Labor & Human Rights

Excimp respects human rights understood as the principles expressed in the International Bill of Human Rights and in the eight ILO core conventions and respects their employees' fundamental rights at work. Excimp also upholds its duty in all business activities with customers and other business relations, such as:

- Avoidance of Child Labor
- Non-Discrimination
- Compliance with local Working Hours requirements
- Compliance with local Wages and Benefits requirements
- Freely Chosen Employment
- Freedom of Association

- Humane Treatment

7 Environment, Health & Safety

Excimp recognizes that quality of life, products and services, consistency of production and workers' morale are enhanced by a safe and healthy work environment. Excimp prevents workers' exposure to potential safety hazards. To enable producing world class products, Excimp recognizes that environmental responsibility is a requirement. Since 2014 Excimp's data center is running for 75 % on solar energy.

8 Resources & Responsibilities

Excimp safeguards customers' resources which include property, assets, intellectual property, company technology assets (network, phone, Internet, software applications and e-mail systems), trade secrets and other confidential, proprietary or sensitive information while performing work. Use of EXCIMP and/or customer resources without proper approvals or for anything other than to perform EXCIMP related work activities is strictly prohibited. Intellectual property rights of EXCIMP must be protected at any time.

8.1 Trademarks

Excimp respects all existing trademarks.

8.2 Confidential Information

EXCIMP confidential or sensitive information must be protected. If such information needs to be disclosed, appropriate EXCIMP approval through a signed NDA is required prior to the disclosure. Confidential information and IP cannot be used or accessed other than as necessary in the ordinary course of business as directed or authorized by the signed NDA. Customers or anyone else can never use this information to gain an advantage, and can never share this information. Use of this information is only allowed when in direct relation to EXCIMP work activities All confidential or sensitive information obtained by or from EXCIMP, a customer or anyone else, must have documented authorization in place. Inappropriate use of EXCIMP Information is strictly prohibited. EXCIMP safeguards confidential information by:

- not reproducing copyrighted software, documentation, or other materials without permission, and
- not transferring, publishing, using or disclosing it,
- requiring customers and anyone else involved, to sign Non-Disclosure Agreements (NDA) for each specific project.

8.3 Monitoring

EXCIMP retains the right to monitor its assets and work environments in compliance with applicable federal, state and local law. Monitoring is performed to promote safety, prevent criminal activity, investigate alleged misconduct and security violations, manage information systems, and for other business reasons.

8.4 Data Privacy

The terms of any confidentiality provision in the NDA or other relevant agreement between Partner and EXCIMP will also govern confidentiality terms between the parties. Excimp observes applicable data privacy standards, materials that contain confidential information or which are protected by

privacy standards (for example but not limited to, software and other inventions or developments (regardless of the stage of development) developed or licensed by or for EXCIMP, marketing and sales plans, competitive analyses, product development plans, pricing, potential contracts or acquisitions, business and financial plans or forecasts, and prospect, customer and employee information) are stored securely and are shared only internally with those employees with a “need to know”.

8.5 Communication

Excimp is not committed to future functionality towards customers or other third parties. Outside the scope of the relevant project, EXCIMP does not provide statements or speak and act on behalf of others toward customers or third parties unless EXCIMP is specifically and explicitly authorized to do so. EXCIMP protects its reputation and does not allow unauthorized communication by its employees on behalf of the customer and/or with reference to EXCIMP.

9 Compliance Management System

Excimp shall adopt or establish a lean and mean compliance management system whose scope is related to the content of this Code and relates to Excimp’s company size. The management system shall be designed to ensure:

- Compliance with applicable laws, regulations and customer requirements related to Excimp’s operations and products;
- Conformance with this Code of Conduct, and;
- Identification and mitigation of operational risks related to this Code; and
- Documentation of the Compliance Management System for auditing purposes.

10 Questions & Concerns reporting

The standards of conduct described in this EXCIMP Code of Conduct are critical to the ongoing success of EXCIMP’s relationship with its customers. In case of any question or concern about compliance or ethics issues or to report illegal or unethical activities send an email to hans.kardol@excimp.com for assistance or guidance as necessary. All matters raised in good faith through these reporting lines will be handled on a confidential, non- retaliatory basis. All information will be maintained as confidentially as practical in light of the need to conduct an investigation and implement remedial measures. Anonymity will be granted upon request by the reporting person.