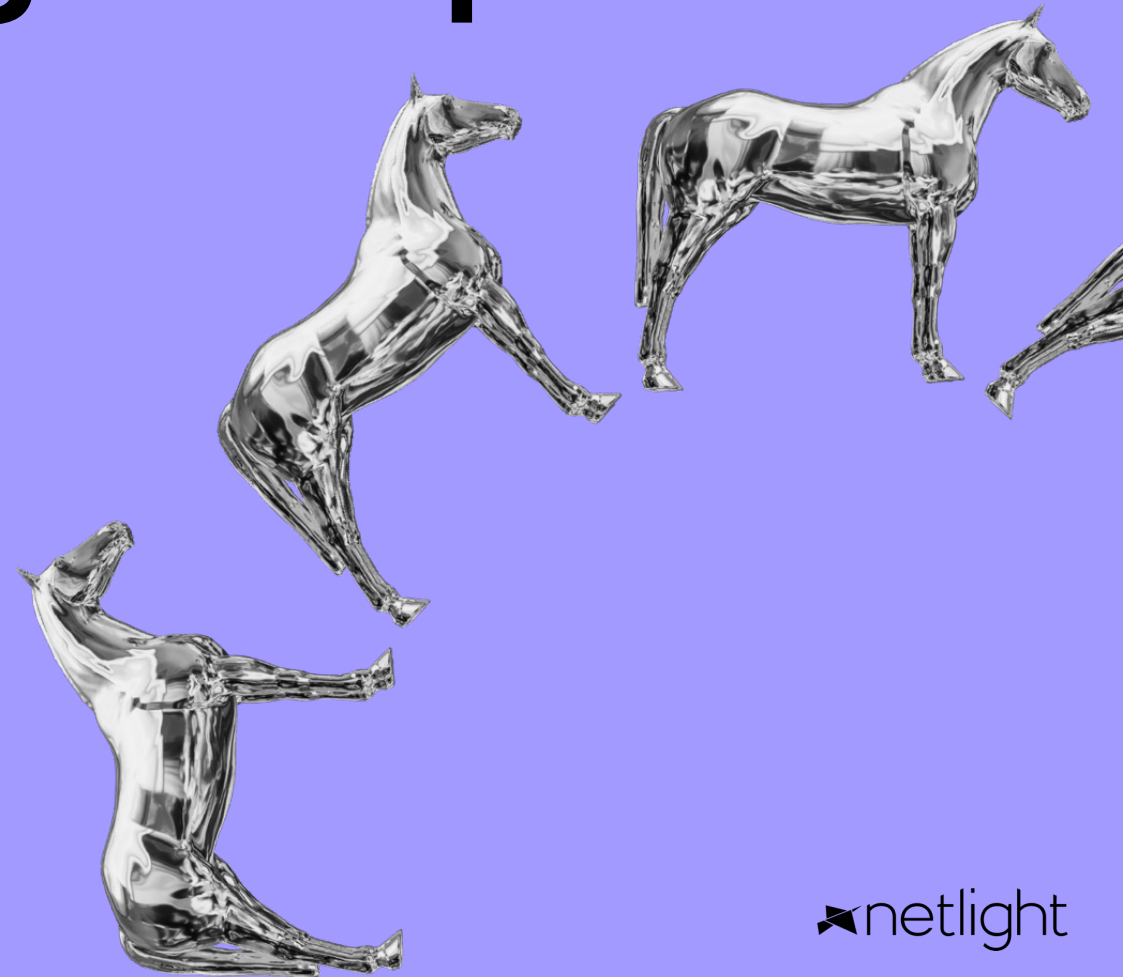


Netlight Consulting Group

CODE OF CONDUCT

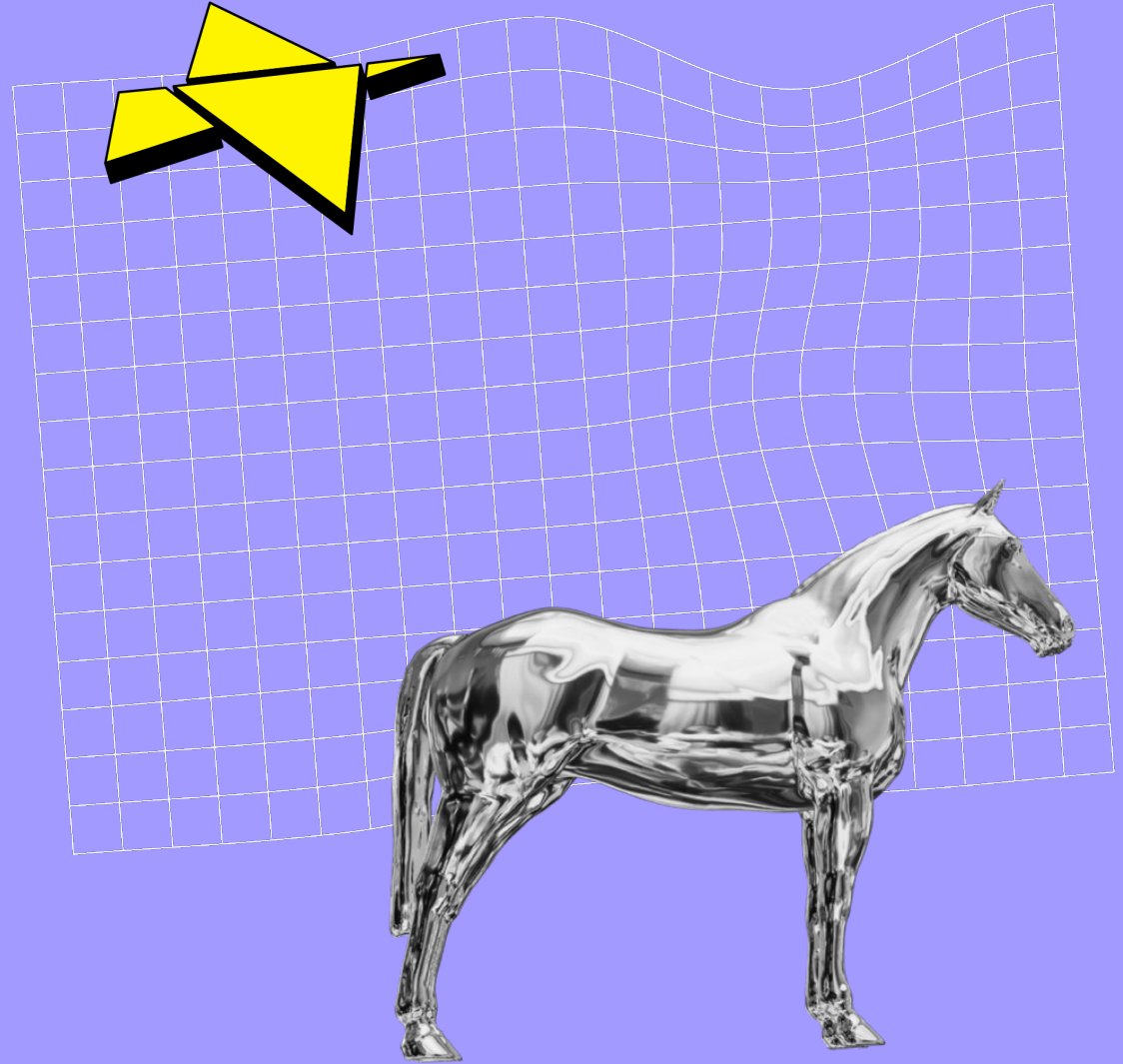
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About Netlight



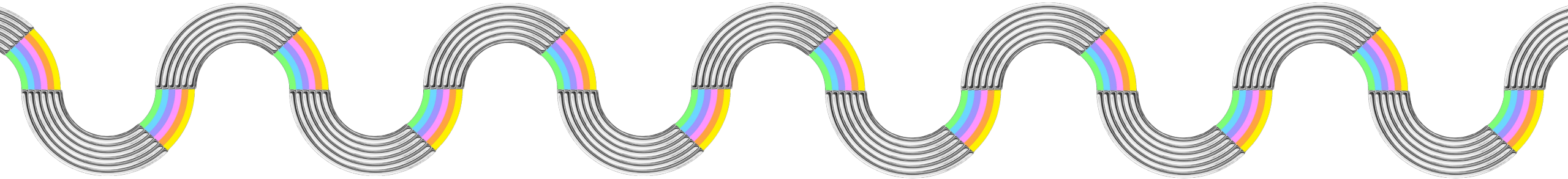
Our journey

Netlight is an international digital consulting firm, helping leading companies to succeed in the digital landscape, from advice to implementation.

Our service contains the collective intelligence of over 2000 employees offering a comprehensive range of digital services, from strategy to technology. We support industries that are facing new challenges and opportunities based on new technology, to make better business.

With a presence across multiple locations in Europe and, since 2024, North America, we operate as the unified **Netlight Consulting Group**, co-creating the future with our clients since 1999.

We are committed to transforming the world through ethical leadership, sustainable practices, and an inclusive culture. Together, we shape tomorrow, guided by the conviction to do what's right **today**.



EMPLOYEES

2000+

CLIENTS

350+

FOUNDED

1999

Leading with integrity and purpose




At Netlight, we believe in shaping the future by leading with integrity and purpose.

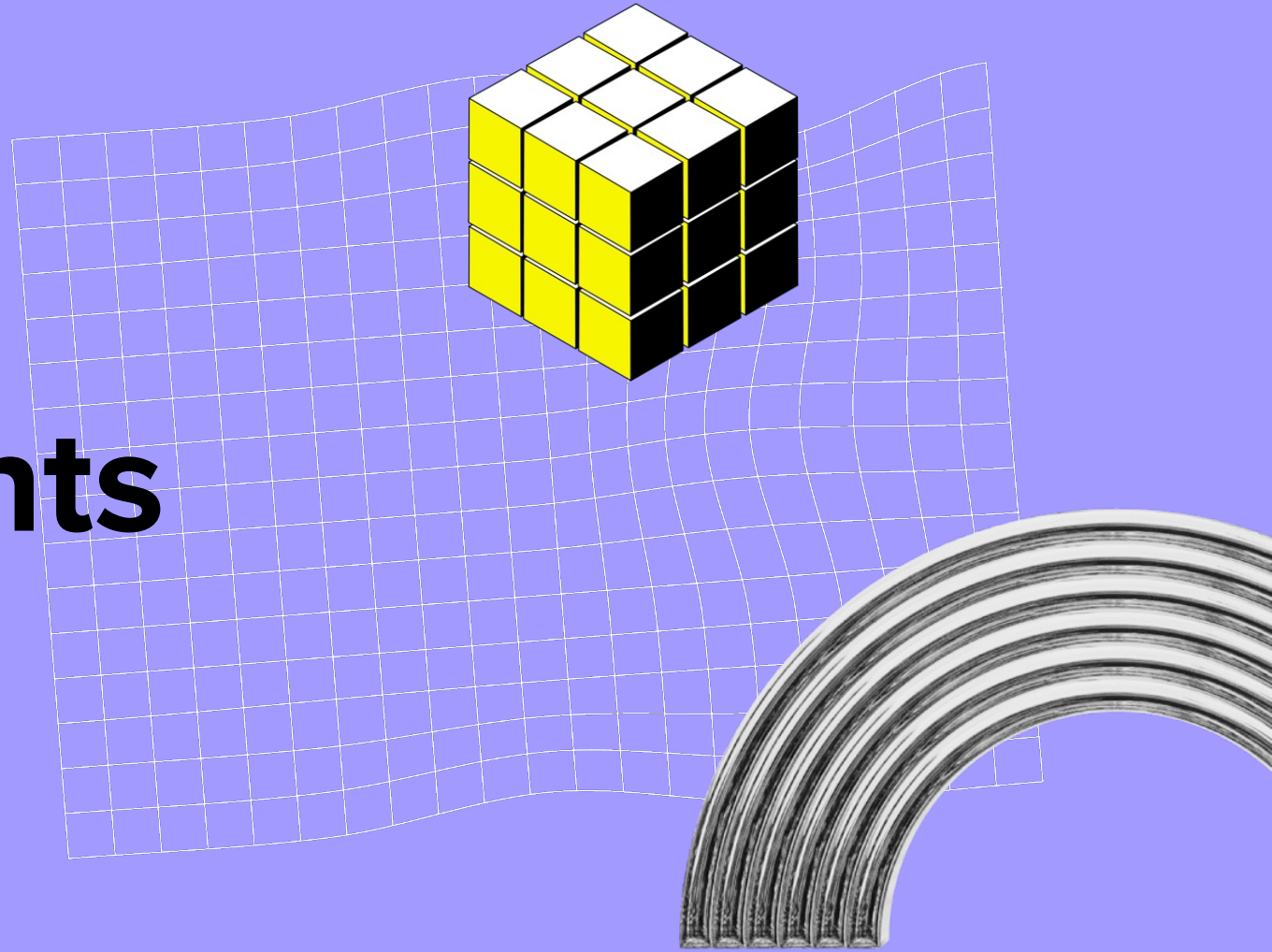
Our ambition is to act as a role model in every interaction, fostering positive change in society by inspiring those around us. To this end, we hold ourselves to high standards of responsibility, sustainability, and ethical leadership — and we expect the same commitment from our business partners.

For us, role models are those who embrace the **Ten Principles of the United Nations Global Compact** and take meaningful action to uphold **human rights, fair labor practices, environmental stewardship, and working against corruption, bribery and financial misconduct**. These principles go beyond compliance — they reflect a deep commitment for people and the planet, and taking a stand for **long-term sustainability**.

By working with organizations who share this commitment, we build relationships that are not only commercially sound but also deeply aligned with our purpose. We invite our business partners to walk this path with us — collaborating in a way that reflects these shared principles and the essence of this **Code of Conduct**.



The commitments



Putting people first

Empowering people, upholding dignity

We are dedicated to respecting and safeguarding the fundamental human rights of all individuals. We believe that dignity, fairness, and equality are the core principles that drive a just and thriving society, and we embed these values into everything we do.

We reject all forms of discrimination, harassment, exploitation, and abuse. Whether interacting with employees, clients, suppliers, or communities, we ensure that all individuals are treated with respect and fairness. We take proactive steps to eliminate practices like forced labour, child labour, and unsafe working conditions from our operations and supply chains.

Furthermore, complicity in human rights violations is not tolerated at Netlight. We remain vigilant, actively identifying and addressing potential risks, and creating an environment where anyone can raise concerns, knowing they will be taken seriously and handled with integrity.

By consistently upholding these principles, we strive not only to protect human rights but to lead by example, fostering a more compassionate, equitable, and sustainable future for all.

Upholding human rights in every action

We are committed to ensuring that human rights are respected and upheld in every decision, interaction, and relationship. We believe that true success stems from protecting the fundamental rights and dignity of every individual, not just within our organization, but across all of our operations and partnerships. To ensure we uphold these rights, we expect our business partners to:

- ❑ **Make human rights a priority** in every aspect of their operations and decision-making.
- ❑ **Ensure their practices respect the rights of all individuals**, free from discrimination, exploitation, or abuse.
- ❑ **Maintain transparency and provide access to grievance mechanisms** where individuals can report concerns without fear of retaliation.
- ❑ **Actively assess and mitigate human rights risks** within their own operations and supply chains.
- ❑ **Promote a culture of inclusion, fairness, and equal opportunity for all.**

By embedding human rights into all our actions, we aim to build a future where dignity and equality are universally respected.

No room for complicity

At Netlight, we hold ourselves and our partners accountable for the impact we have on the world. We believe that being silent or passive in the face of human rights violations is as harmful as the violation itself. Our commitment to human rights means ensuring we are never complicit in any form of abuse or injustice. We expect our business partners to:

- ❑ **Ensure their operations and supply chains do not contribute, directly or indirectly, to human rights violations** such as forced labour, child labour, or discrimination.
- ❑ **Take swift, responsible action** to address and rectify any instances of human rights violations within their operations or supply chains.
- ❑ **Engage in continuous due diligence** to identify and prevent potential human rights risks, maintaining full accountability.
- ❑ **Foster a culture of openness and reporting**, where concerns regarding human rights violations can be raised without fear of retaliation.
- ❑ **Adhere to the highest international standards** for human rights and collaborate with stakeholders to prevent violations before they occur.

By fostering a culture of zero-tolerance for complicity, we ensure that we and our partners actively contribute to a world where human rights are protected, and abuses are never tolerated.

Fostering ethical and inclusive work environments

Turning principles into everyday practice

We are committed to fostering ethical and inclusive work environments where every individual is treated with dignity, equity, and respect. We believe that safe, fair, and inclusive workplaces are essential for people to thrive and reach their full potential, and we actively work to uphold these principles in everything we do.

Our commitment is rooted in a deep respect for fundamental labour rights and a genuine appreciation of the uniqueness and diversity of every individual. We uphold and promote internationally recognized labour standards, including the right to freely associate and organize, the elimination of all forms of forced or coerced labour, the abolition of child labour, and the assurance of safe, healthy, and equitable working conditions. These are not just legal or policy requirements — they are moral imperatives and vital to building trust, resilience, and sustainability in our workplaces and communities.

Driven by our core values of respect, integrity, and inclusion, we work to ensure that every person, regardless of their background or role, is empowered to contribute, to speak up, and to thrive. We believe that when workers are free, safe, and respected, organizations and societies as a whole flourish.

Voices matter: protecting the right to organize

We believe that open dialogue, mutual respect, and empowered voices are the foundation of fair and resilient workplaces. This belief extends to our partnerships — we expect our business partners to actively protect and promote workers' rights to organize and bargain collectively. To align with this principle, we expect our partners to:

- ❑ **Allow workers to freely form or join trade unions** or other lawful organizations without interference or fear of retaliation.
- ❑ **Engage in collective bargaining** with employee representatives in good faith and with mutual respect.
- ❑ **Ensure that no worker is discriminated against, harassed, or penalized** for participating in union activities or exercising their right to organize.
- ❑ **Support an inclusive workplace culture** where open communication between workers and management is encouraged and valued.

By upholding these standards, our business partners help foster workplaces where people feel heard, respected, and empowered to shape their professional environment.

Work should be a choice, not a chain

Employment must always be freely chosen. No one should be trapped in work through coercion, manipulation, or fear. This fundamental principle is non-negotiable — and we expect our business partners to uphold it in full. To align with this principle, we expect our partners to:

- ❑ **Prohibit all forms of forced, bonded, indentured, or involuntary** labour in their operations and supply chains.
- ❑ **Ensure that all workers are employed voluntarily** and have the freedom to leave their job with reasonable notice.
- ❑ **Never retain identity documents, withhold wages, or restrict freedom of movement** as a condition of employment.
- ❑ **Eliminate practices that can lead to debt bondage**, including the charging of recruitment fees to workers.

By adhering to these standards, our business partners affirm their commitment to human dignity and help build a world where work is empowering — not exploitative.

Childhood is meant for dreams, not labour

Every child deserves the opportunity to learn, play, and grow in a safe and nurturing environment. Child labour robs young people of their futures — and we are committed to ensuring it has no place in our operations or those of our business partners. To align with this principle, we expect our business partners to:

- ❑ **Comply with all applicable laws regarding the minimum age of employment**, ensuring no child below the legal working age is employed under any circumstances.
- ❑ **Prevent the employment of minors** in hazardous work or in roles that interfere with education, development, or well-being.
- ❑ **Monitor their supply chains carefully** to identify and eliminate any form of child labour.
- ❑ Where relevant, **support initiatives that improve access to education and protect children's rights** in the communities where they operate.

By meeting these standards, our business partners help protect childhood as a time for learning — not labour — and contribute to a world where every child can thrive.

Diversity is strength

Diversity is a key driver of creativity, innovation, and success. Every individual deserves to be treated with respect and have equal opportunities, regardless of gender, race, age, religion, disability, or any other personal characteristic. Discrimination has no place in any workplace, and we expect our business partners to embrace this principle fully. To align with this vision, we expect our business partners to:

- ❑ **Ensure equal employment opportunities for all individuals**, regardless of their gender, race, nationality, age, religion, sexual orientation, disability, or any other characteristic.
- ❑ **Take active measures to prevent discrimination in hiring**, promotions, training, compensation, or termination decisions.
- ❑ **Implement inclusive practices** and policies that encourage a welcoming and supportive environment for people from diverse backgrounds.
- ❑ **Foster a culture of inclusion** where differences are celebrated, and all workers feel valued and respected.

By adhering to these standards, our business partners contribute to a diverse and inclusive business ecosystem — where everyone is empowered to bring their best selves to work.

For a better workplace

We are committed to fostering safe, inclusive, and supportive work environments — both mentally and physically — while upholding responsible business practices that empower individuals to thrive and perform at their best. Likewise, we expect our business partners to embody these principles within their own organizations. To this end, we require all partners to uphold the following standards:

- ❑ **Ensure fair and ethical working conditions** for all employees.
- ❑ **Provide a safe and healthy workplace**, addressing both physical and psychosocial health, in full compliance with all relevant health and safety laws and regulations.
- ❑ **Implement appropriate safety measures to prevent accidents**, injuries, and mental health issues in the workplace.
- ❑ **Provide suitable personal protective equipment** to employees at no cost.
- ❑ **Establish and maintain emergency response plans** to mitigate and manage the impact of unforeseen incidents.

Together, we share the responsibility of creating workplaces that respect and uphold the dignity and well-being of every individual. By aligning on these principles, we build partnerships that not only drive success, but also uphold the dignity, safety, and development of every individual involved.

Commitment to a sustainable future

Our business partners take action

We recognize that every action we take has an impact on the environment, and we are deeply committed to reducing that impact. Our goal is to minimize our carbon footprint and other environmental effects to the greatest extent possible. We are actively contributing to the low-carbon transition by adopting a science-based emissions reduction target through the Science Based Targets initiative (**SBTi**). This ensures that we not only set ambitious goals but also rigorously measure progress and evaluate how we can further reduce our environmental footprint on an ongoing basis.

Partnering for a greener future

Our commitment to the environment is reflected not only in our own operations but also in the standards we set for our business partners. To align with this vision, we expect our business partners to:

- ❑ **Use resources responsibly, minimize waste, and manage emissions** — across air, water, and soil — including greenhouse gases in all scopes.
- ❑ **Adhere to all relevant environmental regulations**, including those requiring reporting or prohibiting harmful activities, products, or services.
- ❑ **Actively work to reduce greenhouse gas emissions** as much as reasonably possible, supporting the global shift to sustainability.
- ❑ **Identify and manage hazardous chemicals safely**, in full compliance with local laws.
- ❑ **Act in alignment with recognized environmental standards** and maintain appropriate internal policies to support this commitment.

By meeting these standards, our business partners contribute to a shared commitment to sustainability and a responsible business ecosystem. Please note that you may be requested to provide documentation demonstrating your compliance with these requirements.

Ethical excellence

United against corruption, bribery and financial misconduct

We uphold the highest standards of integrity and ethics in all our business dealings. We are committed to ensuring that our operations and relationships are free from all forms of corruption, bribery and financial misconduct. These actions undermine trust, distort markets, and pose serious threats to the stability of economies, societies, and democratic institutions.

We expect all of our business partners to adhere to these same principles. Netlight will not engage with individuals, organizations, or entities involved in corruption, financial crime, or otherwise unethical conduct. Our commitment is to work exclusively with those who demonstrate transparency, accountability, and a dedication to ethical business practices.

By promoting a culture of integrity, fairness, and responsibility, we aim to contribute to a sustainable and inclusive global business environment. Compliance with applicable anti-corruption and anti-money laundering laws is not just a legal obligation, but a fundamental expectation that all business partners must meet.

Transparency, fairness, and accountability

As a business partner to Netlight, you play an essential role in upholding the values that form the foundation of our business practices. We expect you to operate lawfully, ethically, and in full alignment with our core principles, ensuring that integrity and accountability remain central to all interactions. Specifically, we require our business partners to:

- ❑ **Comply with all applicable anti-corruption and anti-money laundering laws and regulations.**
- ❑ **Neither offer nor accept bribes or participate in any form of corrupt activity.**
- ❑ **Respect and uphold fair competition**, complying with all applicable antitrust and competition laws.
- ❑ **Adhere to all relevant sanctions regulations** and ensure business activities do not support sanctioned entities or contribute to global instability.

By aligning with these standards, you not only demonstrate your commitment to ethical business practices but also strengthen our collective efforts to create a fairer and transparent global business environment. Together, we can safeguard what matters most: a business community anchored in integrity, mutual respect, and a shared vision for long-term success.

We trust you with information

Safeguarding trust

At Netlight, trust is fundamental to how we operate. We recognize the importance of safeguarding confidential and sensitive information, whether it pertains to our business, our partners, or our employees. Protecting this information is not only a contractual or legal obligation but also a reflection of the integrity and respect that define our relationships.

We are committed to handling all information responsibly, ensuring it is securely stored, accessed only by authorized individuals, and used solely for its intended purposes. Our internal processes and practices are designed to prevent unauthorized access, breaches, and misuse, while fully complying with data protection and privacy regulations.

This commitment to confidentiality and information security underpins our promise to operate with professionalism. We approach this responsibility with the utmost care, allowing us to build lasting partnerships, foster innovation, and maintain the trust of everyone we work with.

Strike a balance

We place great importance on knowledge sharing, transparency, and trust, recognizing them as the cornerstones of all professional relationships. However, we also understand that protecting certain types of information is just as critical to maintaining integrity and trust within our professional network. To strike a balance, we ask our business partners to:

- ❑ **Protect all confidential or sensitive information** obtained through their relationship with Netlight, including, but not limited to, information about Netlight's business partners, employees, and operations.
- ❑ **Fully comply with all applicable confidentiality agreements, laws, and regulations.**
- ❑ **Take proactive measures** to prevent the disclosure of confidential or sensitive information to unauthorized individuals or entities.
- ❑ Share any confidential or sensitive information only **with individuals who are explicitly authorized to access it**, and solely for its intended purpose.
- ❑ **Notify Netlight** immediately and ensure that the information is neither used nor further disseminated in the event of accidental access, loss or breach of confidential information.

These practices preserve the balance between open collaboration and necessary confidentiality. This shared commitment reinforces trust, professionalism, and upholds the integrity of our partnership.

Respect others' data as you would your own

Netlight operates with respect for our employees', clients' and business partners' data. We expect our business partners to handle data with the same care, integrity, and respect that we do. To ensure a responsible and mutually respectful relationship, we expect our business partners to:

- ❑ **Comply with applicable data protection laws** and uphold data subject rights, including transparency, consent management, erasure, restriction, and portability.
- ❑ Process personal data **only when necessary** and with a **clear legal basis**.
- ❑ Take **full responsibility** for the personal data you manage and ensure it is handled securely and lawfully.

By meeting these expectations, we help ensure the responsible handling of personal data — protecting the rights of individuals and reinforcing trust in our collaboration.

Secure data, strong partnerships

Netlight takes information security seriously, especially in a global and mobile working environment where threats like phishing and data breaches are ever-present. We expect our business partners to uphold a high standard of security and vigilance when handling data and collaborating with us. To that end, we expect you to:

- ❑ Ensure that all communication involving sensitive or confidential information is conducted through secure, encrypted channels, such as VPNs or equivalent technologies, to **reduce the risk of data interception**.
- ❑ **Store data in secure, access-controlled environments.** When applicable, client-approved storage solutions should be prioritized to maintain alignment with project-specific security protocols.
- ❑ **Be proactive in recognizing and preventing cyber threats.** Your teams should be educated on how to detect and report phishing, fraud, and other forms of social engineering. Vigilance and awareness are critical.
- ❑ In the event of a security incident or suspected breach, **we expect full transparency, timely communication, and cooperation.** Prompt and honest reporting builds trust and allows all involved parties to respond effectively.

These practices are not only technical necessities — they are foundational to the trust we build together. A strong security posture protects not only data, but the integrity of our shared work.

Final words

Lead with integrity and purpose

- ❑ **We believe true role models lead with integrity and purpose.** We expect our business partners to embrace the same approach and comply with this Code of Conduct.
- ❑ **Integrity also means accountability.** Upon request, we ask our business partners to demonstrate compliance with this Code of Conduct by sharing relevant information and documentation. To uphold our shared values, Netlight also reserves the right to carry out independent audits. Furthermore, any breaches of the Code of Conduct must be reported to Netlight as soon as they are identified.
- ❑ **We are committed to ethical business practices at every level.** To that end, we encourage business partners — and others alike — to raise concerns about Netlight's own conduct through the whistleblowing channel outlined on our website: www.netlight.com.

Together, we set the standard!

