

## CODE OF ETHICS

### I. Regulatory compliance

This Code of Ethics applies to Agoria. Agoria will at least comply with the provisions in the present Code of Ethics, as well as with the applicable legislation and regulations in every jurisdiction where it operates. The strictest rules prevail. Regarding Corporate Social Responsibility, Agoria will uphold the [OECD Guidelines for Multinational Enterprises](#).

Agoria will make every reasonable effort to impose similar standards on its subsidiaries and affiliated companies, as well as on appointees, employees, subcontractors, suppliers and any other party it relies on. Furthermore, Agoria recommends that its members follow the guidelines of this Code of Ethics or a similar code of conduct based on the OECD Guidelines for Multinational Enterprises.

### II. Human rights and occupational health and safety

#### a. Freedom of association and collective bargaining

Agoria respects the rights of the employees to associate freely and to bargain collectively and will not impede their exercising said rights, in accordance with applicable law.

#### b. No child labour

Agoria will not allow or support child labour. Child labour is deemed to be work performed by minors under the age of 15 years or by minors who are subject to compulsory full-time schooling and who do not qualify as any of the legally allowed exceptions.

#### c. Freedom of choice in employment

Agoria will ensure that the production of goods or the delivery of services does not involve the use of forced labour, slave labour or involuntary prison labour.

#### d. Diversity and inclusion

Agoria supports diversity and equality in employment. Agoria does not accept any type of discrimination based on personal characteristics such as ethnicity, nationality, gender, colour, race, marital status, sexual orientation, religion, age, political opinions, handicap or disability, of people who have the required qualifications as employee.

#### e. Working time and minimum wage

Agoria complies with all applicable labour and social legislation including but not limited to the regulations regarding minimum wage, working hours, break times, compensation, etc. Agoria undertakes to distance

itself from all unlawful practices, such as undeclared work, the use of “false” self-employed workers and the prohibited provision of labour.

- f. Zero tolerance for unwelcome behaviour or violence

Agoria ensures that all employees are treated with dignity and respect and are protected from unwelcome behaviour, harassment and danger in any form whatsoever on the work floor.

### **III. Wellbeing and safety**

Agoria complies with all applicable international, European and national standards, laws and regulations and ensures that the employees have a safe and healthy workplace to minimize the risk of accidents, incidents and occupational illnesses. Agoria will undertake appropriate action, such as policies, standards, procedures and emergency measures to prevent occupational illnesses and accidents and incidents at work. Agoria encourages management, employees and co-contractors to start initiatives to improve health and safety and to organize training courses.

### **IV. Environment**

- a. Respect for the environment

Agoria complies with all applicable international, European and national (including federal and regional) standards, laws and regulations for what concerns the protection of the environment. Agoria takes all the required initiatives to prevent, assess and if required compensate the risks and impact of operational activities on the environment. Agoria elaborates an effective and adjusted management policy for this purpose. Agoria encourages management, employees and co-contractors to start initiatives to improve the protection of the environment and to organize training courses.

- b. Product quality and safety

Agoria guarantees that all delivered products comply with all applicable quality and safety standards. Substances that are prohibited by the applicable standards, laws or regulations in the countries where these products are delivered or which constitute an unacceptable risk to the health of people or the environment, may not be included in these products. Agoria encourages management, employees and co-contractors to start initiatives to improve the quality and safety of the products and to organize training courses.

### **V. Ethics and transparency**

- a. Professional conduct

Agoria provides its services in a professional manner, it being understood that it shall not accept an assignment without having the skills required to fulfil it. Agoria provides its services in compliance with

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professional standards, best practice guidelines and the rules of professional conduct, and refrain from any actions or conduct which might be detrimental to the sector.

### b. Transparency and fairness

Agoria transfers clear, correct and truthful information to all stakeholders and to its members or customers within the framework of its relationship with these last ones.

### c. Anti-corruption

Agoria complies with the applicable international and national (including federal and regional) laws and regulations on corruption, bribes, prohibited business practices, extortion and money laundering. Agoria will not pay, offer to pay, either in money or anything of value, either directly or indirectly, any government, organisation or individual to gain a business advantage, such as the sale of products or services, establishing or maintaining relations or influencing an act or decision of said government, organisation or individual. Agoria also prohibits its employees from doing so.

### d. Gifts and hospitality

Agoria is prohibited to offer gifts, invitations and other benefits of more than nominal value to employees of its members or customers which may influence their decision-making within the framework of the relationship at its members or customers.

### e. Fair competition

Agoria will operate its activities according to the applicable competition law. Agoria undertakes to refrain from any active and organised efforts aimed at the simultaneous enticement, with malicious intent, of employees of a competing organisation. It will make every effort to constructively promote contacts and exchanges of experience within the limits of what is permitted by the applicable competition law (see also the [Antitrust Code of Conduct](#)).

### f. International trade

Agoria complies with the applicable international, European and national laws and regulations on international trade, including regulations on embargoes, export controls, economic sanctions and anti-boycott regulations.

### g. Conflicts of interest

Agoria will prevent or avoid every situation that could lead to a conflict of interest between its members or customers and Agoria, its subsidiaries and affiliated companies, as well as appointees, employees, subcontractors and any other people it relies on to perform the assignment. Agoria will immediately inform its members or customers of any possible conflict of interest between the personal interests of one of its employees and the interests of its members or customers.

### h. Confidentiality and privacy

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Agoria shall ensure the confidentiality of all commercial, financial and technical details and all other confidential information that concerns its members or customers. Agoria will not use such information for any other objective or share such information with third parties outside the contractual relation with its members or customers. If Agoria will be processing personal data, it will comply with the applicable international, European and national regulations on the protection of privacy, including the General Data Protection Regulation (GDPR) (EU) 2016/679.

Agoria shall ensure the confidentiality of all commercial, financial and technical details and of all other confidential information, including personal data, concerning its members or customers or contact persons of members or customers. Agoria will not use such information for any other purposes or share it with third parties outside its contractual relationship with its members or customers. Agoria employees may only process the personal data on the instructions of the organisation or if the law requires them to do so. The organisation will also implement access rights so that the employees only have access to the data they need for the performance of their job. The employees who have access to personal data will sign a confidentiality agreement. Agoria will ensure that third parties who receive personal data from Agoria will comply with the applicable data protection legislation. If Agoria processes personal data, it will comply with the applicable regulations with regard to the protection of personal data, such as the General Data Protection Regulation (GDPR) (EU) 2016/679 and the Data Protection Act of 30 July 2018.

More information about the processing of personal data by Agoria can be found [here](#).

### i. IP protection

Agoria undertakes to respect the intellectual property rights of third parties, such as its members or customers, suppliers and competing organisations.

## VI. Compliance with this Code of Ethics

Agoria is solely responsible for compliance with this Code of Ethics within its organisation. Agoria will establish appropriate training measures to allow its managers and employees to gain an appropriate level of knowledge and understanding of the contents of this Code of Ethics, the applicable laws and regulations and generally recognized standards. Should the application of the Code of Ethics lead to any ethical or compliance issues or questions, Agoria should take the appropriate measures in order to resolve these issues or questions.