

CODE OF CONDUCT

At CTOUCH, we believe in fostering a work environment that values integrity, respect, and inclusivity. Our Code of Conduct serves as a cornerstone for maintaining these principles and guides our actions as individuals and as an organisation. By adhering to this Code, we strive to create a workplace where everyone feels valued, heard, and supported, and where ethical practices and responsible behaviours are paramount.

We recognise that each member of our organisation plays a vital role in upholding these principles and maintaining a positive work culture. We encourage open communication, accountability, and the courage to speak up when ethical or conduct issues arise. Together, we can ensure that CTOUCH remains a place where every employee can thrive, collaborate, and contribute to our shared success.

By embracing this Code of Conduct, we commit ourselves to the highest standards of ethical behaviour and professional conduct. Let us work together to create an environment that reflects our values and helps us achieve our goals while positively impacting our communities and the world around us.

This Code of Conduct applies to all entities of CTOUCH:

- CTOUCH Europe B.V.
- CTOUCH Services and Training B.V.
- CTOUCH UK Ltd.
- CTOUCH Germany GmbH
- CTOUCH Denmark ApS
- Sahara Benelux B.V.

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CHAPTER 1: OUR PEOPLE

1.1: Dignity, Fairness, and Respect

We treat everyone with dignity, fairness, and respect, promoting a culture of collaboration, empathy, and open-mindedness. Discrimination, harassment, or any form of disrespectful behaviour based on race, ethnicity, gender, sexual orientation, religion, disability, or any other protected characteristic will not be tolerated.

1.2: Diverse and Inclusive Workforce

We strive to create an inclusive and welcoming environment where everyone can participate, contribute, and thrive, regardless of their backgrounds. In our recruitment and selection process and review interviews, we assess the candidate's suitability based on capacity, knowledge, behaviour and fit with the company culture.

1.3: Health and Safety Regulations

We prioritise the health, safety, and well-being of employees, clients, and visitors by providing a safe work environment. We comply with health and safety regulations and promote practices that ensure the physical and mental well-being of all individuals.

1.4: Employee Well-Being and Work-life Balance

We value and prioritise employee health and supporting work-life balance. We collaborate with a certified occupational health service provider to take proactive measures and encourage employees to lead a healthy lifestyle, which includes offering healthy food options at work, promoting cycling to work, and providing gym memberships.

1.5: Employee Satisfaction

We regularly conduct employee satisfaction surveys in which CTOUCH is valued on themes like Pride, Teamwork, Credibility, Respect, and Fairness. The results indicate that our employees experience fair treatment regardless of their sexual orientation, ethnic origin, religious beliefs, gender, or age.



CHAPTER 2: OUR WORKPLACE

2.1: Our Core Values

Our four core values are at the heart of our company and guide our interactions with customers, partners, employees, and suppliers.

- **We Work Smarter:** we actively look for better ways to work together and deliver brilliant results.
- **We Are Proud:** we come to work everyday with drive, enthusiasm and optimism.
- **We Are Personal:** the people we do business with matter. We go the extra mile to delight and make a difference.
- **We Own It:** we do everything we can to do things properly and succeed. We help each other and those who matter to us.

These values are also incorporated into the CTOUCH Circle, which represents our 4-year strategy.

2.2: Collaboration and Teamwork

We foster a collaborative and inclusive work environment, promoting effective teamwork and knowledge sharing.

2.3: Appreciating Diverse Perspectives

We value and appreciate diverse perspectives, encouraging constructive dialogue and healthy debate.

2.4: Supporting and Mentoring Colleagues

We support and mentor colleagues, promoting professional growth and development.

2.5: Efficient and Interdisciplinary Collaboration

Projects arising from the CTOUCH Circle are managed in a project-based manner, involving project leaders, workgroups, and steering committees. This approach promotes efficient and interdisciplinary collaboration, allowing for the generation of innovative ideas through brainstorming and reflection with colleagues from different departments.

CHAPTER 3: OUR BUSINESS RELATIONS

3.1: Integrity and Professionalism

We conduct all business activities with the highest level of integrity, honesty, and professionalism. Employees are always obligated to make business decisions based on objective and legitimate criteria, without external influences that could compromise the integrity of decision-making.



3.2: Compliance with Laws and Regulations

We comply with all applicable laws, regulations, and company policies in the countries where we operate.

3.3: Conflict of Interest

We avoid conflicts of interest and disclose any potential conflicts promptly and transparently.

3.4: Accountability and Responsibility

We take responsibility for our actions and decisions, ensuring they align with the company's values and goals.

3.5: Open and Honest Communication

We communicate openly, respectfully and honestly, fostering a culture of transparency, trust, and constructive feedback.

3.6: Ethical Standards and Reputation

We adhere to ethical standards and avoid engaging in activities that could harm the company's reputation or undermine its business interests.

3.7: Documentation of Business Agreements

We document our business arrangements with our partners through written agreements or Service Level Agreements (SLAs), which are reviewed in accordance with the principles outlined above.

3.8: Interaction with Colleagues and Business Partners

The terms of employment include agreements on how our colleagues interact with each other and with business partners.

3.9: Fraud

We will not engage in, promote, or tolerate fraud.

3.10: Reporting Fraud

Employees must immediately report irregularities to the designated authorities within the company.



3.11: Anti-Corruption and Bribery

We will not accept, offer, approve, or facilitate any bribery, kickbacks, or any other form of corruption.

3.12: Money Laundering

CTOUCH strictly prohibits any involvement in money laundering activities. Employees must not engage in, facilitate, or support any transactions or activities aimed at concealing the true source of funds.

Employees are required to exercise due diligence in all financial transactions. This includes verifying the legitimacy of business partners, customers, and third parties involved in financial dealings.

3.13: Reporting Money Laundering

Any suspicion or evidence of money laundering must be promptly reported to the designated compliance officer or appropriate authority within the company.

3.14: Anti-Competitive Practices and Fair competition

We are committed to fair and open competition. Employees must not engage in any practices that distort or restrict competition, including but not limited to price-fixing, market allocation, bid rigging, or any other anti-competitive agreements.

3.15: Compliance with Antitrust Laws

Employees must comply with all applicable antitrust laws and regulations. This includes understanding and adhering to the principles of fair competition and avoiding any actions that could be perceived as anti-competitive.

3.16: Collaboration and Information Sharing

Collaboration with competitors should be approached cautiously and in strict compliance with applicable laws. Sharing sensitive information, especially concerning pricing, contracts, or market strategies, with competitors is strictly prohibited.

3.17: Reporting Anti- Competitive Practices

Employees should report any potential violations of anti-competitive practices to the designated compliance officer or appropriate authority within the company.



CHAPTER 4: OUR COMPANY ASSETS & INFORMATION

4.1: Safeguarding Confidential Information

We safeguard confidential information, including client data, trade secrets, and intellectual property rights.

4.2: Compliance with ISO 27001 Standards

We comply with the ISO 27001 safety standards. This means that all processes related to data security are well-established according to integrity, availability, and confidentiality.

4.3: Privacy and Data Protection

Security principles regarding the use of social media, email, internet, equipment and software, data sharing, and remote working are documented in the [Code of Conduct regarding Privacy & Data Protection](#). These principles are applicable to all employees, internal and external.

4.4: Whistleblower Procedures

The company provides whistleblower procedures to enable employees and business partners to confidentially report suspicions of corruption, bribery, or other ethical violations.

4.5: Whistleblower Protection

Whistleblowers will be protected from retaliation, and the confidentiality of the reported information will be ensured.

CHAPTER 5: OUR SOCIAL RESPONSIBILITY

5.1: Anti-Slavery and Human Rights

We prohibit any form of modern slavery, forced labour, or human trafficking within our operations and supply chains.

5.2: Due Diligence and Supplier Commitment

We conduct due diligence to ensure that our suppliers and business partners share our commitment to respecting human rights and maintaining fair and ethical practices.

5.3: Social Responsibility Employment Statement

We require our suppliers to sign the [Social Responsibility Employment Statement](#) to ensure that slavery and child labour do not occur in any part of our supply chain.



5.4: Monitoring and Addressing Risks

We actively monitor and address any risks related to slavery, forced labour, or human rights violations in our supply chain. One of the tools we use to identify potential CSR Risks is the [CSR Risk Check](#).

5.5: Responsible and Sustainable Actions

We act responsibly and sustainably, considering the environmental and social impacts of our actions and decisions.

5.6: Environmental-Friendly Practices

We promote environmentally friendly practices throughout the entire life cycle of our products, from raw material acquisition to factory processes, and from the use phase to the end-of-life of our products.

5.7: Charitable Initiatives and Community Involvement

We actively engage in charitable initiatives, community involvement, and partnerships to optimise the environmental and social impact of CTOUCH as an organisation.

5.8: United Nations' Sustainable Development Goals

In our sustainability journey, we are guided by the United Nations' Sustainable Development Goals (SDGs). We have adopted four SDGs where we believe we can make a real difference. These SDGs form the foundation of our sustainability mission and our social activities.

- SDG 4: Education Quality
- SDG 11: Sustainable Cities and Communities
- SDG 12: Responsible Production and Consumption
- SDG 17: Partnerships for the Goals

5.9: Sustainability & CSR Information

Information about our sustainability journey, goals, and insights into the environmental and social impact of our organisation can be found on our website:

www.ctouch.eu/sustainability.

CHAPTER 6: COMPLIANCE, REPORTING AND CONSEQUENCES

6.1: Compliance with the Code of Conduct

We comply with this Code of Conduct and promptly report any violations or concerns to the appropriate channels within the company.

6.2: Reporting Violations

Reports of any violations or concerns can be submitted to Bernard Gosselink (b.gosselink@ctouch.eu), CFO at CTOUCH.



6.3: Cooperation with Investigations

We support and cooperate with investigations into reported violations, maintaining confidentiality and protection for those involved.

6.4: Consequences for Violations

Violations of the Code of Conduct may result in disciplinary action, up to and including verbal or written warnings, suspension, termination of employment, or legal action, depending on the severity and recurrence of the violation. The appropriate consequences will be determined on a case-by-case basis, taking into account the nature of the violation and the impact on individuals and the organisation.

