



October 1st, 2019

## Ethics Policy

We are committed to conduct our business according to the highest professional integrity standards.

### Responsibility

Mondeca's CEO and COO are responsible for ensuring that the ethics policy is defined, updated and implemented. The entire staff has a responsibility to ensure that the aims of the policy are met in their areas of activity.

### Policy aims

We endeavor to:

- Conduct our business in compliance with local and international laws and regulations.
- Never trading our integrity against a business opportunity.
- Avoid conflict of interests.
- Never enter into any arrangements involving bribery.
- Promote equal opportunity for employees regardless of race, religion, sexual orientation.
- Avoid any form of harassment or violence at the workplace.

### Financial transparency

- Although Mondeca is a privately owned company, we apply financial reporting rules for publicly held companies. Our financial statements are audited annually and are available to business partners.

### Diversity and differences

- Diversity is one of our strengths. People have different professional views on issues, and that brings new ideas and solutions.
- We are open to professional differences and encourage employees to understand their colleagues points of view.

### Harassment

- We do not tolerate any form of harassment in our workplace.



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- Any form of harassment towards our employees will imply considering terminating business relationships.

## Business courtesies

- We accept and offer non-cash, no value business courtesies, except where prohibited by law, regulations and business partner policies.
- We do not tolerate, accept nor offer any items of significant value.

## Monitoring and improvement

- We comply with and exceed all relevant regulatory requirements.
- We review this policy and any related issues at our monthly management meetings.
- We do not expect our employees to know every detail of applicable laws and regulations. We encourage employees to raise any concerns with managing partners. If we cannot resolve the issue ourselves, we will seek professional legal advice.

## Reporting violations

- We encourage employees to report violations and/or ethics related concerns to managing partners. We are committed to handle them seriously and never “retaliate” against employees reporting them.

## Culture

- We involve staff in the implementation of this policy.
- We update this policy at least once annually in consultation with staff.
- We listen and resolve issues if they arise.