White Label Consultancy

# WLC Code of Conduct

Version 1.0 September 2023

# Our commitment to this Code of Conduct



We strive to make a **positive difference in the world** and apply high ethical standards when acting. Our Code of Conduct offers guidance to all of us on what is our expected behaviour.



Our Code of Conduct is structured around four key perspectives and is based in the **UN Guiding Principles on Business and Human Rights.**



All employees, suppliers, and contractors are **expected to follow** this Code of Conduct when conducting business and in relationships with colleagues, customers, partners, and other contacts.



This Code of Conduct drives our behaviours in interactions with:

- **Society**
- **Clients,**
- **Employees, contractors, and suppliers,**
- **With the company.**

# Working with our customers and business partners professionally

## Anti-Corruption

- We do not allow employees and contractors to accept gifts, particularly of large value or during negotiation periods.
- Small tokens of appreciation that are clearly independent can be accepted.
- We prohibit bribery for the benefit of any external or internal party.
- We do not tolerate any other form of corruption.

## Fair Competition

- We are committed to conducting our business in a transparent, fair, and honest manner and will not tolerate anti-competitive agreements.
- We do not engage in any competition law breaches including: price fixing, market sharing, bid rigging, resale price maintenance, and exchange of commercially sensitive information.

# Protecting our employees and contractors

## Labour Rights

- We provide proper conditions for our employees and contractors and ensure that our business partners offer similar standards.
- We ensure to offer conditions that cover the following: clear terms and conditions, job title, place of work, working hours, remuneration, benefits, holiday, confidentiality and policies, termination, intellectual property rights, and return of the property. All of this is in a language understandable to the employee and contractor.

## Equal Opportunity

- We are an equal-opportunity employer committed to diversity and inclusion in the workplace.
- We prohibit discrimination and harassment of any kind based on race., colour, sex, religion, sexual orientation, national origin, disability, genetic information, pregnancy, or any other protected characteristic as outlined by laws.
- We make hiring decisions based solely on qualifications, merit, and business needs at the time.
- We apply this Code applies to all employment practices within our organization, including hiring, recruiting, promotion, termination, layoff, recall, leave of absence, compensation, benefits, training, and apprenticeship.

## Conflict of Interest

- We expect employees and contractors to avoid personal, financial, or other interests that might hinder their capability or willingness to perform their job duties.
- We avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs.
- At times, we may be faced with situations where our business actions on behalf of WLC may conflict with our personal or family interests.

# Contributing to society positively

## Human Rights

- We promote our understanding of internationally recognized human rights, and will respect and not infringe on the human rights of all those involved in our business activities.
- We implement human rights due diligence appropriate to the social circumstances of the countries and regions where we have operations and the nature of our businesses, products, and services there.
- We assess and prevent potential violations of human rights. In the event of such a violation, we will promptly take internal and external actions to correct and remedy the situation.

## Climate and Sustainability

- We endeavour to have as little negative impact on the environment as possible.
- We strive to limit the number of business trips and encourages climate friendly choices.

## Donations

- We regularly donate to support humanitarian causes.

# Managing risk to the company

## Company Property

- We treat company's material or intangible property with respect and care.
- We respect all kinds of incorporeal property including trademarks, copyright, and other property (information, reports, etc.).

## Due Diligence

- We perform diligent background checks on third parties to ensure minimal risk to the company.
- We respect sanctions while supporting customers and selecting business partners.

# Reporting and disciplinary actions

Any known breach of the Code of Conduct within WLC must be reported immediately.
Failure to follow the Code of Conduct can result in disciplinary action. Disciplinary actions will vary depending on the violation and all breaches will be handled according to the documented process.

Employees and contractors are required to act proactively by asking questions, seeking guidance, and reporting suspected violations of the Code of Conduct and other policies and procedures of the Company, as well as any violation or suspected violation of applicable law, rule, or regulation arising in the conduct of the Company's business.

To report concerns contact your manager and any of the partners via CoC@whitelabelconsultancy.com.