



**BENEFIT  
CORPORATION**  
PEOPLE, PLANET & PROFIT

# Code of Conduct Critical Software

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# Code of Conduct Critical Software

## 1. Overview

A central pillar of the development of Critical Software SA (hereafter referred to as CSW or the company and including all of its subsidiaries) is our ethical conduct. It embodies the principles that are part of our DNA. The policies expressed in this Code of Conduct (Code) detail our ethical commitment in the relationship with clients, employees, suppliers, government authorities, the media, communities and society in general.

The approval of this code and any further updates are the responsibility of the Board of Directors (BoD) of CSW.

This Code of Conduct is a public document.  
It may be amended at any time.

## 2. Purpose and Scope

The purpose of this Code is to express the ethical principles by which CSW abides. We firmly believe that ethical behaviour is a precondition to building trust and is therefore crucial to the sustainable development of the company. Our Code is fundamental in supporting prosperity and advancing the company's constant pursuit of excellence.

We believe this Code can inspire honest, impartial and transparent relationships that respect clients, suppliers, employees, society and the environment.

The application of this code is mandatory for company employees, outsourcers, trainees, and anyone working as part of our project teams, independent of the contractual relationship established. The Code should also serve as a reference for subcontractors, advisors, business and community partners. Without intending to cover all the possibilities inherent in the daily operations of business, it does intend to offer clear and non-negotiable guidelines. It is also a dynamic document that will be subject to periodic updates.

### a. Values

CSW has four central values; the fourth is the main driver behind the present document.

### Engineering Ingenuity

Driven by engineering ingenuity, we embrace the most demanding challenges with a blend of creativity and precision. Our spirit is fuelled by endless curiosity and a quest for excellence. We craft solutions with an unwavering commitment to safety and a sharp focus on the essentials. Learning from every misstep, we grow stronger. We champion simplicity and make bold, clear-cut decisions which shape the future.



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### **Stronger Together**

We are stronger together, valuing teamwork, innovation, and our impact on the world. We prioritise team spirit, fulfillment, and attracting top talent, ensuring agility through a flat structure and open communication. Embracing change and role diversity fuels our growth and vitality. Our purpose transcends titles: we're a meritocracy committed to diversity, inclusion, and hybrid working for better collaboration, creativity and balance. Our success reflects our ecosystem's prosperity.

### **We Act Boldly**

We're passionate doers who jump in headfirst! We're all about bold action and ambition, constantly aiming for extraordinary achievements. Growth is our mantra, fueling both our business and personal journeys. There is no room for stagnation here; we're on a mission to evolve sustainably. We lean on our expertise, daring to make brave, committed decisions. Challenges pop up, but we tackle them head-on, owning every outcome without excuses. Our workplace thrives on trust, autonomy, and the belief that even the underdogs - the dreamers among us - can accomplish greatness.

### **We Care**

'Caring' anchors our culture, values and purpose, crafting a legacy of trust and collaboration. Integrity guides us to excel and reach further. It's not just an act; it's our identity, shaping how we support our community, customers, and the planet. We are creating enduring progress for future generations with a commitment that transcends the present.

## **3. Relationships**

### **a. Client Relationships**

CSW commits to creating value for its clients by meeting and exceeding their expectations and developing innovative and trustworthy solutions. The requirements and expectations of clients should always be considered, and all requirements agreed on must be met as a minimum.

Information about our products, services and project execution, provided by Critical in any phase of the interaction with its clients, should always be clear and true, to the best of our knowledge. Technical data, especially safety, health and environmental requirements, must be reported to clients. Each product or service should comply with the relevant legal demands of the market and country for which it is intended.

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Company, product and service promotional materials must avoid exaggerations and prejudice. They must also guarantee the veracity of the information communicated. CSW disapproves of misleading communications. The company's communication initiatives shall comply with the relevant local and international legislation, ethics and regulations.

CSW does not discriminate against any client because of their origin, economic size or location. However, it reserves the right to reject or re-evaluate any business relationship whenever that relationship is not in its best interests or when it represents a legal, social, environmental or ethical risk that the company deems unjustified.

In the specific case of defence and related industries, CSW is committed to not working on weapons, ammunition and other such systems that have the capability of harming people or the planet in disproportionate or indiscriminate ways. CSW is committed to complying with all export control laws and international conventions and to not doing business with clients whose applications may have high-severity impacts due to high levels of social and ethical concerns and potential harm.

CSW recognises that projects carried out in the defence sector are considered particularly sensitive. It recognises its responsibilities when providing engineering solutions to clients in the defence sector which could cause potential damage, both human and material. Therefore, CSW has a [specific policy](#) in place in order to be extra vigilant whenever it is engaged in defence projects, with the aim of preventing such damage.

Improper payments to client representatives are strictly forbidden. Gifts and meals may be offered (please see Section 5. Gifts, Meals and Improper Payments).

CSW commits to protect its client's confidential data, providing it to state institutions only as strictly required by applicable law and contractual terms.

## **b. Supplier Relationships**

CSW's relationship with suppliers is founded on respect and to enable the development of products and services which add value to the company. But it goes beyond that. CSW cares about its suppliers. The company is committed to engaging with local suppliers (in relation to the geographies of its offices) and will partner with them to further develop their sustainability.

CSW is not in favour of monopolies – they strangle competition, eliminate opportunity and hinder the human capacity for creativity when faced with a challenge like changing the world. For the same reason, the company believes that it should promote competition among its suppliers – meaning that it avoids establishing exclusive relations with any supplier.



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CSW's suppliers are evaluated by means of clear criteria and without discrimination. Every decision should have technical, customer service and economic backing, not permitting unfair favouring of any kind. Sustainability criteria and, in general, the principles stated in this code are also accounted for when CSW selects suppliers.

Suppliers must ensure adequate remuneration to workers, in accordance with current legislation and collective labour agreements, when applicable, which shall be paid on time, respecting the minimum wages established in each country, while also paying overtime and other compensation, social security contributions and taxes that are due.

No child labour is accepted at suppliers', or their subcontractors', premises or places of production, or in any circumstances under suppliers' direct or indirect responsibility. Also, no employee can be made to work against his/her will or work as bonded/forced labour, and no employee is to be subject to corporal punishment or coercion of any type.

Human trafficking-related activities of any kind are also unacceptable.

CSW expects clarity and transparency from its suppliers in the description of products and services, and in terms of ethics, health, safety and the environment.

Improper payments received from a supplier are strictly forbidden (please see Section 5. Gifts, Meals and Improper Payments).

Suppliers should be informed about this Code – including the policy it establishes related to gifts, presents or meals – and CSW expects their activities to be compatible with the principles here established.

CSW will re-evaluate a business relationship with a supplier whenever it is detrimental to its interests or if ethics, legal, tax, environmental and occupational health and safety issues are disregarded, respecting all legislative and contractual conditions.

CSW commits to protect its supplier's confidential data, within the strict provisions of the applicable law and contractual terms.

## **c. Relationships with Government and Other Public Entities**

CSW honours the legislation and the authorities of all the government jurisdictions where it conducts business and respects United Nations and European Union guidelines when applicable.

Within its power, CSW provides to state institutions company data as required by law, at a local, national and international level. CSW commits to providing information that is complete and accurate, in rigorous compliance with the applicable legal rules.

Improper payments to an official of any government are unacceptable. Gifts and meals may be offered (please see Section 5. Gifts, Meals and Improper Payments).

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The company reserves the right to publicly voice its opinion about governmental policies and decisions that affect, or can affect, the progress of business and relationships with employees, clients or other stakeholders, in addition to the fulfilment of this Code. This representation can only be exercised by the company Chairman of the Board of Directors or the Chief Executive Officer unless another spokesperson is explicitly authorised.

#### **d. Relationships with Political Parties and Organisations**

CSW adopts the principle of avoiding party-political activity and does not participate in external political events. No one acting in the name of the company, employee or not, can make any contribution in any form to political parties and similar organisations running for elections. CSW does not accept political requests for visits to our offices during any campaign or pre-election campaign period, understood as the six months prior to elections taking place.

The representatives of political parties and similar organisations running for elections will be received whenever their requests are considered appropriate, outside the six month pre-electoral period. Outside of that period, the company is also available to receive representatives of political entities that seek our input on the concerns, aspirations and perspectives of businesses like ours.

Improper payments to an official of any political party are unacceptable. Gifts and meals may be offered (please see Section 5. Gifts, Meals and Improper Payments)

The company reserves the right to publicly voice its opinion about political policies and decisions that affect, or could affect, the progress of business and relationships with employees, clients or other stakeholders, and the fulfilment of this Code. This representation can only be exercised by the company Chairman of the Board of Directors or the Chief Executive Officer unless another spokesperson is explicitly authorised.

CSW employees are, of course, free to engage in the political activities of their choice when acting as individual citizens, as opposed to representatives of the company, but that participation must occur in their free time, at their own expense and reasonable care should be taken to prevent associating CSW with the pursued political views, avoiding direct or indirect association to CSW, for instance via garments or other elements that make CSW brand explicit. The company's resources, spaces and image cannot be used for personal or party-related political interests, except as determined by law, for instance in what relates to trade union activities.

#### **e. Relationships with Non-Governmental Organisations (NGOs)**

CSW supports and is committed to work with NGOs whenever the

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company considers that their mission is commendable and aligned with its ambition to help make the world a better and safer place.

Improper payments to an NGO or any of its members are unacceptable. Gifts and meals may be offered (please see Section 5. Gifts, Meals and Improper Payments).

## 4. Anti-Facilitation of Tax Evasion and Money Laundering

CSW is committed to paying taxes in the countries where its activity takes place and takes a zero-tolerance approach to the facilitation of tax evasion.

Tax evasion is the offence of cheating the public revenue or fraudulently evading taxation. Tax evasion is not the same as tax avoidance or tax planning, which are legal. Facilitating tax evasion is a deliberate act, or omission with dishonest intent, to enable tax evasion, in the individual or company's home country or abroad.

Everyone working for or with CSW must promptly report any request or demand from anyone, including third parties, to facilitate tax evasion, or any suspected fraudulent evasion of tax by another person.

Any facilitation of tax evasion, failure to report suspected tax evasion, and "turning a blind eye" to suspicious activity will be considered a breach of this Code leading to CSW taking formal disciplinary action, including dismissal.

The company is also fully committed to complying with all the applicable legislation and adequate guidelines for the purposes of fighting money laundering activity and the funding of terrorism or any other criminal activity.

## 5. Gifts, Meals and Improper Payments

As a reference, no gifts above 30 euros can be offered by anyone from CSW or on behalf of CSW, unless they constitute normal, legitimate, business practice.

Similarly, a reference limit value for meals, that can be paid for the purposes of a normal business meeting, is 50 euros per person.

No expenditure other than for lawful purposes can be made. No one acting in the name of the company, employee or not, can make improper payments (including, but not limited to, client representatives, official of any government, official of a political party, NGOs) or perform any act which might be interpreted as bribery, even if this means losing business opportunities.

An improper payment is a payment, in any form, that is beyond contractual terms, legal requirements or business



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practices formally approved by CSW management bodies.

Under no circumstances can money be offered to the above parties, directly or indirectly, irrespective of the amount.

On the other hand, CSW employees must not receive gifts because of his/her affiliation to CSW if they constitute any kind of bribery – including, but not limited to, gifts that may be offered by suppliers. In general, employees cannot accept presents or advantages on their behalf or on behalf of their family or friends. A reference limit value for gifts to be accepted is 30 euros.

Meals can only be accepted if they correspond with a normal business meeting, with a reference limit value of 50 euros per person.

Objects received as a bonus, presents and free gifts that represent, either directly or indirectly, distinction of or tribute paid to CSW should be directed to the Division management, or to the Area Directors.

Employees should inform entities with which they maintain relationships on behalf of the company about CSW's policy in relation to gifts or presents.

No kind of bribery is tolerated. People involved will be dismissed, without prejudice to other legal measures.

## 6. Health, Safety and the Environment

The health and physical integrity of employees, and everyone that works in or for the company, and the protection of the environment, are priorities for the company. CSW deals transparently with all the information concerning health, safety and the environment that might have an impact on its employees, any other communities or ecosystems. CSW is committed to its own contribution to the objectives of the Paris Agreement within the United Nations Framework Convention on Climate Change and is hence working towards becoming carbon neutral and aligned with United Nations SDGs (Sustainable Development Goals). CSW policies in this scope are detailed in its Environment, Health and Safety policy statement.

### a. Use of Alcohol, Drugs and Firearms

The ingestion of alcoholic beverages while working, and the entrance in the company in a state of intoxication, or working in such state, is unacceptable. Alcoholic beverages can be consumed moderately during meals and during festive moments in adequate zones of the CSW premises. Employees are also prohibited from using or carrying illegal drugs, and from remaining on the worksite in an altered state caused by said substances, which could affect the safety or performance of the other employees; this also applies to any visitor. No kind of firearm is permitted on the company premises, except for expressly authorised professionals.

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## 7. Employees

CSW shall treat its employees with dignity, providing a working environment with equal opportunities for professional and personal growth, with respect for individual freedom.

CSW believes that the wealth it manages to generate should be distributed in a fair way, thus committing itself to the rule that, in the company, the highest salary within the company cannot be more than 10 times greater than the lowest salary.

We do not accept child labour and we work actively against it. No employee is made to work against his/her will or work as bonded/forced labour, and no employee is subject to corporal punishment or coercion of any type. It is unacceptable for employees, subcontractors and subcontractors' employees and agents to engage in human trafficking-related activities.

CSW refuses all kinds of unlawful payment mechanisms to employees.

Mistakes or errors that result from good-intended actions are seen as learning and growing opportunities and should receive constructive guidance. CSW believes that only through mistakes can we grow, be creative and develop ourselves either individually or collectively. However, the repetition of said mistakes or errors resulting from carelessness, negligence, lack of interest or even foul play will not be accepted by CSW.

CSW believes and is committed to an open, honest and transparent working environment, namely in what concerns employees' career development and aspirations. As an example of this, any employee's expression of interest in participating in an internal recruitment process is seen by his or her manager as a normal career development alternative and will not carry any type of negative bias or reaction or adversely affect the employee's career aspirations.

The company encourages freedom of speech, respects free association, acknowledges union entities to be legal representatives of employees and seeks constant dialogue for the resolution of conflicts of a labour or union nature.

Employees cannot use the name of the company for their personal benefit in dealing with personal matters of any nature with the government or public administration entities.

Improper payments received by an employee are strictly forbidden (please see Section 5. Gifts, Meals and Improper Payments).

## 8. Pledge Regarding Separation of Shareholders and Executive Management



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CSW believes that, in order to foster transparency, accountability, fairness, good governance and long-term sustainability, the Management Board of the company should be strictly composed of individuals that stand-out for their own merits. These individuals should not have close family ties with the shareholders, who have their rightful seat at the Board of Directors.

CSW's entrepreneurial nature and history has determined that currently, as of 2020, the founders and key shareholders continue to be deeply involved in the operations of the company and the Management Board. However, the company pledges to establish a policy, as soon as practically possible, to separate shareholders and relatives from the Management Board of the company.

Shareholders in this context are defined as individuals directly or indirectly owning more than 5% of CSW shares and excludes management-related stock incentive plans.

## 9. Conflicts of Interest

### a. Conflicts of Interest Involving Suppliers or Other External Entities

A conflict of interest in the employee-company relationship (e.g. with a supplier) exists when CSW employees may be tempted not to act in the best interests of the company but instead to use their influence or act to benefit their own personal interests or third parties' interests, or to cause harm to third parties' interests. This includes, but is not limited to, family and other strong relationships, positive or negative.

All CSW employees must ensure they have no participation whatsoever in any dealing where such a conflict of interest may arise or, if they are not able to ensure so, they must disclose the situation to the Immediate Managers and to the Division or Area Director, or to the Chief Executive Officer or the Chairman of the Board of Directors, depending on who is in the best position to make the necessary arrangements to guarantee no interference of any kind. Failure to do so will be considered a breach to this Code and may lead to CSW taking formal disciplinary action, including dismissal.

CSW employees cannot undertake independent external professional activities, such as consulting services or other professional independent collaborations of any sort, with clients, suppliers, competitors or other third parties that have dealings with CSW. Exceptions must have prior written consent from the company's Board of Directors.

### b. Conflicts of Interest Between Employees

Critical understands that, as a living community, employees may have

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strong personal relations of a love or hate nature, be members of the same family or belong to the same strongly-knit interest group. Whenever those circumstances may bias professional judgement, all CSW employees must ensure that they remove themselves from any situation where this type of bias may occur. In case the employee does not manage that by him/herself, he/she should disclose the situation to the <Ombudsperson>, that should involve whoever is in the best position to make the necessary arrangements to guarantee the absence of said bias (e.g. Line Managers, Division or Area Directors, the Chief Executive Officer or the Chairman of the Board of Directors).

Employees may be invited to collaborate actively in finding and applying a solution that protects against any such conflict of interest, for instance by preventing the parties from working together, or having any direct or indirect reporting connection.

Anyone with a personal relationship with someone, of a family nature or otherwise and despite whether such a relationship is positive or negative, can refer that person to be considered for a job, but cannot participate in the correspondent recruitment process in any case and in any form.

Failure to abide by that which is stated in this section will be considered a breach of this Code and may lead to CSW taking formal disciplinary action, including dismissal.

## c. Conflicts of Interest Involving Top Leadership Positions Within the Company

The conflicts of interest described in the previous section involving a member of the Management Board, Board of Directors, other statutory bodies, or any Director of the company ("Top Positions"), are subject to a stricter policy. CSW believes that the nature of these positions, their level of responsibility and visibility to the rest of the company make them particularly accountable to higher standards, outlined as follows:

**Principle of avoidance:** The members of the Management Board, Board of Directors and other statutory bodies of the company fully understand that conflicts of interest, of any nature – namely friend or foe, love or hate – are not desirable and should be avoided. Therefore, they are subject to a fiduciary responsibility to the company and are encouraged to act promptly in order to prevent and avoid – to the maximum extent possible – any such conflict of interest arising.

**Principle of disclosure:** To the extent that avoidance is not achieved, CSW requires that any member of the Management Board, Board of Directors, and other statutory bodies of the company immediately and fully discloses any such conflict of interest with any employee of the company or candidate for a job opportunity at the company. Failure to disclose this will be considered a breach of the Code and may lead to CSW taking formal disciplinary action, including dismissal. The disclosure is made to all members of the



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board to which the involved person belongs, and to the person/board that will seek remediation, as stated in the next paragraph.

**Remediation:** If a conflict of interest arises involving a member of the Management Board, Board of Directors and other statutory bodies, a solution will be sought that mitigates the situation. Conflicts within the Management Board will be mediated and resolved by the CEO. Conflicts with the CEO and other statutory bodies besides the BoD will be mediated and resolved by the BoD. Conflicts within the BoD will be mediated and resolved by the <[Ombudsperson](#)>.

### 10. Equal Opportunities

CSW fosters diversity and inclusion, and does not allow discrimination or prejudice of any nature, including pregnancy or parenthood, disability, race, colour, ethnic or national origin, nationality, religion, political belief or affiliation, trade union membership or non-membership, gender, gender reassignment, sexual orientation, physical condition, age, marital or civil partnership status, etc, hereafter collectively called Protected Characteristics.

In recruitment, selection and promotion processes, candidates should be assessed exclusively on their ability to meet and adapt to the requirements of the position.

Individuals who are disabled or become disabled are encouraged to disclose their condition to the company so that it can consider what reasonable adjustments or support may be appropriate. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

The company will actively promote equal opportunities in its business to ensure that individuals receive treatment that is fair and equitable and consistent with their relevant aptitudes, potential skills and abilities. All employees have a personal responsibility to adhere to the principles of equal opportunity.

Among its efforts to promote diversity and inclusion, CSW is committed to proactively furthering gender equality. Gender equality is an essential topic for the company not only at the level of tech communities but also within top-level management. Tech communities are known for the prevalence of males within them, a situation which becomes noticeable at university level; this creates an acute asymmetry, gender-wise, which tech companies inherit and is difficult to fix. CSW invests energy and resources into overcoming this challenge comprehensively.

The company will regularly monitor its policies to ensure that it effectively pursues an equal opportunities environment. In addition, it recognises its obligations under



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the applicable laws in each country where it operates.

### **a. Recruitment**

Vacancies should be profusely advertised within the labour market. Advertisements shall avoid stereotyping or using wording that may discourage particular groups from applying.

Recruitment is carried out on the sole basis of the applicant's abilities and suitability for the job. Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic.

For example, applicants shall not be asked whether they are pregnant or planning to have children. Applicants shall not be asked about health or disability conditions, except in the very limited circumstances permitted by law. For example, to check that an applicant could perform an intrinsic part of the job (taking into account any reasonable adjustments), or to see if any adjustments might be needed to the application procedures to ensure that they are not disadvantaged because of disability – but guaranteeing always that this procedure does not result in any kind of discrimination. Where necessary, job offers can be made conditional on a satisfactory medical check, but a disability will not of itself justify the non-recruitment of an applicant.

### **b. Adjustment**

When a disabled employee commences employment, or an existing employee becomes disabled, the company will, in consultation with the disabled employee, ensure that such reasonable adjustments are made as required to enable him or her to work safely and effectively and to secure equal access to the benefits of employment. The prime responsibility for arranging the appropriate adjustment will lie with the company who will consult with the employee concerned, whose expertise concerning his or her own disability will be recognised. The employee's agreement will be sought throughout. Where the company does not have the relevant expertise to resolve the problem it will, where required, consult an outside specialist.

### **c. Training and Career Development**

The company will train, develop and promote individuals based on merit and ability, and encourage employees and applicants with all kinds of Protected Characteristics. Promotion and training will be made accessible to everyone, including employees with disabilities, for whom adjustments shall be made whenever needed.

### **d. Discrimination**

Discrimination is not to be tolerated at CSW, including amongst



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current and former employees, job applicants, clients, suppliers, visitors or any other individual. This applies in the workplace, outside the workplace (when dealing with clients, suppliers or any other people), and on related trips or events including social events.

The following forms of discrimination are strictly prohibited:

**(a) Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because of their sexual orientation.

**(b) Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect parents that have childcare commitments. Such a requirement would be discriminatory unless it can be justified.

**(c) Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about, for instance, discrimination, conflict of interests, harassment or bullying.

### e. Part-Time and Fixed-Term Work

Part-time and fixed-term employees should be treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate) unless different treatment is justified.

### f. Grievances

Any employee who believes that he or she has been unfairly discriminated against because of a Protected Characteristic or for reasons related to their having a Protected Characteristic, or for any other kind of reason (e.g. conflict of interests, harassment or bullying), can use the Grievance procedure (see section 12. Grievance Procedure and Disciplinary Action).

Serious breaches of this policy will be taken as gross misconduct and may lead to CSW taking formal disciplinary action, including dismissal.

## 11. Anti-Harassment and Anti-Bullying

CSW is committed to providing a work environment free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect.

This policy covers harassment or bullying which occurs both at work and outside the workplace, such as on business trips or at work-related events or social functions. It covers bullying and harassment by employees (which may include consultants,



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contractors and agency employees) and also by third parties such as clients, suppliers or visitors to our premises.

This policy fulfils the requirements of the applicable laws of the countries in which it operates.

### a. What Is Harassment?

Harassment is unsolicited and unwelcome workplace behaviour that adversely affects the dignity of the recipient. It consists of repeated physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment if serious enough. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Harassment may involve conduct of a sexual nature (sexual harassment), or it may relate to age, disability, gender, race, or any other Protected Characteristic, or in general to the simple right to a healthy and productive work environment (moral harassment).

Harassment may include, for example:

- a) Unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing.
- b) Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless).
- c) Suggestions that sexual favours may further a person's career, or that refusal may hinder it.
- d) Derogatory or demeaning remarks based on gender, or the display of sexually explicit material in the workplace.
- e) Jokes about race.
- f) References to people using offensive racist descriptions.
- g) Offensive names.
- h) Verbal or physical abuse because of a person's race or colour.
- i) Offensive e-mails, text messages or social media content.
- j) Using colleagues or others' ideas, projects or proposals, without identifying the authors.
- k) Hiding information needed for colleagues to complete tasks, while disclosing it to others.
- l) Mocking, mimicking or belittling a person's work performance, disability or personality.

A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a





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different ethnic group if the jokes create an offensive environment.

### **b. What Is Bullying?**

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:

- a) Physical or psychological threats.
- b) Overbearing and intimidating levels of supervision.
- c) Establishing unfeasible tasks or deadlines.
- d) Promoting someone's social isolation.
- e) Inappropriate derogatory remarks about someone's performance.

Legitimate, reasonable and constructive criticism of an employee's performance or behaviour, or reasonable instructions given to employees in the course of their employment, does not amount to bullying.

### **c. If You Are Being Bullied or Harassed**

If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult or embarrassing, you should speak to your line manager, who can provide confidential advice and assistance in resolving the issue formally or informally. If informal steps are not appropriate, or have not been successful, you should raise the matter formally under our Grievance Procedure (see section 12. Grievance Procedure and Disciplinary Action).

Any form of harassment or bullying is a potential disciplinary matter.

### **d. Protection and Support for Involved Parties**

Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

### **e. Record-Keeping**

Information about a complaint by or about an employee may be placed



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on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Data Protection Policy.

### 12. Grievance Procedure and Disciplinary Action

CSW encourages their employees to report breaches of this code, including accusations of conflict of interests, discrimination, harassment, bullying, fraud, embezzlement, and bribery, to the company <[Ombudsperson](#)>. More than a right, it is a duty of every member of CSW to address these issues.

Every accusation of a breach received by the company will be treated as confidential. Employees will not be subject to any form of retaliation if they are reporting facts in good faith. Making a false allegation in bad faith will be treated as misconduct and dealt with according to the company's Disciplinary Procedure.

Serious cases of deliberate breach and/or false allegations in bad faith may amount to gross misconduct resulting in dismissal.

### 13. Data and Intellectual Property Protection

We strictly respect the intellectual property and confidentiality of client's data and information.

Employees that, on account of their position or responsibilities, have access to confidential information which has not yet been made public must not share or transfer that information to unauthorised third parties during the confidentiality period and respect any other contractual requirements.

In general, personal information should only be used for the purpose for which it was provided.

CSW fully conforms to the European Union General Data Protection Regulation (GDPR).

### 14. Corporate Social Responsibility

CSW is committed to the development of the communities where it is located and maintains permanently open channels of dialogue with them. The company provides incentives for employees to participate in volunteer and community support programmes and has established environmental goals and policies that are brought together in CSW Corporate Social Responsibility Programme.

### 15. Clarifications and Omissions

The objective of this code is to cover most situations that could



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occur in daily life at CSW. However, situations could exist that are not included in this document, or in internal regulations, and their interpretation might not be clear. Questions should be directed to the Board of Directors or to the [<Ombudsperson>](#).



