



Code of Conduct

ICT Group Holding B.V.

ICT Group brings people, technology and ideas together. Our goal is to make the world a smarter place day by day. We can only accomplish this together. We are connected through the core values of our ICT Group companies and we incorporated them into the ICT Group Values. The ICT Group Values represent who we are, what we regard important as an organization and in which areas we are valuable for our society.



Introduction

THE ICT GROUP VALUES



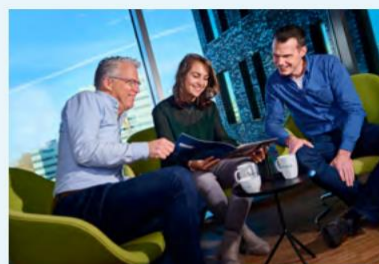
We are leading experts

With our sustainable innovative vision, domain knowledge and drive for technological solutions, we create impact and deliver the best quality and results.



It is our challenge to link people, technologies and ideas

We collaborate with our customers, partners, suppliers, and colleagues, with respect, transparency, and responsibility in an open setting and with a no-nonsense mentality. Our people make the difference in delivering value to our customers.



We are passionately involved

We are passionately involved and strive for the best and most sustainable solutions for our customers and their markets.

This Code of Conduct derives from the ICT Group Values and describes the guiding principles and norms of our personal and professional conduct. The complete description of the ICT Group Values is available on our website.

Compliance with the Code of Conduct is of utmost importance for sustainable business operations and to achieve our goal of making the world a smarter place day by day.

To whom is the Code of Conduct applicable?

The Code of Conduct is applicable to anyone who works for ICT Group Holding (hereinafter: ICT Group) (or a group company or subsidiary), including on the basis of an employment agreement, but also freelancers, trainees, interns, temporary workers and hired-in workers and all others working

on the basis of an assignment contract like members of the board of Directors and the management team (hereinafter all to be referred to as: “employees”).

ICT Group encourages its suppliers to implement a policy that is in accordance with our Code of Conduct and to comply with the rules of the Code of Conduct. If ICT Group suspects that a supplier is violating the Code of Conduct, ICT Group may require the supplier to take measures to remedy non-compliance with our Code of Conduct. To clients and other relations of ICT Group the same applies. When an employee is in doubt about the actions of a supplier or client in accordance with the Code of Conduct, the employee will never make a decision independently but always consult the immediate supervisor or the management team in order to address the situation at hand.



Code of Conduct

The Code of Conduct has been divided into three categories: **Personal Norms**, **Professional Norms**, and **Business Norms**. In this respect, a distinction is made between the personal conduct, the professional conduct and the norms that ICT Group values as an organization. The principles also include references to relevant internal documents for information for our employees.

Personal Norms

Human rights, anti-discrimination and slavery

1 ICT Group respects the internationally recognised human rights for all stakeholders. ICT Group respects the personal privacy and the individual rights of its employees, customers, suppliers and others we are in contact with. ICT Group does not tolerate any form of and also strives to a working environment (including deployment) that is free of aggression and violence, discrimination or (sexual) intimidation of its employees, partners, suppliers and customers, which will also be stipulated by ICT Group in deployment agreements with customers and other relations. At ICT Group, everyone is equal and we treat each other with respect. Mutual differences are respected and embraced. All employees have equal access to information and opportunities. ICT also does not tolerate modern slavery, forced labour, child labour and human trafficking of any kind within our organization. Thus, each employee will not exercise, support, allow, accept and/or contribute to (modern) slavery, forced labour, child labour or human trafficking in any form.

- **ICT Ethics**
- **Policy for preventing and combating undesirable conduct**
- **Undesirable Conduct Complaints Procedure**
- **Meet our confidential advisor – ICT Insite (afasinsite.nl)**

Well-being and work environment

2 ICT Group is committed to the well-being of its employees. ICT Group stimulates a diverse and inclusive work environment in which not only our employees are motivated to develop their talent and ambition, but also where our employees feel respected, valued and empowered. Moreover, ICT Group is committed to creating a safe and healthy work environment for its employees by proactively working on adequate safety and precautionary measures and procedures.

- **Occupational Health & Safety Policy**
- **Safety Manual**

Avoid conflicts of interest

3 The employees of ICT Group are obliged to avoid any activity, work-related and/or private, that (may) result in a conflict of interest. The interests of ICT Group and the personal interests of its employees may not conflict. Confidential information of our customers, suppliers and partners can never be used for personal gain or advantage nor shared with third parties. The employees of ICT Group may not abuse their position for personal benefit. Thus, business matters can never be influenced by personal interests or considerations. Our employees are obliged to immediately report potential or apparent conflicts of interest to their manager.



Professional Norms

Anti-bribery and corruption

4 ICT Group does not tolerate any form of bribery and corruption in every jurisdiction in which it operates and therefore strictly prohibits its employees from directly or indirectly offering, giving, promising, granting, receiving, accepting or authorizing anything of value in order to obtain or retain a business or personal advantage. ICT Group prohibits an improper abuse of entrusted power for personal gain. Employees of ICT Group are expected to exercise absolute caution when offering or accepting gifts, hospitality and entertainment and always consult on beforehand their manager or (a designated member of the) management board / board of Directors before any acceptance or offer. Furthermore, employees of ICT Group are expected to exercise absolute caution in case of facilitation payments, political contributions, charitable contributions and possible conflicts of interests and always consult on beforehand their manager or (a designated member of the) management board / board of Directors before taking any decision in this respect. Our employees are obliged to report at any time and as soon as possible (suspicions of) bribery and/or corruption and a possible conflict of interest of any kind whatsoever.

- **ABC rules: Anti-bribery and corruption**

Gifts

5 The business decisions of ICT Group should never be influenced by gifts, hospitality or entertainment. Gifts and hospitality must not inappropriately influence the nature or continuity of the business relationship. In addition, the gifts, hospitality and entertainment must be transparent, of reasonable and proportionate value, gifts always not exceeding the amount of EUR 100,-, and appropriate to the nature of the business relationship. We give and offer, as well as receive and accept gifts and invitations only in a transparent manner, with internal approval and in accordance with the applicable legislation, regulations and the company policy. In all cases employees must consult on beforehand their

manager or (a designated member of) the management board / board of Directors for approval.

- **HR Manual**

Reporting and fraud prevention

6 Integrity and transparency form the basis of our corporate accounting, business transactions and financial reporting. The financial documentation and transactions are handled diligently, correctly and accurately. It is not permitted to mislead and deceive others or to create this suggestion with others. Embezzlement, money laundering, theft, swindling and other forms of fraud are prohibited. All these events lead to an urgent cause for dismissal or instant termination of the working relationship. Our employees are obliged to report suspicions of fraud to their manager.

Fair competition

7 ICT Group believes in fair competition and the independent determination of market conduct by all market parties. ICT Group acts in accordance with legislation and regulations regarding fair competition. Employees of ICT Group shall respect at any time national and international competition rules and refrain from arrangements between ICT Group and other companies that may restrict or distort competition. This includes price-fixing agreements, market distribution or customer allocation between competitors and other unfair competition methods and agreements.

- **Fair Competition Directive – interaction with competitors, suppliers, and buyers**

Trade sanctions and export compliance

8 ICT Group complies with all applicable legislation and regulations regarding the import and export and domestic trade of the goods delivered or the services provided by or via ICT Group. This includes specific rules about goods, technology, software, services and the rules concerning international sanctions and trade restricting practices.



Business Norms

Sustainability

9 ICT is committed to the sustainable use of resources and environmental protection, including climate protection. Sustainable business operations form an integral part of our commitment to make the world a little smarter every day. ICT Group focuses on promoting sustainable availability, maintaining high ethical and business integrity standards, improving sustainable innovation and reducing our ecological footprint and that of the world. These sustainable business practices also include our commitment to reduce carbon emissions. They also include measures for reduction of waste including recycling. ICT Group endorses the Sustainable Development Goals (“SDGs”) of the United Nations.

Accurate accounting and administration

10 ICT Group commits to keeping complete and correct accounts. The (non-)financial documents and other records are accurate, complete, consistent and up to date. ICT Group formally records all agreements with third parties, including customers and suppliers, in writing and carefully stores and saves contract documents in a diligent manner.

Protect and respect confidential information

11 Business information, including but not limited to personal data, customer data, pricing information and intellectual property, is valuable and safeguards our competitive position. ICT Group makes every effort to protect confidential information and stores or destroys it in accordance with contractual and statutory obligations. Employees of ICT Group must not share confidential information with others or discuss it in public.

- **Information Classification**

Data protection, information security and privacy

12 ICT Group may only collect, process, transmit and use personal data to the extent that this is reasonably required for stipulated and communicated business purposes. ICT Group ensures to protect the confidential nature of personal data and strictly complies with the legislation regarding data protection and privacy.

- **Information Security Code of Conduct**
- **Privacy statement (public)**
- **Data Protection Regulations ICT Group B.V.**
- **Data Breach Protocol**

Legal compliance

13 Next to the specific legislation and regulations already mentioned in the previous sections, ICT Group complies with all other legislation and regulations of the countries in which it is active, e.g. the legislation and regulations with regard to human rights, health, safety, the environment and privacy. The employees and representatives of ICT Group are responsible for being aware of the applicable regulations. In this respect, they can receive support from the internal Legal Department of ICT Group.



Relationship with specific regulations and guidelines

This Code of Conduct forms the framework and defines the general guiding principles. This Code of Conduct does not cover all the behaviours and practices we expect based on our values and guiding principles. We have included references to internal documents, including internal policies, procedures and regulations that relate to different subject matters already covered in this Code of Conduct. In the event that a specific internal policy, procedure or regulation is not consistent with a norm laid down in the Code of Conduct, the specific policy, regulation or guideline shall prevail. The specific regulations and guidelines are only available internally to our employees via hyperlink.

Reporting breach of Code of Conduct

All employees of ICT Group have the responsibility to act with integrity and to comply with the law, this Code of Conduct and specific the internal regulations and guidelines. ICT Group provides its employees the space to speak out and to report malpractices and violations of this Code of Conduct, either anonymously or to your manager.

- **Whistleblower Regulations (public)**