

CORDSTRAP

CODE OF CONDUCT

INTRODUCTION

At Cordstrap we have the Passion to Protect. To support this mission, Cordstrap has developed a Code of Conduct to define our values and the way that Cordstrap undertakes to carry out its mission.

OUR CORE VALUES

To support our mission, Cordstrap has developed five core values to guide Cordstrap's employees and outline how we want to fulfil our mission and vision. Our core values detail how we do business, and our success depends upon our unwavering commitment to conducting business ethically, with integrity and in compliance with the laws and regulations that govern Cordstrap's business.

PURPOSE & SCOPE

The Code of Conduct defines what Cordstrap believes is the right way to do business. Our Code of Conduct applies to all employees of Cordstrap regardless of local customs, habits or practices common in any region. This Code of Conduct contains a description of Cordstrap's five core values and sets high standards of integrity and conduct. All of us are expected to live Cordstrap's core values in our conduct and the policies and procedures connected with it. As part of this commitment, the Code of Conduct has been established to help guide our way.

ROLES & RESPONSIBILITIES

Employees are responsible for reading and understanding the contents of our Code of Conduct. In case of any doubt about how to comply with a particular value described in this Code of Conduct or if any part of the Code of Conduct is unclear, please discuss this with your manager.

This Code of Conduct is approved by the Chief Executive Officer B.J. Tribble.

Signature:



CORDSTRAP'S FIVE CORE VALUES

1. CUSTOMER CENTRIC

Cordstrap is a customer-focused organization and therefore all Cordstrap employees should always be committed to engaging directly with our customers to provide the best possible service and experience. We do not share private information of the customer without their consent, and we always seek to honor the promises made by Cordstrap to the customer. This means we do not commit to things that cannot be lived up to nor do we mislead our customers or give false representations in any way. In case of doubt always seek clarification before acting.

2. INTEGRITY

Cordstrap employees are committed to doing the right thing: to provide honest and transparent advice to our customers; to create a safe working environment for our employees and our customers' employees; and to behave ethically with all stakeholders. This means complying with all (local) laws and regulations: avoid fraud, avoid corruption and bribery, avoid conflicts of interest, and respect human rights.

2.1. Act in accordance with applicable (local) laws and regulations

Every company needs to comply with all relevant local laws and regulations. At Cordstrap we take this seriously and assume that all employees are familiar with the (local) laws and regulations applicable to Cordstrap's business and act accordingly. If not, you should discuss this with your manager. This means that, among others, Cordstrap always seeks to obey competition laws and laws regarding the prevention of money laundering.

2.2. Avoid fraud

Cordstrap strives to provide a fair and honest representation of all data, financial and non-financial. Therefore, it is not allowed to manipulate any information, documentation or other data.

2.3. Avoid corruption and bribery

We do business in a fair and open manner. Therefore, it is not allowed to accept, offer or promise to offer or accept gifts of any value (gifts also means payment or hospitality) in order to receive assistance or improper advantage in business matters. Further information about bribery and corruption can be found in our Anti-bribery and Corruption Policy.

2.4. Avoid conflict of interests

Cordstrap's reputation always comes first. Cordstrap assets are only used to pursue and achieve Cordstrap's goals and not personal goals. If you cannot comply with this rule, or there may be doubts from the public whether you act in accordance with this rule or not, you should inform and discuss this with your manager.

2.5. Respect human rights

All work should be voluntary and not subject to mental or physical oppression or duress. This means, among others, children's rights, woman's rights, minority rights and migrant worker's rights should be always respected.

3. FLAT AND OPEN

Cordstrap seeks a culture with open communication, minimum hierarchy, and a high degree of employee involvement, where everyone has a role, everyone is valued, and anyone can approach and talk to anyone. We encourage a healthy debate and respect differences in opinion. We raise concerns, discuss dilemmas and hold each other accountable for non-compliance with this Code.

4. AGILE AND INNOVATIVE

Cordstrap is flexible and believes in constant innovation through experimentation, in empowered teams, in rapid decision and learning cycles and in leveraging next generation technology to do things faster, smarter and simpler.

5. EXECUTION DRIVEN

Cordstrap exudes a winning, can-do mentality backed by discipline and focus on execution to drive impact, consistent performance and continuous improvement.

SPEAK UP

All employees are responsible for acting in accordance with this Code of Conduct. Failure to act in accordance with this Code of Conduct can have serious consequences for Cordstrap and for any employee not complying with this Code of Conduct.

We want to encourage you to speak up to your (direct) colleagues if they do not comply with this Code of Conduct. If this is not possible, this does not feel right or your speak up does not help, we want to encourage you to discuss this with your manager or to contact the Legal Department by emailing to legal@cordstrap.com. The Legal Department will handle your request confidentially. Further guidance for speaking up about non compliance with this Code of Conduct can be found in our Whistleblower Policy.

Besides contacting your manager or the Legal Department you can also contact Cordstrap's external confidential advisor. This safeguards that you remain anonymous throughout the whole organization.