

# 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.

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## 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.

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## 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 and all entities within the Cordstrap Group, 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.

The Code of Conduct should be read and understood in conjunction with other applicable Cordstrap policies, including but not limited to the Anti-Bribery and Corruption Policy, the Whistleblower Policy, and relevant HR and IT policies.

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## ROLES & RESPONSIBILITIES

Employees are responsible for reading and understanding the contents of our Code of Conduct. To support this, employees may be given access to (online) training resources, at Cordstrap's discretion. Employees are required to periodically acknowledge that they have read and understood the Code of Conduct. In case of any doubt about how to comply with a particular value described in the Code of Conduct or if any part of the Code of Conduct is unclear, please discuss this with your manager.

The Code of Conduct is reviewed periodically and updated as necessary.

This Code of Conduct is approved by the Chief Executive Officer (CEO) 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 act with integrity and behave ethically towards all internal and external stakeholders. This means complying with the applicable (local) laws and regulations, among others to avoid and refrain from any form of fraud, corruption, bribery and conflict of interest, as well as to 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 the Code of Conduct.

### **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 the Code of Conduct. Failure to act in accordance with the Code of Conduct can have serious consequences for Cordstrap and for any employee not complying with the Code of Conduct.

We want to encourage you to speak up to your (direct) colleagues if they do not comply with the 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](mailto:legal@cordstrap.com). The Legal Department will handle your request confidentiality. Further guidance for speaking up about non-compliance with the 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.

Violations of the Code of Conduct may result in disciplinary measures, taking into account the applicable laws and regulations, company policies, and the circumstances of the case.