



Code of Conduct.●

January 2021

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At Adjust, we are committed to providing **great value** to our clients, to our people and to society at large.

We make our best efforts to deliver services that align with what we believe in and strive for, starting with **business integrity and transparency**.

These values are laid down in the following **Code of Conduct**, which each member is expected to understand, embrace, and uphold.

Business Relationships.

We firmly believe that lasting business relationships are built first and foremost on mutual trust. Honesty, professional rigor and excellence are the guiding principles that act as our organization compass.



Honesty and Fairness: Adjust's members always act with honesty, openness, and fairness in the opinions they provide and business promises they make. Adjust also clearly states the limits of its know-how and scope of its past experiences. Adjust's services are fairly priced, reflecting the value delivered to its customers.



Professional Rigor: Adjust's members hold themselves to applicable professional standards. When carrying out any activity, they abide by the laws and regulations of the sector. They value objectivity and maintain the highest standard of competence in performing their mission(s). They collect and handle data in compliance with the laws and contract terms agreed upon with the client(s), never disclosing or using information for the benefit of third parties or their own.



Excellence: Adjust's members do their utmost to deliver high-quality work consistently and on time. They demonstrate, through their excellent track record, that they have the skills for a fruitful completion of the mission assigned to them. Adjust is particularly attentive in seeking to quickly incorporate feedback and constantly improve its services and relationships. Its members update their knowledge and abilities to keep abreast with any advancement in their respective fields. Because of their commitment to quality, Adjust can anticipate and quickly meet its clients' needs.

Talent Management.

While we praise individual talent and expertise, we also believe that a collaborative environment is the essential driving force behind our continued success.



Inclusive and Collaborative Environment: Adjust works with talented individuals coming from diverse backgrounds, displaying different skillsets, and holding different points of view. Adjust takes pride in creating an inclusive and collaborative environment conducive to creativity, innovation and the circulation of new and bold ideas. Adjust's members are expected to treat each other with respect, courtesy and fairness.



Empowerment: In order to provide honest and informed advice to its clients, Adjust fosters a culture wherein its members work in a spirit of constructive criticism and skepticism. They are invited to challenge the status quo to push back the boundaries of the expertise and knowledge Adjust brings together, thereby improving the quality of services. Adjust supports any effort aimed at maximizing its members' potential and accelerating the results.



Teamwork and Personal Accountability: Adjust members commit to delivering excellent customer service, seeking support from other members of the team in any way they see fit to help them fulfill the terms of the contract. Adjust's members are encouraged to speak up should they be faced with an ethical problem or challenge.

Corporate Social Responsibility.

We understand **the impact of our work** and how it affects society at large.

We strive to minimize its effects and collaborate in any way possible to the creation of a more open, yet **privacy-friendly digital world**.

Adjust focuses particular attention on issues related to **transparency & data protection** and abides by the European General Data Protection Regulation (GDPR), put into effect on May 25, 2018.

Anti Corruption.

Because of the values of integrity, transparency and fairness Adjust defends, it is firmly committed to creating a corruption-free, bribery-free environment and upholding all applicable laws.

Adjust and each of its members stand against corruption and subscribe to the document issued by the United Nations against Corruption and approved on October 31, 2003, which articulates the following objectives:

- a. To promote and strengthen the measures to prevent and combat corruption more effectively and efficiently.
- b. To promote, facilitate and support international cooperation and technical assistance in the prevention and struggle against corruption, including the recovery of assets.
- c. To promote integrity, the need for accountability and the correct management of issues and public goods.

Likewise, Adjust implements best practices that ensure bribery is prevented. Bribery involves any act that may help to gain business, regulatory or personal advantage. It shall therefore be prohibited to:

- Accept gifts in inappropriate circumstances with the intention to influence a decision, secretly, in cash or equivalent, or in an individual's name.
- Make political contributions of any form to any political parties or candidate, as it would clearly go against the principle of fairness.

- Engage in charitable activities suspected to conceal or facilitate bribery.

To ensure full compliance with these terms, newly hired employees receive proper training on anti-corruption policy. They are also required, each year, to formally confirm that they comply with anti-corruption policies and abide by the rules stated herein. Adjust's members are strongly encouraged to signal any infringing behavior and seek further advice from the organization.

Adjust also clearly communicates to any of its clients, contractors, and business contacts that it fully commits to protecting and defending anti-corruption and anti-bribery policies. Any act that might threaten to breach them will be immediately investigated, reported to authorities, and subjected to internal and legal sanctions.



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