

Code of Ethics and Business Conduct

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1. Purpose

The present Code guides the actions of Integrate Investment and our affiliate, Integrated Consulting & Education Services SRL (INCES) and the behaviors of our employees. Integrate Investment always respects the laws and regulations, as well as the internal policies and procedures and builds its actions on the principles of trust and quality.

The following chapters will describe the way in which this Code is being put into action, and the principles that guide our actions.

2. Our vision, mission and values

We assimilate, process, develop and continuously share knowledge and best practices for strategic and operational procurement and public procurement, contract management, category management, change, program, project and process management in Romania.

We advocate for innovation as a primary driver of success and we champion our partners to out-think creating added value. Ambitious plans and bold targets only have value if they can be realized and we are aware of that.

We know that each business is unique and with unique challenges, so unlike others we do not replicate, but provide tailor made solutions.

We work hard to understand our customer's business and priorities creating trust and turning decision into action. Our solutions are tailored to customer's needs and focused on getting the job done.

We have a passion for results and a commitment to the highest level of professionalism and ethical standards in everything we do.

We leverage the latest procurement know-how, combine it with bold thinking and we come up with creative yet practical solutions for solving procurement challenges while delivering sustainable results to enhance our customer's business performance.

In a rapidly changing world where the only constant is change and the most important factor in maintaining the competitive edge is an emphasis on innovation and re-invention, we support organizations in developing a favorable environment towards the emergence of tomorrow's products and services by providing tailored solutions and integrated expertise, enhanced by advanced practices.

Our approach is to go beyond price reduction paradigms, embracing a long-term sustainable perspective.

Our values are evident in every detail of a company that is 100% customer-oriented:

- I. Initiative: We explore and capitalize on opportunities.
- II. Integrity: Honesty and integrity govern our business relationships.
- III. Competence: We are well informed and adhere to the highest professional standards.
- IV. Partnership: We trust in the synergy of the partnership and we have long lasting ones.
- V. Innovation: We promote study and research as a basis for developing new processes and services.
- VI. Intelligence: We use knowledge and experience to address what is essential.

3. Teamwork and healthy environment

We build relationships based on shared respect, trust and personal and professional commitment. We strive to provide a safe, inclusive, and respectful workplace environment for all employees. We foster diversity and equal opportunity, valuing the unique contributions of every individual. We prohibit any form of discrimination, bullying, or harassment based on race, color, religion, gender, sexual orientation, age, disability, or any other protected characteristic. We are committed to communicated honestly and open and we support the professional development of our colleagues and promote individual achievements and continuous learning.

4. Focus on clients and stakeholders

We consider ourselves professionals and we strive to uphold the clients and stakeholders trust. Our commitment is to deliver high-quality services and we always strive to support our clients in successfully completing the most complex projects.

We prioritize the needs and satisfaction of our clients. We strive to understand their requirements, expectations, and goals, and tailor our products and services to meet their needs. We are committed to delivering high-quality solutions, maintaining open lines of communication, and building long-term relationships based on trust and mutual benefit. We approach our work with professionalism, expertise, and a commitment to excellence. We continuously enhance our knowledge and skills to stay at the forefront of our industry.

We believe in open, honest, and timely communication with our clients and stakeholders. We provide clear and accurate information about our products, services, pricing, terms, and conditions. We actively listen to our clients, value their feedback, and address their concerns promptly and effectively.

5. Objectivity and independence

We maintain and affirm our objectivity and independence and we recognize that these principles are crucial to our professional conduct. We reject inappropriate pressure and conduct from our clients and stakeholders.

We strive to maintain objectivity and impartiality in all our actions and decisions. We approach situations and challenges with an open mind, free from personal biases, conflicts of interest, or undue influence. We embrace a mindset of professional skepticism, which encourages us to critically evaluate information, assumptions, and assertions. We question and challenge ideas, theories, and practices to ensure thoroughness and accuracy.

6. Professional integrity

We comply with the laws, regulations and standards that apply to our industry and we promote a culture of integrity. We acknowledge that each member of our team is responsible for keeping up with the professional knowledge and to sharing the best practices and innovation. We recognize our competitive advantages and that we can only achieve them through continuous learning. We provide services within the boundaries of our knowledge and skills, seeking assistance or collaboration when needed.

We adhere to the highest standards of honesty and truthfulness in all our professional dealings. We provide accurate and reliable information, and we do not engage in deception, misrepresentation, or withholding of relevant facts. We value transparency and ensure that our actions are consistent with our words.

We strive to align our words, actions, and values consistently. We do not engage in behaviors that contradict our principles or compromise our integrity. We are reliable and predictable in our conduct, ensuring that our actions always reflect our ethical standards. We make decisions based on ethical considerations and moral principles. We assess the potential impact of our choices on all stakeholders, striving to make decisions that are fair, just, and in alignment with our values. We prioritize ethical standards over personal gain or short-term benefits.

We have a **zero-tolerance policy towards bribery and corruption** in all forms. We prohibit the offering, solicitation, or acceptance of bribes, kickbacks, or any improper inducements. We conduct our business with integrity, transparency, and in compliance with anti-bribery laws and regulations.

Our company strictly prohibits any form of corruption, including but not limited to bribery, embezzlement, fraud, money laundering, extortion, and abuse of power.

We do not tolerate corruption by employees, agents, intermediaries, or any other parties acting on behalf of the company. We comply with all applicable anti-corruption laws, including local and international legislation. We adhere to the laws and regulations governing the prevention of corruption, such as the UN Convention against Corruption and other relevant legal frameworks.

We conduct thorough due diligence on potential business partners, agents, intermediaries, and other third parties to ensure they uphold similar anti-bribery and anti-corruption standards. We assess their reputation, track record, and commitment to ethical conduct before engaging in any business relationship or collaboration.

7. Respect for Human Rights

We are committed to upholding and respecting the fundamental human rights of all individuals, both within our organization and in the communities where we operate. We recognize and respect the principles outlined in the Universal Declaration of Human Rights and other international human rights standards.

We promote a workplace and business environment that is free from discrimination. We do not tolerate discrimination based on race, color, religion, gender, sexual orientation, gender identity, age, national origin, disability, or any other protected characteristic. We treat all individuals with dignity, fairness, and respect.

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8. Sustainability

Sustainability is integrated in all our operations. Our approach towards sustainability is based on the goals in the UN 2030 Agenda. We focus on having as little negative impact on the environment as possible when it comes to the life cycles of our services. We follow the laws and regulations and set clear goals on the way in which we can reduce our environmental impact. We demand that all of our partners comply with all the local, national or international environmental laws and regulations, as well as all applicable health and safety regulations.

We regularly monitor our environmental impact. We manage our business responsibly and our operations are fair and transparent and we expect the same from our partners. We procure goods and services that match our values and that help to reduce our negative impacts and deliver positive impacts on the environment and the society.