



CODE OF CONDUCT

TRIANGULAR GROUP B.V.

Triangular Group B.V. ('**Triangular Group**'), also including its subsidiary, Triangular Group Intelligence B.V. ('**TGI**'), which is carrying the business name: 'Triangular Group Intelligence', provides its global clients with solid, reliable and in-depth information as well as, consultancy services and quick and efficient solutions to a variety of problems. In providing these services Triangular Group applies and adheres to a strict ethical Code of Conduct.

This Code of Conduct demonstrates the intention of Triangular Group to work not only according to applicable local legislation and regulations but also according to certain principles and rules of conduct of an ethical nature.

The application of these principles is guaranteed by the existence of procedures in Triangular Group aimed at ensuring that its employees, internal bodies and third parties (it deploys) who provide services, carry out activities or act on the instructions of Triangular Group, perform their work in accordance with these ethical principles.

THE TRIANGULAR GROUP TAKES THE FOLLOWING CORE VALUES AS A STARTING POINT:

1. Triangular Group has integrity - by observing the highest professional standards, giving sound advice and guaranteeing its independence - and expects this integrity to be promoted and observed by its employees and by the third parties it deploys.
2. Triangular Group expects everybody to retain their objectivity in the sense that an employee and/or a third party will not be involved in the exertion of undue influence and will therefore avoid all relationships prejudicial to an independent and professional opinion.
3. Triangular Group expects all its employees and third parties to carry out their activities with common sense and good judgement at all times and anywhere in the world, and also to act responsibly regardless of whether or not there is a written policy with regard to specific conduct. Considering the contents and purport of the services offered to its customers or clients Triangular Group has certain expectations of its employees and any third parties it deploys with regard to their conduct, possession of common sense, fundamental work ethics, safety and respect for others (life and property).
4. Triangular Group expects all its employees and third parties it deploys to perform their responsibilities in a legally and ethically responsible way with due observance of or in accordance with National Values, both according to the letter as well as the spirit of local legislation and regulations where the employee and/or third party is active and with respect for the culture prevalent there.
5. Triangular Group expects that everyone will at all times refrain from undertaking activities and/or acts that might have a negative impact on the interests and/or reputation of Triangular Group and/or its customers or clients, also including but not exclusively, acts on the work location or otherwise that at the discretion of Triangular Group can be considered as violent behaviour, moral ignominy, terrorism, or constitute an offence under



national, regional or local law, regardless of whether that person is prosecuted or sued or has been sentenced or given an order under civil or criminal law.

6. Triangular Group does not expect any employee and/or third party to be involved in corruption, bribery, extortion and embezzlement in any form whatsoever, or to tolerate these activities. In this connection neither does the Triangular Group expect any proposals to be made or accepted that might lead to unfair or improper advantage. Such improper proposals can consist of cash money, non-monetary gifts, pleasure trips or services and provisions of any other nature.
7. Triangular Group does not expect anyone to perform and/or omit any acts contrary to the law, even if these acts or omissions will be to the benefit of Triangular Group, its customers and/or clients. Triangular Group cannot realise or achieve its business purposes and/or aims or the objectives of its customers or clients unless everybody observes these legal and ethical standards.
8. Triangular Group expects every employee and/or third party not to disclose any confidential information to unauthorised third parties, provide it to any third parties nor use it to benefit himself. An exception to this is if the provision of information is or will be required by law and the employee and/or third party cannot invoke a right of privilege. In this connection, Triangular Group expects everyone to ensure that this obligation to observe secrecy is complied with and that everyone complies with the provisions applicable in this respect after termination of the activities and/or assignment.
9. Triangular Group, and all of its contracted personnel will comply with the United Kingdom Bribery Act and the Foreign Corruption Practices Act.

The foregoing is an illustrative and non-exhaustive list of the core values of Triangular Group, which entails practices and/or conduct that are not tolerated. Any violation of this Code of Conduct or other misconduct can lead to sanction measures including the immediate termination of the employment or the assignment contract.

