



CODE OF CONDUCT FOR BUSINESS PARTNERS AND CLIENTS

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1 Introduction

The way Trans Skills Employment Services LLC (“**Trans Skills**”) does business is a key element for our reputation. Trans Skills wants to be perceived as a world-class performance company and, by the same token, as a reliable and integral partner of our stakeholders all over the world.

We are convinced that sustainable business success is closely linked to compliance with laws, regulations, and ethical standards. And we require our approved business partner to work at the same high level of standards.

This Code of Conduct for Business Partners and Clients (“**Code of Conduct**”) applies globally to the engagement and execution of business activities with all business partners (including vendors and service providers) and clients (“**Business Partners and Clients**”) with which Trans Skills enters into a business or contractual relationship to provide business services, functions or activities.

2 Ethics

2.1 Business and Financial Ethics

Trans Skills expects Business Partners and Clients to provide honest and accurate invoices supported by appropriate documentation as set out in the relevant contract(s).

2.2 Ethical Dealings

Business Partners and Clients will operate with integrity, in an ethical manner and in compliance with all applicable laws, rules and regulations applicable to their industry and place of business.

Business Partners and Clients will not engage in bribery, corruption, money laundering, terrorism financing, embezzlement, extortion, kickbacks, excessive commission, inducements or fees and any other prohibited business practices.

2.3 Tax Evasion and Facilitation of Tax Evasion

Trans Skills takes a zero-tolerance approach to our Business Partners and Clients committing or facilitating tax evasion. Business Partners and Clients (and any of their subcontractors) are expected to have policies and procedures in place to prevent employees and other associated persons from committing or facilitating tax evasion.

2.4 Gifts and Entertainment

All Trans Skills’ contracts for the provision of services and/or purchase of goods will be made on the basis of price, quality and service, and Trans Skills will deal with its Business Partners and Clients fairly, honestly and openly.

Trans Skills employees are required to conduct all business and interactions with Business Partners and Clients in strict compliance with the applicable provisions of Trans Skills Code of Conduct.

Business Partners and Clients must avoid any actions with Trans Skills employees during the selection or re-selection process that could give others the impression of favoritism or other improper advantage.

Furthermore, Business Partners and Clients should not offer, and Trans Skills employees must not accept, gifts or entertainment that might compromise, or appear to compromise, an employee's judgment or independence.

3 Data Privacy and Confidentiality

Business Partners and Clients will process data only for the purposes for which it was collected or otherwise made available. Business Partners and Clients shall demonstrate appropriate industry standards and best practices data security controls to ensure that all information is protected and secure from damage and unauthorized use.

Also, Business Partners and Clients shall follow any data security requirements specified in contractual agreements with Trans Skills.

Business Partners and Clients must respect and maintain the confidentiality of all non-public information about Trans Skills or its activities, business plans.

Business Partners and Clients will immediately notify Trans Skills of any known or suspected data privacy and security breaches and will work with Trans Skills and, if applicable, regulatory authorities and law enforcement to contain the breach and determine a root cause.

4 Labor

4.1 Human Rights

Trans Skills is committed to developing an organizational culture which implements a policy of support for internationally recognized human rights and labor standards. Trans Skills supports the principles contained within the United Nations Declaration of Human Rights and the International Labor Organization's (ILO) Core Conventions on Labor Standards

Trans Skills expects its Business Partners and Clients to treat their employees with dignity and respect, and to uphold their human rights.

4.2 Wages and Benefits

Business Partners and Clients should provide wages and benefits that meet or exceed the requirements of local law. At a minimum, Business Partners and Clients should pay employees regularly and timely, the legal minimum wage, the prevailing industry wage, or the wage negotiated in an applicable collective agreement, whichever is higher. All other types of legally mandated benefits must be provided as required by law, including, as applicable, paid leave, pension, statutory insurance, health benefits, maternity leave, parental leave, family care leave, and childcare benefits. All overtime work must be performed and compensated in accordance with the law and the individual's employment contract or other applicable contract or collective agreement.

4.3 Working Hours

Business Partners' and Clients' employees should not be required to work in excess of the relevant legal limits on working hours, overtime hours and number of working days per week. Employees shall be

granted and correctly compensated for any types of paid leave or time off to which they are legally entitled under applicable law, which may include, for example, holidays, maternity/parental leave, family care leave and sick leave.

4.4 Slavery, Forced Labor and Human Trafficking

Trans Skills does not tolerate slavery, forced labor, or human trafficking in any form and will not knowingly work with Business Partners and Clients who engage in these practices or permit their subcontractors to engage in these practices.

All work must be performed under and in accordance with contracts that have been entered into voluntarily. Business Partners and Clients must not use involuntary labor of any kind, including prison labor, debt bondage, or forced labor by governments. Business Partners and Clients must not engage in practices associated with forced labor.

Additionally, Business Partners and Clients must not engage in or support human trafficking and are encouraged to implement due diligence measures to ensure that no human trafficking exists within their extended supply chains.

4.5 Child Labor

Business Partners and Clients must not employ child labor and should take the necessary preventive measures to ensure that it does not employ anyone under the applicable legal minimum age of employment.

4.6 Respect and Non-Discrimination

Business Partners and Clients will not discriminate on the basis of race, religion, age, nationality, social or ethnic origin, disability, sexual orientation, gender, gender identity, marital status, veteran status or political affiliation, in its hiring or employment practices; such as, compensation and benefits, access to training, promotion, termination and retirement.

Business Partners and Clients shall (and shall ensure that each of their subcontractors shall) comply with all applicable human rights laws, statutes, regulations and codes from time to time in force. Business Partners and Clients shall implement due diligence procedures for their own suppliers, subcontractors and other participants in their supply chains, to ensure that there is no human rights violations, including but not limited to slavery, child labor or human trafficking in their supply chain.

5 Environmental Protection, Health and Safety

Trans Skills is aware of its responsibility to protect the environment and is guided by its commitment to promoting sustainability and safety. This awareness and decision will ensure that it is safe and acceptable from the perspective of employees, business partners, clients, the general public, and all other stakeholders, as well protecting the environment.

Business Partners and Clients will comply with all applicable environmental laws and regulations.

Business Partners and Clients are expected to operate in an environmentally responsible manner and strive, as far as practical, to manage and minimize negative environmental impact including use of energy, greenhouse gas emissions, water, biodiversity, waste, hazardous materials and other natural resources.

6 Communication

Business Partners and Clients may contact Trans Skills with any questions or concerns related to this Code of Conduct by email compliance@transskills.com.

Trans Skills will communicate this Code of Conduct internally and externally to relevant parties.

Business Partners and Clients are responsible for communicating the provisions of this Code of Conduct to their employees, suppliers, and any sub-contractors.

Where needed, relevant training and guidance can be given to employees of Business Partner and Client to achieve compliance with this Code of Conduct.

7 Compliance

This Code of Conduct sets forth Trans Skills' expectations for current and future Business Partners and Clients. Trans Skills expects all new and existing Business Partners and Clients to meet our minimum expectations and to aspire to make continuous improvements to their businesses as noted herein across ethical, human, and labor rights, environmental areas.

Any facts or circumstances which are likely to lead to a Business Partner or Client inability to meet the requirements and expectations of this Code of Conduct should be immediately reported to Trans Skills.