



DESIGNED
TO TALK



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CODE OF CONDUCT

The Designed to Talk Code of Conduct is a set of principles and expectations that aims to guide and inspire the conduct or behaviour of all Designed to Talk colleagues.

Please find below the overview of Designed to Talk Code of Conduct Principles, which are detailed out in every chapter of this document.

We respect each other.

Together we achieve our goals while we treat each other with respect and dignity, as Designed to Talk is a safe workplace in which we foster diversity and inclusion, and which is free from discrimination, harassment, sexism or intimidation in any way.

We take care of ourselves and others.

We care about the mental and physical health and work-life balance of all colleagues.

We care about a trustworthy and confidential environment, in which there is respect for people's privacy; Designed to Talk fosters a secure environment in which data of people and sensitive content is handled with respect for information security, confidentiality, and privacy.

We act responsible and with integrity.

We value integrity and play fair, ethical, and always abide by applicable laws and regulations. This means we avoid conflict of interest, we do not bribe, do not use or accept gifts to wrongfully influence business partners or colleagues, and never use illegal or unethical methods to gather information.

We take care of our environment.

We care about doing business in a sustainable way. We do an ongoing effort to spot opportunities to reduce the impact that any of our business activities have on our local and global environment.

We have open and honest communication.

We believe open and honest communication amongst all colleagues and with external partners is crucial for a healthy work environment. Designed to Talk finds it important to have open communication channels for 'daily' communication, and for situations in which the Code of Conduct is violated. For the latter we provide low threshold and safe communication channels (like e.g. the whistleblow option).



INTRODUCTION TO THE CODE OF CONDUCT

This Code of Conduct is Designed to Talk' guideline to help the employees of Designed to Talk, (sub-) contractors and business partners to make sound decisions in doing their job. We have a responsibility to establish and maintain business relationships based on integrity with each other and our business partners. This Conduct provides a moral compass for working together and doing business in an integer way.

This Code of Conduct sets fundamental principles of law and ethics governing the way that Designed to Talk does business and we work together internally. These principles are applicable when our employees work with external partners or stakeholders; both the employees should feel safe, as the business partners who work with us.

This Code is not the exclusive source of guidance and information on Designed to Talk' expectations, but it serves as the basis for other Designed to Talk policies and guidelines. For example, we find in most Designed to Talk countries a so called employee handbook, which includes all kinds of rules and regulations in alignment with the local labor law.

The Designed to Talk Code of Conduct sharpens what is good and bad company behavior. We ask all to role model the described principles, and when violated to address this with your Circle Lead or Manager, Talent Lab, the local Trust Person or follow the whistleblower procedure. We will not tolerate retaliation against any colleague at Designed to Talk who reports or participates in an investigation of a possible violation of our Code, policies or the applicable laws and regulations.

Designed to Talk expectations for responsible conduct are applicable to all parties who work on behalf of Designed to Talk, including, but not limited to, its employees, partners, contractors and other representatives that act on behalf of Designed to Talk. In the case there are local country laws which differ from the Designed to Talk Code of Conduct, then the local laws prevail for employees working in those countries. In case the Designed to Talk Code of Conduct is more strict than the local law, then the Code of Conduct prevails.



DESIGNED TO TALK'S PURPOSE AND CORE VALUES

Create Contact Magic

The Code of Conduct is of special importance as it is an important fundament to achieve **Designed to Talk Purpose of 'Create Contact Magic'**. This Purpose reflects the impact we want to create with our customers and in the way we collaborate with each other. Adhering to the Designed to Talk Code of Conduct brings us closer to achieving our Purpose.

Core values: open, exciting, beyond

The Designed to Talk Code of Conduct builds on the Designed to Talk core values: Open, Exciting and Beyond.

- **Open** Openness is at the heart of the Designed to Talk culture. Curious and caring, we listen and ask why; eager to work across teams. We are transparent and always present with one another.
- **Exciting** Every individual can contribute to an exciting workplace by creating a safe and positive place where everybody can be themselves at work. This means we do not create formalities and bureaucracies where this is not needed; we are personal and approach colleagues with a smile and constructive feedback to bring things forward.
- **Beyond** We tick unlike any other company. Bold, up for challenging the status quo: we push unconventional thinking. Experiment and dare to make mistakes and continuously learn. We want to take leadership, amaze and go out of the box.



WE RESPECT EACH OTHER

Diversity and inclusion

Designed to Talk is dedicated to equal employment opportunity without regard to race, color, religion, gender, national origin, age, disability, sexual orientation or other protected characteristics.

Designed to Talk is committed to the equitable treatment of all employees and qualified applicants for employment. Employment decisions will be based on business reasons, such as qualifications, demonstrated skills and achievements.

Designed to Talk values the difference of diverse individuals from around the world, and each employee will treat each other with respect and fairness at all times. Designed to Talk employees will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee.

Safe workplace free from harassment, intimidation and bullying

We expect and encourage everyone to provide and maintain a safe work environment free from discrimination, psychological or sexual harassment, intimidation and bullying. We do not tolerate unlawful and inhumane behavior towards each other. This includes any inappropriate conduct or comment by any person that would cause another colleague to feel humiliated or intimidated.

Examples of prohibited behavior are (but not limited to):

- Verbal or written conduct such as naming, humiliating remarks, slurs, or sexual advances, invitations, or sexual comments.
- Visual conduct such as derogatory or sexually oriented posters, photography, cartoons, drawings, emails, or gestures.
- Physical conduct such as assault, unwanted touching, intentionally blocking normal movement, interfering with work because of gender, race, colour, religion, national origin, age, disability, sexual orientation, or other protected characteristics.
- Threats or demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss.
- Offers of employment benefits in return for Favors.



Be yourself and mindful of others

We are curious and open minded about new ideas and progress; we explore new grounds and actively look for innovative solutions. We flavour our days with positivity, humour and joy. We are all individuals. Being yourself is not only encouraged but celebrated within Designed to Talk. We believe authenticity is key to Create Contact Magic and creating a welcoming and inclusive environment, and this extends to personal clothing style.

We encourage individuals to express their personality and individuality through their attire, at the same time we ask our employees to be mindful of their appearance and personal hygiene. We believe that clothing is a way of expression and "being you". We also ask you to recognize there are times of flaunting and times to dress up a bit. For example: please don't wear flipflops when meeting with customers. However, we do not impose a dress code and trust our employees to use their own judgement in deciding what is appropriate for their role and the momentarily circumstances.

Drugs and alcohol

Use of alcohol at the workplace or the use of drugs adversely affects the job performance and can risk the health and safety of others and ourselves. Designed to Talk employees will therefore not work or report to work under the influence of alcohol, illegal drugs or controlled substances. Use of alcohol or drugs may never impact the ability to do the job, endanger others or themselves, or reflect adversely on Designed to Talk reputation.

According to local custom and law, norms relating to alcohol consumption during business entertainment or work-related social events, vary greatly. When alcohol is consumed in these type of events, then still it should not impact one's ability to do one's job effectively, lead to inappropriate behaviour, create a danger to employees or others (impacting driving is an example), or violate local law or a customer rule or policy. All employees are expected to behave responsibly in this regard and Designed to Talk will take appropriate action if they do not.

All employees are prohibited from possessing, selling, purchasing, using, manufacturing, distributing, or offering to others any illegal drugs or controlled substances while on company business or on company premises. This prohibition does not include legally obtained medications or prescriptions used as directed by a medical practitioner. Subject to applicable law, any employee found using, selling, purchasing or possessing illegal substances on company or customer property or during work time may be dismissed.

WE TAKE CARE OF OURSELVES AND OTHERS

Work-life balance, mental health and physical health

At Designed to Talk, we are all responsible for maintaining a safe workplace by following safety and health rules and practices. All employees are responsible for immediately reporting accidents, injuries and unsafe equipment, practices or conditions to the designated person. Our policy forbids retaliation against any employee who, in good faith, reports a suspected violation of law or policy.

Designed to Talk is committed to:

- Protecting, and striving for improvement of, the mental and physical health, work life balance, safety and security of our people at all times
- Planning for, responding to and recovering from any emergency, crisis and business disruption

The commitments listed are in addition to any applicable local laws and regulations. For further details, please consult the (local) Designed to Talk Employee handbook(s).

Information security, confidentiality and data protection

Confidentiality and integrity Designed to Talk and its employees process data and content with respect for information security, confidentiality and privacy. All employees are required to protect and maintain confidentiality and integrity of any information disclosed to them by business partners, customers or other 3rd parties. Information, including personal data, is to be handled according to existing contracts, local and global business practices and statutory law. Personal data, customer's confidential information and other confidential data will be stored in a secure environment.

Privacy Designed to Talk has a special focus on privacy, and its processing of personal data shall be subject to the care and awareness which is required according to law and regulations and with special consideration for information that might be sensitive, regardless whether the data refer to customers, employees, suppliers or others. As a European based company, Designed to Talk complies with EU data protection regulations.

Dealing with information We build trust by being honest, caring and reliable. We respect each other, our customers and partners. We achieve our business goals with integrity. No employee shall use any illegal or unethical methods to gather competitive information. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent or inducing such disclosures by past or present employees of other companies is prohibited.



WE ACT RESPONSIBLE AND WITH INTEGRITY

Conflicts of interest

Designed to Talk values integrity, and this is its most valuable asset. As an employee, you are expected to act in the best interests of Designed to Talk and avoid situations that may cause a conflict of interest. A conflict of interest can arise when competing loyalties could cause you to prioritize personal benefit for yourself, friends, or family at the expense of Designed to Talk or its partners.

To avoid conflicts of interest, ask yourself if the action you're considering could provide an incentive for you to benefit yourself or others at the expense of Designed to Talk. If the answer is "yes," then it is likely a conflict of interest, and it should be avoided. You should disclose any interest, relationship, or activity that may create a conflict of interest, and you may be required to stop any conflicting behavior as part of your job.

Conflicts of interest can occur in various situations, including (but not limited) to the following:

- **Private activities:** Designed to Talk employees may not engage in outside employment activities that conflict with the company's interest.
- **Family members and close relationships:** No employee may use personal influence to get Designed to Talk to do business with a company in which their family members or friends have an interest. Employees should disclose any close relationship that might make it appear they could favour another company to the disadvantage of Designed to Talk's interests.
- **Board memberships:** Serving on a board of directors or board of trustees or similar body for an outside business or organization requires advance approval.
- **Business or investment opportunities:** Designed to Talk employees may not allow their investments to influence, or appear to influence, their independent judgment on behalf of Designed to Talk.



Dealing with gifts and bribery

Designed to Talk is committed to dealing legally and ethically and complies with all applicable anti-bribery laws. Although exchanging courtesies in the form of minor gifts or meals might promote goodwill, it is important to realize that misunderstandings can occur, especially when an exchange occurs during or near the negotiation of a business deal.

Acceptance of questionable gifts can expose Designed to Talk to legal risk. Employees must not solicit or accept anything of value that could create the appearance that they or Designed to Talk are being influenced into doing business. It is critical that nothing of value is ever offered, promised, or given (directly or indirectly) to influence or obligate the recipient to reciprocate for the benefit of Designed to Talk. Such behaviour is prohibited. Employees should politely decline any such offer and promptly contact the Compliance officer or other designated person.

- **Giving and receiving gifts:** can sometimes give the appearance of being improper or may even be illegal. No gift may be offered or accepted by Designed to Talk employees if it is illegal or will create a feeling of obligation, compromise judgment or appear to improperly influence the recipient. Specifically, Designed to Talk employees must take care not to violate any laws and regulations with respect to the receipt of gifts and/or entertainment by government employees. Designed to Talk' employees should not provide any gifts or entertainment to any government employee or official unless they have received the prior written approval of Designed to Talk.

Designed to Talk employees and their relatives, life companions, and other people with whom they have a close personal connection must not accept any gift in kind, payment, loan, vacation, or other privilege from current or prospective customers, vendors, competitors, or partners, where (1) accepting the gift, etc., would prejudice Designed to Talk's business interests, or (2) accepting the gift, etc., would allow an impression of unjust advantage to arise, or (3) the gift, etc., is unlawful or contrary to ethical principles.

- **Charitable donations:** Designed to Talk will not offer charitable donations, community investment, or political contributions to obtain or retain improper personal or business advantage or to dissuade or encourage others from failing to act in connection with the performance of their duty. Designed to Talk will also not offer charitable donations if there is a close relationship between a customer and the charity.
- **Sponsoring:** is a payment in form of money or physical objects given by Designed to Talk to increase the company's awareness, for example, using the logo or the name. All sponsorships must be transparent, documented in a written contract, intended for a serious business purpose and be equivalent to Designed to Talk' received value. Payments may not be promised, offered, or rendered to anyone, to gain a business advantage or to pursue an inappropriate purpose.



- **Entertainment of Designed to Talk employees:** Unless prohibited by law or the policy of the recipient's organization, Designed to Talk may accept entertainment (social events), including transportation and lodging, that is reasonable in the context of the business and that advances the company's interests. If an invitation seems inappropriate, the employee must turn down the offer or pay the true value of the entertainment themselves.
- **Entertainment by Designed to Talk:** Unless prohibited by law or the policy of the recipient's organization, Designed to Talk may provide entertainment, including transportation and lodging, that is reasonable and suitable in the context of the business. If employees have a concern about whether providing entertainment is appropriate, they will discuss it with their Circle lead or Talent Lab in advance. Entertainment of government officials may be prohibited by law. In these circumstances, the employees are advised to consult the Compliance Officer in each instance to ensure that such activities do not violate the law.



WE TAKE CARE OF OUR ENVIRONMENT

Designed to Talk recognizes its role in reducing the impact that any global business has on the local and global environment. We believe that it is important for all people to aim to minimize their impact on our planet, we therefore aim to reduce our environmental impact each day through the measures described below:

1. We aim to implement sustainable practices designed to ensure the health and safety of our employees, stakeholders, and our direct and indirect environment.
2. We aim to promote adoption of sustainable commuter and business transport options such as train, electric cars, cycling or walking.
3. We aim to reduce the impact on the environment by our business travel by ensuring that only necessary journeys are undertaken, and we promote online alternatives.
4. We aim to hold multi-location remote meetings when possible.
5. We aim to reduce waste by increasing the amount of recycled or reused material. Thus, we concentrate on reuse and safe disposal.
6. We aim to power all our offices with renewable energy and, if possible, we will install solar panels on as many offices we have.
7. We aim to find and implement measures to further reduce our carbon emissions and environmental footprint.

WE HAVE OPEN AND HONEST COMMUNICATION

Open and honest conversations

Many problems may be solved with open and honest communication without immediately resorting to formal steps. Preferably we have an open dialogue in which mutual perspectives are explored and both come into a constructive problem solving modus. However, if that seems impossible or makes you uncomfortable or unsafe: don't hesitate to seek help from others within or outside the company!

Reporting (Whistleblowing) and aftercare

Designed to Talk is committed to ensuring a workplace where employees can report violations without fear of retaliation. We encourage employees to promptly report concerns, anonymously or otherwise, in accordance with this Code of Conduct. We ask all colleagues not to turn a blind eye to (possible) misconduct. Instead, address and report it.

Below sets out options you have to report and provides information on confidentiality, how your protection is ensured if you are the reporter or the person involved, as well as the different processes, depending on your role in the reporting. Note that you may choose your own method of reporting, the options below are meant as a guideline.

Reporting (Whistleblowing)

If you become aware of conduct that leads you to reasonably believe that there is a violation of Designed to Talk's Code of Conduct, legal or ethical obligations have been breached, you must immediately report it to relevant persons around you. There are different options for reporting:

1. Consider resolving the issue with an open conversation between you and the other party, or:
2. Talk to your Circle lead/manager and/or Talent Lab, or:
3. Talk to a Trust person
4. Report it via the Whistleblower link on the intranet or Designed to Talk website

In some Designed to Talk countries we have a local designated internal and or external Trust Person to share your concerns anonymous. Designed to Talk has 2 designated internal Trust persons in the Group, which can be approached by any employee in the Group, in case you cannot find your way in your country. The names can be found on the Designed to Talk Sharepoint (intranet).

Please note these Trust Persons will not take any action without your consent and will primarily lend you a sympathetic ear and will try to advise you to the best of their knowledge on next steps inside or outside the company (depending on the reported issue).

Investigation

All reports will be promptly addressed and pending the case the appropriate and thorough investigation will take place. Information disclosed before and during the investigation will remain



confidential to others and the alleged offender, including the identity of the reporting employee, except as necessary to conduct the investigation and to take any action required by law.

All employees have a duty to cooperate in investigations of misconduct related to work. Failure to cooperate may result in disciplinary action, up to and including termination of employment. If it is determined that a violation has occurred, Designed to Talk will take appropriate action that is proportionate to the misconduct. Steps will also be taken to prevent further violations.

No Retaliation

As stated in the introduction of this code: **Designed to Talk shall protect and shall not retaliate against any person who makes a report or participates in an investigation in accordance with this policy.** There shall never be any form of retaliation towards reporters. Anyone should feel completely safe to report suspected misconduct. In case of doubt: speak up and reach out. Never remain silent, no matter what the issue is.