

SCOPE: Behaviour and responsibilities for all staff working for White (White Research SPRL).

RESPONSIBILITIES: All staff members

DESCRIPTION: The code of conduct contains the following:

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Preamble

We believe that all members of White should conduct themselves in a professional and ethical manner. As we are a multinational and multicultural team, cultural and behavioural norms may differ, which is why we believe that, as a company, it is our responsibility to guide staff and to create a common understanding of what behaving professionally means.

This Code of Conduct is not exhaustive, but sets out rules, guidelines and examples of the behaviour all our staff is expected to follow. In addition, where the Code is non-exhaustive, the staff is expected follow the spirit of the guide, use common sense, be professional and act ethically in all situations.

- The Managing Directors

Who must follow the Code and why?

All staff, including employees as well as vendors (both freelancers and subcontractors) are expected to follow the code.

White provides services to many different types of organisations, deals with many different stakeholders and works with a large number of staff, all of which need to be treated correctly, but also need to be able to rely on us to behave with the highest level of integrity.

Asking questions & raising concerns

Although the Code provides guidelines and sets out a clear spirit, you may have questions. If you are external, then please contact us by email at info@white-research.eu. If you are a staff-member then ask the Director of your office.

Anyone who has concerns with the Code of Conduct or who observes staff members violating the Code, please contact info@white-research.eu.

Anyone should be free to raise concerns in good faith and people should feel encouraged to assist in any investigations related to such concerns. Therefore, White Research does not retaliate nor tolerate retaliation by its staff members. Neither direct nor indirect retaliation is tolerated. Examples include harassment, exclusion from meetings, sanctions or other discriminatory behaviour, if you experience retaliation, please report it immediately.

Ethics & integrity

Honesty & transparency

Honesty and transparency are core values of the company and they are embedded in all that we do, of course respecting the limitations related to privacy and confidentiality of our clients and co-workers. In all our interactions we are honest and transparent, this is an essential part of our business and it helps ensure that we are trustworthy. We do not under any circumstances pretend to be something that we are not, nor deal in bad faith. We are clear about who we are, what we do, why we do it and for whom we are doing it.

Equal opportunity

We are an equal opportunity employer and business partner, we do not discriminate based on race, age, gender, (dis)ability, sexual preference. All employee-related decisions are based on a meritocratic approach. All business partnership decisions are made purely on business merits.

Privacy

We respect the privacy of all stakeholders and employees. We build respect for privacy into all our policies, processes and procedures. We collect, process and store personal data only if and when necessary. We comply with the General Data Protection Regulation (GDPR) – please see our section the GDPR compliance on page 7.

Confidentiality

As a part of our business, we are privy to confidential information from our business partners. We view the trust that our business partners put in us by sharing confidential information as a sign of our reliability and trustworthiness, but also as a very serious responsibility. All our staff is trained on confidentiality and take the NDAs they sign, when they join, very seriously. Furthermore, all contractors that may in any way deal with such information are also obliged to sign an NDA and beyond the legal implications of the NDA, we stress to all contractors, the importance of respecting the confidentiality of any information that we share with them. Finally, we also ensure the security of the confidential information through the application of the policies and procedures linked to our information security system, which is part of our ISO 27001 certification.

Conflicts of Interest

We act in the best interest of our company and of our clients. We consider it a conflict of interest is when personal or professional activities or relationships interfere with our ability to serve our company and our client's best interests. This includes active investments in competitors or other organisations whose interests conflict with ours and those of our clients. It also relates to outside employment, speeches, presentations and similar activities – such activities are permitted as long our management is informed and has approved when and in what context this happens and so long that it does not conflict with the interest of our company and clients. Many of our team members have relatives or friends that invest in or work for potential and actual clients and competitors (of our company and our clients). This is not an issue unless they are in a position to make or significantly influence decisions that relate to our business or our work for our clients – however, such relationships must be reported to management in order to be able to assess them and take action if needed.

We do not accept meals, entertainment or other gifts that exceed a value of 70 euro/person from clients, competitors or others. Should such gifts be offered, we either decline or seek approval from our management. We do not accept any gifts, favours or alike for which there is any expectation of quid-pro-quo.

Intellectual property

In the course of our work we may obtain and use intellectual property of others, if such property is used, then this should be in agreement with the rights-holder and they should be compensated when relevant. Furthermore, we may be temporarily or permanently be in possession of intellectual property of our clients, which we fully respect and use following the guidelines and rules set out by the client. Finally, we create new intellectual property as a part of our work, both internal work and client work. For such this kind of intellectual property, if they specific to a client or are a part of work for clients, then the clauses on intellectual property in our contracts with the clients are followed. When this is not for clients the intellectual property is retained within the company and such materials are not used for personal or external purposes. In the cases where material is of a general nature (e.g. templates and general presentations) and these are shared with clients or third parties, intellectual property is either retained by our company or shared with those organisations.

Our team is always vigilant when it comes to intellectual property rights.

Digital ethics

Our team members are expected to act in a fully ethical way when interacting in person as well as digitally. We respect others and their opinions and views as well as their rights. When we communicate, we make it clear what is in a professional capacity and what is in a personal capacity.

Office behaviour

Dress code

Our dress code is split into two different parts:

- **In the office in general: Smart casual** – This means comfortable, but presentable clothes. We encourage people to be comfortable in the office, but of course a partner might drop by the office, so we are always presentable.
- **Client meetings: Full business attire** – This means full business attire, meaning suit and tie for men and equivalent for women. We serve our clients in the best way possible, this includes showing our respect by being professionally dressed, but also it means that we have to be dressed professionally in case we meet clients or partners of theirs, so that we represent our clients in a professional manner.

Drugs & Alcohol

Consuming drugs or being under the influence of drugs while being in the office, with clients or acting on behalf of our company in any way is not tolerated and is cause for dismissal.

As moderate consumption of alcohol at for example a business lunch is a cultural norm in some countries and given that we work in a multi-cultural environment, alcohol consumption in small quantities is accepted for situations like business lunches, partner and client events, etc. However, our policy is to consume alcohol with moderation and under no circumstances consume quantities that would impede our abilities to deliver client work or stay professional.

Harassment, Discrimination & Bullying

Our policy on harassment, discrimination and bullying is one of zero-tolerance. Any kind of harassment, discrimination or bullying is cause for dismissal. All team members can report instances of harassment, discrimination and bullying to the Director of their office or to the assigned confidence person without any risk of reprisal and with the assurance that action will be taken to address any issues. Should anyone outside the company ever feel harassed, discriminated or bullied by one of our members of staff, we kindly request that you report this to us immediately so that action can be taken.

Good colleagues & ambassadors

We believe in being good colleagues and good ambassadors of the company. Both in our offices and at client premises, we act in a polite and courteous manner and help others. For example, we all hold the door for the delivery persons, we all answer the phones in a courteous manner, while there is no receptionist or secretary, we offer to get coffee for our colleagues and their guests when there are meetings, etc. We believe that the world is a nicer place to be in when we are all friendly and nice to each other and that starts with our own actions towards people around us.

Use of company resources

We use company resources with respect and care, regardless of whether this is company materials, premises or other property of the company. When spending company money, we are diligent in ensuring that the expenditure is appropriate and justified. Naturally, in situations where we use resources of partners or clients, we show the same respect and approach.

Following the law

Employment law

Our team members include employees, in-house consultants and independent specialist freelancers, for all three groups, in all our locations, we comply fully with the employment laws and always strive to improve the conditions for our team members, so that in as many areas as feasible, we go beyond our legal obligations.

Competition law

We fully respect relevant competition law and neither practice, nor condone distortion of competition in any way. We are in no way in a monopoly situation, nor in an oligopoly situation, nor do we have any influence over the market or market pricing in any way.

Anti-bribery & corruption

We do not support nor condone bribery or corruption in any way. We do not accept bribes, nor do we give bribes. Any such behaviour is not tolerated and is reported immediately.

Insider trading

Insider trading of any kind is not accepted. If in any cases we are subject to information that could in any way be used for insider trading, this information is treated with the same full confidentiality that all our client and partner information is treated with and all team members are aware that they cannot take any action on any such information.

GDPR

We take privacy and data protection very seriously and comply with the GDPR. To ensure that our system for dealing with personal data is appropriate, following the development of our policies and processes, we had a full external review done by an independent third party. The result of this review is publicly available on our website. Furthermore, we continue to monitor developments in recommendations on best practices and adapt our policies and processes accordingly.

Sustainability

Environment

We love our planet and we want to be as environmentally sustainable as possible.

We are committed to being as environmentally sustainable as possible and all our staff are encouraged to contribute to this be e.g. minimising printing, sorting our trash, recycling, etc. We also encourage input from our staff on how we can further reduce our environmental footprint.

Social

We are committed to not having a negative social impact.

We believe in the importance of social sustainability and do not want to have a negative impact on this, which is why we work with that in mind. We consciously consider the social impact of our actions and recommendations to partners and clients.

Quality

Quality is a cornerstone of our business and we take quality assurance very seriously.

In all our partnerships and projects, we consider quality to be of paramount importance. We take a holistic approach to quality and believe that it is essential to ensure quality in every step of our work in order to ensure the overall quality.

Our quality approach starts in our hiring stages where we screen large numbers of candidates, carry out extensive interviews and test the final selection of candidates. Once someone has been hired, they are trained and coached in order to continue to develop their skills and competences with a view to continuously improve the quality of the work we deliver.

On each project and for each partnership, we have a quality manager, this is a person with experience in the service, who either leads the service for our company or who is in a senior position in that service area. We encourage our partners and team members to provide feedback on our work and to ensure that this feedback is incorporated in our processes. We regularly analyse our work with a view to identifying best practices and lessons learnt so that we can ensure continuous improvement of our quality.

DOCUMENT HISTORY

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