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POLICY BRIEF & PURPOSE

Our professional code of ethics policy aims to give our employees guidelines on our business ethics and stance on various controversial matters. We trust you to use your better judgment, but we want to provide you with a concrete guide you can fall back on if you are unsure about how you should act (e.g. in cases of conflict of interest). We will also use this policy to outline the consequences of violating our business code of ethics.

SCOPE

This policy applies to everyone we employ or have business relations with. This includes individual people such as employees, interns, volunteers, but also business entities, such as vendors, enterprise customers or venture capital companies.

Note that our code of ethics is slightly different than our code of conduct. Code of conduct may include elements such as dress code and social media use, whilst our code of professional ethics refers to legally or morally charged issues. Still, these two codes do overlap.

POLICY ELEMENTS

WHAT IS A CODE OF ETHICS?

Our code of ethics definition refers to the standards that apply to a specific setting – in this case, our own organization.

WHAT IS THE PURPOSE OF A PROFESSIONAL CODE OF ETHICS?

Having our business ethics in writing does not mean that we do not trust our employees. We strive to hire ethical people, who have their own personal standards, so we expect that a written code will not be necessary most of the time, but it can still be helpful. You may find yourself in a situation where you are not sure how you should act. Life is full of grey areas where right and wrong are not so apparent. Some professional ethics also correspond to laws that you absolutely must know to do your job properly, so we will mention them in our code of ethics.

Additionally, every organization makes bad hires occasionally. We also cannot predict how people are going to behave. When an employee behaves, or intends to behave, in a way that is against our professional ethics, or applicable laws, we will have clear guidelines on what disciplinary actions we will consider.

For these reasons, we advise you to read this document carefully and consult with your manager or HR, if you have doubts or questions.

THE COMPONENTS OF OUR CODE OF PROFESSIONAL ETHICS

RESPECT FOR OTHERS. Treat people as you want to be treated.

INTEGRITY AND HONESTY. Tell the truth and avoid any wrongdoing to the best of your ability.

JUSTICE. Make sure you are objective and fair and do not disadvantage others.

LAWFULNESS. Know and follow the law – always.

COMPETENCE AND ACCOUNTABILITY. Work hard and be responsible for your work.

TEAMWORK. Collaborate and ask for help.

A MORE DETAILED OVERVIEW OF OUR CODE

RESPECT FOR OTHERS

It is mandatory to respect everyone you interact with. Be kind, polite and understanding. You must respect others' personal space, opinions, and privacy. Any kind of violence ([HR-POL-01, Corvalent Employee Handbook](#)) is strictly prohibited and will result in immediate termination. You are also not allowed to harass or victimize others.

What constitutes harassment or victimization? To answer this, we have a [policy on harassment](#) and a more specific policy on [sexual harassment](#) you can take a look at. As a rule, try to put yourself in someone else's place. How would you feel if someone behaved a specific way to you? If the answer is "I wouldn't like it much" or "I would never let them behave like that to me", then we do not tolerate this behavior no matter the person it comes from. Refer to Corvalent's [Employee Handbook, HR-POL-01](#).

If someone, be it customer, colleague, or stakeholder, is offensive, demeaning or threatening toward you or someone you know, report them immediately to HR or your manager. You can also report rudeness and dismissiveness if they become excessive or frequent.

INTEGRITY AND HONESTY

First, always keep in mind our organization's mission. We all work together to achieve specific outcomes. Your behavior should contribute to our goals, whether financial or organizational.

Be honest and transparent when you act in ways that impact other people (e.g. taking strategic decisions or deciding on layoffs). We do not tolerate malicious, deceitful, or petty conduct. Lies and cheating are huge red flags and, if you are discovered, you may face progressive discipline or immediate termination depending on the damage you did.

Stealing from the company or other people is illegal. If you are caught, you will face repercussions depending on the severity of your actions. For example, if you steal office supplies, you may receive a reprimand or demotion (at a minimum), while if you steal money or data (e.g. engaging in fraud or embezzlement), you will get fired and face legal consequences. The decision is at HR's discretion on a case-by-case basis.

Bribery and corruption are unacceptable behaviors. Employees must not offer or accept bribes or any kind of improper payment or gifts such as meals, gift cards and/or other type of vouchers.

CONFLICT OF INTEREST

Conflict of interest may occur whenever your interest in a particular subject leads you to actions, activities or relationships that undermine our company. This includes situations like using your position's authority for your own personal gain or exploiting company resources to support a personal money-making business. Even when you seemingly act to the company's advantage, you may actually disadvantage it. For example, if an employee uses dubious methods to get competitor intel and raise their sales record, their action will have a positive impact on the company's revenue, but it will put us at a legal risk and promote unhealthy business practices.

If it turns out you have created a conflict of interest for yourself, you will be terminated. If the conflict of interest was involuntary (e.g. buying stocks from a company without knowing they are a competitor), we will take actions to rectify the situation. If you repeat the offence, you may be terminated.

JUSTICE

Do not act in a way that exploits others, their hard work, or their mistakes. Give everyone equal opportunity and speak up when someone else does not.

Be objective when making decisions that can impact other people, including when you are deciding to hire, promote or fire someone. Be sure that you can justify any decision with written records or examples. Seek and use the most objective methods in any case; for example, when interviewing candidates, ask the same interview questions to all of them and avoid judging non-job-related criteria, like dress, appearance, etc.

Also, do not discriminate against people with protected characteristics, as this is forbidden by Federal and State Law. If you suspect you may have an unconscious bias that influences your decisions (taking Harvard's Implicit Association Test could help you determine this), ask for help from HR.

When exercising authority, be fair. Do not show favoritism toward specific employees and be transparent when you decide to praise or reward an employee.

If you need to discipline an employee, be sure to have prepared a case that you can present to HR. You must not retaliate against employees or applicants (such as in cases when they have filed complaints) as this is forbidden by law.

Be just toward customers or vendors as well. If you think our company was in the wrong in a specific instance, do not try to cover it up or accuse the other side. Discuss with your manager to find solutions that can benefit both sides.

LAWFULNESS

You are obliged to follow all laws which apply to our organization. Depending on your role and profession, there might be various laws you need to observe. For example, accountants and medical professionals have their own legal restrictions and they must be fully aware of them.

When you are preparing contracts, clauses, disclaimers, or online copy that may be governed by law (such as consent forms), please ask verification from HR Manager before finalizing anything.

You are also covered by our confidentiality and data protection policy. You must not expose, disclose, or endanger information of customers, employees, stakeholders, or our business. Always follow our cybersecurity policy.

Following laws regarding fraud, bribery, corruption, and any kind of assault is a given. You are also obliged to follow laws on child labor and avoid doing business with unlawful organizations.

If you are not sure what the law is in a specific instance, do not hesitate to ask HR Manager.

COMPETENCE AND ACCOUNTABILITY

We all need to put a healthy amount of effort in our work. Not just because we are all responsible for the organization's success, but also because slacking off affects our colleagues. Incomplete or slow working might hinder other people's work or cause them to shoulder the burden themselves. This comes in direct conflict with our respect and integrity principles.

We also expect you to take up opportunities for learning and development, either on-the-job or via educational material or training. If you are unsure how you can achieve this, have an open discussion with your manager.

In addition, take responsibility for your actions. We all make mistakes or need to make tough decisions and it is important we own up to them. Failing to be accountable on a regular basis or in important situations (e.g. a crucial mistake in our financial records) will result in termination. If you take responsibility and come up with ways to fix your mistakes where possible, you will be in a far better position.

TEAMWORK

Working well with others is a virtue, rather than an obligation. You will certainly get to work autonomously and be focused on your own projects and responsibilities. But you should also be ready to collaborate with and help others.

Be generous with your expertise and knowledge. Be open to learning and evolving. If days go by without you consulting or brainstorming with anyone, you are missing out on opportunities for excellence. Instead, work with others and do not hesitate to ask for help when you need it.

REPORTING AND PROCESSING VIOLATIONS

Employees are encouraged, in the first instance, to address such issues with their managers/supervisors or the HR manager, as most problems can be resolved swiftly. If for any reason that is not possible or if an employee is not comfortable raising the issue with his or her manager or HR, Corvalent's President/CEO does operate with an open-door policy. Refer to Corvalent's [Employee Handbook, HR-POL-01](#) (under Open-Door Policy) for more details.

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact his/her immediate supervisor or Human Resources. The employee must exercise sound judgment to avoid baseless allegations. An employee, who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

WHISTLEBLOWER POLICY

Corvalent forbids retaliation against any member of its workforce for reporting in good faith a possible violation of these Standards or any other Company policies, or for initiating or testifying, assisting, or participating in any manner in any investigation, proceeding, or hearing. You should not be afraid to report any misconduct.

A whistleblower as defined by this policy is an employee of Corvalent who reports an activity that he/she considers to be illegal or dishonest to one or more of the elements specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. Corvalent will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower, who believes he/she is being retaliated against, must contact Human Resources immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

INVESTIGATIONS

Conduct Investigation per Procedure (Misconduct Investigation Procedure, HR-SP-02).

PROGRAM MANAGEMENT

MANAGEMENT RESPONSIBILITY

The President/CEO is responsible to ensure that the contents of this program are implemented and followed.

RISK ANALYSIS

Ethics and Code of Conduct risk analysis is performed annually by Senior Management, and mitigations plans implemented as needed.

Records and actions are recorded. Refer to 'Management Review Procedure' (AM-SAP-01).

MANAGEMENT REVIEW

Ethics and Code of Conduct metrics are reviewed annually for performance to Company Goals annually, and action taken as needed. The meeting and review are chaired by senior management.

Records and actions are recorded and retained. Refer to 'Management Review Procedure' (AM-SAP-01).

REFERENCES

- Receipt & Acknowledgement of Corvalent Ethics and Code of Conduct (AM-FORM-02)
- Employee Handbook (HR-POL-01)
- Management Review Procedure (AM-SP-01)
- Misconduct Investigation Procedure (HR-SP-02)
- Misconduct Findings Report (HR-FORM-31)

External:

Responsible Business Alliance Code of Conduct Version 8