

## WACEO

# MODEL CODE OF CONDUCT FOR A DECENTRALIZED ASSET COMPANY (the “COMPANY”)

**15/03/2021**

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## 1. COMPANY Values

COMPANY is committed to the highest standards of ethical and professional conduct. Our Code is based on COMPANY core values and principles and is an important resource to help you to make the right decisions and take actions consistent with COMPANY Mission and Value Proposition.

The Code has been adopted by the Board of Directors of the COMPANY and applies to every director, officer, and employee of COMPANY and its consolidated subsidiaries. We are all required to read and comply with this Code, regardless of the country in which we live and work, because COMPANY commitment to conducting business according to the highest standards of ethical conduct transcends national boundaries. Other persons performing services for COMPANY also may be subject to this Code by contract or other agreement.

### Our Responsibilities

We share a common responsibility to ensure that our decisions are in our clients' interests, create economic value, and are always systemically responsible. We hold ourselves to the highest standards of ethics and professional behavior in dealing with our clients, business colleagues, shareholders, communities, and each other.

To protect the COMPANY reputation for integrity and be the best for our clients, you must:

- Understand and comply with the laws, regulations, and COMPANY policies and procedures that govern your business, region, and/or function.
- Act in accordance with the values and principles expressed in this Code and apply them every day, to everything you do, and in every decision you make.
- Conduct business in a manner that is fair, transparent, prudent, and dependable. This includes a commitment to honesty in our dealings and communications with our clients, suppliers, competitors, and each other. Take responsibility for your decisions and actions and hold others accountable.
- Immediately report unacceptable conduct, and promptly escalate violations or potential violations of law, regulation, rule, or breaches of policy, procedure, or this Code.  
Fully cooperate with any investigation into alleged violations of laws, regulations, rules, or breaches of policy, procedure, or this Code and be truthful and forthcoming during such investigations.

### Managers' Responsibilities

We expect all employees to be leaders, but recognize that our managers are role models who must lead by example and inspire their teams to live our values.

As role models, managers must:

- Regularly reinforce the importance of understanding and following our Code and the policies and procedures that apply to their team members' daily job responsibilities.
- Understand the risks inherent in their team members' work and play an active role in assuring the quality of that work.

- Encourage employees to speak up and raise concerns, especially about potential legal or ethical issues, and foster a work environment where they feel comfortable doing so.
- Listen to employees who raise concerns and take their concerns seriously.
- Ensure all concerns are properly resolved or promptly escalated through appropriate channels.
- Promote awareness of all resources available for seeking advice or reporting concerns, including the Ethics Hotline.
- Not engage in or tolerate retaliation of any kind and clearly communicate the COMPANY the prohibition of workplace retaliation.
- Recognize team members who act in accordance with our values.

## Our Decisions

When faced with a challenging decision or a situation that does not feel quite right, you should use the following questions to help guide your actions:

### **1. Is it in the client's best interests?**

We put our clients' interests first in everything we do.

### **2. Does it create economic value?**

We create economic value by providing financial products, services, and advice that help individuals, organizations, and communities grow and prosper.

### **3. Is it systemically responsible?**

We hold ourselves accountable and take actions that reduce undue risk to our organization, our clients, our communities, and to the broader financial services industry.

### **4. Does it comply with the law, regulation, COMPANY policies, and our Code of Conduct?**

We consider both the letter and spirit of each and put our values into action.

### **5. Would it cause harm to the COMPANY or your reputation?**

We take actions based on a thorough understanding of the risks involved and act with due care, diligence, and skill.

### **6. Would it result in even the appearance of a conflict of interest or impropriety?**

We avoid situations where personal interests appear to be in opposition to COMPANY interests or the interests of our clients.

### **7. Would you feel comfortable if it was made public?**

We are fair, honest, transparent, and accountable for our actions.

## Speaking Up and Seeking Help

### Escalating Business Concerns

COMPANY reputation depend on our exercising appropriate judgment and common sense in every action we take and considering all aspects of the potential impact of transactions, activities, or other practices in which we engage.

It is your responsibility to escalate any issues or concerns that may pose potential franchise, reputational, conduct, fairness, or systemic risk to your manager or to another resource listed in this Code, each of whom may escalate further to the appropriate business department of COMPANY.

### Escalating Ethical Concerns

If you encounter a situation that does not feel right, you should stop and reflect. If something seems unethical or improper to you, it may very well be and you must escalate.

If you have any question as to whether a particular situation requires escalation, you should always choose to escalate.

We believe acting ethically is not only the right thing to do but also the right way to do business and best serve our clients, colleagues, shareholders, and communities. We lead by example, having the courage to always do what is right and setting a standard for integrity.

We are all required to report concerns about conduct or situations that may put our company or our customers at risk. The early identification and resolution of issues is critical to maintaining COMPANY strong relationships and being the best for our clients, business colleagues, employees, and stakeholders.

If you have reason to believe that any COMPANY employee, or anyone working on the COMPANY behalf, may have engaged in misconduct, which includes violations or potential violations of law, regulation, rule, or breaches of policy, procedure, or this Code, including threats or acts of physical violence, you must promptly escalate your concerns to any of the following:

- Your manager or another member of management.
- The appointed person under any applicable local disclosure procedure.
- Your internal legal counsel.

### Anonymity and Confidentiality

COMPANY believes it is essential that you feel secure when raising a concern, and we encourage you to communicate your concerns openly. All contacts and investigations are treated as confidentially as possible, consistent with the need to investigate and address the matter, and subject to applicable laws and regulations.

Anonymous concerns are made to the extent permitted by applicable laws and regulations. If you wish to report anonymously, please do not provide your name or other identifying

information when submitting your concern. However, you must understand that if you do choose to remain anonymous and do not provide a means to contact you, COMPANY may be unable to obtain the additional information needed to investigate or address your concern. When submitting a concern, please provide as much detailed information as possible. Including specific information, such as the business or function, location, individuals, transactions, events, and dates involved, enables a more effective investigation.

You will not be retaliated against for reporting, in good faith and in accordance with this Code, information that you reasonably believe relates to possible misconduct, unethical acts and/or violations of law.

Retaliatory conduct includes discharge, demotion, suspension, threats, harassment and any other manner of discrimination in the terms and conditions of employment because of any lawful act performed in connection with such reporting.

COMPANY takes seriously claims of retaliation against those who report possible misconduct. We will investigate allegations of retaliation, and anyone found responsible for retaliating against anyone who reported possible misconduct is subject to disciplinary action, up to and including termination of employment and possible legal action.

If you raise an ethical issue and you do not believe it has been addressed, you should raise it with any of the other contacts listed in this Code.

## Prohibition of Workplace Retaliation

COMPANY prohibits any form of retaliatory action against anyone who raises concerns or questions in good faith regarding ethics, discrimination, or harassment matters; requests a reasonable accommodation for a disability, pregnancy, or religious belief; reports suspected violations of law, regulation, rule, or breach of policy, procedure, or this Code; or participates in a subsequent investigation of such concerns.

## Upholding Our Values

### Investigations

**When concerns are raised about possible misconduct or unethical behavior, conducts investigations thoroughly, fairly, with discretion, and in a timely manner.**

If you are asked to participate in an appropriately authorized internal or external investigation, you must:

- Cooperate fully.
- Provide accurate and comprehensive information. Do not withhold, tamper with, or fail to communicate relevant information.
- Not make false statements to internal or external auditors, investigators, legal counsel, representatives, regulators, or other governmental entities.
- Maintain and safeguard the confidentiality of an investigation to the extent possible, except as otherwise provided by applicable law.

## Disciplinary Action

Abiding by the standards outlined in this Code and related policies is a condition of continued employment with COMPANY. Violations of law, regulation, rule, or breaches of policy, procedure, or this Code may result in disciplinary action up to and including termination of employment or other relationship with COMPANY. They may also be reported to regulators and can result in civil or criminal penalties, disqualification from serving in certain capacities, and a permanent bar from employment in the financial services industry.

Misconduct that may result in discipline includes:

- Violating or asking others to violate this Code.
- Failing to raise a known or suspected violation of this Code.
- Retaliating against another employee for raising a concern in good faith or for participating in an investigation.

You are personally responsible for any misconduct, including improper or illegal acts committed by you during your relationship with COMPANY.

## Waivers

To the extent that exemptions are available from COMPANY policies, they are detailed in the specific policy, together with the exemption process.

Waivers related to other provisions of this Code may be granted only by the General Counsel or the Chief Compliance Officer of the COMPANY. Any waiver of this Code for an executive officer or a member of a board of directors of the COMPANY may be made only by a documented decision of the COMPANY Board of Directors or a Board Committee and must be disclosed publicly within four business days of the decision.

## 2. COMPANY People

We achieve our best results in an environment of mutual respect, professionalism, and inclusiveness. We do not tolerate discrimination, harassment, retaliation, or intimidation of any kind that breaches our policies or is unlawful, whether committed by or against a manager, co-worker, client, supplier, or visitor and whether it occurs while at work, at work-related events, or outside of work. Everyone is responsible for creating a work environment free of unlawful discrimination, harassment, and retaliation, and the COMPANY encourages employees who witness inappropriate behavior to speak up.

To promote a respectful work environment, you must:

- Help create a workplace where all team members can contribute, develop, and express themselves.
- Avoid and prevent discrimination, harassment, or intimidation based on person's race, sex, gender, pregnancy, gender identity or expression, color, creed, religion, national origin, nationality, Unicornzanship, age, physical or mental disability or medical condition as defined under applicable law, genetic information, marital status (including domestic partnerships and civil unions as defined and recognized by applicable law), sexual orientation, culture, ancestry, familial or caregiver status,

military status, veteran's status, socioeconomic status, unemployment status, status as a victim of domestic violence, or any other basis prohibited by law.

- Avoid and prevent sexual harassment. Sexual harassment includes making sexual suggestions to colleagues, commenting on colleagues' sexual lives, making unwanted sexual advances or requests for sexual favors, or discussing inappropriate sexual matters with colleagues either in the workplace or elsewhere.
- Never retaliate against anyone for reporting harassment, discrimination, or other concerns.
- Promptly notify your manager, another member of your management chain, an HR representative, or the Unicorn Ethics Office if you feel harassed, discriminated against, or retaliated against, or if you observe or receive a report of discriminatory, harassing, or retaliatory behavior. You are not required to report your complaint to anyone who is the subject of the complaint.
- Cooperate fully with investigations into allegations of discrimination, harassment, or retaliation.

### 3. Our Company

We value the personal, proprietary, and confidential information of our clients, our colleagues, and our franchise and protect it from unauthorized disclosure or misuse.

**Personal Information:** Is information that can be used to directly or indirectly identify an individual, including past and present of the COMPANY customers, applicants for Unicorn products or services, members of Unicorn's workforce, their dependents, or applicants for the COMPANY jobs, no matter how the information is collected or from where it is collected.

**Customer Data:** Is information about customers that COMPANY is required to keep confidential under applicable laws (this includes application, transaction, and similar information about customers).

**Proprietary Information:** Is information owned by the COMPANY or created by a member of our workforce within the scope of employment. It may consist of any information, data, intellectual property, analysis, report, system, or process that could give the COMPANY an advantage over competitors.

**Confidential Information:** Includes, among other things, PII, Customer Data, Proprietary Information, or nonpublic information and can be written, oral, telephonic, or electronic. A general rule is to presume that any information you receive about the COMPANY or its customers is confidential information and, therefore, should be protected from disclosure.

We maintain processes and controls to govern the use, transmission, sharing, storage, disclosure, transfer, security, accuracy, and access to client and employee information globally. When we use other companies to provide services for us, we require them to protect the personal and confidential information they may receive about our clients or workforce.

While working for the COMPANY and after ceasing your employment with the COMPANY, you have an obligation to safeguard personal, proprietary, and confidential information that you obtained or created while performing your COMPANY responsibilities.

To do so, you must:

- Comply with all COMPANY policies and procedures relating to security and privacy of information, inside or outside of the workplace.
- Use and share confidential information only for the purpose for which it was collected, only to the extent necessary to perform your assigned job responsibilities, and only with authorized persons. Never access or use clients' or other employees' information except for appropriate business purposes.
- Take steps to ensure that personal, proprietary, or confidential information is produced, copied, transmitted, stored, and disposed of by means designed to prevent unauthorized disclosure of such information.
- Follow applicable local law when collecting, using, transmitting, and storing information about our clients or our workforce.
- Not share or discuss personal, proprietary, or confidential information outside COMPANY, except where permitted or required by applicable law or regulation, or pursuant to a subpoena or order issued by a court of competent jurisdiction or requested by a judicial, administrative, or legislative body, and only as permitted by applicable law, regulation, or COMPANY policy.
- Respect the confidentiality of information from any former employer. Do not use such information to aid the business of COMPANY without the prior consent of your former employer and unless permitted by applicable law or regulation.
- Respect the confidentiality of COMPANY information even when your employment with COMPANY ends. Before you leave, return all COMPANY assets.
- Immediately report the improper disclosure or receipt of personal, proprietary, or confidential information to your manager, or Legal.
- Contact your internal legal counsel with any questions regarding appropriate uses of client or employee information. These are rapidly changing areas of law, and many countries have evolving data protection, Company, and professional secrecy or privacy laws that affect the collection, use, storage, and transfer of personal and confidential client or employee information.

## **Protecting Assets of COMPANY and Others**

We safeguard our assets and use them for legitimate business purposes and not for personal gain.

To protect the value of the COMPANY assets, you must:

- Avoid carelessness, waste, and unauthorized use.
- Not misappropriate, misrepresent, or disclose COMPANY assets without authorization. Such acts may constitute a crime.
- Use COMPANY, client, supplier, and other third party assets only for approved purposes and in compliance with applicable licenses, terms, and conditions.
- Disclose to your manager before commencing employment with the COMPANY the existence of rights or interests you have in any technology or invention that may relate to your employment with the COMPANY and, where appropriate, assign such rights to the COMPANY.
- Disclose and assign to the COMPANY all interests in any technology, software, invention, improvement, discovery, know-how, design, copyright, or any product or

creation you, or a group including you, made or conceived that arises out of, or in connection or relationship with, your employment or assignment with the COMPANY.

- Understand that if your relationship with the COMPANY terminates for any reason, all rights to property, technology, and information generated or obtained as part of your relationship will remain the exclusive property of the COMPANY.

## Communications Equipment, Systems, and Services

To protect these assets, you must:

- Use only communications equipment, systems, and services that were provided or approved by COMPANY to conduct business on behalf of COMPANY, in compliance with local country laws and regulations, including cross-border transfer of COMPANY customer, human resources, and internal data.
- Not expect personal privacy when using COMPANY resources, whether inside or outside the workplace. To the extent permitted by applicable laws and regulations, COMPANY may monitor and record your use of its equipment, systems, and services, and may intercept any information you send or receive as a result of such use, at any time.
- Keep personal use to a minimum and in compliance with COMPANY policies and procedures, as well as applicable laws and regulations. Personal use should not interfere with the performance of your job responsibilities.
- Not use COMPANY resources for the unauthorized downloading or use of any copyrighted or unlicensed material. This includes the downloading of music, unlicensed software, copyrighted images, video, or printed material.
- Not use COMPANY resources to view, download, transmit, or post illegal, inappropriate, harassing, demeaning, or offensive material.

## Managing Our Financial and Tax Reporting

The COMPANY must comply with various securities and financial reporting requirements.

To ensure the integrity of COMPANY financial and tax records and reports, you must:

- Submit disclosures that are complete, accurate, timely, and understandable.
- Prepare financial statements in accordance with generally accepted accounting principles.
- Fairly present COMPANY financial position and results of operations.
- Accurately report taxes and tax-related records in accordance with all applicable laws.

## Avoid Conflict of Interest

To prevent conflicts of interest, you must:

- Act transparently in everything you do.
- Avoid personal activities, interests, or relationships that could interfere, or even appear to interfere, with your objectivity.
- Not engage in self-dealing or use your position at COMPANY to derive benefits that are not available to others.

- Disclose potential conflicts to your manager, internal legal counsel.
- Ask for guidance if you are unsure whether a conflict of interest, or the appearance of one, exists.

Considerations for identifying potential conflicts of interest:

You are responsible for identifying, managing and escalating actual, potential or perceived conflict in accordance with applicable regulatory requirements and COMPANY policies, including this Code. Some general considerations for identifying potential conflicts of interest:

**Perception:** Could the activity or transaction be perceived as a potential conflict by others?

**Intent:** Is the offer or request an attempt to influence the recipient's or your judgment?

**Impact:** Will the company, its employees, its shareholders or its customers be disadvantaged or negatively impacted if you participate in the activity?

**Objectivity:** Will your participation in the activity affect a customer's or your judgment or your ability to be objective with regard to any business decision?

**Time considerations:** Will the time required by an outside business activity or outside interest interfere with your ability to effectively carry out your job responsibilities to the company, its shareholders or its customers?

## Gifts and Entertainment

Sustaining strong business relationships can include exchanging gifts and hospitality with our clients and partners. The provision or acceptance of reasonable and proportionate gifts, entertainment (including meals), travel, or lodging, given openly and transparently, to promote COMPANY's image, present products and services, or establish cordial relationships, is permissible. In many cases, the offer or receipt of gifts or entertainment must be pre-approved in accordance with COMPANY's Gifts and Entertainment Standard and other applicable policies and procedures.

COMPANY employees, their close family members, and anyone acting on COMPANY's behalf are strictly prohibited from offering, providing, requesting, accepting, or receiving:

- Cash, or a cash equivalent.
- Gifts intended to induce an improper advantage, action, or inaction.
- Lavish or frequent gifts or entertainment.
- Anything that could have a negative reputational impact to COMPANY (for example, anything indecent, sexually explicit, or otherwise inappropriate).

Never personally pay for gifts or entertainment or any portion thereof to circumvent policy thresholds, pre- approval, or other requirements.

## Conflicts of Interest with Clients, Customers, and Counterparties

We maintain the highest standards of integrity in our relationships with clients, customers, and counterparties.

To protect these valued relationships, you must:

- Determine whether your actions on behalf of COMPANY would create an actual, perceived, or potential conflict of interest with a client, customer, or counterparty.
- Identify, manage, mitigate, monitor, and report conflicts that arise in connection with providing products and services to clients.
- Exercise sound judgment, seek advice from your manager or another resource listed in this Code, escalate or obtain review by the relevant approval committee, and disclose activities as required by policy.

## Outside business activities

- A conflict of interest or other risk may arise from activities, employment or other relationships conducted outside your role with COMPANY. You must not act on behalf of or appear to represent the company in any business transaction outside your role and responsibilities with COMPANY. You must inform your manager and obtain all required approvals prior to engaging in an outside business activity.
- You are permitted limited use of COMPANY resources while pursuing such outside business activities and relationships (including but not limited to physical space, supplies, communication methods or time). However, you must not allow any outside business, civic or charitable activities to interfere with your job performance. With few exceptions, COMPANY generally discourages employees from serving on a board of a for-profit organization in a personal capacity, particularly the board of a public company, and additional approvals are required.

## Activities outside of work

- We are all expected to act in a manner consistent with high standards of professional conduct that merits public trust and confidence.
- You must be aware that your actions outside of work have the potential to impact COMPANY's reputation/brand, customer relationships, co-worker relationships or your role. If your actions outside of work are associated with COMPANY, even if the association is unintended, a real or perceived conflict of interest or conduct issue may arise, especially if the actions conflict with our values or this Code.
- Actions outside of work that create a real or perceived conflict of interest, excluding protected speech involving terms and conditions of employment, could lead to disciplinary action up to and including termination.

## Interactions with third parties

- A conflict of interest may arise from relationships with third parties or other service providers. If you are authorized to approve or award orders, contracts, commitments or engagements to third parties of goods or services, you must do so based on objective

business standards to avoid any real or perceived favoritism. Interactions between employees of

- COMPANY and third parties, who may also be COMPANY clients, must be conducted in accordance with all applicable COMPANY policies and principles of arm's-length transactions.

## **Charitable contributions**

A conflict of interest may arise from a contribution made to a charitable organization at the request of a client or vendor as a means to maintain or induce business, or when an employee asks a client or vendor to give to a charitable organization in exchange for reduced fees, favorable terms, products or services. A perceived conflict can also occur when a contribution is made by an employee to a charitable organization that is a direct client and/or a charity board member who is a direct client of the employee, or a charitable organization that is associated with a government employee.

## **Electronic communications and social media**

Electronic communications help us improve overall business efficiency and are an important part of how COMPANY does business. Adhering to all applicable electronic communications policies preserves customer trust, protects our brand and minimizes risk.

We are all responsible for utilizing approved communication devices and applications for sharing company information, including information that may be material, nonpublic, confidential or private.

All electronic communications activities (e.g., email, text, instant messaging, voice, video, collaboration tools and web conferencing) using internal and external systems, devices, tools and applications are, to the fullest extent permissible by law, subject to monitoring and retention by or on behalf of COMPANY.

You are permitted limited personal use of company- managed devices and applications, the internet and email for personal communications. The use of the resources may be monitored and inspected to ensure productivity is not negatively impacted. Maintain the integrity of the systems (e.g., monitoring for the introduction of malware or inappropriate data transmissions) and avoid activities that may give rise to company liability or risk (e.g., claims of unlawful harassment or conduct). However, all employees are prohibited from using digital text (e.g., non-company- approved mobile applications, instant messaging, SMS text and iMessage) for company business activities on personal devices as the COMPANY cannot monitor, secure or retain business communications sourced from personal devices.

## **Duty to cooperate**

The COMPANY must fully and truthfully cooperate with any internal or external investigation or audit, or any regulatory examination or request for information. You need to be aware of and comply with any applicable business-specific policies and procedures regarding contact with regulators, which, among other things, may require you to report such contact to either your manager and/or compliance or global regulatory relations. Additionally, you must

immediately inform your manager if you are the subject of an external investigation unless laws, regulations or the investigating authority prohibit you from doing so.

## 4. The COMPANY Business

### Fair Treatment

We are committed to dealing fairly and honestly with our clients, suppliers, distributors, competitors, and employees.

To treat all our business partners fairly, you must:

- Not engage in manipulation, concealment, abuse of confidential information, misrepresentation of material facts, or other unfair dealings or practices.
- Provide fair access to credit and make credit decisions based on objective criteria.
- Not discriminate against prospective or current clients on the basis of race, color, religion, national origin, age, sex, sexual orientation, gender identity, disability, marital status, or familial status.
- Inform customers and potential customers about options that may be appropriate for them, and explain terms and features in a fair and balanced way.
- Listen carefully to any feedback you receive from those doing business with COMPANY and promptly escalate that feedback as appropriate.
- Approve or award contracts, work orders, or commitments based on objective business standards to avoid favoritism or perceived favoritism.

### Fiduciary Duties

We act as a fiduciary in certain investment advisory and other client relationships.

A fiduciary has a legal duty to act in the best interests of its clients by putting its clients' interests ahead of its own interests or the interests of its affiliates or employees. You must:

- Understand when fiduciary duties arise in COMPANY business dealings.
- Never use a client relationship to serve your personal interests ahead of those of your clients.

### Antitrust and Fair Competition

We protect the interests of our clients and customers by abiding by all competition and antitrust laws. By doing this, we help preserve competition in the market and protect consumers from unfair business arrangements.

To ensure fair competition, you must:

- Avoid situations that create the potential for unlawful anti-competitive or collusive conduct.
- Immediately stop any conversation in which a competitor, client, or third party with whom COMPANY

does business tries to engage in anti-competitive or collusive conduct, and promptly report the incident to your internal legal counsel.

## **Insider Trading**

Misuse of material nonpublic information erodes our clients' trust and places our license to do business at risk.

COMPANY policy, and the laws of many countries, prohibit trading in securities of any issuer while in possession of material nonpublic information (MNPI, also referred to in some jurisdictions as "inside information") regarding the issuer. It is also illegal in many countries to "tip" or pass on inside information to any other person who misuses such information by trading in securities or passing such information on further, even if you do not receive any monetary benefit. Trading on or conveying MNPI may also breach contractual obligations assumed by COMPANY with our clients or on their behalf.

To protect against insider trading, you must:

- Not use MNPI about COMPANY or any other company for the purpose of buying or selling COMPANY's or any other company's securities.
- Understand that the prohibition against trading while in possession of MNPI applies to COMPANY securities, to the securities of other issuers, and to transactions for any COMPANY account, client account, or personal account.
- Not share or tip MNPI.
- Adhere to information barriers to protect MNPI.
- Contact your internal legal counsel if you believe you have come into possession of MNPI relevant to a trade you intend to make.
- Know the restrictions relative to your job. Certain employees have significant restrictions placed on their trading in COMPANY securities or the securities of other companies.

Consequences for insider trading violations can be severe, including termination of employment; civil or criminal penalties for you, the tippee(s), and COMPANY; and irreparable damage to our reputation and public trust.

## **We focus on growing responsibly**

At COMPANY, we are driving responsible growth with a strong focus on Environmental, Social and Governance (ESG) leadership. This enables us to serve clients, deliver long-term value through sustainable results to our shareholders, and address some of society's greatest challenges. Our focus on ESG enables us to drive opportunities and manage risks across our company, helps us define how we mobilize our capital and resources, and informs our business practices and how and when we use our voice in support of our values. Through our commitment to ESG principles, we build trust and credibility as a company people want to work for, invest in and do business with.

Integrated across our business, our ESG focus reflects our values, ensures we are holding ourselves accountable, presents tremendous business opportunity, and allows us to create shared success with our clients and communities.

## Conclusion

Thank you for taking the time to review our Code of Conduct. Remember, the decisions you make on a daily basis can make an impact on our reputation. Please use this Code as a guide to help uphold our ethical standards. If you have questions about our Code or policies or need additional guidance, please reach out to your manager or contact the relevant Compliance officer.