

NFQ CODE OF CONDUCT

WHY IS THE NFQ CODE OF CONDUCT RELEVANT?

In NFQ, we aim to establish universally recognized rules that describe how we conduct our work and justify our actions. The Code of Conduct is a crucial tool for establishing and maintaining a positive, ethical, and lawful environment for all - our employees, shareholders, clients, partners, and providers - ultimately contributing to the long-term success and sustainability of the organization.

The aim of this code is to:

- have **agreed norms** that regulate our behavior, keep us safe, comfortable, and welcomed in our working environment;
- define what constitutes **ethical behavior** both within and outside the organization, and explain how to handle any violations that may arise;
- provide **equal opportunities** for all our employees.

SCOPE

This Code of Conduct applies to **all NFQ employees, contractors and external partners**. Anyone subject to the Code, acknowledge that they have read and agree to follow principles described in this Code.

ADMINISTERING THE CODE

We encourage every NFQ employee to **speak up** and **report** any **disrespectful, inappropriate, fraudulent, unethical or illegal behavior** by following the process described in the “We are here to help” section. Your line manager or People Business Partner will always listen to your concerns and deal with them appropriately.

If any **violation of this Code appears**, each situation will be analyzed and handled under the appropriate policy or procedure and consequences might be applied based on local Labour law.



NFQ VALUES

Our core values — #fairness, #entrepreneurship, #excellence — shape the culture and define the character of NFQ. They, together with the Code of Conduct, serve as a foundation for how we behave and make decisions at NFQ on a daily basis.

FAIRNESS: Fairness to us means achieving a harmonious balance in our daily work. This involves treating everyone with respect and consideration while serving our colleagues, clients, shareholders, and the environment.

ENTREPRENEURSHIP: We think and act like entrepreneurs. Unconventional thinking, responsible risk-taking and drive to transform our ideas into tangible successes is what defines us. To be true entrepreneurs we need the freedom to think and act independently.

EXCELLENCE: Excellence means going above and beyond what is expected to deliver exceptional results and a “wow” factor to our stakeholders. It does not mean perfect code. Rather, we seek to create additional value for our clients and colleagues.



OUR GUIDING PRINCIPLES

WE RESPECT EACH OTHER & OTHERS

At NFQ, we value diversity and inclusion and we maintain a culture of respect and support for our colleagues, potential future hires, as well as stakeholders, clients and other external partners.

We aim to ensure our employees feel truly accepted, their voices are heard, and they have a sense of belonging within the company. Consequently, we provide equal employment and career opportunities to all qualified candidates and employees. Both in and outside the company, any **harassment** or **discrimination** based on sex, age, sexual orientation, and other grounds listed below are **strictly prohibited**.

Discrimination in the workplace happens when a person or a group of people is treated unfairly or unequally because of specific characteristics. It could be based on any ground such as sex, age, sexual orientation, gender reassignment, race, color, ethnic or social origin, professional background, genetic features, language, religion or belief, marital status, political opinion, membership of a national minority, parental status, medical condition, physical or mental disability.



WE DO NOT TOLERATE ANY FORMS OF HARASSMENT

HARASSMENT is any treatment of a person that creates an intimidating, hostile or offensive environment, or any inappropriate behavior that interferes with work performance. Harassment can take place both in live surroundings and online (e.g. on email, Slack, social media) and can take many forms including, but not limited to offensive or disparaging remarks, threats, retaliation, workplace violence, slurs, gestures, bullying, negative stereotypes and intimidating acts.

SEXUAL HARASSMENT INCLUDES, BUT IS NOT LIMITED TO:

- Sexually suggestive, lewd or indecent comments, jokes, pictures, offensive emails, text messages, social media content.
- Repeated unwanted attention, such as requests to meet up in a social context, or phone calls, texts or messages to an individual that have no work-related grounds.
- Unwanted physical conduct including touching, pinching, pushing and grabbing.
- When a person in a position of power implies that some decisions may be affected by acceptance or rejection of sexual advances.

DISRESPECTFUL BEHAVIOR INCLUDES, BUT IS NOT LIMITED TO:

- Abusive, threatening, bullying or intimidating behavior.
- Targeted vulgarity and rudeness.
- Repeated, blatant disregard by an individual for another person's personal time.
- Sarcastic comments or negative trolling.
- Deliberate exclusion or continued isolation from work social activities (including speaking in a language that others do not understand with the intent of such exclusion or isolation).
- When a person uses their position of power to justify any inappropriate or disrespectful behavior.

The list of behaviors isn't limited only to points above and each case will be evaluated separately.

WE ARE CONSCIOUS ABOUT DATA SECURITY

Our clients, employees, and external partners want to know that their information is safe when interacting with us. That is why it is of the utmost importance that we **maintain trust and reputation**, **comply with regulations**, and **protect sensitive information** (i.e. data that, if disclosed, altered, or accessed by unauthorized individuals, could have a significant impact on the organization's security, reputation, or operations) we hold.

Each of us is responsible within the scope of our duties to collect, use and process any information only for legitimate business purposes and protect it from possible loss, misuse or disclosure. We should never share it with

any unauthorized person outside of NFQ or anyone in the company who does not require use of such information to complete their job.

If you are unsure whether you are handling any sensitive information or whether the manner in which you are using information complies with NFQ Guidelines, please discuss this with your line manager.



WE COMMUNICATE IN A PROFESSIONAL MANNER

NFQ VOICE AND TONE

NFQ Voice and Tone recommendations help us keep NFQ's communication style unified in our **internal** and **external** communication and allow us to be better understood.

HERE ARE THE MAIN GUIDELINES FOR HOW WE COMMUNICATE:

- We share our personal or NFQ's expertise in a friendly manner, maintaining a professional tone.
- We use clear and concise language, avoiding mistakes in grammar and style, or factual errors (proofread twice).
- We use clear narratives and engaging examples to tell stories of how we assist clients through our solutions for their business challenges and guide them to success.
- Our tone is encouraging rather than demanding.
- We avoid all caps in both internal and external messages, as it may come across as rude and impolite.
- We are responsive and transparent regarding any issues that arise, providing solutions promptly.
- Our communication must adhere to the main principles listed in this Code of Conduct; it must be respectful and ethical in all terms.
- And, most importantly, we should always remember that through communication, we build both our personal and our company's brand.



WE GIVE SUPPORT AND RESPECT EACH OTHER'S TIME

We value our colleagues' time and always try to use it wisely.

RESPONSE TIME WITHIN NFQ

We take ownership of our areas of expertise. If a colleague contacts us and we are not on vacation or sick leave, we aim to respond to emails, Slack messages, or other requests **within one working day** (**two working days** if we are on training, attending a conference, or on a business trip). For longer absences, we update the Google calendar/Slack to notify colleagues of delayed responses. For specific requests, we ensure internal agreements are in place before our days off.

INTERNAL MEETINGS

We seek to use our planned meeting time in the most efficient way to align with NFQ Meeting Guidelines. According to which, we all come to the meetings prepared, share the agenda in advance and ensure that discussions remain focused and concise.

INTERNAL COMMUNICATION

At NFQ, we maintain consistent communication with our colleagues, both online and offline. We share project updates, discuss daily work matters, and ensure that we are aligned on the strategic focus of our business. To ensure everyone is included in our conversations, we use **English** as the primary language. Our main internal communication channel is Slack.



WE PROVIDE FEEDBACK

At NFQ we can give and receive feedback from **anyone in the company**. Feedback is one of the foundations of our professional development and is at the heart of how we build relationships. We encourage **giving feedback directly** to the colleague and it should always be concerned with work related behaviors, and not focused on the individual's personality.

POSITIVE FEEDBACK

Feedback might be **positive and encouraging** – and be used to show appreciation and highlight the behavior or work the individual should continue doing. This can be expressed in live meetings or via message.

CORRECTIVE FEEDBACK

When it comes to **corrective** feedback, it should be shared only when it is motivated by a positive intention to discuss what could be improved or changed in the future. Corrective feedback is best expressed **in person** during live meetings versus remote messages. Any feedback that is motivated by resentment or desire to offload one's frustrations is not tolerated.

If you don't feel comfortable sharing your feedback directly, speak to your manager and/or dedicated People Business Partner, who can provide confidential advice and assistance. If you notice any recurring issues or improvement areas within a team or a process, feel free to speak to the relevant team manager or process owner.



ETHICAL CONDUCT AND RESPONSIBILITY

In alignment with our values, NFQ is committed to maintaining the highest standards in all our daily operations. We aim to ensure that every representative and employee actively practices these principles of **ethical behavior** in their daily work.

TRANSPARENCY

NFQ values transparent business transactions and clear, honest communication with all stakeholders. Our commitment to transparency is vital for building trust and maintaining our reputation.

CONFLICT OF INTEREST

We avoid situations where personal interests could conflict, or appear to conflict, with the interests of NFQ. You should disclose any potential conflicts of interests to your line manager or any of the People Business Partners.

BRIBES AND GIFTS

We strictly prohibit accepting or offering bribes or inappropriate gifts. You must not offer, give, or accept any form of bribe or unauthorized gift that may influence business decisions or gain unfair advantage. If you're ever conflicted or unsure whether you can or can't accept a gift, feel free to speak to your line manager or one of our People Business Partners.

DECISION MAKING

When facing a decision, ask yourself: Is it legal? Is it in line with our company's values? How would it look if it were made public? Consider if you would be proud to share your decision with your colleagues.



WE ARE HERE TO HELP

At NFQ, we encourage a culture where everyone feels safe and supported when addressing and reporting concerns.

Speak up if you experience or witness any disrespectful, inappropriate, fraudulent, unethical or illegal behavior, whether that involves your colleagues, external partners or clients.

You have the option to remain anonymous where possible, and we assure confidentiality and a safe, supportive environment for all reports.

IF YOU'VE NOTICED OR EXPERIENCED ANY INAPPROPRIATE OR UNETHICAL BEHAVIOR, FEEL FREE TO:

- Talk to your manager.
- Talk to your People Business Partner.
- Submit written notice of concern. You may choose to stay anonymous or disclose your identity. The company will investigate all reports and depending on the findings, appropriate actions will be taken. If you choose to disclose your identity, we will come back to you within 2 working days.

IMPORTANT! Complaints of illegal behavior, harassment or bullying are taken seriously and will be investigated promptly and discreetly. Investigations are conducted by impartial individuals with no prior involvement in the matter to ensure confidentiality. All measures necessary for the upkeep of ongoing relationships will be taken throughout the investigation. You will be regularly informed of our findings, progress and any decisions made.

Issues of harassment or bullying by an employee are treated as potential misconduct. Incidents involving third parties will be addressed with appropriate actions. Regardless of the complaint's outcome, our focus remains on maintaining a professional and respectful working environment for all parties involved.

