team.blue's code of conduct:

Your daily behavioural blueprint

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A message from our CEO

Dear reader,

At team.blue we value our customers, staff members and partners, and believe in a trusted collaboration where respect and openness are the key to success.

Our customers are our priority, and we strive to always do our best when delivering our services and helping our customers in their digital journey. To ensure we deliver the best and most satisfying services within our industry, we always think 'what's next'. By this, we make sure we constantly develop and improve our products and services for the benefit of our customers.

In this Code of Conduct you will find our fundamental values and principles that drive our daily work and behavior.

Respectfully,

Claudio Corbetta
Group CEO

Introduction

Our values

Our values are at the heart of our team.blue culture. We believe that sustainable strong business performance is more than just numbers.

As we look to grow our business in an ever-challenging competitive environment, how we interact with each other, our customers, suppliers, and the wider community makes a big difference to our ability to continue to delight our customers and create a fantastic place to work for all our team.blue colleagues.

Being successful in our day-to-day work activities while role modelling team.blue values makes us stronger, both individually and as one team.blue.

We put our customers at the heart of everything we do

We treat each other with respect and regard

We're stronger together and we trust each other to do the right thing

We tell it like it is, and keep minds and doors open

We're always thinking 'what's next?'

Our values help to define our culture through the behaviours we demonstrate in our day-to-day interactions. Read more about the example behaviours in our "our guide to team.blue's values".

Our code of conduct

When it comes to making the right decisions, it's your responsibility to determine what's right and how to apply it in your work at team.blue.

Our Code of Conduct guides you in applying our values and principles to your everyday tasks, regardless of your role - whether you're a board member, officer, employee, contingent worker, or contracted worker.

As a team, it's crucial that we make decisions aligned with our values to maintain trust and protect our brands.

Keep your moral compass in mind when facing ethical dilemmas, because no document, including this Code of Conduct, can replace your own good and sound judgement.

| Is it legal? | → | Is it permitted by our Code of Conduct and our policies? | → | Does it reflect our Values? | → | Are you comfortable with your action(s)? |

If you answer 'yes' to all these questions, it's probably Ok to proceed.
If the answers is 'no' or 'I am not sure', stop, reconsider and if needed ask for guidance by your leader.

Our leader's responsibility

In the context of our Code of Conduct, leaders play a crucial role in promoting ethical behavior within their teams. Our leaders have an important responsibility to create an environment where ethical conduct is valued and encouraged.

We expect our leaders to foster an atmosphere where staff feel comfortable asking questions and raising concerns without fear of retaliation.
By setting a positive example and actively promoting ethical behavior, leaders not only uphold our company's values but also inspire trust and confidence among their teams, contributing to a culture of integrity and accountability.

team.blue leaders are committed to act in line with the ten principles of the UN Global Compact, recognising they have a role to play in integrating these into our daily operations.

Read more: United Nations Global Compact Initiative

Our duty to Speak Up!

Being able to speak up and raise concerns about misconduct or unethical behaviour in good faith shall be a natural behaviour for everyone within team.blue, and not something you should be afraid of doing.

We have therefore made it easier for you to speak up and raise concerns by implementing a guide to help you decide which channel you want to use when reporting a concern.

Which channel you decide to use is fully up to you to choose:

Afraid of retaliation when raising a concern?

Not here! It is as clear as that.

You can contact your line manager and discuss your concern

If you're not comfortable in doing that, you can instead choose to reach out to HR

or contact the legal & compliance department, anonymously if preferred, by using our Speak Up! line

or simply scan this QR code

Any concern raised by anyone within team.blue will be treated confidential and without retaliation. Read more about speaking up and raising concerns in our "Speak Up! policy".

Our staff

Honouring our code
and each other

We drive diversity, equity and inclusion

We believe that our people are our greatest asset and we encourage our staff members to be true to themselves.

team.blue follows the UN Guiding Principles on Business and Human Rights. At team.blue you as a staff member can be yourself. In fact, we all bring a unique set of backgrounds, experiences and skills to our work at team.blue every day – and that is a beautiful thing. Throughout team.blue we have made a commitment to promote inclusion and diversity, observe fair employment practices and not tolerate discrimination of any kind.

Our principles

To ensure we celebrate, integrate and include diversity at team.blue, we do our utmost to live by the following principles:

- Be fair, honest and helpful, and most important of all, kind.
- Build trust and collaboration with our colleagues.
- Be open to and respectful of different viewpoints and perspectives. Because our differences shouldn't divide us.
- Foster an inclusive work environment to empower an inclusive behaviour among our staff.
- Make employment-related decisions based on job requirements and on individual's qualifications.

What if?

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Some office staff are frequently visiting a local bar every Friday, but are excluding a co-worker who openly identifies as LGBTQ+. This behavior could be due to their sexual orientation.

If bias is suspected, it's important to assess if this affects workplace professionalism. If exclusion extends to business discussions, it constitutes harassment and should be reported promptly.

let's all act as an ally on DEI matters.

Read more: UN Guiding Principles on Business and Human Rights   Impact Reports

We respect and protect each other

We don't tolerate any violations of human rights within our organisation, or among our suppliers, partners or stakeholders.

To feel safe at work, both physically and psychologically, it is crucial for everyone to be able to do their best and feel confident in their work. That is why, regardless of your position or level, we expect our staff to show respects towards each other, regardless of our differences, and treat each other with dignity and respect.

Our principles

We expect our staff members to promote a work environment that is free of harassment, bullying and abusive conduct, by asking them to:

- Pay attention to your own behaviour and to the response and reaction of others
- Speak up when you see or suspect misconduct or unethical behaviour
- Offer your help if you see a colleague struggling with their work

What if?

I work in our contact centre, and I'm pressured to produce a report for my entire team. One specific team member consistently adds subtle jabs about my responsiveness in their emails, even though I reply promptly. They also copy my manager into the emails.

Discuss this uncomfortable situation with your supervisor, as your colleague may not realize their impact.

We prioritize a safe and healthy workspace

Our staff's safety and well-being are our priority.

Building a secure and healthy work environment requires an effort from everyone at team.blue, as the policies and procedures have to be reflected through our staff.

What if?

I'm behind on work due to time-consuming security tests on servers. Can I skip some tests to catch up?

No, skipping tests is bad conduct and against company policy. Incomplete tests risk our reputation for quality, security, and reliability.

Our principles

To ensure a safe and pleasant working environment, we do our utmost to live by the following principles:

- Prioritize safety by adhering to job regulations and policies
- Stay updated on relevant health and safety guidelines
- Support mental health in the workplace for all employees
- Always conduct your daily work free from the influence of drugs and alcohol
- Practice good workplace safety habits, free from threats or concerns of workplace violence

Read more: UN Guiding Principles on Business and Human Rights   ILO Declaration on Fundamental Principles and Rights at Work

We are all ambassadors of team.blue

When representing team.blue in public, staff members are expected to embody team.blue's values and uphold its reputation through professional and transparent communication.

Our principles

To maintain team.blue's reputation and integrity, we expect our staff to follow the following principles:

- Protect confidential information and respect privacy rights in public settings
- Maintain consistency in messaging and branding across public platforms
- Disclose conflicts of interest and third-party relationships transparently
- Distinguish personal views from company positions on social media channels
- Ensure all information shared about the company is truthful and reliable

What if?

I'm on LinkedIn and want to use my company e-mail contacts to solicit new members for an online group I belong to. May I do this?

Yes, as long as the group involves business related to our company or our industry.

Read more: Marketing policy

We are mindful when sharing information

At team.blue we prioritize responsible sharing of information across all levels of the organization.

This includes safeguarding personal information to respect individual privacy rights, adhering to strict protocols for handling classified or proprietary information to protect sensitive data from unauthorized access or disclosure, and exercising caution when incorporating outside information into our operations.

Our principles

To ensure to handle information correct, team.blue staff is expected to:

- Handle personal information with the utmost care
- Ensure compliance with data protection regulations
- Obtain the necessary consent for the use of information
- Follow security protocols for handling classified information, including encryption and restricted access
- Avoid sharing team.blue's confidential info in Generative AI tools

What if?

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A customer requests their data to be removed. Can I save their name in case they change their mind?

No, all personal data must be deleted in line with team.blue's privacy policy.. Saving her name violates privacy rights and risks legal consequences.

Read more: Employee Privacy Notice   General Guideline for Generative AI

Our Customers

Having a 'customer first' approach

We treat benefits with caution

team.blue acknowledges that it's common for staff to occasionally receive benefits, such as gifts and entertainment, during their professional interactions.

team.blue staff should exercise sound judgement as to what may be considered disproportionate, advantageous or excessive regarding remuneration, gifts or entertainment, donations or unwarranted preferential treatment, in particular if given to gain or retain a business advantage.

Our principles

The following guidelines should be taken into account by each team.blue staff member when it coms to obtaining benefits during professional interactions:

- Make sure that the value and nature of any gifts and/or entertainment accepted are reasonable and proportionate to the context of the business relationship or transaction. Excessive or lavish gifts may raise concerns about undue influence or unethical behaviour
- Avoid situations where accepting advantages could create a conflict of interest or give the appearance of impropriety. This includes situations where personal gain could influence business decisions or relationships
- Ensure that the acceptance of advantages does not compromise your ability to act impartially and make fair decisions in the best interests of the company and its stakeholders
- Report all gifts and hospitality above a value of 25 EUR to the Legal & Compliance department (tb-compliance@team. blue) so they can be accurately recorded on company's register

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What if?

Supplier offers discount for personal use, can I accept this?

No, accepting could bias future decisions. Base supplier choice on price, quality, and service, not personal benefits.

Read more: Third Party Management policy   Marketing policy   Anti-Bribery and Corruption policy

We maintain integrity in third party relationships

At team.blue, our dedication to ethical practices and preserving integrity within our interactions with third parties is fundamental.

These collaborations are crucial to our operations, emphasizing the necessity for alignment with our core values and standards.

Our principles

In order to maintain integrity in third party relationships, we encourage team.blue staff to:

- Provide clear and accurate information about team.blue
- Respect third-party confidentiality and avoid disclosing sensitive info without authorization
- Treat third parties with professionalism and value their contributions
- Foster a long-term relationship with third parties
- Be clear and transparent on terms and conditions, and any contract renewal process
- Treat vulnerable customers fairly and excercise particular care with vulnerable customers

What if?

As the investor relations coordinator, I oversee the advertising agency for our annual reports. My contact there said that the agency's invoices have gone unpaid for the last three months. My efforts to get them paid have been unsuccessful. What can I do?

Check with the finance department on the status of the invoices. If you do not receive a clear and credible explanation for the unpaid invoices, contact the legal and compliance department right away. If there is a good reason for the delays, be sure to follow up with both your contact with the agency and finance.

Read more: Third Party Management policy   Marketing policy   Anti-Competition policy

We compete fairly

At team.blue we conduct business with third parties in a fair, honest, and ethical manner, avoiding any actions that may give unfair advantage or cause harm to competitors.

team.blue's policy prohibits any competition practices (also called anti-trust) which could affect, inbound, restraining or distorting competition, as well as any practices of unfair competition.

Our principles

We ask team.blue staff to compete fairly by applying the following principles:

- Outperform our competitors fairly and lawfully
- Respect the free market. team.blue staff members should never, either formally or informally, agree with any third party (customers, suppliers, competitors, etc.) to:
  - » Raise, set or hold ("fix") prices
  - » Divide markets, territories or customers
  - » Refuse to deal with a particular customer, supplier, competitor or other type of third party
  - » Prevent another third party from entering the markets in which team.blue is active
  - » Influence the outcome of a competitive bid
  - » Restrict production, sales or output of a third party

What if?

Two software providers act independently and raise prices for licenses to the same level. Soon after, hosting providers in the area each take independent action in raising prices to consumers to reflect increased license prices. Do these actions constitute price fixing?

No. the software providers didn't collude to raise prices. Under EU law, it's not price fixing if the competing firms act independently and unilaterally when raising prices.

Read more: Anti-Competition policy

We avoid conflicts of interest

At team.blue, we emphasize the importance of identifying and managing conflicts of interest to maintain integrity.

Staff are required to promptly disclose any conflicts, ensuring transparency and ethical decision-making. By addressing conflicts of interest proactively, we uphold trust and safeguard our organization's reputation.

What if?

I'm friends with a consultant from work, but I can't influence their contract or workload. They invited me for a weekend of golf, and I'll cover my expenses. Is it okay to go?

Accept the invitation. Company respects personal friendships of staff. However, if you had influence over the consultant's contract or work, it could be a conflict of interest. If your role changes, disclose the relationship.

Our principles

To steer clear of conflicts of interest, we ask all team.blue staff to:

- Disclose and avoid conflicts of interest with third parties
- Prioritize team.blue's interests over personal gain or relationships
- Recuse yourself if conflicts arise
- Be transparent and document actions to address conflicts
- Regularly review potential conflicts for compliance

Read more: Third Party Management policy

We do not engage in corrupt practices

team.blue has zero tolerance towards all forms of bribery and corruption, as well as to all forms of procurement fraud or any other deceptive or collusive practice in the engagement of suppliers and/ or associated parties (collectively referred to as third parties).

Our principles

In this context, we ask each team.blue staff member to act by the following:

• Avoid bribery in any form

• Refrain from influencing public officials for business advantage

• Maintain clear records of transactions

• Monitor third-party relationships for policy and legal compliance

• Don't make or receive any sort of facilitation payment

• Don't make payments to parties outside the agreement terms of an engagement

What if?

An outside regulatory group is conducting an audit in our area. I wasn't expecting to be involved, but the auditor has requested that I turn over some records. Should I do it?

Be cooperative but explain that you didn't anticipate this request and would like to inform your supervisor before providing the records. Your supervisor must track what's been sent to the auditor for defense purposes if needed. Provide only necessary records within the audit scope.

Read more: Anti-Bribery and Corruption policy   Third Party Management policy

Our stakeholders/ vendors

Acting responsibly with team.blue's assets

We protect our assets

It's important to look after team.blue's assets to ensure its continued success.
Our assets include everything from physical property to intellectual property and financial resources.
It's up to all staff to take care of these assets, whether it's by following security procedures, keeping information confidential, or using resources wisely.

By taking responsibility for our assets, we're showing our commitment to keep team.blue strong and thriving.

Our principles

As such, we ask each team.blue staff member to:

• Take responsibility for looking after and using company assets wisely, making sure they're safe

• Protect confidential information and share it only with authorized individuals

• Ensure physical assets are secure from theft or damage

• Use strong digital security measures to safeguard information

• Make sure the company follows all the rules and laws about protecting its assets

• Keep a close watch on the companies we work with to make sure they're keeping our assets safe too

What if?

I mistakenly sent an email to a vendor that contained the personal email addresses of all my clients. Normally I use the "Blind cc" feature instead. What should I do?

In today's fast-paced digital era, errors can occur. Apologize to clients via blind cc and request the vendor to delete the email. Consult Legal and Compliance Department for data protection law compliance and potential reporting obligations.

Read more: Employee Privacy Notice

We ensure financial integrity

At team.blue, making sure our finances are handled properly is really important. We're committed to being honest and transparent and following the rules to avoid any cheating, bribery, or breaking the law.

Each team.blue staff member needs to be careful with money, record transactions accurately, and report any problems right away.
By being strict about financial honesty and creating a culture where everyone plays fair, we keep team.blue's reputation strong and make sure everyone can trust us.

Our principles

Therefore, we ask you to apply the following principles when it comes to dealing with our financial assets:

• Ensure transparent and accurate financial transactions and reporting

• Adhere to team.blue's rules and avoid involvement in bribery, theft, or fraud

• Say no to any offers of bribes or kickbacks, and don't offer them to anyone else

• Watch out for anyone trying to cheat, bribe or steal money, and report it if you see something suspicious

• Comprehend financial laws and regulations, particularly regarding international trading and sanctions compliance

What if?

My department is over budget for one project and under budget for another one. Since the money all comes out of the same pot, it is okay to reallocate expenses so we'll meet budget on both projects?

No. For accounting and planning purposes, expenses must be recorded accurately.

Read more: Fraud Prevention policy   Sanctions policy   Anti-Bribery and Corruption policy

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We protect confidential business information

Within team.blue keeping business secrets safe is crucial. We're talking about things like client information, financial data, and plans for the future, basically anything that we wouldn't want our competitors to know . It's up to all staff to make sure this information stays private by following security rules, like using passwords and not sharing secrets with people who shouldn't know them.

What if?

I often communicate with our vendors or clients via email and Internet. If they request information which is confidential, is it okay to send it to them via email?

Only if you use encryption when discussing confidential information, you may use email and Internet for this purpose. Ask our security department for help. Also, be sure that the client or vendor has signed an NDA to receive confidential information. If an NDA is needed, you can contact the legal department.

Our principles

In order to protect team.blue's confidential business information, all staff should:

- Treat all business information confidential and don't share it with unauthorized persons
- Only give internal access to confidential information to colleagues who genuinely require it for a business purpose
- Encrypt data with codes and passwords for electronic security
- Secure sensitive information on paper or computer with locks or strong passwords
- Use NDAs with staff and third parties to prevent sharing confidential information
- Use special software to protect digital information from hackers and other threats

Read more: Anti-Competition policy   Third Party Management policy   Employee Privacy Notice

We communicate responsibly

Responsible communication is defined by speaking truthfully, accurately, and respectfully in every interaction. This includes avoiding spreading rumors or saying negative things about others. We also need to keep sensitive information confidential and only share it when necessary and allowed by company rules. By communicating responsibly, we maintain trust, build good relationships, and make team.blue a better workplace for everyone.

Our principles

The following principles support our staff in communicating responsibly:

- Communicate truthfully and transparently, avoiding deception
- Listen actively, respect confidentiality, and respond promptly
- Give constructive feedback, considering cultural differences

What if?

I want to add some client testimonials to our Website. I don't have time to get permission from everyone, so my plan is to use first names and first initials of last names. Since the comments are basically anonymous, can I edit or combine them as long as I stay true to their spirit?

No. Even if the comments you select to publish are anonymous, you should use only actual verbatim testimonials.

Read more: Third Party Management policy   Employee Privacy Notice   Marketing policy

Our Impact

fostering an ethical and climate positive ecosystem

We practice good governance

In today's fast-changing business world, it's crucial to prioritize good ethics, transparency, and sustainability in how team.blue makes decisions. These aren't just nice-to-haves—they're essential for building trust, boosting our reputation, and ensuring our long-term success.

Our principles

More specifically, we underwrite the following principles:

- Encourage leaders to lead with integrity and uphold high ethical standards
- Hold everyone accountable for compliance
- Promote open communication and stakeholder engagement
- Integrate sustainability into decision-making

Our commitment

team.blue is commited to:

- Support the OECD Guidelines for Multinational Enterprises, reflecting how to act responsibly and covering all key areas of business responsibility
- Maintain an efficient and effective governance system
- Embed ESG sponsorship within our governance model
- Provide regular training on ethical behavior and good governance

Read more: OECD guidelines   Impact Reports

We give back and engage locally

team.blue wants to play a vital role in shaping the well-being of the local communities in which it's present. By giving back through charitable giving and engaging with our suppliers, we can not only make a positive impact but also strengthen our ties with the community and show our commitment to social responsibility.

Our commitment:

As team.blue, we are commited to use our position as a business to support the development of its communities, including through charitable contributions, training and career development, and engaging with local community and industry partners

We support our staff to:

- Prioritize the local community in charitable giving and supplier engagement decisions
- Select initiatives addressing local issues
- Partner with socially responsible suppliers and support local businesses
- Encourage staff involvement in community service

Read more: Impact Reports

We manage & reduce our environmental impact

From reducing carbon emissions to minimizing waste, team.blue is taking proactive steps to mitigate its environmental footprint. We expect each team.blue staff member to contribute in achieving our sustainability goals and to promote environmental stewardship.

Our principles

We ask our staff to:

- Engage with environmental responsible and/or local suppliers
- Think twice before going on an airplane or use transport modes with less environmental impact
- Engage in responsible e-waste management practices by donating or recycling used laptops

Our commitment

team.blue is commited to:

- Measuring and reporting on its carbon footprint at least annually
- Purchasing or generating renewable energy for our datacenters and main offices where feasible and within our control
- Engaging with its key suppliers on climate change as part of its commitment to reduce Scope 3 carbon emissions
- Providing sufficient recycling options and equipment within our offices and encourage employees to recycle when possible
- Monitoring the ESG performance of our supply chain more closely

Read more: Impact Reports

7. Violation of our Code of Conduct

There may be rare occasions when misconduct occurs. Misconduct refers to any action that violates our Code of Conduct, policies, ethical and industry standards, or laws and external regulations.

All team.blue staff members are required to report potential misconduct through one of the channels listed below without further disseminating the information:

- Your supervisor or team manager
- Your Local HR business partner
- Your Legal and Compliance Department
- Via the confidential Speak-Up! reporting system

> Staff who report potential misconduct or provide information for any investigation will be protected from any retaliatory actions. However, reporting potential policy violations does not automatically grant immunity from disciplinary procedures, should the reporting staff member be involved in misconduct.

> Breaches of our Code of Conduct will not be tolerated and may result in disciplinary action, including termination of employment or termination of agreement with business partners.

8. Overview of policies
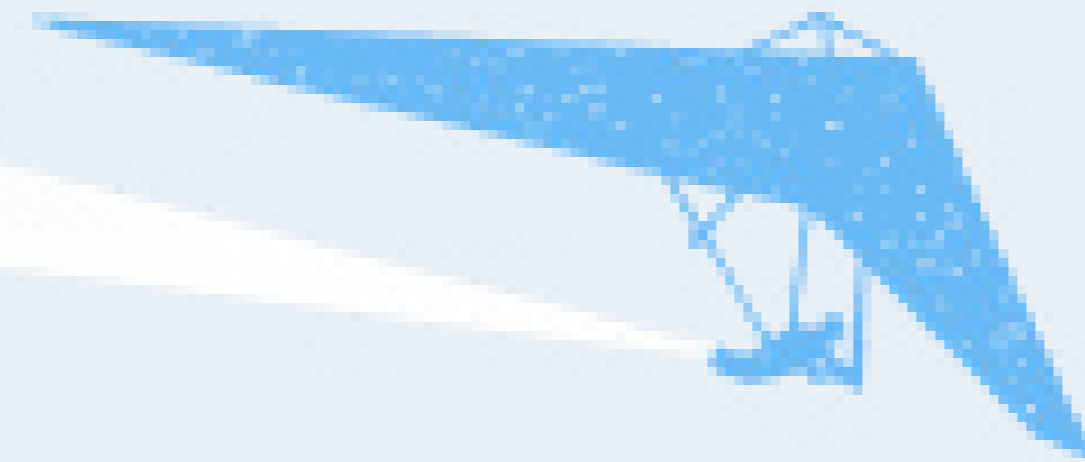
The code of conduct is supported by underlying policies:

- Anti-Bribery and Corruption policy
- Anti-Competition policy
- Employee Privacy Notice
- Fraud Prevention policy
- General Guidelines for Generative AI
- Marketing policy
- Sanctions policy
- Speak-Up policy
- Third Party Management policy

Speak Up!