



DEVELOR INTERNATIONAL

Code of Conduct and Ethics

In place since 2016 / last update: January 2021

Introduction

Our Code of Conduct is designed to help our employees, organization members, associates and collaborators make the right choices and decisions when conducting business in the learning and development industry, and to assist them in upholding the integrity upon which our reputation is founded.

Develor is an ethical business entity that engages with clients and suppliers in a responsible and ethical way. Compliance with all related and applicable ethical, social and environmental legislations is highly important for us. Therefore, the principles listed below are deemed to be of fundamental importance. Develor undertakes, therefore, to abide by them in its dealings with all other parties. In exchange, our Company demands that these principles be respected by all parties, internal and external, having relations of any kind with the same.

Integrity - Our reputation as a company and international network that our clients, vendors and future partners can trust is our most valuable asset, and it is up to all of us to make sure that we continually earn that trust. All of our communications and other interactions with our past, present and future partners should increase their trust in us.

I. WORKPLACE ENVIRONMENT

Our employees and partners should act with integrity, comply with laws, maintain a professional work environment and comply with company policies. They should treat customers, colleagues, and partners ethically at all times.

1. We treat each other with Mutual Respect

Develor employees are expected to treat one another professionally and with mutual respect and partnership. Our employees must also display respect when interacting with customers, contractors and others affected by our operations. Develor does not tolerate any form of harassment or other offensive action.

2. We embrace Diversity and Equality

One of our company's strengths is the diversity of our workforce. Employees of many nationalities and backgrounds work together to achieve common objectives. As an international company, we encourage fair employment practices and offer equal opportunities to all our employees.

Develor obeys the employment laws of the countries in which it operates and does not engage in discrimination based on race, colour, gender, age, sexual orientation, ethnicity, disability, religion, union membership, or marital status in hiring and employment practices such as promotions, rewards, and access to training.

Our Organization undertakes to safeguard the moral integrity of its personnel, ensuring their right to working conditions that respect the dignity of the individual. All individuals shall be afforded the same respect and dignity and be entitled to the same professional development and career opportunities. Access to roles and positions is determined on the basis of expertise and ability.

3. Safe and Productive Workplace

We maintain a work environment that empowers everyone to do their best work and enables and inspires them to excel. A safe workplace inspires trust and allows us all to contribute and succeed. Discrimination, harassment, and unsafe working conditions diminish what we can achieve together. All of our Partners are expected to follow all safety rules and practices; cooperate with officials who enforce these rules and practices; take necessary steps to protect themselves and other partners; attend required safety training; and report immediately all accidents.

4. Conflict of Interest

As Develor employees we must avoid situations where personal interests conflict, or even appear to conflict, with the interests of Develor. Many actual or potential conflicts of interest can be resolved in an acceptable way for both the individual and the company. In case of a conflict of interest, the employee concerned should immediately inform his/her Manager in order to find an appropriate solution.

II. BUSINESS PRACTICES

Develor is committed to full compliance with the laws, rules and regulations of the countries of operation.

1. Compliance with laws and regulations

Develor works in abidance with the law and strives to ensure that all its personnel behave in the same way: the conduct of individuals must be in compliance with the law, irrespective of the context and activities involved. This commitment also applies to consultants, suppliers, customers and any other party having relations with the company.

2. Anti-bribery and Anti-corruption policy

Develor is committed to conduct fair and open Business Practices with all clients and partners. We are truthful and transparent in our interactions, and do not influence their decisions through improper payments. We have zero tolerance for corruption and no employee may offer or accept bribes in any form.

3. Fraud

Develor is committed to preventing and detecting fraud – we do not engage any kind of fraud against Develor, any of our business partners or government entities. In this context by fraud, we understand deliberately deceiving a person or company to unjustly obtain an unauthorised benefit, such as money, property or services.

4. Whistleblowing

In accordance with ethical principles Develor has implemented the Whistleblowing policy to disclosure internally or externally by employees of malpractice, as well as illegal acts of omissions at work. The Whistle blower is required promptly report the suspected or actual event to the Manager – with the identity or anonymously. Manager who receives the information is obliged to act promptly to investigate and resolve the issue.

5. International business

Develor is committed to the highest ethical standards in all business transactions and to working fairly and honestly with all officials and others in our communities. All our employees and partners must follow and comply with all applicable laws, rules and regulations when conducting Develor business transactions.

In managing business, our actions must meet high ethical and legal standards. It is against our policy to offer or make a payment or gift of any kind in order to facilitate a local process or to influence a local government official.

Develor partners at no time are permitted to influence the outcome of any business decision by exchanging bribes or kickbacks of any kind.

6. Choose Suppliers with Integrity

We rely on our supplier relationships for our success. To achieve our mission (to grow individuals and teams at work), we need partners and suppliers that are as committed as we are to building trust with our customers, that will do great work, and that will follow the law. We select the best suppliers for the job, by carefully considering their proven track record, reputation for integrity, and other merits — not based on favouritism.

7. Fair competition

The way we compete is as important as the result we achieve. Healthy competition and fair business practices put our customers first by giving them access to a variety of products and services at fair prices. Competing fairly ensures that we meet our business objectives with our integrity intact.

We avoid any formal or informal agreements with competitors that limit competition. Develor respect competitive bidding processes, and do not rig or fix the outcomes or help anyone else do so. When gathering competitive intelligence, we use appropriate sources, are truthful, and do not misrepresent who we are.

8. Gifts

We demonstrate sound judgment and moderation when giving and receiving business courtesies. A gift or favour should not be accepted or given if it might create a sense of obligation, compromise your professional judgment or create the appearance of doing so.

Giving and receiving gifts, hospitality, entertainment and travel can build strong working relationships and goodwill between Develor and those we do business with. But gifts that are extravagant or lack transparency or a legitimate purpose may be viewed as bribes or as simply inappropriate. These things erode trust and harm our business, therefore they should not be given or accepted.

III. ENVIRONMENTAL RESPONSIBILITY

We have a responsibility to the global community to protect the environment in our operations and throughout our value chain. In addition, we must comply with and strive to exceed all applicable environmental laws and regulations wherever we do business.

We therefore promote eco-efficiency in all our business activities by striving to reduce the overall Develor environmental footprint. This means that environmental leadership, responsibility and action are needed at all levels of the company. Develor is committed to protect the environment and human health, reduce the environmental impact of its activities, products and services and ensuring the effectiveness of its environmental management.

At the same time, we expect our supply base to embrace, follow, and cascade our environmental sustainability principles.

IV. DATA PROTECTION AND PROPRIETARY INFORMATION

1. Protect Confidential Information & Intellectual Property

We protect and respect the business value of information and ideas, whether they belong to Develor or another company. This responsible and respectful attitude is crucial to our business success and builds our reputation as a trustworthy partner.

2. Other Intellectual Property

As a Develor partner, the things you create for Develor and its clients belong to the company. This includes inventions, discoveries, ideas, improvements, software programs, training materials and works of authorship. This work product is Develor property if it is created or developed, in whole or in part, on company time, as part of your duties or through the use of company resources or information.

3. Transparent Business Records

Investors rely on accurate and easily comprehensible information to understand our financial results and where we are headed as a company, and to have confidence in that direction.

Our records are managed to be clear, accurate, and complete. We comply with accounting and financial reporting standards and require employees to comply with internal financial approval limits. We retain or destroy business records in accordance with local laws and Develor requirements.

Develor's Information Management Policy states that partners will manage information in such a way that supports the needs of the business while ensuring efficiency, security and compliance with any legal or regulatory requirements. This policy applies to records maintained in all forms at Develor, including paper and electronic.

4. Protection of personal and business data

Develor respects the privacy of all its employees, business partners, clients, and the participants of our programs. We must handle personal data responsibly and in compliance with all applicable privacy laws. Employees who handle the personal data of others must act in accordance with applicable law. We limit access to the information to those who have a legitimate business purpose for seeing the information; and do take care to prevent unauthorized disclosure.

Our clients trust us with their personal data every single day and we are transparent about how we handle and ensure the protection of their data. We take that responsibility seriously and see the GDPR as an opportunity to protect and utilize that data in an even more

effective way. We have made our operation comply with the General Data Protection Regulation (being Regulation (EU) 2016/679 of the European Parliament and of the Council [2016] OJ L119/1).

5. Processing of information

Information relative to other parties are processed by Develor with respect for the confidentiality of the parties involved.

Our personnel shall guarantee maximum confidentiality with regard to news and information forming part of the company assets or inherent to the company's activity, in compliance with the rules of law, the regulations in force and internal procedures. We expect each employee to prevent disclosure of confidential information and to protect access to company property.

V. REPORTING OF PROBLEMS

Anyone who finds out about, or is reasonably convinced of the existence of, a violation of this code, of a given law or of corporate procedures, shall immediately report this to his/her manager or superior and/or DEVELOR International Ltd (info@develor.com) or the global CEO of the company, Zsolt Pozvai (zsolt.pozvai@develor.com).

This report shall be made in writing and duly signed by its author.

Develor takes the necessary measures to ensure that all those reporting violations are protected from any kind of reprisal. And, to this end, the confidentiality of the identity of the reporting party is safeguarded, unless otherwise required by law.

1st June, 2016

Reviewed and updated 12th January, 2021



Zsolt Pozvai

Global CEO
Develor International