

**SQUARE FACTS**  
**CODE OF CONDUCT &**  
**BUSINESS ETHICS**



**Effective Date: November 2024 (Version 2)**

**SQUARE**  
**FACTS**

**CODE OF CONDUCT & BUSINESS ETHICS for SQUARE FACTS**

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## CODE OF CONDUCT & BUSINESS ETHICS for SQUARE FACTS

### / Message From Our CEO

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**“ Our reputation is built on our people’s work ethics “**

Operating since 2014, Square Facts has been serving clients all over the world, delivering meaningful data and empowering them to make informed decisions while managing compliance risks in an ever-changing regulatory environment.

Square Facts grew larger and larger over the years, expanding its business operations across the globe while embracing various cultures and people whose diversity and exceptional talent are today our most precious assets.

Square Facts’ history and values come from how we do business: respecting each other and our work, pursuing excellence, and being accountable for our actions. We should be proud that our reputation is built on the efforts of our people, and this is why what you do every day is so important.

Every step towards creating products is taken with compliance and integrity in mind. Collaborating to provide best-in-class products fuels our passion and unites all teams.

Working at Square Facts is a commitment to uphold Square Facts values, comply with applicable laws and therefore with this "Code of Conduct and Business Ethics". In other words, doing the right thing is not an option at Square Facts; not only should we be an example to each other, but also to our business partners who must adhere to our ethical standards.

Compliance is a shared responsibility and can be achieved only if we make the effort together, communicate more openly and speak up when we suspect that a situation or behaviour is contrary to the law or our Code.

Please read this Code carefully and feel free to contact your supervisor, the Legal or HR department should you have any questions or need further information.

We should live by our shared values, act with integrity, and use good judgement to guide us in raising our standards of conduct, in order to ensure that Square Facts meets the high expectations of customers, paving the way for innovation, growth, and continued success.

Thank you for helping us become the best provider we can be!



**James OSBORN**  
CEO, Square Facts

## CODE OF CONDUCT & BUSINESS ETHICS for SQUARE FACTS

### / Our Core Values

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**Our strong work ethic comes from our compliance-minded teams, who promote reliable and compliant services over rapid solutions.**

**Integrity**

Wherever we operate and/or provide our services, we ensure our business is conducted in compliance with all applicable laws and regulations. Our strong work ethic comes from our compliance-minded teams, which promote reliable and compliant services over rapid solutions.

**Respect**

We firmly believe respect - for our employees, customers, and business partners - to be the foundation of a healthy work environment, ensuring fluent communication between stakeholders and demonstrating professionalism in our everyday actions and interactions with each other.

**Customer Focus**

At Square Facts, the client is king. We recognize that our customers are key to our success in business. We are committed to catering to their needs and always think of ways to enhance customer experience.

**Excellence**

Status quo has never been part of our vocabulary. Constantly improving the quality of our products and services and implementing state-of-the-art technology and processes is what drives us on a daily basis. Our people are professionals in their field of expertise and continuously challenge themselves to achieve excellence in what they do.

**Accountability**

We foster an environment of trust and autonomy where each and every one takes ownership of their actions and for the delivered results, in order to reach the common goals of the company.

## CODE OF CONDUCT & BUSINESS ETHICS for SQUARE FACTS

### / **Compliance with the code : purpose, scope and responsibilities**

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This Code provides the general expectations and principles on how we should conduct ourselves and our business, how we should serve our customers, and how we should work with our partners and suppliers.

Anti-corruption laws exist in most countries of the world. Square Facts aims at conducting its business, regardless of differing local practices, and pursuant to the most stringent applicable legislations, including, without limitation:

- The French Sapin II law n°2016-1691 voted on 9th December 2016
- The United States Foreign Corrupt Practices Act of 1977 U.S.C. § 78dd-1, et seq
- The United Kingdom Bribery Act 2010"

This Code is not meant to be exhaustive and cover every possible issue that may arise or to provide an overview of specific regulations. Many topics covered within this Code feature some concrete examples in the form of Q&A to illustrate how we should react and behave in certain situations; this is to serve as practical guidance, a resource that will help us uphold our standards and make the right decision in any given situation.

We must apply good judgement and common sense when facing a situation as it is paramount that we deal with it responsibly and ethically.

This Code applies to all Square Facts officers, directors, and employees worldwide, regardless of their seniority or job title.

Likewise, Square Facts sets high expectations for its third parties by promoting adherence to our business integrity and ethical standards.

Business partners, suppliers, contractors, as extensions of Square Facts, are invited to commit to our principles by acting in accordance with this Code and by confirming their compliance with our Partner Code of Business Conduct and Ethics.

**Each and every one at Square Facts is expected to read and understand the Code, as well as any supplemental materials that might apply to us, and act accordingly.**

**In addition to upholding our core values, we are all expected to:**

## CODE OF CONDUCT & BUSINESS ETHICS for SQUARE FACTS

- Learn about, understand, and comply with the laws, regulations, rules, and policies that may apply to our specific positions;
- Live our core values to the fullest extent;
- Speak up if we see or suspect unethical behaviour or a violation – whether of laws, policies, or of this Code;
- Respect local customs in the countries where we do business, as long as doing so does not violate any applicable laws or this Code; whenever there is a conflict, we should apply the strictest requirement;
- Complete in a timely manner compliance trainings and other training programs assigned by the management;
- Acknowledge that we have received and read this Code, and that we understand our obligation to comply with it.

Leaders at Square Facts – including managers and directors – are expected to hold themselves to even higher standards than they demand of their teams. Leaders should be role models and play an essential role in building a culture of transparency, open communication, and trust that extends from colleagues to business partners.

To help achieve this, leaders should:

- Listen and take action when team members raise concerns – whether big or small;
- Be knowledgeable about the laws, rules, regulations, and policies that apply to their teams;
- Personally handle or escalate compliance issues;
- Be accountable for managing and mitigating risks pertaining to their department's activities;
- Highlight and recognize decisions that honour our values and long-term success over short-term gain;
- Demonstrate accountability and a willingness to listen to all points of view;
- Make time to discuss the importance of ethics and compliance regularly with their teams;

## CODE OF CONDUCT & BUSINESS ETHICS for SQUARE FACTS

- Encourage colleagues to contact their manager or any other appropriate resource for help when questions or concerns arise;
- Never retaliate against anyone who reports an issue.

### **/ SPEAK UP!**

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Resources for reporting concerns and violations of the Code or the law

If you have any questions, need further guidance or want to report any actual or potential/suspected illegal or unethical behaviour(s), we encourage you to contact either of the instances listed below:

→ **Your line manager**

→ **The Legal & Compliance Department via email: [compliance@icover-services.com](mailto:compliance@icover-services.com)**

→ **The Human Resources Department via email: [hr@icover-services.com](mailto:hr@icover-services.com)**

We will investigate and report to the senior management any material violation of this Code. Investigations will be conducted promptly, thoroughly, and confidentiality shall be maintained to the fullest extent possible.

All reasonable efforts will be deployed to determine the relevant facts behind any reported violation and bring the investigation to a timely conclusion. Any employee who becomes involved in an investigation must cooperate.

The Human Resources and the Legal & Compliance departments will keep records of any such reports or complaints, tracking their receipt, investigation and resolution. If for whatever reason:

- you feel that you cannot speak with your direct line management,
- you consider that your concern or complaint has not been handled properly; or
- you prefer to report anonymously,

you may also raise your concern or complaint to the attention of the Human Resources Manager or to the Compliance Officer by post (including all relevant information and supporting documents) to the following address: **BP 50003 14807 DEAUVILLE CEDEX FRANCE**

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**Violations of this Code, of any Square Facts policies, or of applicable laws, may result in disciplinary actions where appropriate, depending on the seriousness of the case and in accordance with local applicable labour regulations and implemented company internal rules and processes:**

- Verbal warning
- Formal notice
- Detraction of benefits for a definite or indefinite time
- Demotion
- Suspension or termination of employment for more serious offences
- In cases of grave infringements of the law such as fraud, corruption, theft, embezzlement, or other unlawful conduct, we reserve the right to report violations to appropriate authorities and take legal action (e.g., penalties/damages, fines/imprisonment, etc.).

**Non-Retaliation Policy - Remember:** By reporting possible misconduct or concerns, you are complying with the Code and doing the right thing! No employee shall ever be punished, reprimanded, or in any way persecuted for blowing the whistle in good faith.

On the contrary - filing a malicious report, trying to retaliate against someone or harass them, or failing to cooperate in an ongoing investigation will lead to disciplinary sanctions.

### **1. Our commitment as fair and ethical employer**

As a business within society, we must commit to the highest international principles most notably set out by the United Nations Declaration of Human Rights, which is a necessary foundation for social development and economic progress.

Additionally, we are committed to adhere to the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.



## CODE OF CONDUCT & BUSINESS ETHICS for SQUARE FACTS

### / Fair treatment and equal opportunity

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We firmly stand against discrimination in employment and fully respect freedom of association and collective bargaining.

We are committed to fair and equal treatment in all human resources matters, including recruitment, training and development, promotion, mobility, compensation, discipline, redundancy, and dismissal.

We do not tolerate any form of discrimination based on gender, age, religion, marital status, race, national origin, citizenship status, sexual orientation, disability, disease, pregnancy, trade union and/or political affiliation. We reward everyone based on individual performance, as measured against Square Facts' long-term strategic goals and vision.

**Question:** I am interviewing a candidate for a heavy project, which would most likely require long working hours and full commitment to ensure completion in a very short time frame. I notice that the person has a wedding ring and a photo of kids on their phone screensaver.

Can I decide not to hire this person despite obvious qualifications for the position, simply because I believe that their marital status will not allow them to satisfactorily complete the project?

**Answer:** Keeping an open mind by treating everyone with the same dignity and respect is key to avoiding unconscious bias. This is a situation of discrimination that we must avoid at all costs. If you want to ensure that the person will be capable of doing the job, you may ask for concrete examples on how he/she has managed similar projects in the past, what challenges they faced and how they coped with them.

### / Workplace health, safety, and physical security

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We never tolerate acts or threats of violence, harassment, intimidation or hostility in our workplace, whether directed at colleagues or third parties.

We also do not allow:

- Misuse or abuse of alcohol and drugs, weapons, or hazardous devices at any premises leased or owned by Square Facts or at any Square Facts sponsored events;
- Behaviour that injures or is likely to injure another person or damage company property;

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- The making or sending of harassing or threatening statements (regardless of how these messages are delivered), stalking or surveillance of another person;

We must all maintain a working environment that is clean, healthy, safe, and free of physical violence.

To prevent dangerous conditions in our workplaces and protect our colleagues, business partners, customers, and visitors, we must:

- Comply with both the letter and the spirit of all applicable occupational and environmental health and safety laws as well as follow safety policies and procedures;
- Take any mandatory or on-the-job training that improves our ability to safely perform job responsibilities and use company equipment;
- Require that all colleagues, partners, contractors, and other third parties abide by those safety regulations;
- Speak up when we see something that seems suspicious or threatening.

Committing or threatening to commit violent acts: if you witness such a threat, or see something suspicious, move out of harm's way, call the local police and follow the instructions of emergency authorities.

These principles may extend to activities outside of work if they adversely affect the company's reputation or interests, or the safety of our employees.

### **/ Zero-tolerance for harassment at the workplace**

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We do not tolerate harassment or bullying of any kind at our workplaces, including verbal, physical, visual, or sexual. Even if a local law or customs does not explicitly prohibit these acts, we hold our employees to a higher standard.

We support dignity in the workplace without regard for whether the person engaging in the conduct or the recipient is an employee, manager, business partner, supplier, customer, consultant, or visitor.

This means we do not allow conduct that:

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- Has the purpose or effect of creating an intimidating, hostile, or offensive work environment or otherwise adversely affects an individual's employment opportunities;
- Explicitly or implicitly alludes to sexual favours as a term or condition of employment or promotion decisions

**Question:** My colleague has revealed to me that she was recently promised a well-deserved promotion after 5 years of loyal service and performance exceeding expectations. However, later on, her manager started to regularly express some comments of a sexual nature, making her more and more uncomfortable, although she did not react to any of it. When reminded of the promotion, the manager changes the subject and never really starts the adequate process. What should I do with this information?

**Answer:** You should advise her to immediately report this situation to the Human Resources department or to any other designated interlocutor as per the Speak Up! chapter of this Code. If she fears that if she speaks, she will get further inappropriate remarks from the manager and will never be promoted or worse, dismissed from her job, you are encouraged to carefully report the behaviour yourself and furnish as much factual information as possible.

## 2. Our commitment as a responsible business

We must at all times perform our duties with honesty, loyalty and fairness and ensure that we avoid conflicts of interest or situations of undue influence. We must also abide by all applicable laws, rules and regulations and internal policies that apply to our business in every country of operation. We are committed to principles of good corporate governance which emphasise transparency, accountability, and independence.

We must seek mutually beneficial long-term relationships with customers, suppliers, contractors, regulators and other third parties based on fair, respectful and trustworthy practices.

### / Compliance of our products

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Square Facts operates in the risk & compliance business. Such sensitive work requires a particular, multi-level approach to compliance in order to uphold our Excellence value

Product Compliance at Square Facts is a team effort. We must make sure that the solutions we offer to customers and especially our work methods comply with the best practices in the industry and with all applicable laws and regulations. The way we approach research, product design, IT engineering, or report delivery, and the way we apprehend the selling and marketing aspects are a direct reflection of our own high standards, professionalism, and reputation.

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Thus, before offering a product, we must review, inter alia, the legality of access to and usage of certain information we find, whether it is publicly accessible or not.

Skipping the compliance evaluation of a product not only goes against ethical, contractual, or regulatory obligations but is also frowned upon by industry standards to which we adhere.

We must therefore always comply with any communicated policies or processes relating to product compliance.

**Question:** A client engages Square Facts to perform a multi-jurisdictional Know Your Customer (KYC) screening on a business counterparty. While conducting research, I came across an online database that seems to be providing corporate records information, including data on ultimate beneficial owners (UBO), which is normally hard to find in the sourced jurisdiction. However, upon further analysis of the database's terms and conditions, it becomes clear that the use of the information contained therein is restricted to local public authorities. Moreover, additional legal research indicates that the UBO register in the concerned jurisdiction may not be accessed by the public but only by the entities which are registered with it. For the sake of providing the due diligence report to the client on time, can I go ahead and use this source?

**Answer:** No, you cannot use the information contained within this source.

We must always make sure that the way we access any information on behalf of a client is ethical and lawful, and that there are no technical or legal constraints with regard to the usage of a source we locate. Therefore, using data despite the clear legal impediment associated with the source could not only violate local civil or corporate laws, but also damage intellectual property rights of the organisation or authority maintaining the database.

I should speak with a member of the Legal & Compliance Department before moving forward with signing up, accessing, or paying for data from such a source. Bypassing these critical steps would be going against both our Excellence and Accountability values. The client would appreciate it even more if we go that extra mile to ensure that the information is accessed lawfully, especially since further questions from the client may come down the line, with expectations of full compliance.

### / **Protecting confidential information and intellectual property**

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Due to the nature of our business, we must handle confidential information on an everyday basis. Confidential information includes some of our most valuable assets, such as:

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- Trade secrets, know-how, inventions;
- Pricing policies and information about our products;
- Operation manuals, processes, and procedures;
- Business or strategic plans, including merger, acquisition, or divestiture plans;
- Non-public financial information about Square Facts, our employees, customers, suppliers, or business partners;
- Non-public information about another organisation or person that we learn about in the course of our work or as a result of our position;
- New product, brand or marketing studies, developments, plans, or forecasts;
- Our manner of conducting business and fulfillment methods;
- Partner, supplier, competitor, and customer data, including contact details, orders, specifications, preferences, and subscription lists;
- Agreements signed internally or with any third parties, including terms such as expiration dates, any non-solicitation/non-compete provisions, and financial conditions;
- Legal information, including data or information covered by legal privilege;
- Data that Square Facts has a legal or contractual obligation to protect (e.g., credit card data, healthcare records, or personal data processed in the course of the performance of any service for a client);
- Information about our software, source codes, programs, systems, and infrastructure; Intellectual property and proprietary information owned by Square Facts: Intellectual property and related rights that we create during the course of our employment, whether we create this in the office, at home, or elsewhere, if they are related to company business or created with company resources, those belong to Square Facts and must be duly protected (e.g., copyright notices on all Square Facts materials, information, services or other products intended for public distribution); We also respect the intellectual property of third parties, including competitors, and do not use it in any way that would violate the law or our values.

The above information may be communicated verbally or in writing and may be marked or not, as confidential. In any case, when presented with information, you should apply reasonable judgement in considering whether this information is confidential or not. If in doubt, and before making any assumptions, you are encouraged to reach out to the Legal & Compliance department for help.

## **CODE OF CONDUCT & BUSINESS ETHICS for SQUARE FACTS**

We must never share confidential information with anyone, including people within Square Facts, unless there is a legitimate need-to-know or we are expressly authorised to do so by the owner of that information.

We must protect Square Facts' confidential information during and after our employment, as well as continuously uphold our confidentiality and non-disclosure provisions signed with clients or other third parties

We should remain vigilant and immediately report any unauthorised use of company confidential information, copyrights, patents, trademarks, or other intellectual property of which we become aware to the Legal & Compliance department, as this constitutes a data breach.

### **/ Privacy and information security**

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Considering the nature of our business, we must endorse and show a strong commitment to protecting the privacy of individuals. It is thus our responsibility to comply with applicable personal data protection laws and more specifically, with the European Union General Data Protection Regulation.

Depending on the country where we perform our operations or provide our services, various privacy laws may come into play and govern the collection, use, retention, and transfer of certain information about individuals. We should therefore be careful to adopt a compliance by-design mindset when building new products, technology, or processes. Where we collect and process personal data, we should do so lawfully, transparently, and to the extent that it is strictly necessary to fulfil a specific purpose, as indicated by company policy or by a third party on whose behalf the processing takes place.

Square Facts has established information security policies, as well as privacy policies to protect data, whether it belongs to us, our customers or business partners. This means we should:

- Read, understand and comply with the company's privacy and information security policies;
- Collect, use, retain and transfer information about individuals in accordance with applicable data protection laws and company policies;
- Store information in a safe and secure environment, using company-approved devices. Never leave any documents containing personal data unattended in a public space (desk, printer, open computer screen, etc.); we may consult our clean desk and clear screen policies for more information;

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- Only disclose personal data to those who have a need to know and are bound by confidentiality requirements; signing a non-disclosure agreement or obtaining proper authorization before sharing any confidential or personal information, may be required;
- Respond to individuals' requests for information or to other questions relating to our data handling practices, by following company processes to ensure we do so safely and properly; The Legal & Compliance department must be notified at all times;
- Report immediately to our manager, the Legal & Compliance department or to the Chief Technology Officer, any suspected data breach.

Data protection is a rapidly changing area of law, and each of us should consult the appropriate resources or contact Square Facts' Legal & Compliance Department with any questions regarding the appropriate collection, use, retention, or transfer of information about individuals, including our customers, business partners, marketing contacts, employees, contractors, consultants, and other individuals

**Question:** When gathering information as part of a service ordered by a client, I need to download and save several documents containing an individual's personal data on my work computer's drive, for practical purposes and easier access; I would like to retain the final deliverable to use as a template for next assignments. Furthermore, a newly hired colleague of mine, located in another country who is working on a similar assignment but processing information on a different individual, asks me to send him my report as an example to follow. Should I help?

**Answer:** Where you can fully execute our work within Square Facts' software platform, you are highly encouraged not to download or handle any documents outside that platform. The client has determined a particular purpose and provided instructions for the data processing, which we must strictly observe. Be mindful that you should not retain transaction related documents on your computer drives for longer than necessary to complete your task or reuse these for another purpose, unless expressly required by our manager or any other authority.

Same issue with transferring your work containing personal data to a colleague in a foreign country - we expose ourselves to an unnecessary risk of breaching client confidentiality and data transfer requirements. Thus, it is wise to avoid sending any report containing personal data, unless the document is just an empty template. If unsure, talk to the Legal & Compliance Department.

**CODE OF CONDUCT & BUSINESS ETHICS for SQUARE FACTS****/ Working with third parties**

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During the course of its global business activities, Square Facts may interact with the following third parties: partners (vendors and data providers as per internal classification), service providers (financial advisors, consultants, etc.), back-office suppliers, and customers.

To comply with applicable laws on preventing corruption and money laundering and to protect Square Facts from legal, financial, and reputational risks, we have implemented a Third-Party Compliance Framework embedding compliance steps into our procurement and sales processes.

The framework emphasises our commitment to only work with reputable third parties who share our values and ethical standards, and who, where necessary, have passed adequate due diligence screening and a thorough risk assessment before formalising the relationship in a written contract approved by the Legal & Compliance department. Third Parties categorised as partners are expected to certify and comply with our Partner Code of Conduct, on top of signing our comprehensive standard contractual documentation.

Our responsibility does not end at the onboarding stage – we must monitor appropriate third parties throughout our collaboration by regularly conducting business performance as well as compliance audits to ensure that the third party continues to uphold the quality of their services and the high level of integrity we seek. That is why we should clearly communicate our compliance standards to the third party and outline their associated contractual obligations, from the start.

If you have concerns regarding a third party's practices or an incident has occurred, we must report it through the Speak Up! channels.

For additional guidance, we may refer to Square Facts' Ethics & Compliance Policy.

**Question:** I have an urgent mission to complete for a client. I have swiftly found an in-country partner who has an impressive resume, seems professional, and warrants that they will follow strong ethical practices when performing the service. I believe the due diligence process will be time-consuming, thus it can be skipped, as I will make sure that the partner signs our full standard contractual documentation. Is there still a risk?

**Answer:** Yes, the risk is still there. We are liable for the actions of our third-party subcontractors acting on our behalf and contractual provisions are not enough. Without a due diligence process, we cannot be protected from reputational risk, nor can we escape fines imposed by authorities or damages to be due pursuant to a client's lawsuit. Bear in mind that due diligence is risk-based, thus some screening can be performed quickly and efficiently without compromising our principles and values.



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We must ensure all transactions are properly included in the books and records of Square Facts and are available for audit. Accounting records must be accurate, reliable, true, and in compliance with all applicable accounting standards.

Strong internal controls that Square Facts has implemented must prevent any attempt to create false or misleading records, conceal malfeasance or other information from the company's auditors or regulatory agencies.

As a largely information-based business, Square Facts generates numerous business records. These records must be stored and disposed of according to strict legal and regulatory requirements. When we can access records in a timely fashion, we provide better service to our customers and business partners, avoiding audit, regulatory, or litigation issues. At the same time, records kept past their disposal dates may create some information security, privacy, or legal risks.

To prevent these risks, we must:

- Consistently organise our filing, storage, and retrieval of records;
- Use the proper storage method indicated by company policies;
- Protect records from loss, damage, or deletion, and back them up regularly, where allowed;
- Retain all records related to any pending or threatened litigation or government investigation until otherwise directed by the Legal & Compliance department; be aware that it may be a criminal offence to destroy or falsify documents or e-mails related to a legal proceeding;
- Dispose of all records (electronic and physical) according to retention and disposal schedules.

**Question:** A colleague asked me to approve the payment of a very large amount to an important client. He says the sum represents a refund from past overcharged services but is not able to substantiate the claim with documented proof. At the same time, I remember that this colleague has been stressed lately, as the client had previously threatened to terminate business with us. Should I comply with the request?

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**Answer:** No, you should not comply with this request. This may well be an improper payment that the colleague tries to conceal by providing misleading information and for the purpose of regaining the client's business. Reporting this through the Speak Up! channels would be the best course of action.

### / Preventing anti-competitive behaviour

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Square Facts believes in fair competition and achieving success, not through market manipulation, but by competing openly and offering high-quality products at reasonable prices. Open competition paves the way for constant market innovation and ensures customers' access to best-in-class services.

We must comply with all applicable competition laws and should remain careful to avoid participating in unlawful business practices such as:

- obtaining corporate intelligence through illegal means;
- market dominance;
- entering into pricing arrangements, bid-rigging;
- allocating market shares with competitors;
- exchanging sensitive commercial information that could weaken competitors;
- force unfair restrictions onto suppliers or clients

Excluding such practices from our business is not only a legal obligation but constitutes, in itself, a demonstration of our ethical behaviour, which will reflect positively on our reputation, and will help us live by our Accountability value.

If you are in a meeting or at a conference where competitors, customers, or other third parties engage in a potentially inappropriate discussion, be vocal about your unwillingness to participate in it due to its unethical or even illegal nature. Leave the conversation and notify your manager and/or the Legal & Compliance department.

## CODE OF CONDUCT & BUSINESS ETHICS for SQUARE FACTS

### / Conflicts of interest

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A conflict of interest may occur when our personal interests conflict with the interests of Square Facts, a situation that could impact our ability to act objectively

We must always act in the best interests of Square Facts and avoid any situation where our personal interests, or interests of friends or members of our family, may be in conflict with our obligations to Square Facts.

A few examples of situations that could give rise to a conflict or an appearance of a conflict of interest:

- Hiring or supervising family members or close friends;
- Us or a close relative having direct or indirect ownership or financial interest in a customer, partner, supplier, or service provider or holding a position as director, officer, legal representative, a colleague of, or consultant to a customer, partner, supplier, or service provider;
- Being employed by any organisation outside Square Facts on a regular or consulting basis;
- Engaging any outside individual or organisation (partner, supplier, service provider, etc.) in which we have a personal interest to undertake any work for Square Facts.

To appropriately deal with a conflict, we must be transparent and disclose, in writing, any situation, personal or professional relationships, that might create a conflict, to our direct supervisor and to the Legal & Compliance department for approval, handling, and resolution.

It is each manager's responsibility to escalate to the Legal & Compliance department which shall keep a register of any such conflicts for monitoring purposes.

For additional guidance, we may refer to Square Facts' Ethics & Compliance Policy

**Question:** My team has been assigned with finding a new supplier. At the end of the supplier selection process, we must choose between two providers. After requesting basic information from one of the potential suppliers, I found out that my brother-in-law sits on its board of directors. Should I push my colleagues to choose this supplier by expressing my vote of confidence towards it?

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**Answer:** This situation constitutes at the minimum an appearance of a conflict of interest, and you should disclose this family link to your manager and the Legal & Compliance department before going further with the procurement. To ensure objectivity in the business decision making, you should recuse yourself from participating further in the selection process and further meetings.

### / Protecting our assets

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Square Facts provides us with computers, phones, office supplies, and facilities for the purpose of helping us all maximise our performance as individuals, as a team, and as a business. By respecting these assets, we ensure they remain accessible and fully functional when our customers and colleagues need them. We also help make sure company time and resources are used on positive initiatives, not on fixing preventable issues.

We must use company assets for legitimate and authorised business purposes only. We consider misappropriation, carelessness, or waste of assets to be a breach of our duty and the taking of assets from company property without permission to be a theft.

This means we:

- Access company systems or information only when we are authorised and enabled to do so;
- Never use company assets for illegal activities;
- Never use company funds or credit cards for personal gain or for a misguided purpose;
- Limit personal use of company assets to when it does not interfere with our work and does not violate this Code;
- Prevent improper third-party use of company property;
- Should not transfer confidential information onto a portable storage device such as a memory stick; not only does this increase the risk of loss or theft, resulting in a data breach, but it is also contrary to our information security policies;
- Immediately report any loss, theft, misuse, damage, or waste;
- Stop using all Square Facts assets in our possession or such that we have access to and return them if we leave the company.

## CODE OF CONDUCT & BUSINESS ETHICS for SQUARE FACTS

### / Responsible communication

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We must use company information and communications systems properly. This means we:

- Limit personal use of e-mail, internet, and personal phones;
- Do not access, download, or send material that is offensive, harassing, explicit, or otherwise inappropriate for work unless we are authorised to do so as part of our job;
- Avoid careless, exaggerated, or inaccurate statements that could be easily misunderstood or used against Square Facts in legal proceedings;
- Proofread before we hit “SEND”;
- Do not use personal software on work devices or download or redistribute copyrighted material, such as music and software, unless legally permitted;
- Never use unauthorised peer-to-peer software to share copyrighted materials;
- Never share user IDs, passwords, access details, software, services, or authentication devices (e.g., Secure ID tokens) that are intended for individual use to gain access to a system;
- Remain cautious when opening email attachments and follow the process of “think before you click” as well as the instructions from the Information Technology department;
- Respect company security controls and access information only within our authorised level;
- Use personal devices to store or access company data only with prior approval from our manager;
- Report any suspected breaches or incidents to the Chief Technology Officer or to the Legal & Compliance department.

**CODE OF CONDUCT & BUSINESS ETHICS for SQUARE FACTS****3. Our commitment as a corporate citizen**

We all have a role to play in reaching the goal to generate greater corporate and social integrity, strong morals and ethical standards. We advocate social responsibility and accountability at every level, abiding strictly by the law and striving to improve the quality of life within the communities that surround us.

**/ Anti-bribery and corruption**

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Square Facts has zero tolerance for any form of corruption or influence peddling, regardless of local practices and the amount of the bribe. We are committed to complying with all applicable anti-bribery laws, living up to our integrity standards. This principle may result in the refusal of certain commercial opportunities

Bribery is when a person offers, promises, or gives another person (who may be a public official) a benefit directly or indirectly (e.g., through a third party) to influence that person to perform their job improperly, or as a reward for doing so. Asking for, agreeing to receive, or accepting such a benefit is also considered bribery. It does not matter if the bribe is offered or accepted by the other party. It is still a bribe

Influence peddling, associated with corruption, can be defined as offering directly or indirectly, donations, gifts, or other rewards to a public official, so the latter would abuse his/her position or influence to gain an undue advantage.

We must never directly or indirectly through a third party arrange, offer, or accept a bribe or a kickback in any form:

- to or from customers, partners, contractors, suppliers;
- to or from any government or public official or other persons in positions of authority able to exert improper influence on business transactions.

We also forbid facilitation payments which are “grease” payments, considered small bribes made to expedite a routine action or process.

Some excessive gifts, entertainment, or hospitality offerings can be associated with bribery, especially if offered during negotiations.

## CODE OF CONDUCT & BUSINESS ETHICS for SQUARE FACTS

We must regularly monitor and audit our third parties' practices, as they are a direct reflection of Square Facts and our standards. Business with those partners who do not rise to our level of compliance should be terminated.

For additional guidance, we may refer to Square Facts' Ethics & Compliance Policy.

**Question:** As part of a service package, a client has requested Square Facts to conduct a rather sensitive mission, involving reputation inquiries and likely interactions with public officials, in a jurisdiction known for its high corruption rate. I am discussing the assignment with our in-country partner who will assist us locally to execute the work. Given the short timeframe provided and the specific information sought by the client, the partner, who is an expert in the concerned jurisdiction's practices, tells me that it is customary to bring all kinds of "small" gifts to the local contact persons as a way of saying "thank you" for the help and information provided. To formalise this, the partner even suggests increasing their fees to include a bottle of champagne into the out-of-pocket expenses, to give to the source.

I want this mission to go smoothly and quickly; should I agree with this proposal?

**Answer:** No, you should not go forward with it. Square Facts is liable for the actions of its subcontractors. The suggested gift – no matter how big or small its value might be, and despite how legitimate this local custom may seem - is completely inappropriate in this context, as it can be perceived as and even constitute active indirect (via a third-party vendor) corruption. Offered before or after providing the requested information, such a gift would undoubtedly exercise undue influence upon the public official especially if he/she would expect such an improper contribution. We impose our zero-tolerance policy for corruption on all our partners, and if they do not comply, we should terminate the business relationship. Whenever a partner makes such a suggestion or otherwise acts against our Code and the law, we should report it through the Speak up! channels.

### / Combating money laundering and the financing of terrorism

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Money laundering is the process by which funds generated through criminal activity (such as terrorism, drug dealing, or fraud) are processed through commercial transactions in order to hide the source of the proceeds, avoid reporting requirements or evade taxes. Illegally originated funds are then re-injected into legitimate economic circuits to make them appear licit.

The financing of terrorism is the act of furnishing or gathering funds, by any means, directly or indirectly, with the intention of such funds being used, or knowing that they shall be used, in full or in part, for the purpose of committing a terrorist act.

## **CODE OF CONDUCT & BUSINESS ETHICS for SQUARE FACTS**

We follow all applicable anti-money laundering and anti-terrorist financing laws and do not condone or facilitate money laundering.

You must be vigilant to not be used by risky third parties who would be trying to integrate their illicitly obtained funds into a contracting scheme with Square Facts.

In this context, the Legal & Compliance department shall guide us through the applicable due diligence process and, where necessary, additionally enquire about the origin of the funds. Further due diligence controls and screening can be envisaged to ascertain the integrity of the third party.

For additional guidance, you may refer to Square Facts' Ethics & Compliance Policy.

### **/ Fighting against modern slavery**

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Modern slavery is the severe exploitation of other people for personal or commercial gain. Forced, undeclared labour, human trafficking, and child slavery are forms of modern slavery, where vulnerable people are being controlled with threats or violence and pushed into working in exploitative conditions.

Given the nature and international reach of Square Facts' work, and as we are constantly improving our products and services, providing new ways to obtain actionable data for our customers, we must be vigilant when collaborating with a source or provider, especially if they are located in a country where governments or laws do not offer adequate human rights protection.

Square Facts does not tolerate any type of human rights abuse, within our organisation or throughout our supply chain.

We are committed to helping fight human rights infringements by only working with business partners who share our values, commitment, and corporate social responsibility goals.

### **/ Trade compliance**

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Trade compliance is critical in today's global market. The European Union and the United States have implemented various regulations governing the import/export of goods and services, imposing trade embargoes and economic sanctions on specific countries, persons, and entities.



## **CODE OF CONDUCT & BUSINESS ETHICS for SQUARE FACTS**

Considering Square Facts' worldwide reach, it is crucial that we ensure compliance with those export control regulations and sanctions regimes

Such regulations do not prohibit Square Facts from simply gathering informational materials from the concerned jurisdictions for the purpose of providing information services to customers.

However, we must never execute any kind of payment - directly or through third parties - to entities or persons located in the countries subject to the restrictions

We should carefully evaluate any business opportunity in such jurisdictions and consult the Legal & Compliance Department for a case-by-case assessment, prior to moving forward.

### **/ Insider trading**

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While providing our services to various customers which may be financial institutions or publicly traded companies, we should stay alert when gaining access to certain non-public information which can impact the share price of a corporation. Such information is considered “inside information”, the use and breach of which are punishable by law.

We must therefore maintain strict confidentiality when handling the below type of data and never sell or buy securities from that company when possessing this information:

- financial forecasts
- sales results
- changes in the leadership
- information on mergers and acquisitions
- on-going lawsuits

If you are in doubt, you may seek assistance from the Legal & Compliance department.

## CODE OF CONDUCT & BUSINESS ETHICS for SQUARE FACTS

### **/ Environmental sustainability**

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Square Facts exercises its best efforts in complying with applicable local health and environmental laws.

We strive to be environmentally responsible by promoting responsible travel, adopting ethical environmental practices at our premises with respect to equipment and consumption of resources, supporting policies such as paperless office (e.g., printing documents only when absolutely necessary) and recycling, to protect and preserve the environment in the countries where we do business.

In the course of our business, we aim to reduce the environmental impacts of Square Facts' products, services, and technology throughout their life cycles, including design, procurement, manufacturing, use, and end-of-life

We make sure to assess the risks of any material we bring into our premises or use in the course of business.

By adopting these standards internally and encouraging our supply chain to do the same, we help reduce our footprint and mitigate environmental or safety risks.

### **/ Corporate political activity**

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We are politically unbiased and do not associate with political parties, nor do we support any activity that is organised by or contributes to any political party.

We should not use any company facility, equipment, resources, or funds to support, directly or indirectly, any political party, individual politicians, or associates representing a political opinion, whether as a way of obtaining improper advantages in business transactions or for any other reason.

### **/ Code Acknowledgement**

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As stated in our Code, adherence to the law and the highest ethical standards of integrity is the foundation of everything we do. Meeting this standard and complying with all applicable laws and regulations require a commitment from each of us.

**CODE OF CONDUCT & BUSINESS ETHICS for SQUARE FACTS**

I acknowledge that I have read and understood our Code, and I agree to abide by its provisions. I agree to complete any required training in a timely manner. I understand that a violation of the law, our Code, or company policies may result in disciplinary action(s) in accordance with local laws and internal procedures.

**Signed by:**

Signed by:  
*James Osborn*  
A6733211A5FF471...

**First Name:** James Osborn \_\_\_\_\_

**Last Name:** James Osborn \_\_\_\_\_

**Position:** CEO \_\_\_\_\_