



DECODO

# Code of Ethics

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This Code of Ethics captures our core values and how we operate. Each of us plays a role in setting the standard for ethical behavior. By living these values and holding ourselves and others accountable, we contribute to a workplace culture that fosters trust, growth, and long-term success. This Code of Ethics represents our strong and consistent commitment to ethical conduct, legal compliance, and social responsibility in all that we do.

Every individual associated with the Decodo, whether an employee, contractor, or executive, is expected to uphold these principles. By aligning our values with our actions, we ensure that our business practices remain transparent, fair, and sustainable, building confidence and credibility with clients, regulators, and the communities we serve.

# 1

## Core Values

The way we act and make decisions is shaped by the beliefs we hold as a company. These shared values influence how we treat each other and approach our work every day.

- **Respect for Individuals.** We value every person's dignity and are committed to fostering fairness, inclusion, and respect in all our interactions.
- **Trustworthiness.** We uphold our commitments and demonstrate integrity in all aspects of our work and interactions.
- **Transparency.** We ensure openness and clarity in our processes, enabling stakeholders to understand and evaluate our actions and decisions.
- **Commitment to Excellence.** We pursue the highest standards of performance while maintaining ethical conduct and accountability.
- **Long-Term Responsibility.** We act with foresight, considering the broader environmental and social impact of our choices to promote sustainability and ethical progress.

We strive to build a culture at Decodo where these values are consistently reflected in everything we do. This ethical vision is embedded in our strategic goals, policies, and daily business conduct, serving as a moral compass for all.

# 2

## Respect for People and Human Rights

We acknowledge and uphold the fundamental dignity and rights of every person. As part of our commitment, we align our practices with global frameworks, including the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organization standards.

Discrimination, harassment, and systemic bias have no place at Decodo. Any complaints will be promptly investigated with discretion and respect for all parties involved. We also support public initiatives and industry collaborations that advance human rights, equity, and social responsibility.

# 3

## Safe, Fair, and Inclusive Work Environment

We strive to maintain a workplace that is safe, inclusive, and empowering. Safety extends beyond physical protection to include mental and emotional well-being. This includes access to mental health resources and ongoing education around wellness.

Decodo upholds fairness by ensuring that employment opportunities, advancement, and evaluations are determined solely by job-related qualifications and performance. We promote a transparent and supportive work environment through structured career development, mentorship initiatives, and accessible communication channels, including feedback mechanisms.

# 4

## Legal Compliance and Ethical Behavior in Business

Operating within the law is the baseline, going beyond compliance to act with integrity is our goal. We adhere strictly to all applicable local, national, and international laws and align our business operations with the highest ethical standards.

Our anti-corruption policies prohibit offering or accepting bribes or any improper advantage. Employees shall avoid any actions or relationships that could lead to, or even appear to lead to, a conflict of interest.

All employees are required to review and sign compliance documentation and complete annual training to ensure understanding of relevant legal and regulatory obligations. We regularly audit internal processes to identify and address any vulnerabilities.

# 5

## Financial Accountability and Anti-Fraud

We are committed to accuracy, honesty, and transparency in our financial management. Our financial policies are designed to prevent misreporting, fraud, and embezzlement.

All financial records, from expense reports to annual budgets, must reflect genuine transactions and follow accepted accounting principles. Deliberate misrepresentation or concealment of financial data is a serious violation and will lead to disciplinary measures.

Our finance and risk management teams collaborate closely to monitor transactions and ensure ongoing compliance with anti-fraud frameworks.

# 6

## Data Ethics and Information Protection

In an age of data-driven decision-making, protecting sensitive and personal information is paramount. We comply with all major privacy laws, including GDPR, CCPA, and equivalent international regulations.

We only collect data that is necessary, and we process it with clear purpose, fairness, and accountability. Technical and organizational safeguards are in place to prevent unauthorized access, alteration, or loss.

All employees are trained in data protection protocols and are expected to follow strict guidelines when handling client, employee, or Decodo information. Breaches or suspected misuse shall be reported immediately.

# 7

## Environmental and Social Responsibility

At Decodo, we are committed to conducting our business with environmental and social responsibility in mind. We aim to minimize our ecological impact by promoting efficient resource use and incorporating sustainable practices across our operations.

As a technology company, we remain mindful of the environmental implications of our systems and processes, continuously seeking ways to improve efficiency and reduce unnecessary waste.

Our social responsibility also extends to supporting broader societal goals, including engagement through meaningful initiatives, donations to social causes and communities, and collaboration with nonprofit organizations.

# 8

## Ethical Sourcing and Third-Party Integrity

Supplier evaluations and audits are conducted regularly to verify compliance and encourage improvement. We avoid working with parties that pose reputational or ethical risks, and we provide channels for third parties to report ethical violations related to Decodo.

Employees shall promptly report any suspected violations or concerns, cooperate with audits or investigations, and refrain from participating in or facilitating any activity that could compromise Decodo's ethical standards.

# 9

## Monitoring and Continuous Improvement

Our ethics and compliance program includes regular training, monitoring, and assessment. Employees receive onboarding and refresher courses on key topics including anti-corruption, data privacy, and inclusion.

We actively encourage employees to propose improvements to ethical policies or procedures. Our teams conduct assessments, and leadership reviews findings to ensure accountability and adapt policies accordingly.

A learning culture is vital to ethical maturity. We provide ongoing resources such as newsletters, surveys, and workshops to reinforce ethical behavior at every level.

# 10

## Speak-Up Culture and Whistleblower Protection

We promote a culture where speaking up is not only safe but encouraged. Any person-employee, contractor, or external stakeholder-can report unethical conduct using our secure Speak-Up platform.

All reports are treated confidentially, and the Decodo guarantees protection from retaliation. Investigations are managed by our Risk Team, and findings are addressed promptly with fairness and transparency.

Our whistleblower policy reflects global best practices and regulatory guidelines, and is periodically reviewed to ensure it continues to provide robust protections.

# 11

## Enforcement and Accountability

Every employee is accountable for understanding and adhering to this Code. Managers are responsible for leading by example and fostering ethical behavior within their teams.

Violations of the Code may result in consequences ranging from verbal warnings to termination and, where applicable, legal action. We ensure consistent and impartial enforcement, regardless of position or tenure.