

# EMPLOYEE CODE OF CONDUCT

This **Code of Conduct** is prepared by \_\_\_\_\_ (the "**Company**") to provide a safe and respectful environment for all its employees.

## 1. Scope

Our Code of Conduct provides guidance on how we should conduct our business for the benefit of all employees, colleagues, customers, and all shareholders.

This Code of Conduct is aiming to present basic standards of our business, expected behaviors and sanctions for unexpected behavior, reporting procedure, policies on confidentiality and cybersecurity, sustainability policies and enforcement procedure of this Code of Conduct. All employees are expected to use their best judgment and to behave in a manner that is consistent with the values and principles of the organization.

The Company designed this Code of Conduct to promote a safe and respectful environment for all members, and to ensure that all individuals are treated with dignity and respect. It is important that all members familiarize themselves with the code of conduct and adhere to its principles at all times.

After careful examination of this document, each employee can consult the Human Resources department or the unit manager about any issues that he or she thinks are not clear about the content of the document.

## 2. Basic Standards

In addition to the expected behaviors that will be explained in detail below, the necessity of arranging general principles has arisen.

The most significant part of our Company culture is respect for others. We respect diversity and value everyone regardless of their race, gender, religion, sexual orientation or any other aspect of their being. Discrimination and harassment will not be tolerated.

One other expectation of us from all our employees is professionalism. This includes refraining from using offensive language, making personal attacks, or engaging in behavior that disrupts the workplace.

We believe that everyone is responsible for their own actions and behavior. Therefore, we expect our employees to be aware of what they are doing and take responsibility for their actions and any consequences that may arise from them.

Lastly, we expect from all our employees to comply with the applicable laws and regulations, including data privacy, intellectual property, discrimination and harassment. At this point, we would like to emphasize that not knowing about the applicable law is not an excuse. Please consult our Compliance Department if you have any questions.

### **3. Expected Behaviors**

As a Company that strongly believes in the power of teamwork, the first behavior that the Company expects from all its employees is collaboration. All employees are expected to work together in a constructive and positive manner.

Do not be afraid of making mistakes. However, you are expected to admit mistakes, take steps to correct them, and take required measures for any harmful results. If we learn the necessary lessons, we will correct our mistakes together.

Regular feedback is our golden key. We would like to state that you are expected to provide regular feedback to your subordinates. Your superiors will also give you regular feedback. We should see constructive criticism as an advantage to develop.

Although we have a comfortable working environment, you are expected to work with self-discipline. You should comply with the working hours and use the time you spend at the workplace efficiently. By sticking to deadlines, you are expected to benefit your own development and Company's growth.

## 4. Sanctions for Unexpected Behavior

- **Warning** - In the case of a minor violation of our code of conduct, the employee may receive a warning from the Human Resources department. The warning will outline the specific behavior that violated the code of conduct and provide guidance on how to correct the behavior.
- **Suspension** - In the case of repeated violations of the code of conduct or a more serious violation, the employment agreement shall be suspended for a specific period of time. During this time, the employee will not be allowed to enter the workplace and shall not be paid for that period.
- **Termination** - In the case of a severe violation of the code of conduct, or repeated violations despite previous warnings or suspensions, the employment agreement may be terminated from the community. This means that the individual will no longer be allowed to participate in any community activities or events and will be removed from all community platforms.
- **Legal Action** - In cases of illegal behavior or behavior that threatens the safety or well-being of others, the Company may take legal action against the employee responsible. In case of employee's behaviors against cybersecurity and confidentiality, the Company may also take legal action against the employee.

These sanctions will be determined by the Discipline Committee, on a case-by-case basis, taking into account the severity and frequency of the violation, the impact on the Company and the colleagues. The Discipline Committee has exclusive competence in determining the appropriate sanction for any violation of our code of conduct.

Our goal in implementing sanctions for unexpected behavior is to create a safe and inclusive workplace where all employees can thrive and contribute to the best of their abilities.

## 5. Reporting

We take all reports of violations of our Code of Conduct seriously. If you witness or experience any behavior that violates our Code of Conduct, we encourage you to report it immediately.

You can directly email to the Human Resources Department if you witness any violating behavior. Also you can report via online reporting form that will be sent to you upon your request. Lastly, you can report directly to your manager. We will keep you informed of the status of your report throughout the process, if

## 6. Confidentiality and Cyber-Security

You may be involved with work pertaining to services provided by Company and/or during your employment you may have access to confidential data and information pertaining to persons and/or entities receiving services from Company. The company have a legal obligation to protect all such confidential data and information in its possession, especially data and information concerning health, criminal and welfare recipient records. The Company must ensure that you, too, will protect the confidentiality of such data and information. Consequently, you must sign a Confidentiality Agreement as a condition of your employment. Please read this agreement and take due time to consider it prior to signing. As a part of Code of Conduct, please consider that you are under obligation to keep all related information confidential.

The Company has taken all technical and organizational measures necessary to protect the information systems and data used in connection with the operation of the Company's businesses. Without limiting the foregoing, the Company has used reasonable efforts to establish and maintain reasonable information technology. We do not use company systems for personal activities that interfere with the operation of the network or that generate costs for Company. We never use Company property to engage in outside commercial activities, illegal activities (including illegal software downloads), or other activities that could reflect negatively on Company. The Company may access any information stored on computers and systems for legitimate business purposes, as allowed by law.

We advise you to keep your company-issued computer, tablet, and cell phone secure. Keep all devices password-protected and install security updates for browsers and other systems as soon as updates are available. Follow all instructions for disk encryption, anti-malware protection, and password management that you received along with your equipment.

## 7. Sustainability

We are committed to promoting sustainable practices in all aspects of our Company. We believe that sustainability is essential to ensuring a healthy and equitable future for all and we are trying to raise awareness among our employees.

As a member of our Company, we ask you to reduce waste, conserve resources and choose sustainable products. Please be mindful of your waste and try to reduce it wherever possible. Please turn off lights and electronics when not in use, as well as conserving water and energy. In addition to promoting sustainable practices, we also strive to reduce our carbon footprint and offset any emissions we do generate.

We believe that sustainability is a shared responsibility and ask that all members of our community help us promote sustainable practices. If you have different ideas or demands to protect nature, please do not hesitate to share your ideas with us.

## 8. Acknowledgement

I, \_\_\_\_\_, have received, read and understand Company's Code of Conduct. I hereby agree to comply with the Code of Conduct during my employment. Otherwise, I declare that I know and accept the sanctions that will be imposed on me.

**Employee's Name**

**Date**

**Signature**

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