



delaware
we commit. we deliver.



living our values to positively
impact the world we live in
delaware's ethical code

delaware believes in an international, intercultural and intergenerational company - eager and warm - that lasts through time.

In realizing our dream, we are guided by our purpose and values that form the foundation of our everyday behavior.



Eric Hiernaux
global managing partner



This ethical code provides the #peopleofdelaware, our suppliers, our customers and all our business partners a framework for doing what is right. This code is firmly rooted in our purpose to positively impact the world we live in and builds further on our shared values that have guided us since delaware was founded in 2003.

Our purpose

We are a partnership of stewards, realizing a dream for today, tomorrow and succeeding generations.

We enable our people, our company and our customers to reach their full potential combining our skills, our values and best-in-class technology.

We want to positively impact the world we live in.

Our values

- **Entrepreneurship** - we cherish creativity and drive
- **Respect** - we embrace differences
- **Team spirit** - we are better together
- **Care** - we take responsibility
- **Commitment** - we are determined

putting our ethical code & values into action

5 guiding principles

The delaware Ethical Code establishes a fundamental framework for ethical behavior, empowering all #peopleofdelaware to make the right decisions and uphold the delaware values. It also sets the expectations for our suppliers, contractors, consultants, and other business partners.

At delaware, acting with integrity and respect means following our 5 guiding principles for ethical behavior:

we commit to

- 1 respecting people
- 2 operating with integrity
- 3 conducting business responsibly
- 4 protecting our assets
- 5 encouraging open communication and speaking up



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we commit to respecting people

Our commitment

Fostering & maintaining a safe and healthy working environment

Fair and equal treatment

It is our commitment to treat all employees, job applicants, contractors, and individuals under our supervision fairly and equally, without discrimination based on race, gender (identity or expression), religion, sexual preference, disability, pregnancy, political affiliation, union membership, national or social origin, age, or any other characteristics protected by law. We provide equal opportunities in recruitment, hiring, training, promotion and compensation.

Zero tolerance for any form of harassment, abuse or intimidation

We have a zero-tolerance policy for any form of (sexual) harassment, physical or verbal abuse, mental or physical intimidation, retaliation, or any kind of aggression or bullying. We expect everyone to contribute to a workplace that is free from inhumane treatment.

Respect for human rights

Respect for human rights is paramount to us. This encompasses a wide range of rights, including freely chosen employment, children's rights, women's rights, minority rights, and the rights of migrant workers.

We strictly prohibit forced, (debt) bonded or indentured labor, involuntary or exploitative prison labor, child labor, slavery, or trafficking of individuals. We ensure that all work within delaware is voluntary and not subject to mental or physical oppression or duress.

Fair and balanced compensation and benefits

Compensation and benefits are consistent with the provisions of all applicable wage laws, including those relating to minimum wage, overtime hours, and legally mandated benefits. We do not permit excessive or consecutive short-term contracting arrangements with the same employee solely to avoid providing regular employment.

Protection of data & privacy rights

We value and respect the privacy rights of our employees, customers, suppliers, and all individuals whose personal data we process. Personal data is protected and managed in an ethical, fair, and lawful manner, in accordance with delaware's privacy policies and in compliance with applicable laws and regulations.



we commit to operating with integrity

Our commitment

Maintaining a strong culture of integrity and compliance

Preventing improper influence

We are committed to preventing any improper influencing of others or allowing others to improperly influence us. At delaware, we do not tolerate bribery, corruption, or the offering or receiving of improper gifts and entertainment. Furthermore, we actively avoid any form of conflict of interest and strictly refrain from making monetary contributions to political parties on behalf of delaware.

Zero Tolerance for fraud

We maintain a zero-tolerance policy toward any form of fraud. This includes the manipulation of information, documentation, or records. Recognizing the critical importance of honest and ethical conduct, we ensure the fair, accurate, timely, and understandable preparation and publication of financial and non-financial statements, in compliance with legal and regulatory requirements. We do not make false or misleading claims or statements in any of delaware's financial reports, monitoring reports, or other documents submitted to government agencies and investors, or published on any media, including advertisements. The #peopleofdelaware are expected to promptly report fraud or any suspicion of it.

Fair business and competition

While we compete vigorously, we always uphold the standards of fair business and fair competition. delaware strictly prohibits any form of conduct that is deemed illegal under applicable competition laws.

Authorized commitments and obligations

We ensure that commitments and obligations made on behalf of delaware are authorized at the correct management level. Our delegation of authority rules provide employees with clear guidance on when and if they can make written or verbal commitments on behalf of the company.

Compliance with export controls and sanctions

As we export, re-export, transfer, broker, finance, sell, and purchase software and services, we uphold our responsibility to comply with the relevant export controls, sanctions laws and regulations. We classify software to identify controlled status and possible restrictions, implementing the necessary requirements and restrictions applicable to the countries, business partners, and individuals with whom we engage.

Preventing money laundering

We do not engage in any process that involves concealing the proceeds of illegal activities, such as crime or terrorism. At delaware, we strictly refrain from attempting to make the sources of illegal funds appear legitimate (money laundering). Any suspicious transactions are promptly reported to prevent money laundering.





we commit to conducting business responsibly

Our commitment

Conducting business responsibly, enabling sustainable growth while fulfilling legal and moral obligations

Safety first

We are dedicated to creating a safe working environment by implementing comprehensive guidelines and procedures. We take proactive measures to prevent, manage, track, and report work-related incidents or illnesses. In case of incidents, we diligently investigate and implement corrective and mitigating measures, ensuring a safe return to work for our employees.

Social, environmental and economic responsibility

We hold ourselves accountable for the impact of our activities on society, the environment, and the economy while fulfilling our moral and legal obligations. Sustainability is an integral part of our business. Balancing the needs of society and the planet while remaining focused on our business and stakeholders is the foundation of our sustainability strategy.

Collaboration for sustainable technology

delaware collaborates with its technology partners to uphold the principles of sustainability. We actively encourage our supply chain partners to meet the sustainability requirements outlined in the UN Sustainable Development Goals agenda. Together, we strive to ensure that technology solutions contribute positively to a sustainable future.

Enriching communities

We are deeply committed to making a positive impact on the communities in which we operate. By giving back to society, we create additional social value. Our approach to community involvement is rooted in collaboration, consultation, and partnership. Through the delaware CSR task force we have initiated and continue to launch various initiatives regularly. These efforts allow us to have a meaningful and positive influence on our broader environment.



we commit to protecting our assets

Our commitment

Safeguarding our assets and fostering a culture of shared responsibility

Responsible use of delaware and customer assets

We expect all individuals entrusted with delaware assets to use them in compliance with the law, our company policies and guidelines mandated by our customers. Unauthorized use of delaware assets, including IT hardware, electronic communication services (such as email and internet access), without proper authorization, poses a serious risk to delaware and must be avoided at all times.

Any use of delaware or customer assets to generate, access, display, or disseminate material that violates or promotes the violation of this Ethical Code may be reported to the relevant authorities. To protect our assets, delaware reserves the right to access and disclose electronic communication in accordance with national and international privacy rules. Individuals will be held accountable for all actions performed through their user account.

Ensuring confidentiality

While we acknowledge that delaware's operations are highly dependent on reliable information processing, it is also of utmost importance that the security, integrity, and confidentiality of all our data and those of our stakeholders are safeguarded.

Preventing unauthorized disclosure of information

We are fully committed to preventing unauthorized disclosure of information belonging to delaware, our customers, or our suppliers. Such disclosures can adversely affect our relationships with customers and suppliers. Any potential or actual information leakage should be promptly reported in accordance with our Ethical Code and, where appropriate, in accordance with the guidelines imposed by our customers.

Upholding quality

Quality is deeply engrained in all our activities at delaware. It is an integral part of our leadership in IT and management consulting services. We foster a company-wide culture of quality to ensure we deliver high-level solutions to our customers, continuously improve our expertise, and maintain the dedication of our suppliers and our people.



we commit to encouraging open communication and speaking up

Our commitment

Fostering an environment of trust and open dialogue

Speak Up policy

delaware has a Speak Up Policy which is applicable to everyone working for or on behalf of delaware worldwide. This policy is also accessible to any individual or party with whom delaware has or had a business relationship (such as business partners, suppliers, contractors, visitors, shareholders, agents, distributors, representatives, and customers). The Speak Up Policy outlines when, how, and where someone can raise concerns about suspected violations with confidentiality, respect for privacy, and without fear of retaliation.

Anonymous reporting through the Speak Up channel

Any concerns can be reported anonymously through our Speak Up channel which is managed by an external and independent provider. This channel acts as a confidential, secure, and anonymous (if necessary and possible within the respective jurisdiction) communication channel between the reporter of a concern and the independent case handler appointed by the Audit & Risk Committee.

Encouraging speaking up

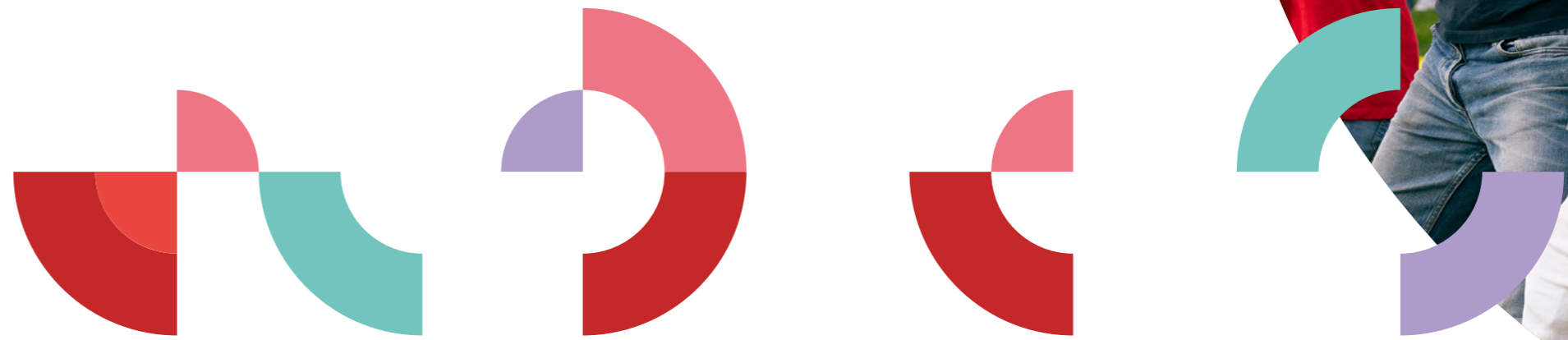
At delaware, we highly value and encourage employees who identify potential violations and speak up. By speaking up, they provide delaware with the opportunity to address the issue proactively. Remaining silent about possible misconduct can exacerbate the situation and decrease trust.

Zero tolerance for retaliation

We have a zero-tolerance policy towards any form of retaliation. Those who speak up will be protected. Concerns raised will be treated confidentially and, if necessary, anonymously. We do not tolerate any form of retaliation or adverse consequences against employees who raise concerns about suspected violations in good faith, even if delaware experiences business implications as a result.

Serious investigation of (suspected) violations

delaware takes (suspected) violations of the Ethical Code seriously and will conduct thorough investigations accordingly. Our Speak Up policy outlines what can be expected when speaking up and the possible steps that will be taken after a concern or ethics complaint was raised. Appropriate action will be taken if a violation is confirmed.



Positively impacting the world we live in

We take great pride in our accomplishments as a partnership of stewards. Our continued success and its contribution to society heavily rely on the skills, commitment, and behavior of our people. Therefore, we expect every employee to embrace delaware's ethical principles, consistently demonstrating integrity and respect in all endeavours.

As a global company we deliver advanced ICT solutions and services, guiding our customers through their business and digital transformations. We provide them with the tools to achieve their mission-critical priorities.

Above all, we want to do the right thing. We deliver enterprise expertise that enables our customers' businesses to reach their full potential, while creating a positive impact in a challenging world. In addition, we take responsibility for our relationship with the social and ecological environment.

**We make it happen. You can rely on us.
we commit. we deliver.**

For a comprehensive understanding of our ethical code, please refer to the full binding version - [accessible here](#).
In addition, the full binding version of our speak up policy - [accessible here](#).