



mindwrk

CODE

OF

CONDUCT



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Introduction

The MNDWRK Code of Conduct (CoC) incorporates a list of core values, integrity policies, and ethical guidelines (referred to as principles from now on) for all MNDWRK employees, managers, and executives (referred to as MNDWRK staff members from now on). MNDWRK staff members must acknowledge and abide by all principles defined in the CoC to clearly understand the company's expectations and approach personal and business-related circumstances accordingly.

Decision making and the CoC

The MNDWRK CoC provides precise guidelines for the MNDWRK staff regarding ethical decision-making in accordance with the MNDWRK principles. When making a decision, always consider the following:

- Is it legal what I'm about to do?
- Does it comply with the CoC?
- Does it reflect the company values and virtues?
- Does it respect the rights of others?

*If you are uncertain about any of them, always make sure to ask or check the CoC for help.

Cores and values

This section provides a list of the MNDWRK core values and virtues that should be considered and upheld by all MNDWRK staff members.

Honesty in our internal and external communications and all business transactions. Integrity by conducting business according to the law and high ethical standards.

Fairness through adherence to applicable laws, regulations, policies and principles.

Diversity & Inclusivity through respect, understanding, empowerment and acceptance.

Respect the employees, customers, partners, stockholders, and the communities we work and live in.

Accountability by taking ownership of the impacts of our actions and decisions.

Responsibility for our words and actions, confirming our commitment to do what we say.

Transparency over our actions, decisions and process. Explaining and showcasing our methods.

Quality in our products and services, striving to deliver the highest value to our customers.

Trustworthiness in our deeds and speech. Making sure we are doing the right thing.

Empathy and kindness towards others in need. Being respectful and understanding towards others.

Environmental and Energy Sustainability and working towards a healthy and better

Coming forward, Reporting & Speaking up

We encourage all MNDWRK staff members to feel free to ask questions and raise issues. All questions and reports are treated with severe care, respect and confidentiality without the fear of discrimination or retaliation. Reports regarding unethical, illegitimate, or suspicious behavior will undergo a thorough investigation process. The company does not tolerate retaliation against anyone who makes a good faith report of suspected misconduct or otherwise assists with an investigation or audit.

To report a concern:

- Talk to your manager
- Contact Human Resources
- Submit an anonymous report



MNDWRK staff members who report a concern in good faith cannot be subjected to any adverse action, including:

- Unfair dismissal, demotion, or suspension
- Unfair denial of a promotion, transfer, or other employment benefits
- Bullying and harassment, either in person or online
- Exclusionary behavior
- Any other behavior that singles out the person unfairly

Diversity, Inclusivity & Equal Opportunity

MNDWRK is fully committed to supporting a diverse and inclusive work environment with equal opportunities for all. MNDWRK does not tolerate discrimination based on race, color, religion, gender, age, national origin, sexual orientation, marital status, disability, or any other protected class.



Harassment & Bullying

MNDWRK facilitates a zero-tolerance policy for any form of harassment, including sexual harassment and bullying. Marketer requires all staff members to treat all fellow employees, customers, business partners, and other stakeholders with dignity and respect at all times. Any type of harassment, including physical, sexual, verbal, or other, is prohibited and can result in disciplinary action up to and including termination. Harassment can consist of actions, language, written words, or objects that create an intimidating or hostile work environment, such as:

- Yelling at or humiliating someone
- Physical violence or intimidation
- Unwanted sexual advances, invitations, or comments
- Visual displays such as derogatory or sexually-oriented pictures or gestures
- Physical conduct including assault or unwanted touching
- Threats or demands to submit to sexual requests as a condition of employment or to avoid negative consequences
- Spreading malicious rumor or gossip
- Excluding or isolating someone socially
- Establishing impossible deliverables
- Withholding necessary information or purposefully giving the wrong information
- Intimidating someone
- Impeding someone's work
- Unfairly denying training, leave, or promotion
- Constantly changing work guidelines
- Sending offensive jokes or emails
- Criticizing or belittling someone constantly
- Tampering with a person's personal belongings or work equipment

If you or one of your coworkers is a subject of harassment, please do not hesitate to report it.

To report a concern:

- *Talk to your manager*
- *Contact Human Resources*
- *Submit an anonymous report*

Information Technology

MNDWRK expects its staff members to safeguard all computer equipment and data against intentional malicious acts by individuals inside or outside the company. Cyber-security training is provided to all employees to ensure compliance with computer security policies. The company safeguards against inappropriate access by individuals or groups untrained incorrect company policies or procedures. The company does not use software for which it does not have a license.

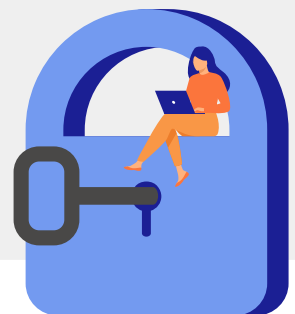


Confidentiality

MNDWRK and its staff members are required to maintain the confidentiality of all proprietary information. Proprietary information includes all non-publicly available information that might be harmful to the company, its customers, and business partners if disclosed.

Confidential information can include:

- Customer lists
- Supplier lists
- Pricing information
- Terms of contracts
- Company policies and procedures
- Financial statements
- Marketing plans and strategies
- Trade secrets
- Any other information that could damage the company or its customers or suppliers if disclosed



Personal Data Privacy

MNDWRK complies with the regulatory requirements of other countries and international privacy laws. All MNDWRK staff members are required to sign an agreement that contains provisions for information confidentiality and non-disclosure.

MNDWRK and its staff members do NOT disclose any private or personal information of:

- Employees
- Customers
- Suppliers
- Competitors
- Third parties

MNDWRK staff members manage all personal information securely, mark it as confidential, and store it only for as long as needed for the purpose it was collected for.

When providing personal information, MNDWRK staff members limit access to only those with a clear business need for the information.

Employees are required to report any breaches of privacy, including the loss, theft of, or unauthorized access to personal information to their supervisor.



Record Keeping

MNDWRK keeps and manages all its records (documents, databases, voice messages, mobile device messages, files and photos, accounts, financial statements, and other assets) in a complete, fair, accurate, understandable, detailed, secure, and timely manner.

MNDWRK staff members are required to:

- Maintain these records and protect their integrity for as long as required.
- Manage and maintain an official record-keeping system to retain file records required for business, legal, financial, research, or archival purposes,
- Dispose of records according to retention and disposition schedule

MNDWRK Staff members should never destroy documents in response to, or in anticipation of, an investigation or audit.

Protection and Proper Use of Critical Assets

MNDWRK requires all staff members to protect its critical assets. All critical assets should be used for legitimate purposes, efficiently, and for conducting company business only. Critical assets include facilities, equipment, computers and information systems, telephones, employee time, confidential and proprietary information, corporate opportunities, and company funds. Suspected incidents of fraud, theft, negligence, and waste should be reported immediately.

Internet Use

MNDWRK understands that occasional personal use of the internet during work hours is a reasonable request and allows this within reason. MNDWRK staff members can ask for clarification from their supervisor if in doubt. However, the company does not allow internet use to support a personal business, political venture, or any act that embarrasses the company and its customers.



External Communication on Behalf of the Company

The primary source of information for the media and legal authorities is the Chief Executive Officer. Employees should forward all requests for information or interviews to the CEO in the first place or ask for guidance on who to additionally contact if necessary.

Use of social media

Social media provides opportunities to create exposure for both MNDWRK and its customer base, but there are risks associated with it if used inappropriately. MNDWRK respects the rights of its staff members to use social media for personal and professional purposes in accordance with its values and virtues. MNDWRK staff members are accountable for any information they publish online and are responsible for complying with company policies and procedures when communicating on social media.



MNDWRK staff members are required to:

- Reveal their relationship with MNDWRK when commenting online regarding the company
- Respect the privacy of others and refrain from publishing photos without their consent
- Ensure any information they post related to the company is accurate
- Comply with the rules of the social media sites they use

MNDWRK staff members must not:

- "Pretext," or pretend to be someone they are not online

Social Responsibility

MNDWRK understands that social responsibilities extend way beyond business needs. It encompasses not only the provided products and services but also the human rights, ethics, and social practices of our company. Our social responsibility is to build partnerships with like-minded organizations by actively seeking out business partners who put great emphasis on environmental preservation and workforce friendliness.

FORCE LABOR

MNDWRK does NOT support or tolerate forced labor. All Marketer staff members are and shall be employed under their own free will without being subjected to forced labor. This policy not only applies to the MNDWRK core business unit but to all of its network with which the company conducts its business.

CHILD LABOR

MNDWRK does NOT support or tolerate child labor. MNDWRK and its business network shall not employ any people under the minimum legal working age of the country in which they live or work.

RESONSIBLE ENVIRONMENTAL IMPACT

MNDWRK and its business network shall conduct ongoing efforts to reduce environmental pollution while increasing sustainability

COMMUNITY SUPPORT

MNDWRK encourages and supports involvement in the community that has supported it. This includes supporting local business and talent by, for example, sourcing local products and services, where appropriate, and showcasing the work of local artists in the company's public spaces.

CHARITY

Charitable involvement is important to MNDWRK, and it is highly encouraged among staff members. The company regularly conducts and takes part in charitable projects

Charitable Contributions

MNDWRK may support and make charitable contributions to causes and organizations in need and not politically affiliated. MNDWRK staff members should check in with their supervisor before making any charitable contributions on behalf of the company.



Political Contributions

MNDWRK does not make political contributions but respects its staff members to do so if they choose their free time. Employees are free to support any political party or entity on a personal level. However, this must be kept separate from company business.

Conflicts of Interest

A conflict of interest can occur when an employee's personal activities, investments, or associations compromise their judgment or ability to act in the company's best interests. MNDWRK staff members should avoid the types of situations that can give rise to conflicts of interest. MNDWRK highly encourages and requires staff members to disclose any relationships, associations, or activities that could create actual, potential, or even perceived conflict of interest to their manager or the Human Resources Department.

Competition, Fair Dealings and Anti-trust

While Marketer wishes to continuously grow its market presence through gaining new customers and business engagements, these relationships must be built on trust, mutual benefits, and compliance with competition regulations, market standards, and government laws. MNDWRK staff members are required to:

- Communicate the company's products and services in a manner that is fair and accurate and that discloses all relevant information
- Familiarize themselves with the company's fair competition policies and remain aware of the consequences of any violation of policies or laws governing fair competition
- Consult the company's legal department before engaging in any new practice that may affect fair competition
- Use only publicly available information to understand business, customers, competitors, business partners, technology trends, and regulatory proposals and developments
- Advise their supervisor immediately of possible violations of fair competition practices

Bribery and Facilitation Payments

MNDWRK does not and will not influence the judgment or behavior of a person in a position of trust by paying a bribe. This applies to people in the government sector and private business. The company does not permit the facilitation (or "grease") payments to government officials or private companies to secure or speed up routine actions. MNDWRK staff members are required to:

- Select third parties carefully and monitor them continuously to ensure they comply with the company's anti-bribery policies.
- Keep accurate books and records at all times and monitor that funds are not being used for bribery or facilitation payments.
- Refuse any offer or request for an unlawful payment and report the incident to the company's ethics and compliance officer.

Money Laundering

MNDWRK is fully compliant with anti-money laundering laws and will not tolerate money laundering. MNDWRK staff members must never knowingly facilitate money laundering or terrorist financing and must take steps to prevent inadvertent use of the company's business activities for these purposes.

MNDWRK staff members are required to immediately report any unusual or suspicious activities or transactions such as:

- Attempted payments in cash or from an unusual financing source
- Transfers to or from entities not related to the transaction or customer
- Unusually complex deals that don't reflect a real business purpose
- Attempts to evade record-keeping or reporting requirements

**Money laundering is the process of concealing illicit funds by moving them through legitimate businesses to hide their criminal origin.*

Insider Trading

MNDWRK staff members may learn information about the company, associates, clients, business partners, or other organizations that are not publicly available. It is illegal for any individual to use the obtained information for personal gain or share it with others. MNDWRK staff members are required to report suspected insider trading activities immediately. MNDWRK staff members are prohibited from:

- Buying or selling securities based on non-publicly available knowledge gained in the course of business

Gifts and Entertainment

While gifts and entertainment among business associates can be appropriate ways to strengthen ties and build goodwill, they also have the potential to create the perception that business decisions are influenced by them. MNDWRK is committed to winning business only on the merits of its products, services and people and complies with all legal requirements for giving and receiving gifts and entertainment.

MNDWRK staff members are required to:

- Use sound judgment and comply with the law, regarding gifts and other benefits
- Never allow gifts, entertainment or other personal benefits to influence decisions or undermine the integrity of business relationships
- Never accept gifts or entertainment that are illegal, immoral or would reflect negatively on the company
- Never accept cash, cash equivalents, stocks or other securities
- Employees may accept occasional unsolicited personal gifts of nominal value such as promotional items and may provide the same to customers and business partners.

**When in doubt, employees should check with their supervisor before giving or receiving anything of value.*

Health and Safety

MNDWRK conducts business in accordance with applicable health and safety requirements and strives for continuous improvement in its health and safety policies and procedures. All MNDWRK staff members are expected to perform their work in compliance with applicable health and safety laws, regulations, policies, and procedures and apply safe work practices at all times. Applicable safety and health requirements must be communicated to visitors, customers, or contractors at any company location. MNDWRK staff members are required to immediately report workplace injuries, illnesses, or unsafe conditions, including "near-misses."



Environment

MNDWRK is committed to operating in an environmentally responsible manner, from the provision of products and services to the operation of its offices and facilities, selection of suppliers, and other business activities. MNDWRK complies with all applicable environmental laws and regulations as well as self-directed commitments to sustainable practices and environmental protection.

Code of Conduct Acknowledgement

As a MNDWRK staff member, you state that you acknowledge and abide by the CoC.

- You have read the entire code of conduct and understand your responsibilities related to it.
- You have had the opportunity to ask questions to clarify any unclear aspects of the code.
- You agree to abide by its principles, values, and virtues.
- You agree to report to the company any violations of the code.