VISEVEN

Code of Conduct



Who we are

Being one of the leaders in Martech and digital marketing, VISEVEN promotes digital transformation in health and life science industry, providing globally a full spectrum of high-quality creative, experience-based and analytically rigorous digital marketing services. VISEVEN helps the life sciences industry to become more innovative, efficient, dynamic and digital.

We have been developing our company based on our mission **“Saving Lives by Improving Communications”** — so as a team of digital, marketing experts, health and life science experts, we nurture, promote, comply and communicate the ethical conduct in all our internal operations, in our marketing and customer experience activities.



Scope and purpose

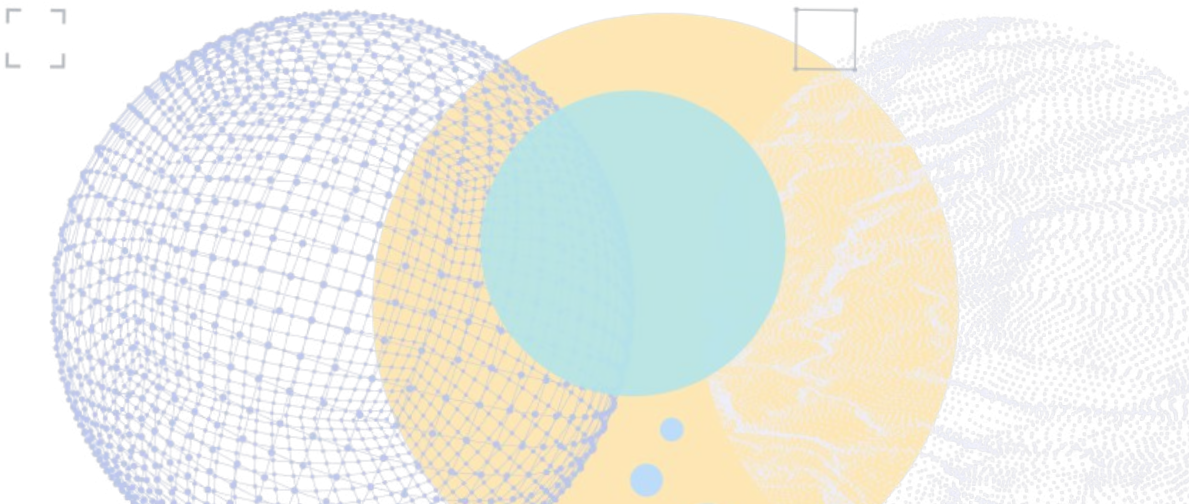
What is the Code of Conduct and why it exists

This Code is a foundation policy designed to communicate and regulate our values, principles, key rules, standards of doing business, behaviours that are expected and applicable to all VISEVEN Staff and to all parties interacting with VISEVEN Europe OU and its affiliated entities (collectively “VISEVEN”, “company”, “us”, “we”, “our”).

Compliance to these principles and rules is everyone’s responsibility and continued employment and/or business relations depend on following them. They should be followed on a daily basis and should be taken into account while making any decision.
VISEVEN follows these principles and expects its counterparties to apply these, or equivalent standards, in their own operations and supply chain.

How principles of this Code are related to legislation

VISEVEN’s Staff should always follow the principles of this Code even if they are stricter than the legislation. However, if there is a conflict with legislation occurs – the last should be followed.



Ethics and fair business

VISEVEN respects the law and complies with all international and local laws applicable to its operations. We always ensure that all our business operations are legitimate and keep our business relations open and transparent. VISEVEN and its Staff employ fair business and competition principles in all business activity.

We act ethically and honestly at all times according to international ethical standards, such as the United Nations Global Compact Principles, and always conduct business with integrity and respect for human rights.

We do not mislead our clients and business partners with false information, or misrepresentations about VISEVEN services. VISEVEN takes all reasonable care to avoid misleading statements, concealment and overstatement. We seek to build long term partnerships with our clients and business partners by being always honest and straightforward in our dealings.

VISEVEN respects the confidentiality of any information it may obtain in relation to its clients and business partners, as well as their objectives and standards set forth in the policies notified to VISEVEN.

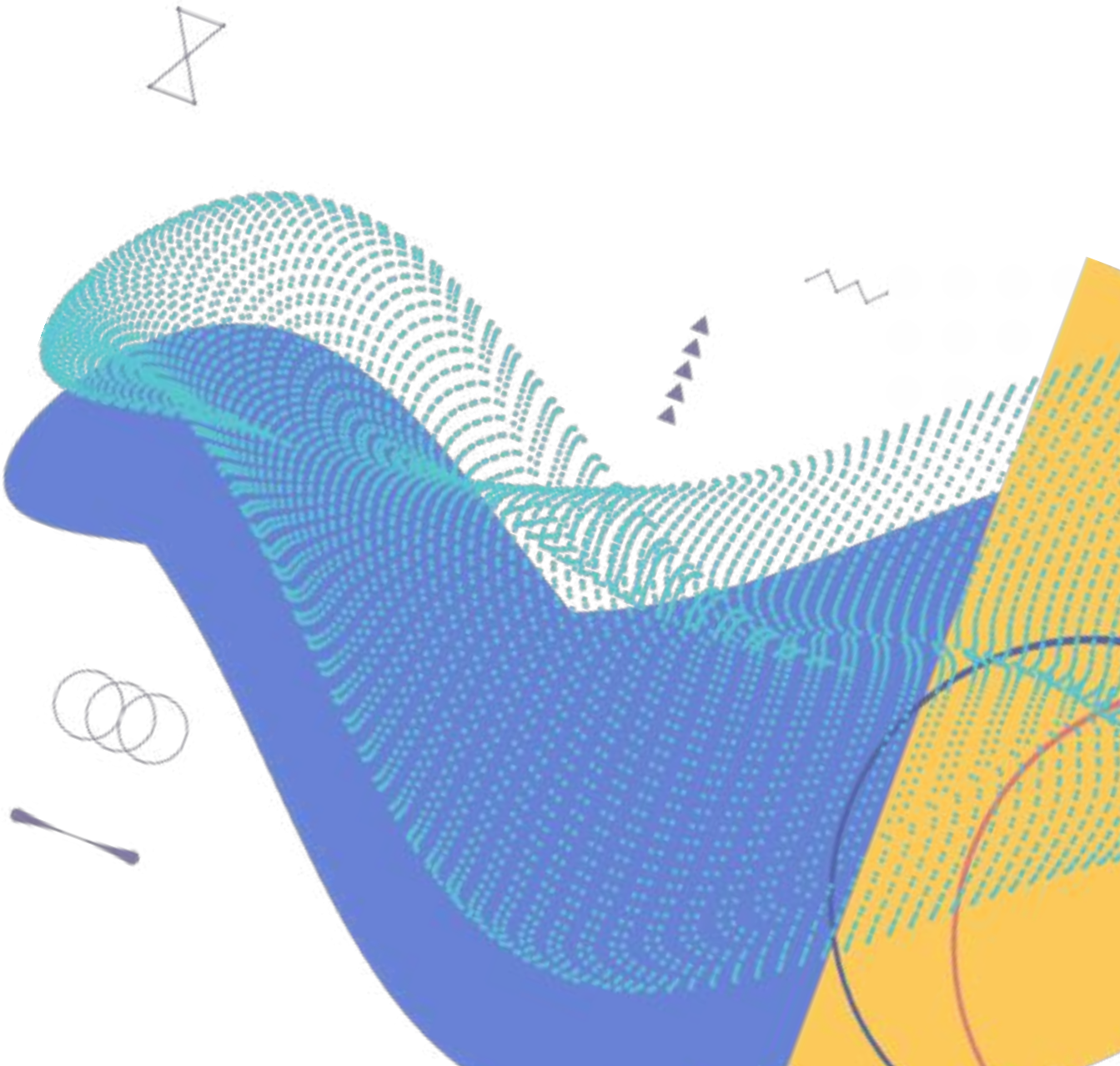


Ethics and fair business

Right to choose partners

As we value our reputation, VISEVEN reserves the right to make a decision whether to enter into business relations with a third party based on such party's adherence to the provisions of this Code.

We require from our business partners to comply with all applicable legislation as well as VISEVEN ethics, environmental, anti-corruption and confidentiality standards stipulated in this Code of Conduct.



Values and desired behaviours

Our culture

In VISEVEN we support and respect each other. We value diversity and create a comfortable workplace and equal opportunities for everyone. VISEVEN always finds room for new ideas and the unique views of each, and you can be sure that you will be heard. Positive and friendly atmosphere is considered the biggest strength of VISEVEN based on multiple anonymous surveys. It is important to demonstrate values and behaviours which are acceptable at VISEVEN for successful cooperation and growth perspectives.

Our values define how we work together, support one another, and create meaningful impact for our colleagues, clients, and partners.

We Think Customer First. We put our clients at the center of everything we do — listening closely, anticipating needs, and delivering tailored, compliant solutions that drive real business outcomes. We speak their language, operate seamlessly across global time zones, and use our global expertise with a local touch to create value that truly matters.

We Strive for Service Excellence. We deliver with precision, care, and consistency — making quality our key differentiator. We focus on every detail, solve problems proactively, communicate clearly, and build trust through dependable, high-impact service.

We Have Passion to Invent and Co-Create. We innovate with our clients, creating space for collaboration and building AI-enabled solutions that shape the future. We embrace change, test bold ideas, and stay ahead of the curve — together.

We Build Deep-Rooted Relationships. We focus on long-term partnerships built on empathy, trust, and shared success. We listen deeply, think critically, and stay by our clients' side — through every challenge and every win.

We Are Unstoppable. We grow through challenges, reinvent ourselves constantly, and aim higher every time. With a winner's mindset and a safe space to learn, we push boundaries, reflect honestly, and keep moving forward — no matter what.

Values and desired behaviours

Behaviours and Competency Model

Detailed expected behaviours are represented in Viseven Competency Model which is also the basis for employee performance evaluation. Some examples of desirable behaviours are:

- ☑ initiating new task, project, improvement and taking ownership for it;
- ☑ proactively offering help to a colleague before s/he asks, picking up extra task when it is needed to support others;
- ☑ speaking up, being brave to voice opinion that can provide value to the company;
- ☑ proposing and implementing creative solutions for complex issues.

Open communication, dialogue and knowledge sharing

It is important to openly communicate with colleagues, reports, managers, share information, insights, be open and transparent. This is done through daily communication, regular team meetings, VISEVEN Insights Hubs, initiation of trainings, participation in update of VISEVEN Knowledge Base. VISEVEN supports open door principle - freedom to address any company member to ask something or share feedback.

VISEVEN collects feedback from our employees on how they are feeling through Engagement Surveys annually and Pulse Surveys on a quarterly basis. This feedback is taken into account when developing company-wide action plans on what should be improved. Some teams are additionally invited to participate in focus groups to get more in-depth feedback after the survey.

We welcome anyone to provide feedback any time to their manager or HR Business Partner.

Corporate Social Responsibility

VISEVEN Corporate Social Responsibility policy (CSR) is focused on social and environmental concerns of our internal and external stakeholders.

Social contribution

We support active social position, social responsibility, support of communities, volunteering, environmental initiatives and experience great respect and support to colleagues who are making social impact.

We make donations and participate in charities, make significant contribution into educating, hiring and growing specialists with no prior experience in the industry, hence helping industry to grow and people to have more employment and earning opportunities.

If you have ideas on how to boost our social contribution or would like to participate – please address our HR Communications Manager.



Corporate Social Responsibility

Environmental impact

VISEVEN clearly understands the necessity to decrease negative impact on the environment and importance of energy saving, minimization of wastes and recycling. More details on our environmental commitments are outlined in the Environmental Policy.

Our products, services, their production and maintenance possess no harm to the environment, our facilities and operations have minimum ecological footprint. Yet we strive to be eco-friendly, are committed to decrease environmental impact and support eco initiatives in communities where we operate. Pioneering in leasing 100% green electricity building premises in Tallinn, VISEVEN Head Office, becomes a driver of sustainable development in VISEVEN group.

VISEVEN is continuously raising awareness on environmental sustainability within INSIGHT HUB platform.

We are certified under ISO 14001 standard requirements on the environmental management and undertakes to be further audited to support this certification.

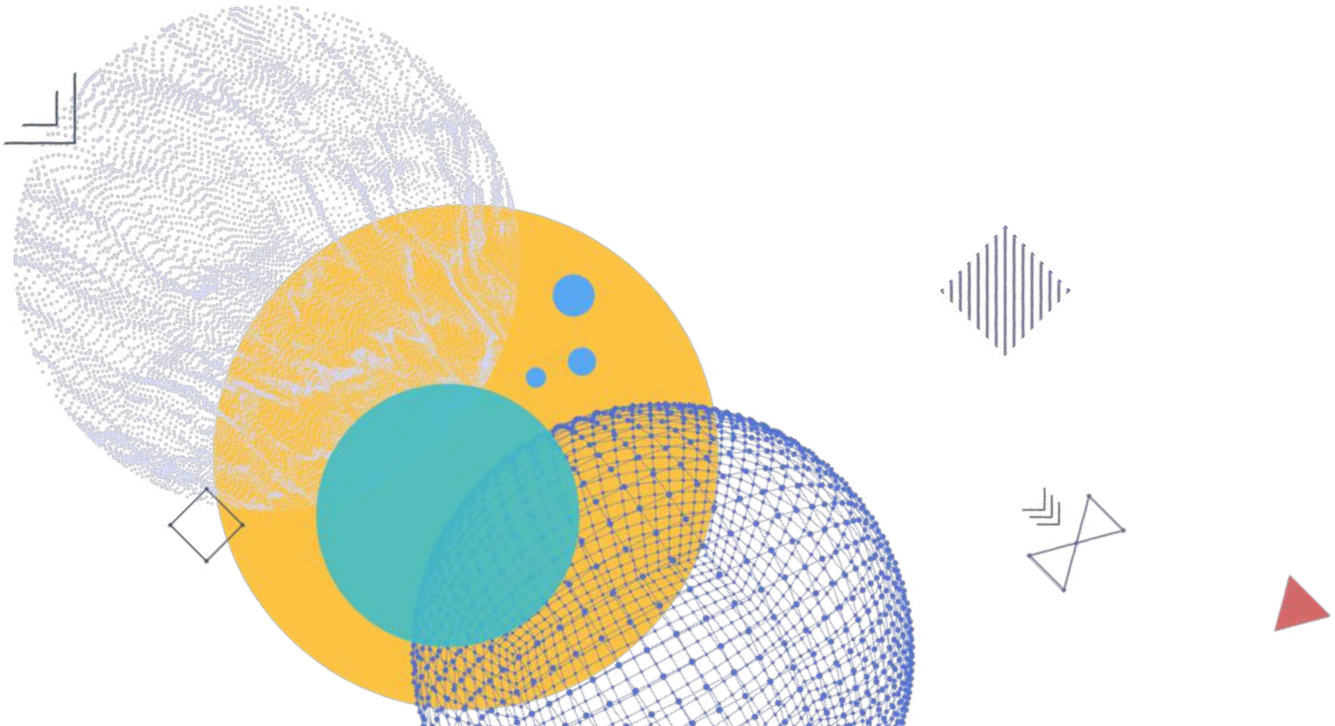
Corporate Social Responsibility

Following general sustainability principles

We are committed to global sustainability principles generally recognised by renowned international organisations (such as the UN) and making the world a better place to live for everyone in all aspects of doing our business. VISEVEN follows United Nations Sustainable Development Goals when designing and implementing its sustainability activities, such as:

- Ensure healthy lives and promote wellbeing for all at all ages;
- Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all;
- Achieve gender equality and empower all women and girls.

We are continuously improving the CSR strategy by virtue of meeting all applicable legislation, boosting our performance and informing our Staff to be mindful of the effect of their actions.



Conflict of interest

What is conflict of interest

A conflict of interest occurs when a Staff Member's private interests interfere, or appear to interfere, with the interests of a company in general. A conflict of interest includes the existence of any circumstances that would lead a reasonable person to question whether he or she is acting in the company's best interests or his/her own.

Conflict of interest may not be breach by itself unless you make other people aware of it and the decision is made that it imposes no harm to the company.

Examples of conflict of interest

- Having any direct or indirect business relationship (employment, consultancy, shareholding) with competitor, supplier, contractor of VISEVEN (applicable to family members as well);
- Being a manager or reporting to a family member, having family member under direct supervision;
- Having gains or potential gains from certain company transaction.

Conflict of interest

Acting in company interest

Private lives and personal interests are deeply respected. However, one should, foremost, avoid conflict of private and business interests, not make it happen in the first place. VISEVEN's Staff Members must make decisions and take actions that are in the best interests of VISEVEN. Staff must avoid any relationship or activity that might impair, or even appear to impair, the ability to make objective and fair decisions when performing their jobs. All staff should make objective and fair decision that, foremost, support company interest. If having conflict of interest (personal, family interests) one should always act in VISEVEN interest and no other interests should impact objective and fair decision making process. Staff must never use company property or information for personal gain or personally take any opportunity that is discovered through the cooperation with the company.

Secondary employment

Secondary employment is being employed by another company while being an Staff Member of VISEVEN. Secondary employment is allowed if you cooperate with VISEVEN as a freelancer or on a part-time basis or if this employment is agreed with your manager. It should not breach anti-competition rules. One cannot combine full-time employment in VISEVEN with full-time employment in another company. One cannot combine any employment in VISEVEN with any employment at our competitors, customers or other life sciences companies.

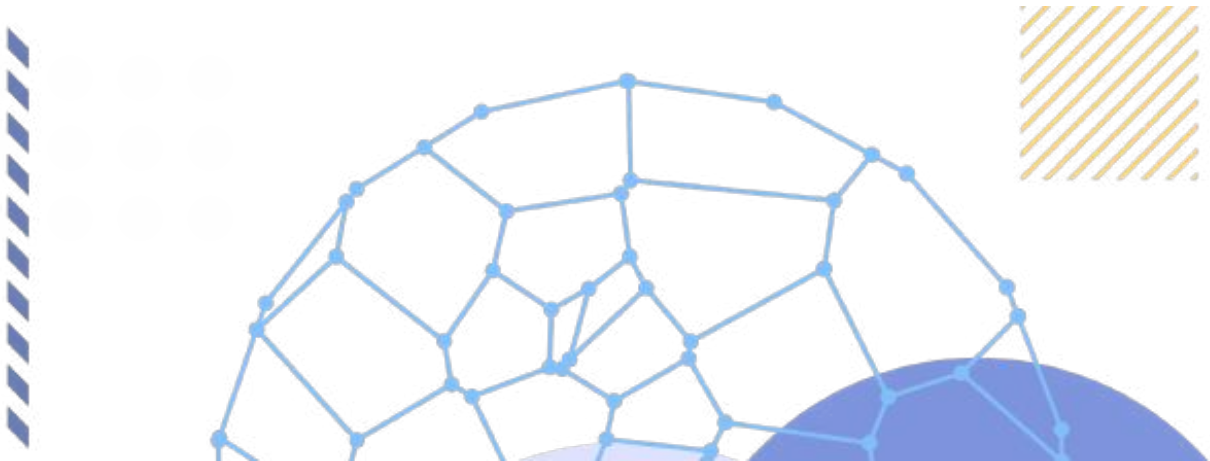
Conflict of interest

Reporting conflict of interest

If you have conflict of interests – you should report it to your manager immediately. If you cannot make or participate in objective decision making due to conflict of interest – you should inform your manager as well. Any conflicts of interests related to hiring, promotion, resignation and other employment matters should be escalated to your HR Business Partner. The relevant manager or HR Business Partner should determine if the situation is acceptable, can be adequately mitigated, or must be avoided. Complicated cases may be of discussion by the management board.

Non-competition

No staff member shall provide or receive information to/from a competitor, or any third party related to a competitor. The exclusion can be if legal counsel will consider such transit of information as non-violating antitrust laws nor create a reasonable basis for inferring such a violation. This allows obtaining competitive information from independent third-party sources who are not acting for a competitor. Staff Members are prohibited to have any proprietary relationship with competitors while they are employed and certain time after employment or equivalent relations with VISEVEN.



Anti-corruption

“Bribery” or “Corruption” includes, but is not limited to, promising, granting, requesting or receiving of benefits to/from another person with the aim of influencing (or being influenced) to gain specific advantage in improper, hidden way. It is the offer, promise, giving or demand of acceptance of this advantage as an inducement for an action which is illegal, unethical or breaches the trust.

VISEVEN has zero tolerance to corruption and complies with anti-corruption and anti-bribery laws, generally recognized anti-corruption principles, regional acts and best business practices, such as UN Anti Bribery Convention, UN Convention Against Corruption, OECD Anti-Bribery Convention as well as international laws and other relevant regulations.

It is strongly prohibited to participate in any corruption activities such as:

- ☑ offering, authorizing, committing or providing anything of value, either directly or indirectly, to or for a government official or to or for a business person, in an attempt to: 1) sway official action; 2) win business or 3) get an improper advantage;
- ☑ any facilitation payments being made in the context of any company`s business;
- ☑ gifts, hospitality and entertainment that are given, offered or promised to be given to receive anything of value for the purpose of improperly influencing any decisions concerning the third parties and/or company, its Personnel, independently of the fact, such action made between the company`s personnel or intended to third parties` representatives;
- ☑ grants and donations that are given to receive, or are to be perceived to receive, any tangible consideration in return;

Anti-corruption

- [x] sponsorship that is used (or perceived to be used) to receive an improper commercial advantage in return;
- [x] political contributions made with the expectation of direct or immediate return for the company, its Personnel or third parties;
- [x] lobbying misused for any corrupt or illegal purposes, or to improperly influence any decision;
- [x] other activities implied herein.

VISEVEN and its Staff are not allowed to make or receive direct or indirect offer, payment, solicitation, or bribes in any form. We refrain from any misleading or deceptive accounting or financial reporting practices and ensure documented evidence on the same by financial audit carried by a Big4 company. We also expect strong ethical standards from those acting on our behalf. Any Staff Member found to be involved in any kind of corrupt practices is likely to be immediately dismissed and may be prosecuted in case they have committed a criminal act.

Gifts, Entertainment and Hospitality

Gifts, entertainment and hospitality include the receipt or offer of gifts, meals or tokens of appreciation and gratitude, or invitations to events or other social gatherings, in connection with matters related to our business.

Gifts, hospitality and entertainment should not be given, offered or promised to be given to receive anything of value for the purpose of improperly influencing any decisions concerning the third party and/or company.

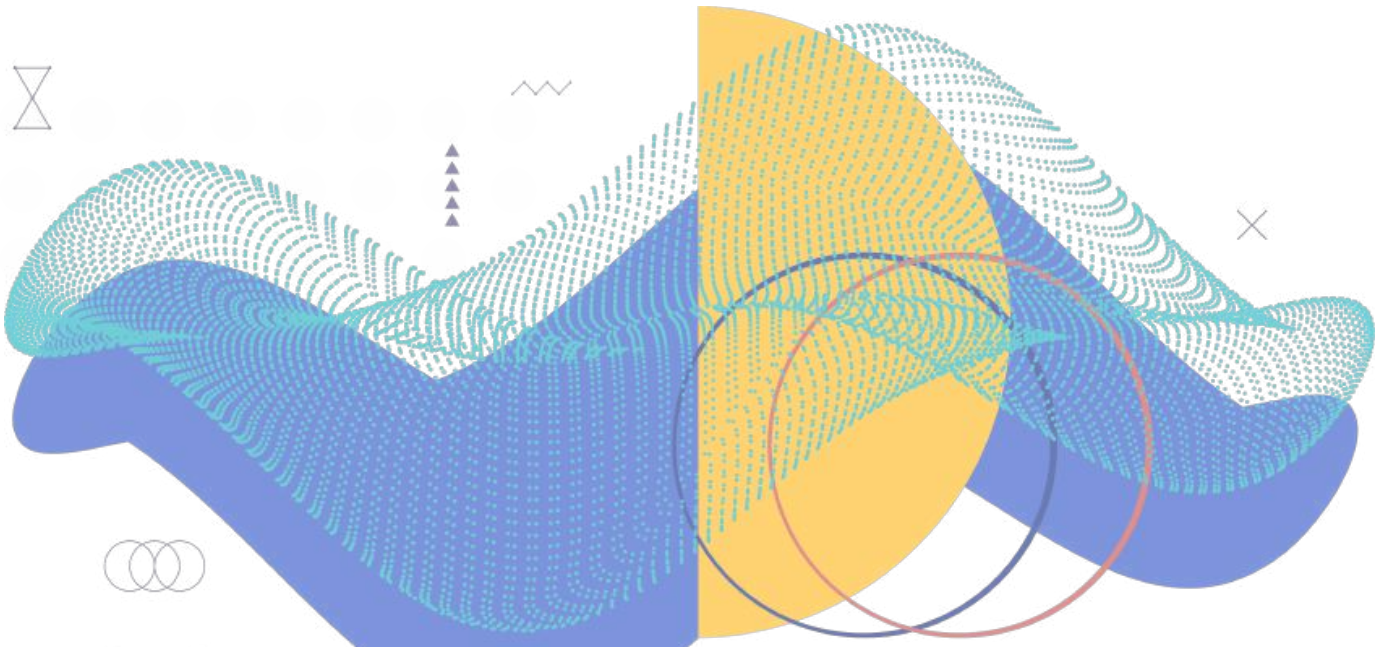
Anti-corruption

These activities are acceptable provided they fall within reasonable bounds of value and occurrence, are modest, reasonable, infrequent. If monetary equivalent of the gift exceeds 100$ - the gift should be reported to the legal councel.

To evaluate what is acceptable one can use the questioning algorithm:

- [x] In terms of intent: what is the intent - is it to build a relationship or is it something else?
- [x] In terms of source: how would you look if these details were on the front of a newspaper?
- [x] In terms of change: what if the situation was reversed - would there be a double standard?

If you find it difficult to answer one of the above questions, there may be a risk which could potentially damage company's reputation and business. The action could also be unlawful. If in doubt, Staff Member should contact their manager, local director or a member of the legal teams.



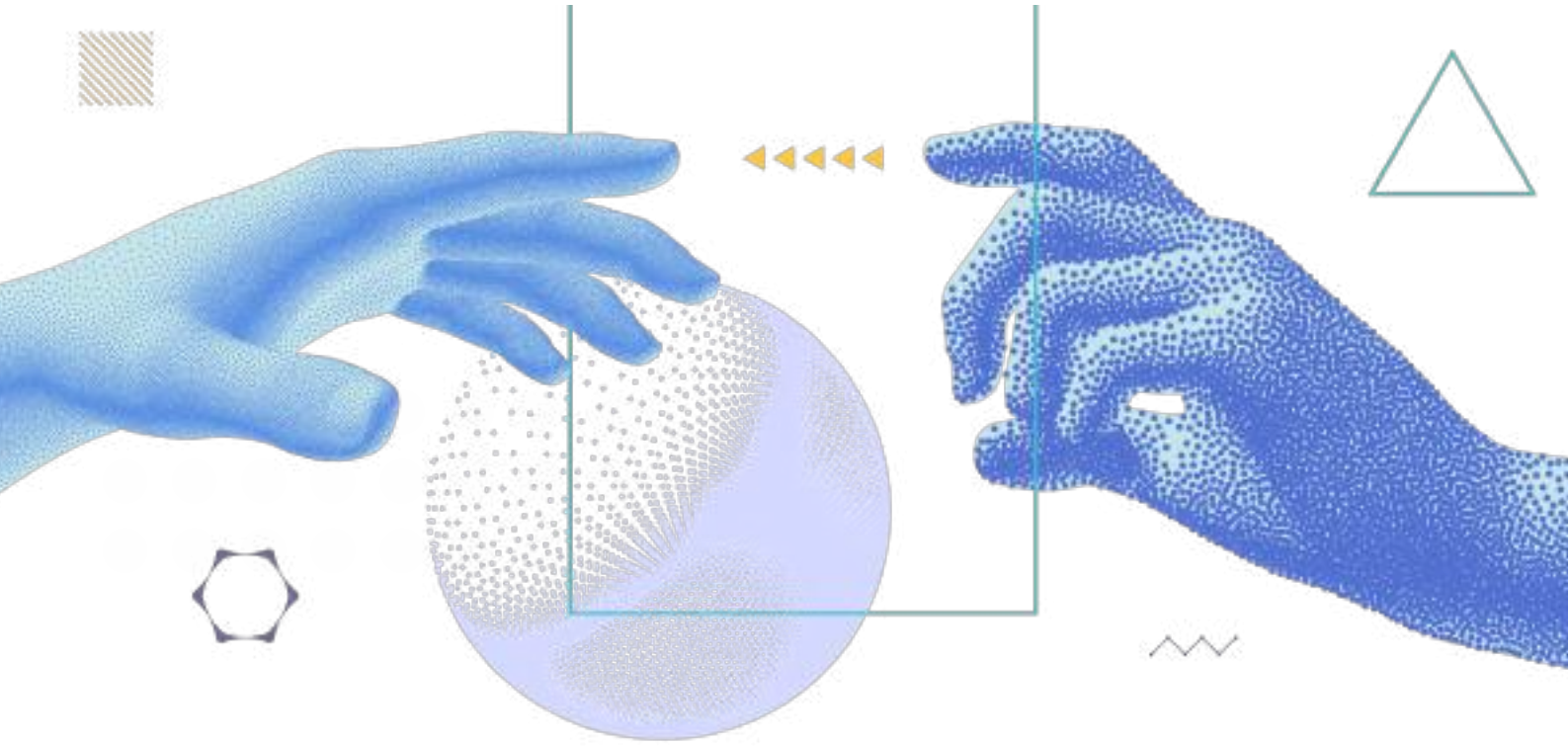
Anti-corruption

Facilitation Payments

VISEVEN makes no distinction between facilitation payments and bribes — regardless of size or local cultural expectations. The company prohibits any facilitation payments being made in the context of any company`s business.

Any relationship with public officials must be in strict compliance with the rules and regulations to which they are subject to and any benefit conveyed to a public official must be fully transparent, properly documented and accounted.

More detailed internal regulations and guidance on mitigating the corruption risks can be found in the Anti-Bribery and Anti-Corruption Policy.



Employment and cooperation principles

Human capital is the most valuable asset of the company. High people engagement is important to us and we understand that it brings sustainable business performance. All our employment principles are derived from creating win-win cooperation.

Respecting fundamental human rights

We respect, comply with and promote all international and local regulations protecting human rights, follow guidelines derived from United Nations, International Labour Organisation and other standards such as Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. This relates to the rights of any people we interact with – be it our Staff or any other external stakeholder we cooperate with.

We reject any use of child labour, forced or compulsory labour, any modern forms of slavery and human trafficking, discrimination or abuse. All staff members and partners should provide services solely on their free will and in exchange for fair and just remuneration. VISEVEN expects sharing the same values and unwavering adherence to securing human rights from our clients and suppliers.

Any form of abuse, harassment or bullying (physical, psychological, verbal etc,) is not tolerated and constitutes Misconduct. VISEVEN's goal is to make sure that no Misconduct is demonstrated towards any Staff Member, regardless of the management level, cooperation type or other factor.

Employment and cooperation principles

Diversity and equal opportunities

We highly value diversity and equity, follow them in all our employment decisions and consider it as a strength of VISEVEN since it makes our organization and teams stronger. Open approach, tolerance, fostering individuality and inclusion, which contributes to productivity and innovative capability, creativity are all important to us.

All employment decisions (hiring, transfer and promotion, development and growth, termination) are based solely on merits: qualifications, potential, skills, experience, performance, demonstrated behaviours and actions.

Equal opportunities and treatment are to be provided to all and there should not be any prejudice connected to races, national origins, ages, genders, family statuses, health conditions, religions, sexual orientations, skin colours, political views, or social background.

VISEVEN's commitments on securing human rights at work, equal opportunities and fair treatment approach are formalized and outlined in the Human Resources Policy.



Employment and cooperation principles

People growth and development commitment

In VISEVEN we are proud of our multinational staff and strongly believe that contributing to their professional development will benefit the company's business and ensure its growth and success in the future, facilitate employees' professional growth and long-term carrier development through employee's performance evaluation and peer feedback reviews, providing onboarding and on-the-job trainings, learning courses, mentorship, etc.

Please review our Career Guideline and Learning and Development Guide for more information on available learning opportunities.

VISEVEN provides fair remuneration and benefits according to the market standards where we operate. Every employee can get information about all the benefits on Viseven Knowledge Base, making request to manager or HR department.



Employment and cooperation principles

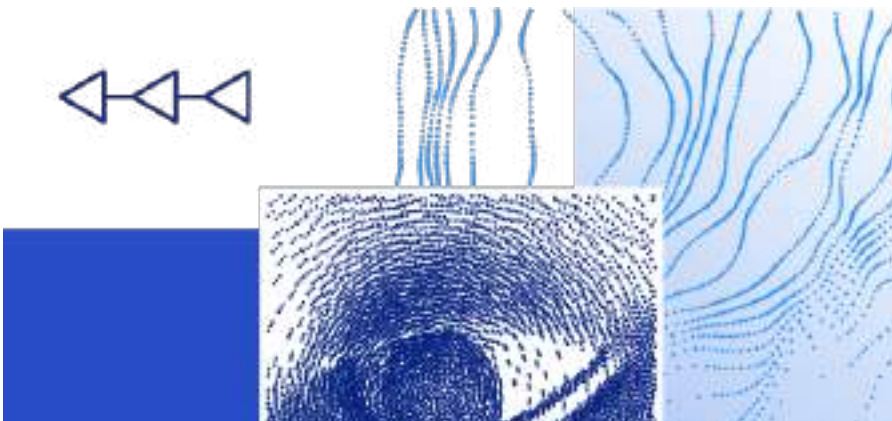
Health, safety and wellbeing

We are proud of being engaged in providing services and implementing projects aimed at improving health and wellbeing of people with special needs and rare diseases. We promote and encourage healthy lifestyle which is in line with our initiatives like online exercising, sport and active lifestyle activities, organizing sport championships. Also, we care for mental health, everyone can request for psychological support on a free and confidential basis.

Safety is a top priority for all Staff. Before executing any action one should make sure that the environment is safe, and one is not exposed to any dangers. We provide safe working conditions in all our offices.

All our employees should be passing mandatory safety trainings, provided by the company, and comply with them. If you cannot fulfil your duties because of lack of safety – inform your manager immediately.

Feel free to address your HR Business Partner for consulting on employment standards or improvement suggestions.

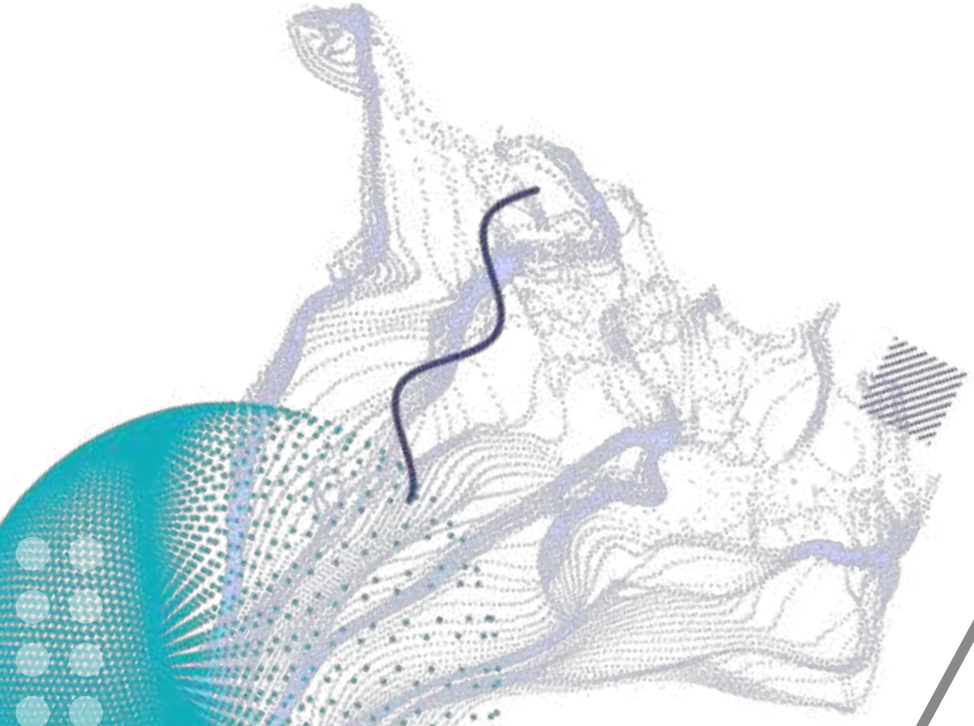


Anti-Abuse and Anti-Harassment

Viseven ensures a harassment-free workplace through its Anti-Abuse and Anti- Harassment imperatives, applicable to all Staff regardless of their role or location. This commitment fosters a respectful and inclusive environment for Staff Members, contractors, vendors, clients, and visitors, promoting respect and inclusivity throughout the company.

Definitions

- **Abuse:** Any form of physical, verbal, or written mistreatment, coercion, or violence.
- **Harassment:** Unwelcome conduct based on race, color, religion, gender, national origin, age, disability, or any other protected status (physical, verbal, non-verbal).
- **Inappropriate behavior:** Any action that disrupts the work environment, compromises the well-being of individuals, or goes against the values and principles of Viseven.



Anti-Abuse and Anti-Harassment

This can involve one or more incidents and actions or a combination of the above. Examples of conduct or behavior which constitute harassment include, but are not limited to:

Physical conduct

- Unwelcome physical contact, including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- The use of job-related threats or rewards to solicit sexual favors

Verbal conduct

- Comments on an employee's appearance, age, private life, etc.
- Sexual comments, stories, and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the gender of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)

Non-verbal

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling
- Leering

Anti-Abuse and Anti-Harassment

Complaint Procedure

Staff Members who experience or witness abuse, harassment, or inappropriate behavior should promptly report the incident via confidential Grievance form (grievance form also provides possibility for anonymous submission without any personal details revealed). Viseven ensures confidentiality to the extent permitted by law during the investigation.

Compliant procedure may be also triggered through submitting a complaint to direct or next-level manager, HR Business Partner, or legal councel.

Investigation and Response

Upon receiving a report, HR Business Partner under legal counsel guidance will conduct a thorough and impartial investigation. If a violation is confirmed, appropriate disciplinary action will be taken by the Manager of the guilty person, ranging from warnings, counseling, and mandatory training to suspension or termination of cooperation, depending on the severity and recurrence of the behavior. Viseven may also take legal action if necessary.

Non-Retaliation

Viseven prohibits retaliation against individuals who report incidents or participate in investigations. Retaliation is a serious violation of this Code and will result in disciplinary action.

Security, confidentiality and data protection

Data privacy protection

Collecting, storing, processing and other use of personal data is done under data subject consent. Data protection is managed by Information Security Officer. VISEVEN guarantees secured storage and proper use of personal data.

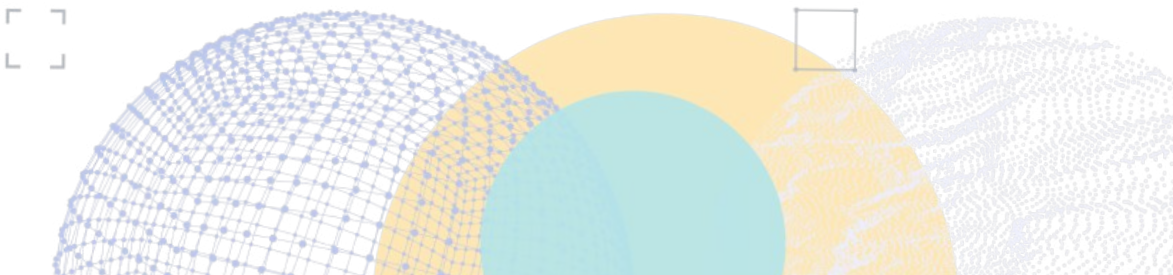
Processing of personal data is performed according to the applicable law. When conflict of law occurs, the stricter legislation regulates the processing and use of personal data, where it is possible. Unless otherwise stated, processing of personal data must be in accordance with Viseven Privacy Policy.

Protecting personal data

VISEVEN protects personal data according to the EU Regulation on General Data Protection Regulation (GDPR). All personal data is stored within well-known and reputable services which are GDPR compliant.

Confidentiality

VISEVEN knowledge, expertise and know-how is the basis for business success. Unauthorized transmission of such knowledge is strictly prohibited. Confidential or inside information is not allowed to be spread.



Security, confidentiality and data protection

Making information public

Any message to media, wide audience at events, official or public statement should be agreed with PR department. Personal opinion can be expressed without approval, however it should be emphasized that this is a personal opinion. Sensitive and confidential information, which corresponds to competitive advantage, innovation and know-hows, employee data, company plans of launching/upgrading new products/services cannot be shared externally (even with close relatives or friends).

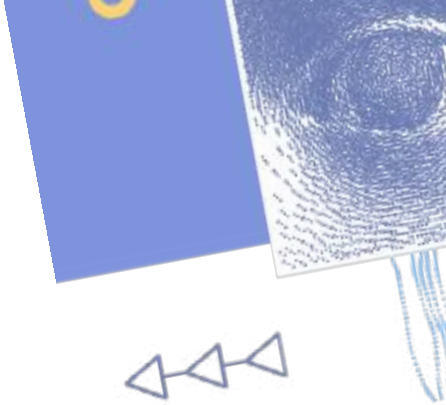
Using company assets

Company's tangible and intangible assets should be respected and not used for non-business purposes.

Compliance with Security policies and procedures

VISEVEN implements IT Security policies and procedures which are obligatory for Staff to follow. For this purpose, VISEVEN has training programs and involves Staff to their completion. Knowledge and compliance with these policies and procedures is crucial for successful evaluation processes, including decisions concerning disciplinary action in case of non-compliance.

Policy enforcement and implementation



Training and sharing the Code

VISEVEN provides mandatory training on this Code's key principles for all current and new Staff Members. It is each Staff Mamber's responsibility to learn the Code and follow it on a daily basis.

If you act as a manager and have reports — your role and responsibility is to ensure compliance with this Code and all auxiliary policies, promote policy principles, take consultive and corrective actions to fix any misalignment of Staff actions with the Code.

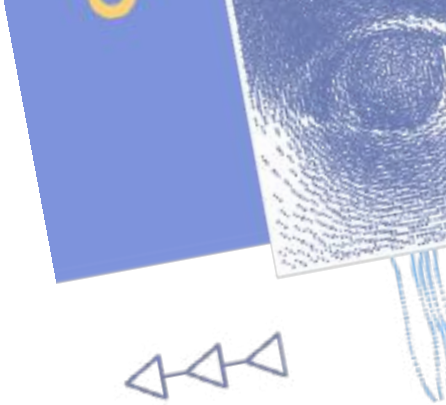
This Code is accessible for all external stakeholders on Viseven's website.

Preventing violations and reporting

Prevention, detection and reporting of any violations or suspicious activity are the responsibility of all those working for the company or under its control. One should also inform third parties about the rules of this Code whenever this is relevant and risks of not following them.

Any kind of breach or misconduct should be reported to the manager of the person suspected of misconduct directly or through the own manager. Manager of the suspect is responsible for triggering the investigation and taking considerate disciplinary action. If the reporter is not satisfied with the actions taken, s/he may escalate the issue to the next level managers (up to the executive level).

Policy enforcement and implementation



If multiple parties cannot reach the agreement regarding the incident, they should involve HR Business Partner or legal counsel for mediation and guidance. If you would like to consult on the reporting of violations — please contact legal team.

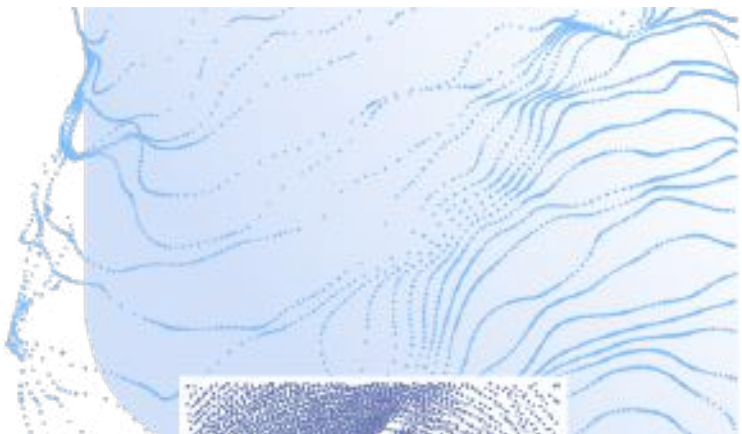
VISEVEN also has and uses Grievance Form as reporting system for sensitive cases to provide confidentiality and anonymity if a reporter prefers to do so.

Disciplinary

Any Staff Member who breaches this Code or any other rules, policies or principles, faces disciplinary action. Insignificant breaches result in warning for the first time. Repeated or significant breaches result in termination and compensation of losses brought by the breach. The decision maker should take all the facts and circumstances and take considerate decision regarding the disciplinary action.

Violation by any third party of the provisions of this Code grants VISEVEN the right to terminate the contract without any compensation and cease any business relationship with such party.





Document control

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v. 1.0	02.01.2023	Original version
v. 1.1	01.03.2024	Anti-abuse and Anti-harassment sections added
v. 1.2.	01.04.2025	Minor terminology amendments, compliance function added, links to auxiliary Policies and Grievance form added
v. 1.3	15.05.2026	Minor amendments

