CODE OF CONDUCT - ON THE RIGHT PATH

CF REPORT

More than a report

CF Report Code of Conduct

At CF Report, we strive to employ the highest ethical standards, demonstrating honesty, fairness and accountability in every decision and action.

Scope

This Code of Conduct ("Code") applies on a worldwide basis to CF Report and all its partners. Therefore, this Code applies not only to the activities of CF Report in every region but also to its, directors, officers, employees, agents, freelance employees, and shareholders.

Our responsibilities generally

CF Report is responsible for complying with this Code and with all CF Report policies and practices. CF Report comply with the laws, rules, and regulations of the countries in which CF Report does business and with specific CF Report policies regarding legal and ethical conduct. CF Report supports the principles outlined in The Council of PR Firms Code of Ethics and Principles. Those policies may be amended or supplemented from time to time. Ignorance from any team member of CF Report is not an excuse for violating this Code.

Our responsibility to comply with laws

CF Report comply with all applicable laws, rules, and regulations. In some instances, local or foreign laws may differ from the principles outlined in this Code. Generally, in those situations the more restrictive policies, laws or regulations would apply. Some of the laws you may encounter are summarized below.

Antitrust and Competition

CF Report do not discuss pricing policies and terms, business or marketing plans and any other confidential business matters in our contacts with competitors. If a competitor raises any of these issues, no matter how casually, stop the conversation, explain that it is against our policy to discuss such matters and communicate the incident.

Anti-corruption and bribery

CF Report do not pay or offer to pay money or give anything else of value to individuals, government officials, officials of public international organizations, political candidates, or political parties for the purpose of obtaining or retaining business for CF Report. CF Report will not engage an intermediary (such as an agent) to provide such payments. Violations of the anti-corruption and bribery laws (and other similar laws) may cause CF Report to incur fines and can also lead to fines or jail terms for the individuals involved.

Insider trading

CF Report do not trade in securities of clients or other companies or advise others to do so, based on material inside (nonpublic) information gained about those clients or companies in the course of our duties for CF Report. CF Report will actively propose to sign an NDA before the start of any project or will sign this NDA according to the Code of Conduct of its client.

Anti-money laundering

Money laundering laws prohibit engaging in any financial transaction if it is known that the funds used in the transaction CF Report will derived from illegal activities, including efforts to conceal the identity, source, or destination of money. CF Report is committed to being transparent and complete in recording and documenting all transactions, and ensuring that the underlying activities, sources, and destinations of the funds comply with applicable laws and regulations.

Our responsibilities to our clients, suppliers, and competitors Even in a competitive environment, CF Report must act ethically in our dealings with other companies.

Gathering competitive intelligence

CF Report may learn about a client's or a competitor's services and activities if such information is based on publicly available information, such as public presentations, public marketing documents, journal and magazine articles, advertisements, and other published information or private non confidential sources. CF Report should not seek information illegally or in a way that involves a breach of integrity or breach of any confidentiality or employment agreement. CF Report must never misrepresent its identities when attempting to collect competitive information. Direct exchange of competitive intelligence with our competitors is prohibited.

Gifts and business entertainment

Developing strong working relationships with our clients, suppliers and other business partners is important to our growth. Business gifts and entertainment are sometimes used to strengthen these bonds. However, CF Report must always exercise caution when offering or accepting business courtesies.

CF Report may give or accept gifts of a nominal value on an infrequent or occasional basis, such as during the holiday season but only as a reasonable business courtesy. Gifts of cash or cash equivalents (e.g., vouchers and gift certificates) are never permitted. Routine business-related entertainment is also generally acceptable. Examples include a business lunch or dinner, sports outings, or cultural events. However, CF Report may not give or accept gifts covering non-business expenses, such as travel for a client, family member or supplier.

Generally, CF Report may offer or accept a gift, favor or entertainment as long as it (1) does not make the recipient feel obligated or give the appearance of an obligation; (2) does not exceed generally accepted local business practices (refer to your local professional organization, e.g., CIPR (UK), for additional information); (3) is of nominal value; (4) cannot be construed as a bribe or payoff; (5) does not violate applicable law, our own agency policies or the policies of the recipient's company; and (6) is not solicited.

Offering gifts, entertainment or other business courtesies can be problematic when dealing with a government official. The Dutch and UK Bribery Act specifically prohibit offering or giving anything of value to government officials to influence official action or to secure an improper advantage. This not only includes traditional gifts, but also things like lunches or diners, political or charitable contributions and job offers for government officials relatives. CF Report should never give gifts to thank government officials for doing their jobs.

Unfair methods of competition and deceptive practices CF Report will not make false or misleading representations about CF Report's services or products, falsely disparage a competitor or its products, or make service or product claims without facts to substantiate them.

Political activity

CF Report will comply with all applicable laws regarding campaign contributions, lobbying, and ethics standards that apply to dealings with public officials and government employees. No CF REPORT funds will be used to make contributions or payments to political candidates of causes. Only designated CF Report directors, officers and employees are authorized to communicate with elected officials regarding the public policy issues that affect CF Report or its clients.

Our responsibilities

CF Report must use only agency resources, agency property and agency opportunities for the benefit of CF Report and its clients.

Business records

CF Report honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy. Examples include, but are not limited to, accurately recording worked hours and PTO and expense reimbursement requests as directed by CF Report. CF Report creates, retains, and disposes of business records in compliance with all applicable legal and regulatory requirements. CF Report is always honest, direct, and truthful in discussions with regulatory agency representatives and government officials.

Conflicts of interest

The term "conflict of interest" describes any circumstance that could cast doubt on our ability to act objectively regarding CF Report. CF Report avoid situations that CF Report knows, or should know, create actual or potential conflicts of interest, or the appearance of a conflict of interest, and immediately disclose them if they arise. This includes instances where an employee, or a member of his or her family, receives personal benefits because of his or her position with CF Report or with a client. CF Report cannot use agency property for personal gain or take for business opportunities that arise using agency property, information, or position.

Protection of proprietary information

CF Report must safeguard proprietary information, client information, and all other third-party proprietary information entrusted to CF Report, from loss, theft, and unauthorized modification, access, and disclosure. All nonpublic information related to CF Report or client business should be considered confidential. CF Report also keep confidential any information received in confidence from an actual or prospective client, supplier, or business partner. CF Report do not bring or use any confidential information obtained from a former employer. Our obligation to protect confidential information continues even after the leave of employees.

Signature and spending authority

Only the Managing Director of CF Report is authorized to sign contracts for CF Report or commit CF Report to spend money. Officers and employees do not sign any document committing CF Report to anything unless they have the required signing authority. Notably, no director, officer or employee enters any "side letters" with clients that purport to change, add to or cancel a signed agreement or that commit CF Report to do or not to do anything (including, without limitation, promises to waive services fees or not charge during a "ramp up" period). No director, officer, or employee commits CF Report to spend money unless they have sufficient budget and approval of the budget owner, which is the Managing Director. No director, officer, or employee attempts to get around the limits of your spending authority by turning a single purchase from the same vendor into several smaller purchases.

Our responsibilities to each other

At CF Report each director, officer, or employee is responsible for creating and maintaining a work environment free from harassment and other inappropriate behavior.

Diversity and inclusion

CF Report affirm the principles of equal employment opportunity, and CF Report practice and promote such policies in all locations as appropriate under the law. Our policies affirm this principle of diversity, inclusion, and freedom from discrimination in all aspects of the employment relationship.

Harassment

CF Report is committed to provide work environments that are free from unlawful harassment and discrimination. Our policies prohibit harassment and provide employees with an effective complaint process.

Environment, Safety and Health (ESH)

CF Report is committed to provide safe and healthy work environments and to being an environmentally responsible corporate citizen. The CF Report standard, at a minimum, is to comply with all environmental, safety and health laws and regulations. CF Report is committed to minimizing the impact of its business on the environment with methods that are socially responsible and economically sound.

Communicate

Management has primary responsibility for enforcing this Code and all CF Report policies on legal and ethical conduct, as CF Report will issue guidance and explanatory materials, subject to supervision by the CF Report Managing Director. CF Report are each responsible for immediately reporting any suspected unethical or illegal conduct. Any reports of misconduct will be investigated as appropriate. Nothing in this Code is intended to restrict communications or actions protected or required by state or federal law.

Certification

All employees acknowledge the Code to certify their understanding and their commitment to comply with it.

