

# CODE OF CONDUCT

**[creative words]<sup>®</sup>**

Creative Words is committed to the principles of honesty, integrity, meritocracy and fair play.

All team members should ensure that the business of the Company, such as procurement of linguists, hiring of team and services for activities, are dealt with in an open, fair and impartial manner.

*Meritocracy guides our choices.*

This Code of Conduct sets out the behaviour we expect from all team members, whether inhouse or not. This code also applies to temporary or part-time team employed by the Company, interns or anybody that for any reason is working within Creative Words' premises.

## ETHICAL PRINCIPLES AND CORE VALUES

Creative Words' core values are listed below, and every member of the team must commit to the same:

- **Help others:** develop supportive relationships with clients, colleague and vendors.
- **Keep learning:** there's always some room for improvement. Fill that room.
- **Be brave:** take calculated risk to find the most innovative way to solve issues.

## DECISION MAKING AND THE CODE OF CONDUCT

Creative Words supports independent and proactive decision making by all team members. When making a decision as part of his/her daily work, everyone should ask him/herself the following:

- Is it permitted by law?
- Does it comply with this code of conduct?
- Is it in line with our company values?
- Does it respect the rights of others?

If unsure about any of the answers, please refer to the Executive team.

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**SPEAKING UP**

Creative Words encourages all team members to ask questions and raise issues without fear of retaliation and is committed to treating reports seriously and investigating them thoroughly.

Every team member must report unethical, illegal or suspicious behaviours immediately. Creative Words does not in any way tolerate retaliation against anyone who makes a good faith report of suspected misconduct or otherwise assists with an investigation.

To report a concern, please contact the Executive team.

**NO RETALIATION**

Team members who report a concern in good faith cannot be subject to any adverse employment action including:

- unfair dismissal, demotion or suspension;
- unfair denial of a promotion, bonus or other employment benefit;
- bullying and harassment in any form;
- exclusionary behaviour in any form;
- any other behaviour that singles out the person unfairly.

**EQUAL OPPORTUNITY**

Employment here is based solely upon individual merit and qualifications directly related to professional competence.

We strictly prohibit discrimination or harassment on the basis of race, colour, religion, national origin, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics.



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### HARASSMENT

All team member, customers, business partners and other stakeholders must be treated 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 include actions, 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 sexually-oriented pictures;
- physical conduct including unwanted touching;
- threats or demands to submit to sexual requests as a condition of employment.



### BULLYING

We are committed to ensuring that our team, our contractors and our customers work in safe and respectful environment that is free of bullying.

Bullying can include:

- spreading malicious rumour or gossip;
- excluding or isolating someone socially;
- withholding necessary information or purposefully giving the wrong information;
- intimidating someone;
- impeding someone's work;
- unfairly denying training, leave or promotion;
- criticizing or belittling someone constantly;
- tampering with a person's personal belongings or work equipment.

### CONFLICTS OF INTEREST

A conflict of interest occurs every time a team member's personal life affects his/her judgment or ability to act in the company's best interests.

Team members should always avoid the situations that can give rise to conflicts of interest.

It's important for team members to disclose any relationships, associations or activities that could create actual, potential, or even perceived, conflict of interest to their manager or the Executive team.

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### CONFIDENTIALITY AND PRIVACY

Creative Words complies with the requirements of the General Data Protection Regulation (GDPR).

Creative Words and its team members, whether inhouse or freelance, **must maintain the confidentiality of all proprietary information according to the Company's Service Level Agreement and Non-Disclosure Agreement.**

All team members have to sign such agreements, which contains provisions for information confidentiality and non-disclosure.

For any question or doubt, please refer to the above-mentioned documents.

### COMPETITION, FAIR DEALINGS AND ANTITRUST

We are in a competitive market, therefore we always compete for new business. Relationships with business partners, however, are built upon trust and mutual benefits and compliant with competition/antitrust laws.

All team members, whether inhouse or freelance, are requested to:

- **communicate** the company's services in a fair, accurate and truthful manner;
- **familiarize** 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 Executive team before engaging in any new practice that may affect fair competition;
- use only publicly available information (for example, on the

Internet or at conferences) to understand business, customers, competitors, business partners, technology trends;

- advise their manager immediately of possible violations of fair competition practices.

### BRIBERY AND FACILITATION PAYMENTS

The company will not by any means attempt to influence the judgement or behaviour of a person in a position of trust by paying a bribe or kickback. This applies to persons in government and in private business.

**The company does not permit** any kind of facilitation payments to government officials or private business in order to secure or speed up routine actions.

Team members always have to:

- select third parties carefully and monitor them continuously to ensure they comply with the company's antibribery policies, with meritocracy in mind;
- 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 Executive team.

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**GIFTS AND ENTERTAINMENT**

While gifts and entertainment among business associates are tolerated and supported as appropriate ways to strengthen ties and build goodwill, business decisions should never be influenced by them.

The company is committed to winning business only on the merits of its services and people and complies with all legal requirements for giving and receiving gifts and entertainment.

Team members are to:

- use sound judgment and comply with the law in relation to gifts and other benefits;
- never allow gifts 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;
- team members 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, team members should check with the Executive team before giving or receiving anything of above-nominal value.

**POLITICAL CONTRIBUTIONS**

Creative Words **does not make political contributions.**

Team members, either inhouse or not, are free to support any political party or entity on a personal level. However, this must be kept totally separate from company business and interests.

**CHARITABLE CONTRIBUTIONS**

Creative Words may make **charitable contributions to causes and companies that are not politically affiliated.**

Team members should check with the Executive team before making any charitable contributions on behalf of the company.



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**PROTECTION AND PROPER USE OF COMPANY ASSETS**

Creative Words requires all team members to protect its assets at all times. All assets should be used for **legitimate purposes**, efficiently, and for company business only.

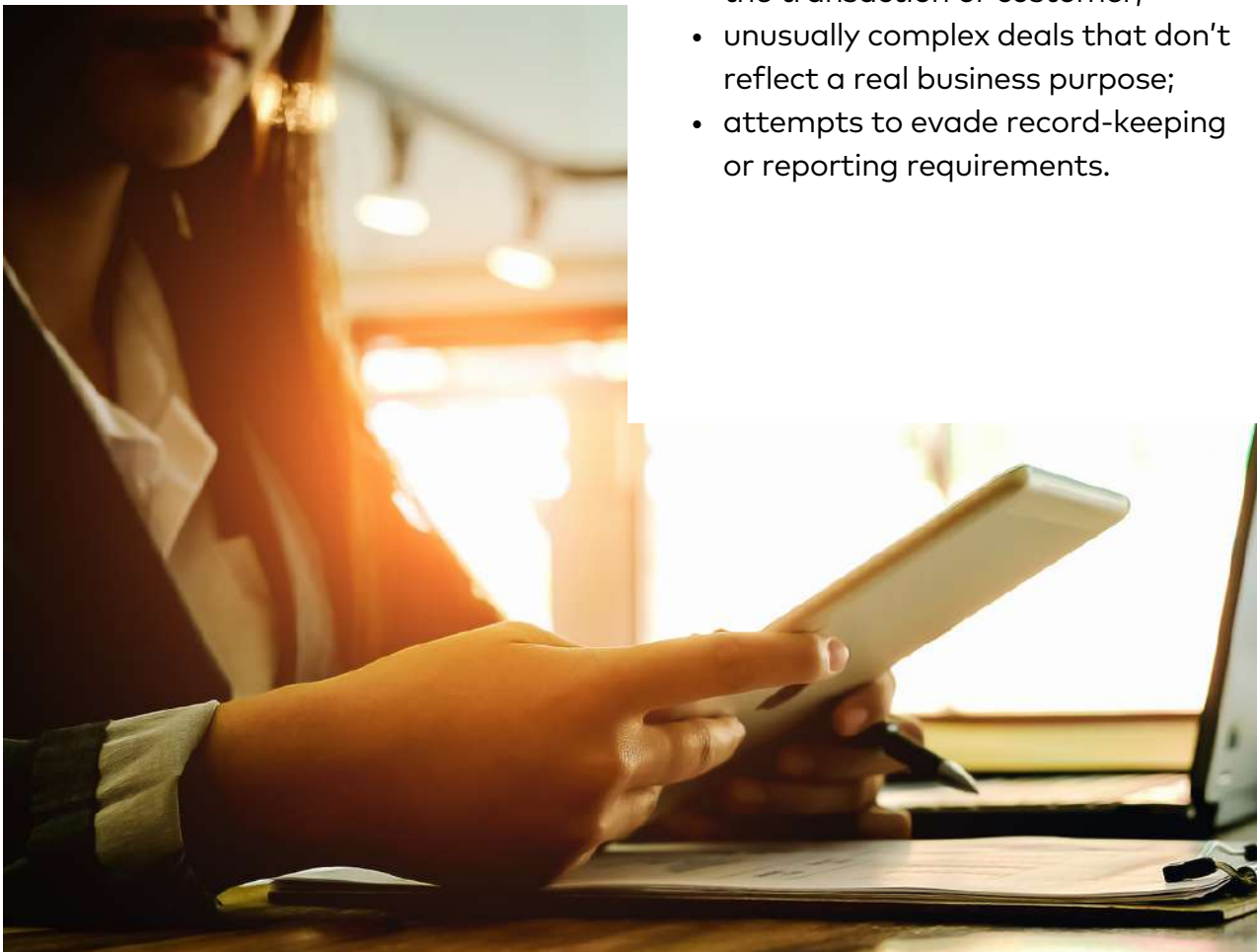
Assets include facilities, equipment, computers and information systems, telephones, staff time, confidential and proprietary information, as well as company funds.

Suspected incidents of fraud, theft, negligence, and waste should be reported to the Executive team.

**MONEY LAUNDERING**

Creative Words complies with national and international anti-money laundering laws. Money laundering is the process of concealing illicit funds by moving them through legitimate businesses to hide their criminal origin. Team members must never facilitate money laundering or war financing, and must take steps to prevent inadvertent use of the company's business activities for these purposes. Team members are required to immediately report any unusual or suspicious activities or transactions such as:

- attempted payments from an unusual financing source;
- arrangements that involve the transfer of funds to or from countries or 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.



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**HEALTH AND SAFETY**

Creative Words conducts business in accordance with applicable health and safety requirements and strives for continuous improvement in its health and safety policies and procedures. All team 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 in all locations.**

Applicable safety and health requirements must be communicated to visitors, customers or contractors at any company location.

Team members are required to immediately report workplace injuries, illnesses or unsafe conditions.

**ALCOHOL AND DRUGS**

Consumption of alcohol in a moderate manner is not banned in our office, but no team members should ever drink in a way that leads to impaired performance or inappropriate behaviour or endangers the safety of Others. **This also applies to any event linked to the company** (such as conferences, training and so on). Use of **illegal drugs in our office or at any event linked with the company is strictly prohibited.**

If a manager has reasonable suspicion to believe that an employee's use of drugs and/or alcohol may adversely affect the employee's job performance or the safety of the employee or others in the workplace, he or she may request an alcohol and/or drug screening. A reasonable suspicion may be based on objective symptoms such as the employee's appearance, behaviour, or speech.

**ENVIRONMENT**

Creative Words is committed to operating in an environmentally responsible manner, from the provision of services to the operation of its offices and facilities, selection of suppliers and other business activities. Creative Words complies with all applicable environmental laws and regulations as well as **self-directed commitments to sustainable practices and environmental protection.** As part of our commitment to protect the environment, we commit not to accept language assignments from fossil-fuel industry clients.



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### INFORMATION TECHNOLOGY

Creative Words expects its team members to help it safeguard all computer equipment and data against intentional malicious acts by individuals inside or outside the company. Creative Words safeguards against inappropriate access by individuals or groups untrained in correct company policies or procedures.

### INTERNET USE

Creative Words understands that occasional personal use of the Internet during work hours is a reasonable request and allows this, within reason. However, Creative Words does not allow Internet use to support a political venture, or embarrass the company and its customers.

### USE OF SOCIAL MEDIA

Creative Words respects and supports the right of team members to use social media for personal and professional purposes. Team members are responsible for complying with company policies and procedures when communicating on social media. Team members are accountable for any information they publish online. They are always required to:

- reveal their relationship with Creative Words whenever needed (for instance, when commenting online on issues related to the company);
- respect the privacy of other team members and refrain from publishing photos of them 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.

Team members must not:

- "pretext", or pretend online to be someone they are not;
- speak on behalf of the company if they are not expressly authorized to do so;
- share confidential information about the company, its clients, stakeholders or suppliers;
- post comments or pictures that could harm the company's brand, reputation or commercial interests.





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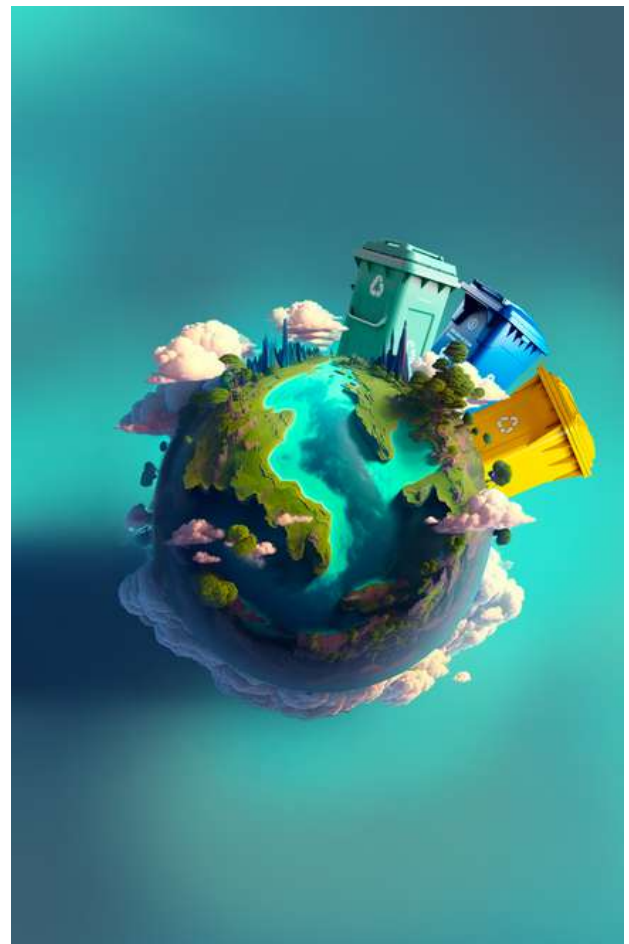
**CORPORATE SOCIAL RESPONSIBILITY**

Creative Words understands that Corporate Social Responsibility extends to our entire supply chain. This includes not only the services supplied but also the human rights, ethics and social practices of our company and its suppliers.

One goal of our Corporate Social Responsibility program is to build partnerships with like-minded companies by actively seeking out business partners who are the most environmentally and workforce friendly.

- **Forced Labour:** Creative Words and its suppliers shall employ all team members under their own free will with no one being subjected to bonded or forced labour. This policy applies not only to the supplier's business operations but also to those in their supplier network with which the company conducts its business.
- **Child Labour:** Creative Words and its suppliers shall not employ any people under the minimum legal working age of the country in which they work.
- **Responsible Environmental Impact:** Creative Words and its suppliers shall conduct ongoing efforts to reduce environmental pollution while increasing sustainability.

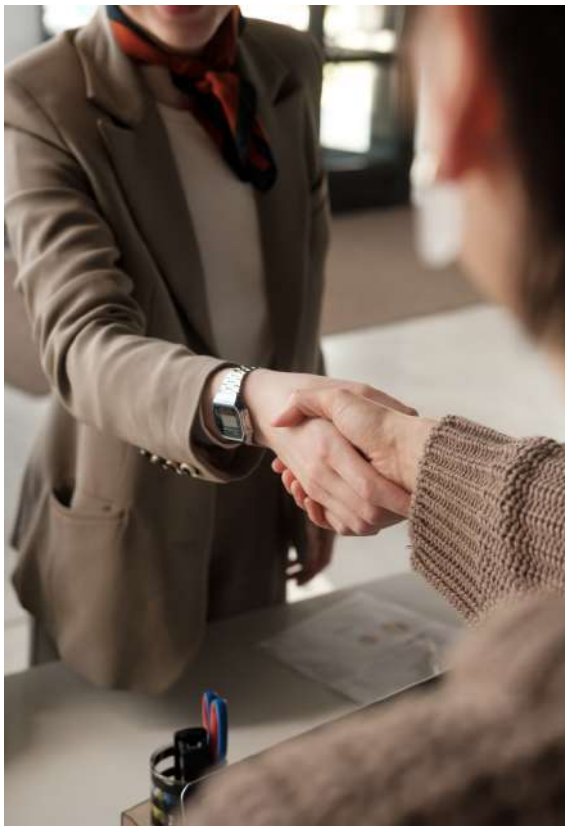
- **Dangerous or derogatory content:** Creative Words will not accept language assignments that are related to topics that are not in line with our Corporate Social Responsibility program, including but not limited to: fossil fuels, sexual harassment, war and weapons, discriminatory content and content advocating suicide, anorexia, or other self-harm or promoting, glorifying, or condoning violence against others.



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- **Collective Bargaining:**  
Creative Words will support any effort by its workers to collectively organise or form a trade union. Collective bargaining through trade unions can often bring about more favourable working conditions. Collective bargaining is not substituted by the arbitration process outlined in the SLA.

At Creative Words, we prioritize safeguarding our freelancers and partner companies by diligently screening content. In the unlikely event that any unacceptable content slips through, we kindly request our partners to promptly notify the responsible Project Managers so that appropriate actions can be taken. Together, we can better protect ourselves, the environment, and the people involved.



Creative Words encourages and supports involvement in its community. This includes supporting local business and talent by, for example, helping students to find their way through the language service industry through training programs designed for this purpose and consulting universities so that they can provide educational paths that are in line with the market needs.

## CORPORATE SOCIAL RESPONSIBILITY

Creative Words is committed to offering fair working conditions to all translators with whom we collaborate. Thanks to our dedication, we achieved a full score in Fairwork evaluations, a project aimed at assessing working conditions in the digital platform sector. You can find more information [here](#).



Although the score is valid for one year, Creative Words' promise to ensure fair working standards remains ongoing.