

**BLUE DOOR
RESPONSIBLE
BUSINESS POLICY:**

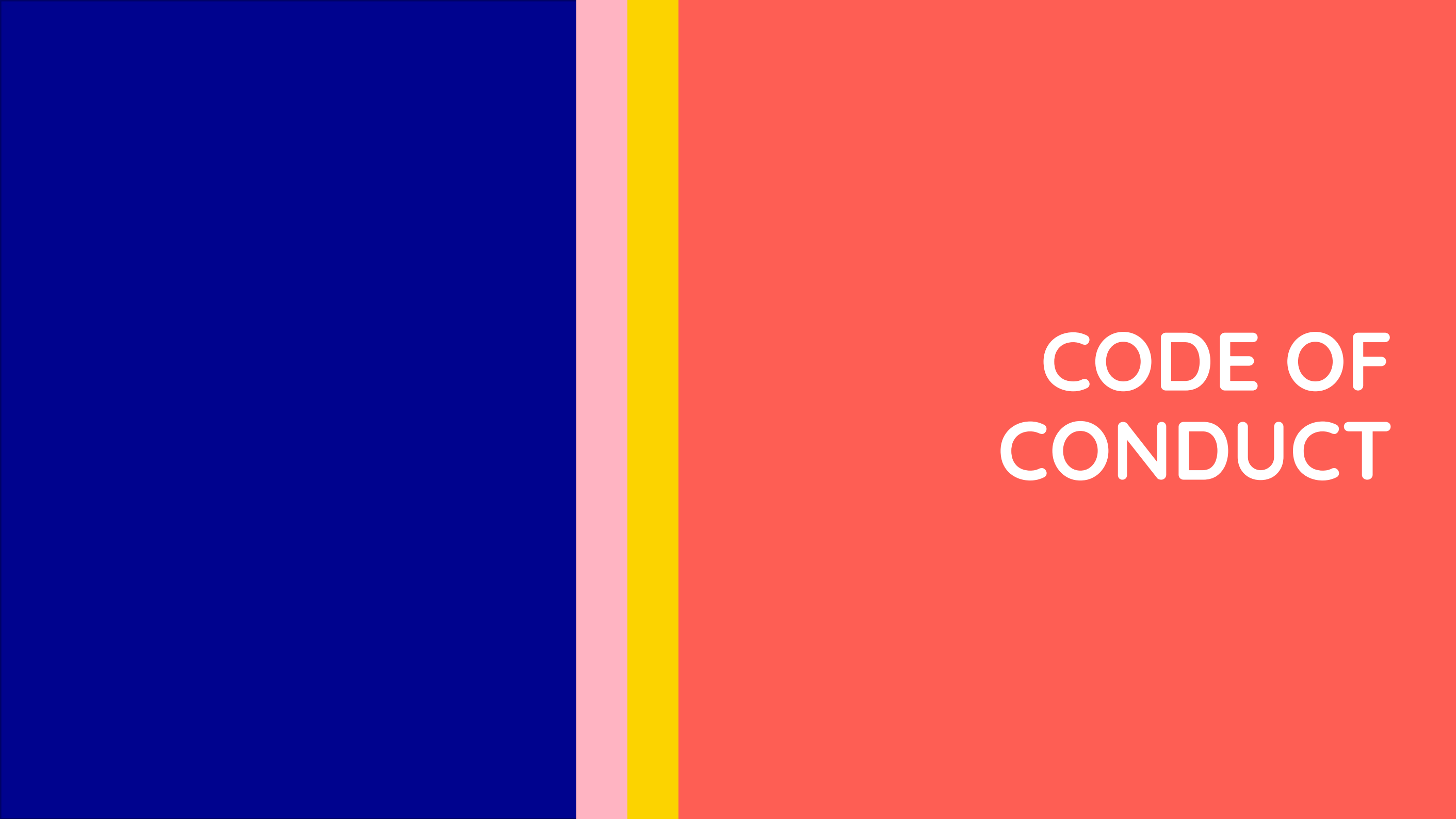
**CODE OF CONDUCT
& ETHICS CODE**



Blue Door takes its responsibilities as an ethical and responsible business seriously. Our Responsible Business Policy is based on the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights; and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We seek to fight corruption in all its forms and to behave responsibly towards our staff, contractors, associates and third party suppliers.

We strive to conduct our business with honesty, openness, respect for human rights and human dignity.

We seek to take on projects that are working towards at least one of the UN Sustainable Development Goals for 2030 and we make this a guiding principle in whether or not to accept a project.



CODE OF CONDUCT

OUR FUNDAMENTAL PRINCIPLES

1.
BUSINESS IS
CONDUCTED
LAWFULLY AND
WITH INTEGRITY

2.
WORK IS
CONDUCTED ON
THE BASIS OF
FREELY AGREED
AND
DOCUMENTED
TERMS OF
EMPLOYMENT

3.
ALL WORKERS
ARE TREATED
EQUALLY AND
WITH RESPECT
AND DIGNITY

4.
WORK IS
CONDUCTED ON
A VOLUNTARY
BASIS

5.
ALL WORKERS
ARE OF AN
APPROPRIATE
AGE

6.
ALL WORKERS
ARE PAID FAIR
WAGES

7.
WORKING
HOURS FOR ALL
WORKERS ARE
REASONABLE

8.
ALL WORKERS'
HEALTH AND
SAFETY ARE
PROTECTED AT
WORK

9.
ALL WORKERS
HAVE ACCESS TO
FAIR
PROCEDURES
AND REMEDIES

10.
ALL WORKERS
ARE FREE TO
EXERCISE THEIR
RIGHT TO FORM
AND/OR JOIN
TRADE UNIONS
OR TO REFRAIN
FROM DOING SO
AND TO
BARGAIN
COLLECTIVELY

11.
LAND RIGHTS OF
COMMUNITIES,
INCLUDING
INDIGENOUS
PEOPLES, WILL
BE PROTECTED
AND PROMOTED

12.
BUSINESS IS
CONDUCTED IN A
MANNER WHICH
EMBRACES
SUSTAINABILITY
AND REDUCES
ENVIRONMENTAL
IMPACT

1. BUSINESS IS CONDUCTED LAWFULLY AND WITH INTEGRITY

Compliance with Laws:

All laws and regulations are complied with in the countries in which we operate. All other applicable international laws and regulations are complied with including those relating to international trade (such as those relating to sanctions, export controls and reporting obligations), data protection and antitrust/ competition laws.

Bribery

There is a prohibition on any and all forms of bribery, corruption, extortion or embezzlement and there are adequate procedures in place to prevent bribery in all commercial dealings we undertake.

Conflicts of Interest

All and any conflict of interest in any business dealings with our clients, of which we are aware, will be declared to our clients. Any ownership or beneficial interest in our business by a government official, representative of a political party or a client's workers are declared to our clients prior to any business relationship with them being entered into.

Gifts and Hospitality

Any business entertaining or hospitality with our clients is kept reasonable in nature, entirely for the purpose of maintaining good business relations and not intended to influence in any way their decisions about how our clients award future business. Gift giving should occur sparingly and always be legitimate and aligned with company policies.

Confidential and Competitor Information

All competitor information is obtained and used legitimately and in compliance with all applicable laws and regulations. No attempt is made to divulge to our clients any information about its competitors. Likewise, our client's confidential information must not be shared with any third party unless expressly permitted by the client.

Financial Records, Money Laundering and Insider Trading

All business and commercial dealings are transparently performed and accurately recorded in the books and records. There is no actual or attempted participation in money laundering. No confidential information in the supplier's possession regarding our clients is used to either engage in or support insider trading.

Safeguarding Information and Property

Our clients' confidential information, know-how and intellectual property is respected and safeguarded. All information provided by our clients that is not in the public domain is deemed confidential and it is only used for its intended and designated purpose. All and any personal information about individuals, such as our clients' consumers or employees, is handled with full respect for the protection of their privacy and for all relevant privacy laws and regulations.

Product Quality and Responsible Innovation

Products and services are delivered to meet the specifications and quality and safety criteria specified in the relevant contract documents and are safe for their intended use. Research and development are conducted responsibly and based on good clinical practice and generally accepted scientific, technological and ethical principles.

Reporting Concerns and Non-retaliation

All workers (whether directly employed or not) are provided with means by which to raise their concerns about any of these requirements and processes are in place to ensure that workers who raise concerns and speak up in good faith are protected from retaliation.

2. WORK IS CONDUCTED ON THE BASIS OF FREELY AGREED AND DOCUMENTED TERMS OF EMPLOYMENT

All workers, both permanent and casual, are provided with employment documents that are freely agreed and which respect their legal and contractual rights.

3. ALL WORKERS ARE TREATED EQUALLY AND WITH RESPECT AND DIGNITY

All workers are treated with respect and dignity. No worker is subject to any physical, sexual, psychological or verbal harassment, abuse or other form of intimidation. There is no discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement. Discrimination based on race, ethnicity, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, pregnancy, dependants, disability, social class, union membership or political views is prevented. In particular, attention is paid to the rights of workers most vulnerable to discrimination.

4. WORK IS CONDUCTED ON A VOLUNTARY BASIS

Under no circumstances will we use forced labour, whether in the form of compulsory or trafficked labour, indentured labour, bonded labour or other forms. Mental and physical coercion, slavery and human trafficking are prohibited.

5. ALL WORKERS ARE OF AN APPROPRIATE AGE

Under no circumstances will we employ individuals under the age of 15 or under the local legal minimum age for work or mandatory schooling, whichever is higher. When young workers are employed they must not do work that is mentally, physically, socially or morally dangerous or harmful or interferes with their schooling by depriving them of the opportunity to attend school.

6. ALL WORKERS ARE PAID FAIR WAGES

All workers are provided with a total compensation package that includes wages, employer's operations, overtime pay, benefits and paid leave which meets or exceeds the legal minimum standards or appropriate prevailing industry standards, whichever is higher, and compensation terms established by legally binding collective bargaining agreements are implemented and adhered to.

7. WORKING HOURS FOR ALL WORKERS ARE REASONABLE

Workers are not required to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. All overtime work by workers is on a voluntary basis.

8. ALL WORKERS' HEALTH AND SAFETY ARE PROTECTED AT WORK

A healthy and safe workplace is provided to prevent accidents and injury arising out of, linked with, or occurring in the course of work or as a result of the employer's operations.

9. ALL WORKERS HAVE ACCESS TO FAIR PROCEDURES AND REMEDIES

All workers are provided with transparent, fair and confidential procedures that result in swift, unbiased and fair resolution of difficulties which may arise as part of their working relationship.

10. ALL WORKERS ARE FREE TO EXERCISE THEIR RIGHT TO FORM AND/OR JOIN TRADE UNIONS OR TO REFRAIN FROM DOING SO AND TO BARGAIN COLLECTIVELY.

The rights of workers to freedom of association and collective bargaining are recognised and respected. Workers are not intimidated or harassed in the exercise of their right to join or refrain from joining any organisation.

11. LAND RIGHTS OF COMMUNITIES, INCLUDING INDIGENOUS PEOPLES, WILL BE PROTECTED AND PROMOTED

The rights and title to property and land of the individual, indigenous people and local communities are respected. All negotiations with regard to their property or land, including the use of and transfers of it, adhere to the principles of free, prior and informed consent, contract transparency and disclosure.

12. BUSINESS IS CONDUCTED IN A MANNER WHICH EMBRACES SUSTAINABILITY AND REDUCES ENVIRONMENTAL IMPACT

Operations, sourcing, manufacture, distribution of products and the supply of services are conducted with the aim of protecting and preserving the environment.

ETHICS CODE

SCOPE

This policy applies to everyone we employ or have business relations with. This includes individual people such as employees, interns, volunteers, but also business entities, such as vendors, enterprise customers or venture capital companies. Our code of professional ethics refers to legally or morally charged issues.

What is meant by code of professional ethics?

These are a set of principles that guide the behavior of people in a business context. They are essential to maintaining the legality of business and a healthy workplace.

Our code of ethics definition refers to the standards that apply to a specific setting – in this case, our own organization.

What is the purpose of a professional code of ethics?

We strive to hire ethical people who have their own personal standards, so we expect that a written code won't be necessary most of the time.

But, it can still be helpful to have a written code of ethics. You may find yourself in a situation where you're not sure how you should act and some professional ethics also correspond to laws that you absolutely must know to do your job properly, so we will mention them in our code of ethics.

Additionally, every organization makes bad hires every once in a while. We also can't predict how people are going to behave. When an employee behaves, or intends to behave, in a way that's against our professional ethics, or applicable laws, we will have clear guidelines on what disciplinary actions we will consider.

For these reasons, we advise you to read this document carefully and consult with your manager or HR, if you have doubts or questions.

THE COMPONENTS OF OUR CODE OF PROFESSIONAL ETHICS

1.

RESPECT FOR OTHERS.

Treat people as you want to be treated.

2.

INTEGRITY AND HONESTY.

Tell the truth and avoid any wrongdoing to the best of your ability.

3.

CONFLICT OF INTEREST.

Never use your position for your own personal gain.

4.

JUSTICE.

Make sure you're objective and fair and don't disadvantage others.

5.

LAWFULNESS.

Know and follow the law – always.

6.

COMPETENCE AND ACCOUNTABILITY.

Work hard and be responsible for your work.

7.

TEAMWORK.

Collaborate and ask for help.

1. RESPECT FOR OTHERS

It's mandatory to respect everyone you interact with. Be kind, polite and understanding. You must respect others' personal space, opinions and privacy. Any kind of violence is strictly prohibited and will result in immediate termination. You're also not allowed to harass or victimize others.

What constitutes harassment or victimization? As a general rule, try to put yourself in someone else's place. How would you feel if someone behaved a specific way to you? If the answer is "I wouldn't like it much" or "I would never let them behave like that to me", then we don't tolerate this behavior no matter the person it comes from.

If someone, be it customer, colleague or stakeholder, is offensive, demeaning or threatening toward you or someone you know, report them immediately to your manager. You can also report rudeness and dismissiveness if they become excessive or frequent.

2. INTEGRITY AND HONESTY

First, always keep in mind our organisation's mission. We all work together to achieve specific outcomes. Your behavior should contribute to our goals, whether financial or organizational.

Be honest and transparent when you act in ways that impact other people (e.g. taking strategic decisions or deciding on layoffs). We don't tolerate malicious, deceitful or petty conduct. Lies and cheating are huge red flags and, if you're discovered, you may face progressive discipline or immediate termination depending on the damage you did.

Stealing from the company or other people is illegal. If you're caught, you will face repercussions depending on the severity of your actions. For example, if you steal office supplies, you may receive a reprimand or demotion (at a minimum), while if you steal money or data (e.g. engaging in fraud or embezzlement), you will get fired and face legal consequences. The decision is at management's discretion on a case-by-case basis.

3. CONFLICT OF INTEREST

Conflict of interest may occur whenever your interest in a particular subject leads you to actions, activities or relationships that undermine our company. This includes situations like using your position's authority for your own personal gain or exploiting company resources to support a personal money-making business. Even when you seemingly act to the company's advantage, you may actually disadvantage it. For example, if an employee uses dubious methods to get competitor intel and raise their sales record, their action will have a positive impact on the company's revenue, but it will put us at a legal risk and promote unhealthy business practices.

If it turns out you have created a conflict of interest for yourself, you will be terminated. If the conflict of interest was involuntary (e.g. buying stocks from a company without knowing they're a competitor), we will take actions to rectify the situation. If you repeat the offence, you may be terminated.

4. JUSTICE

Don't act in a way that exploits others, their hard work or their mistakes. Give everyone equal opportunity and speak up when someone else doesn't.

Be objective when making decisions that can impact other people, including when you're deciding to hire, promote or fire someone. Be sure that you can justify any decision with written records or examples. Seek and use the most objective methods in any case; for example, when interviewing candidates, ask the same interview questions to all of them and avoid judging non-job-related criteria, like dress, appearance, etc.

Also, don't discriminate against people with protected characteristics, as this is forbidden by law. If you suspect you may have an unconscious bias that influences your decisions (taking Harvard's Implicit Association Test could help you determine this), ask for help from our management team and we can support you with training..

When exercising authority, be fair. Don't show favoritism toward specific employees and be transparent when you decide to praise or reward an employee.

If you need to discipline an employee, be sure to have prepared a case that you can present to the management team. You must not retaliate against employees or applicants (such as in cases when they've filed complaints) as this is forbidden by law. Be just toward customers or vendors, too. If you think our company was in the wrong in a specific instance, don't try to cover it up or accuse the other side. Discuss with your manager to find solutions that can benefit both sides.

5. LAWFULNESS

You are obliged to follow all laws which apply to our organisation.

When you're preparing contracts, clauses, disclaimers or online copy that may be governed by law (such as consent forms), please ask verification from our legal team before finalising anything.

You're also covered by our confidentiality and data protection policy. You must not expose, disclose or endanger information of customers, employees, stakeholders or our business. This applies online as well as offline. Be mindful of cybersecurity risks. Following laws regarding fraud, bribery, corruption and any kind of assault is a given. You are also obliged to follow laws on child labour and avoid doing business with unlawful organisations.

If you're not sure what the law is in a specific instance, don't hesitate to ask.

6. COMPETENCE AND ACCOUNTABILITY

We all need to put a healthy amount of effort in our work. Not just because we're all responsible for the organisation's success, but also because incomplete or slow working might hinder other people's work or cause them to shoulder the burden themselves and put extra pressure on our colleagues. This comes in direct conflict with our respect and integrity principles.

We also expect you to take up opportunities for learning and development, either on-the-job or via educational material or training. If you are unsure how you can achieve this, have an open discussion with your manager.

Also, take responsibility for your actions. We all make mistakes or need to make tough decisions and it's important we own up to them. Failing to be accountable on a regular basis or in important situations (e.g. a crucial mistake in our financial records) will result in termination. If you take responsibility and come up with ways to fix your mistakes where possible, you will be in a far better position.

7. TEAMWORK

Working well with others is a virtue, rather than an obligation. You will certainly get to work autonomously and be focused on your own projects and responsibilities. But, you should also be ready to collaborate with and help others.

Be generous with your expertise and knowledge. Be open to learning and evolving. If days go by without you consulting or brainstorming with anyone, you are missing out on opportunities for excellence. Instead, work with others and don't hesitate to ask for help when you need it.



HUMAN TRAFFICKING POLICY

Blue Door strictly prohibits its employees and all subcontractors and agents from:

- engaging in severe forms of trafficking in persons;
- procuring commercial sex acts;
- the use of forced or trafficked labor;
- destroying, concealing, confiscating, or otherwise denying an employee access to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the employee, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if/when arranged by the company), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work;
- using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- charging employees recruitment fees (as defined by the FAR);
- failing to pay return transportation costs upon the end of employment, for certain employees who are not nationals of the country in which the work is taking place (with some exceptions as specified under FAR 52.222.50(b)(7));
- providing or arranging housing that fails to meet the host country housing and safety standards; and
- if required by law or contract, failing to provide an employment contract, recruitment agreement, or other legally required work document in writing in a language the employee understands, containing a detailed description of the terms and conditions of employment, at least five days before an employee relocates to perform work.

More information about Trafficking in Persons can be found at the website for the Department of State's Office to Monitor and Combat Trafficking in Persons at <http://www.state.gov/j/tip/>.

SAFEGUARDING

Data Ethics and Privacy

Personal data is collected, processed, stored, transferred and disposed of in line with applicable laws and with respect for the protection of privacy as a human right. The risk to individuals when using their personal data is always considered and steps are taken to mitigate those risks and restrict the collection or use of personal data to only the purpose it is being collected for. Blue Door has a designated Company Data Protection Officer along with a data protection policy.

Client Confidential Information

Protecting client's confidential information, know-how and intellectual property are respected and safeguarded. All information provided by our Clients or another party that is not in the public domain is deemed confidential and only used for its intended and designated purpose.

Competitor Information

All competitor information is obtained and used legitimately and in compliance with all applicable laws and regulations. No attempt is made to divulge to our Clients, or to any other party, any commercially sensitive or confidential information about their competitors or the business partner's competitors.



FOR BETTER IDEAS

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