Code of Conduct

Version 1.0 - December 2022



1. WHAT?

The **«Code of Conduct»** sets out the core values and principles that should help Ethikos lawyers and their staff members navigate uncharted territories.

The Code of Conduct is based on **4 core values**: Ethics – Integrity – Business Agility – Human Orientation.

From these core values derived **8 principles** that Ethikos Lawyers and their staff members should follow in their interpersonal relationships within the law firm but also with their clients and external counterparties.

As an **ethical law firm**, we strongly believe in the added value of ethics in addition to strict compliance with all the laws, regulations, and professional rules.

2. WHY?

No one can deny the growing importance of ethics in our society.

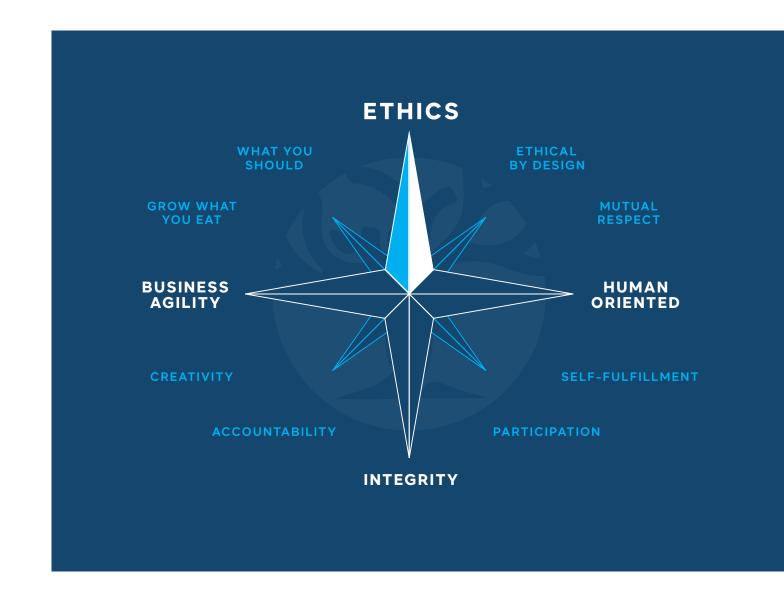
Ethics are everywhere, including within companies.

Many of the regulations companies must comply with have an ethical basis.

These regulations are no longer solely based on economic objectives but aim to fight criminality, stop corruption, restore public confidence in the financial system, or protect our citizens' personal data.

In a world that is now interconnected and increasingly transparent, no company concerned with its sustainability can risk adopting behavior that could damage its reputation and, at the same time, cause its business to fail.

At Ethikos, we believe that adopting ethical behavior is no longer a choice but a necessity.



3. SCOPE OF APPLICATION

The Code of Conduct applies to all lawyers and staff members. The Code of Conduct governs the relations between Ethikos and its business partners, including clients, lawyers, courts, and tribunals.

Territorially, each Ethikos lawyer or staff, located either in Luxembourg or Belgium, is required to take all necessary measures for the implementation and pursuance of our Code of Conduct. Moreover, our Code Conduct might apply extra territorially when a client's business or activity is located out of the territory where Ethikos offices are established.

Our Code is subject to an annual review, or whenever it will be necessary. These updates shall be communicated to Ethikos lawyers and staff members.

4. OWNERSHIP OF THE DOCUMENT

Ethikos Belgium and Luxembourg are the owners of this document.



5. CORE VALUES

1. Ethics

Regulations are no longer strictly related to growth or economic perspectives; ethics must be considered a pertinent factor affecting the law-making process. In addition, due to an increasing regulatory burden, companies must prevent risks of non-compliance to the current regulation to avoid severe consequences for the business.

Ethikos strives to ensure that its clients conduct their activities in a compliant manner by analyzing compliance programs, business processes, and strategies.

Moreover, Ethikos adds value through its client's recommendations by designing new programs or ensuring that enhancements are comprehensive.

Within the firm, too, we attach great importance to ethics, ranging from the selection of people to how we assist our clients.

2. Integrity

Ethikos values a culture of transparency and openness in which everyone has an opportunity to contribute.

Integrity and reliability are guiding principles in our relationships, together with a solid commitment to fairness and truth.

Holding ourselves responsible for results is a reflection of our personal commitment.

We set challenging goals and do not shy away from the importance of accountability.

3. Business agility

Ethikos approaches the law from a business perspective and builds strong knowledge of their client's businesses by understanding their issues and priorities.

Since the world is constantly changing, clients' needs and our business never stay the same. In that sense, we constantly seek innovation by developing new ideas and methods.

We embrace change and are inspired by both the challenges and the possibilities it creates.

The better and faster we adapt to change, the stronger and more successful we become as a firm.

We display a great deal of creativity and pragmatism in our problem-solving.

The best solution is not always the most obvious; to outmaneuver challenge, it is often necessary to think outside the box.

4. Human-oriented

We build strong relationships based on mutual respect and capitalize on the creativity and energy that teamwork creates.

Working together creates a more enriching work environment and generates better results.

We build people up by empowering, appreciating, and celebrating individual and team successes.

We are very serious about our client's needs but never take ourselves too seriously. Having fun at work helps up keep perspective.



6. PRINCIPLES

1. Ethical by design

Ethics should always be taken into account.

Ethics play a critical part in our decisionmaking process, whether it has to do with how we handle our relationships with our clients, the selection of our people, or the choices we make as a firm or as individuals.

2. Mutual respect

We build strong relationships based on mutual respect and capitalize on the creativity and energy that teamwork creates.

Working together creates a more enriching work environment and generates better results.

3. Self-fulfillment

We build people up by empowering, appreciating, and celebrating individual and team successes.

We support our co-workers in their initiatives and take great pride in achieving their life

4. Participation

We believe that transformative change, whether in the individual or the firm, can occur only through the medium of deeply personal participation.

We value a culture of transparency and openness in which everyone has an opportunity to contribute.

5. Creativity

We display a great deal of creativity and pragmatism in our problem-solving.

The best solution is not always the most obvious one.

To outmaneuver challenges, it is often necessary to think outside the box.

6. Accountability

Holding ourselves responsible for results is a reflection of our personal commitment to our core values.

We set challenging goals, and we do not shy away from accountability.

7. What you should

We rely strongly on our core values to achieve durability and growth simultaneously.

If laws and policies are designed to explain what you may or may not do, values will always tell you what you should do.

8. Grow what you eat

Our clients are equally important as us.

We understand that our success mainly depends on their success.

For this reason, we have put in place a compensation culture that considers both our client's interests and the development of each of us.

