

Circletree Enterprises Business Code of Conduct

Circletree is committed to maintaining transparent, honest, and ethical operations in all aspects of its business.

- I. We, the officers and employees of all companies affiliated with Circletree Enterprises (the “Company”), recognize our obligations to all who have a stake in our success including shareholders, owners, clients, and employees.
- II. Information about our business shall be communicated clearly and accurately in a nondiscriminatory manner and in accordance with local regulations.
- III. We select and promote our people on the basis of their qualifications and merit, without discrimination or concern for race, religion, national origin, color, sex, sexual orientation, gender identity or expression, age, or disability.
- IV. We believe that a workplace should be safe and civilized and that employment must be freely chosen. We will not tolerate sexual harassment, discrimination, or offensive behavior of any kind, which includes the persistent demeaning of individuals through words or actions, the display or distribution of offensive material, or the use or possession of weapons on any premises of the Company.
- V. We will not tolerate the use, possession, or distribution of illegal drugs or our employees reporting to work under the influence of drugs or alcohol.
- VI. We will treat all information relating to the Company’s business and clients as confidential.
- VII. We are committed to protecting client and employee data in accordance with national laws and industry codes.
- VIII. We will not knowingly create work which contains statements, suggestions, or images offensive to general public decency.
- IX. We will not undertake work that is intended or designed to be misleading.
- X. We will not engage, directly or indirectly, in any activity which competes with companies within the Company or with our obligations to any such company.
- XI. We will not give, offer, or accept bribes, whether cash or otherwise, to or from any third party.
- XII. We will not offer any items of personal inducement to secure business. This is not intended to prohibit appropriate entertainment or the making of occasional gifts of minor value unless the client has a policy against accepting such offers.
- XIII. We will not accept goods or services of more than nominal value for personal benefit from any third party.
- XIV. We will not have any personal conflicts of interest within our Group or with any third party with whom we do business.