

*"Business should be conducted both profitably and responsibly."*

### **Our Ethical Commitment**

Ester Digital strongly believes that business should be conducted both profitably and responsibly. Ester wants to conduct its business with good ethical principles and practices both internally and with our clients and partners. Ethics are not some rules that we adopt to make us feel good. They define our attitude towards the clients and the projects we get involved into. Guided by such a code and confident in our integrity we have the opportunity to help our clients in the most challenging circumstances. For us, being proud of what we do is more important than some short-term financial gain.

### **Our Core Values**

Ester Digital operates according to its core values which are: integrity, collaboration and team work, and pursuing professionalism and excellence.

### **Business Integrity**

Business integrity for Ester Digital means we comply with the law of the land and even beyond that. We always apply and upheld our core values in business.

Ester Digital therefore does not:

- ◆ pay bribes, receive bribes
- ◆ engage in acts of corruption
- ◆ tolerate conflict of interest
- ◆ engage in spying activity or - hacking - cracking - money laundering - copyright infringement.

Ester Digital however:

- ◆ is a fair competitor
- ◆ protects confidential information
- ◆ abides by NDAs and contracts signed Ester Digital expects its suppliers, partners, sub-contractors and representatives to adhere to integrity principles that are consistent with our own.

### **Human Rights**

Ester Digital supports the Universal Declaration of Human Rights and our employees are never to be involved direct or indirect in human rights abuses. Ester Digital is also part of the United Nations 'UN-Business Action Hub' and thus adheres to the human rights, labour, environment and anti-corruption related principles.

### **Political Activities**

Ester Digital, as a corporate body, is politically neutral. We do not make donations to any political parties, organizations or individuals engaged in politics. Our employees are entitled to their own political views and activities insofar as they do not use the company premises or equipment to promote those views nor associate their views with those of the company.

### **Fair Competition**

Ester Digital will not directly or indirectly exchange information with competitors in areas that can infringe Competition laws:

- ◆ Prices
- ◆ Terms and conditions
- ◆ Volumes
- ◆ Market share
- ◆ Customers

If the Ester Digital has a dominant position in a given sector it will never take an unfair advantage of this dominant position.

### **Conflict of Interests**

A conflict of interest can arise when our directors or employees (or members of their family) can gain material or immaterial benefits by their part in conducting company business. To avoid conflict of interests arising from their employment our staff:

- ◆ should not have a position of management or director of a company outside the Ester Digital
- ◆ must not enter into any financial relationship with any of our partners, clients or suppliers
- ◆ must not engage in business or employment with other IT company outside the Ester Digital
- ◆ should notify the CEO or the Deputy General Manager if they are in a conflict of interest situation.

### **Protection of Assets**

Ester Digital has many valuable assets on which its future in business depends. All directors and employees must protect our information, hardware, tools, copyrights, patents, software in object or source code form, technical information, inventions, trade secrets etc. Misappropriation of resources or manipulation of data or assets, wrong financial reporting can amount to fraud and as such may lead to sanctions from the Ester Digital, as well as civil and criminal sanctions. Similarly, giving wrong information to a customer in order to sign a contract could be a misrepresentation with potential civil and criminal sanctions.

## Confidentiality

Ester Digital does not reveal the identity of any client without their prior consent. Even if a client decides to reveal Ester Digital's involvement, we will neither confirm nor deny our involvement. All documentation and client files entrusted to our company will be handled securely and remain confidential. Any breach or suspect loss must be reported to our CEO or the General Manager immediately. Ester Digital strictly abides by any NDA (Non-Disclosure Agreement) that has signed with a client or partner. No specific or sensitive information regarding the projects we execute shall be disclosed by any Ester Digital employee or sub-contractor to anybody without prior written consent from the client.

## Computer Misuse

Ester Digital does not tolerate any computer misuse by our employees internally and does not engage in any hacking activity (network or system penetration, device hacking etc.). Ester Digital will never accept projects that require:

- ◆ cracking of software (manipulate code in order to make a program do what it was not intended to do)
- ◆ reverse engineering (unless the client can prove it has ownership of the software and wishes to update or enhance it for a good purpose)
- ◆ cracking passwords or encrypted files
- ◆ develop software that will be used to enable crime such as money laundering, fraud, organized crime or any other illegal activity

*Should a non-compliant behavior happen Ester Digital would immediately apply, under supervision of Human Resources department, sanctions which may go up to termination of the contract with the concerned directors and employees or client. The person could also be subject to civil and criminal sanctions.*

*The present document outlines the basis for our ethical behavior.*

*It does not cover all situations and other rules may apply.*

*Each and all of our employees have the duty to protect our company, people, brand and our reputation.*