

CONNECTIONS

Code of Conduct



1. INTRODUCTION

2. DEFINITIONS

3. PRINCIPLES OF THE COMPANIES

4. PURPOSE AND APPLICABILITY

5. FINANCIAL CONDUCT

6. SALE OF OUR SERVICES

7. EMPLOYMENT POLICIES

8. CONFIDENTIAL INFORMATION



Introduction by the CEO

The Code of Conduct is about organization's mission, values and principles, linking them with standards of professional conduct.

Business is done between people. People do business with people they like and trust. We believe in building bridges of trust. In the world of ROIs, KPIs, OKRs and IPOs, it's easy to forget about something so primal as trust. We put all our efforts in gaining trust and keeping it. It's trust from clients and employees, business partners and society.

The code of conduct is a set of standard social norms, regulations and responsibilities of each employee in the company that help us to carry out our activity in the most correct way.

Bogdan Florea,
CEO Connections &
Connections Technologies

1. INTRODUCTION

Connections is a group (Connections Consult and Connections Technologies) of tech enthusiasts, above all. We use technology to improve business efficiency, we help companies to grow and digitalize and we use latest tools to make business easier and safer. We analyze, map processes, re-design and optimize them and enhance them using software, robots and people. We are looking for the best solutions to support us and strengthen the reputation we have built over the years. The excellence of our services allows us to maintain the trusting relationships we have with our employees, collaborators, customers, and investors.

To maintain the trust of our customers and employees, Connections group promotes and supports high standards of conduct. Thus, the Code of Conduct (the "Code") reflects our commitment to respect ethical principles in our business relationships with our customers, employees, and partners.

The main purpose of the Code is to guide our actions and behavior within the companies and in business. This code applies to all employees and collaborators of the Connections Consult and Connections Technologies, but also to any third party with whom the companies develops business relations.

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Problem solving, critical thinking, perseverance, adaptability and customer-first, they are all part of our culture and we call it entrepreneurship. We like to build solutions and deliver results, we have the culture of understanding and following "the definition of done".

Beyond resilience and robustness, we like antifragility. We adapt and transform under the influence of shocks. Nowadays, all the world is under extreme pressure from all directions, while we educate ourselves to live with uncertainty and deliver as expected. We value antifragility and thrive our way towards becoming a true antifragile system.

INTEGRITY is everyone's responsibility. All employees must read the Code of Conduct to implement and necessarily comply. We are all responsible for maintaining the highest standard of integrity.

2. DEFINITIONS

BRIBERY | A bribe is the act by which you directly or indirectly claim or receive money or other benefits in order to obtain an unjustified or inappropriate business advantage. Bribes can take the form of a financial incentive, goods or services or another favor.

FORCED LABOR | Any work or service imposed on a person under threat or for which the person has not freely expressed his or her consent is considered forced labor.

FRAUD | Fraud is a scam to obtain an unjustified, unjust and / or illegal benefit. Corruption is therefore a form of fraud, committed against a public or private organization, by the person receiving the bribe or the illegal commission.

PUBLIC/CIVIL SERVANT | A civil servant within the meaning of the criminal law is a person who permanently or temporarily, with or without remuneration, exercises attributions and responsibilities, established under the law, in order to exercise the prerogatives of the legislative, executive or judicial power, exercises a function of public dignity or function. public office of any kind, exercising alone or together with other persons, within an autonomous administration, another economic operator or a legal person with full or majority state capital or a legal person declared to be of public utility, attributions related to achieving its object of activity. Also, a public servant is defined, within the meaning of the criminal law, the person who exercises a service of public interest for which he has been invested by the public authorities or who is subject to their control or supervision regarding the fulfillment of the respective public service.

TRAFFICKING IN HUMAN BEINGS | Trafficking in human beings occurs when a person recruits, transports, accepts or “trades” another person for the purpose of exploitation - usually forced labor, child exploitation and / or sexual exploitation.

ILLEGAL COMMISSIONS | Illegal commissions are parts of the value of contracts (in the form of bribes) paid by contractors to persons who sign or award contracts or give them a commercial advantage.

2. DEFINITIONS

MODERN SLAVERY | Modern slavery includes forced labor, child exploitation, sexual exploitation and human trafficking.

MONEY LAUNDERING | Money laundering is the process by which the origin and real property of illegally obtained funds is hidden. Corruption is often accompanied by money laundering to hide the illicit nature of bribes or illegal commissions received.

SEXUAL EXPLOITATION | Sexual exploitation occurs when a person abuses power, wealth, influence, or superior trust in relation to sexual activity. It includes non-consensual sexual activity, forced, or unintentionally accepted sexual activity or inability to defend oneself, and sexual activity as a condition of obtaining assistance or rights.

THIRD PARTIES | Third parties with whom the Company operates include business partners, joint venture partners or capital infusion partners, service providers, suppliers of goods, consultants, subcontractors, contractors or any other persons acting on its behalf (such as agents, representatives and sponsors) and their employees or other persons working for them.

HARASSMENT AT WORK | Harassment in the workplace is usually defined as any offensive behavior, in the form of recurring verbal behaviors or comments, actions or gestures, that are hostile or unwanted and deny the dignity or physical or mental integrity of a person and that create an environment. hostile or intimidating work.



3. PRINCIPLES OF THE COMPANIES

The Companies use all their resources to attract, develop, hire, and retain the best professionals in our field of expertise.

We vote for the highest ethical standards applicable in everything we do. We act with moral and intellectual integrity, support and promote respect and categorically and firmly block any form of indiscipline in personal and professional conduct. We are future-oriented and challenge the status quo.

4. PURPOSE AND APPLICABILITY

The Code refers to **Connections Consult S.R.L.** and **Connections Technologies S.R.L.** and applies to all employees and collaborators, without exception. It includes the CEO, directors, managers, employees, independent contractors, and other employees, regardless of the type of employment contract, in the Companies.

The Code establishes the general principles for guiding employees in maintaining correct behavior, guided by ethical principles.

The Code is based on applicable law and regulatory requirements and is designed to provide general guidance.

The Code must be applied and respected in conjunction with its emerging policies and procedures, such as the Personal Data Protection Policy and the Rules of Procedure.

No Internal Regulations / Code or internal procedure can anticipate all the circumstances or questions related to a Company's policy. Accordingly, to the extent that the need to change or modify the policies described in this document arises at any time, the Company reserves the right to revise or add information.

4. PURPOSE AND APPLICABILITY

The Code will be communicated to Employees by posting it at work, sending it by e-mail to all employees, posting it on the company`s intranet page and it will enter into force from the moment of communication. All Employees must know the rules that apply particularly to each of them and are relevant to the department to which they belong. The rules set forth in this document are binding on all Company`s Employees, regardless of: (a) the duration of the individual employment contract; (b) the date of employment with the company.

COMPLIANCE WITH THE CODE

All employees, collaborators, independent contractors, customers of the Connections Consult and Connections Technologies are responsible for understanding and complying with the Code. Employees must act in accordance with the principles of this Code and work fairly and honestly, whether or not the field of activity is mentioned in the Code. Violations of the Code and other associated policies and procedures will be investigated, in accordance with applicable law, the Internal Regulations and the individual employment contract.

Disciplinary action, including dismissal, may be taken against any Employee who:

- Does not comply with the Code and its associated policies or does not adopt the conduct supported by it;
- Encourages other Employees, collaborators, independent contractors, to violate the Code and its associated policies;
- Will not comply with the obligation to report a possible deviation, does not promptly report or hide relevant information about a possible deviation;
- Refuses to cooperate during the investigation of a possible violation of the Code or a confirmed violation thereof, or intentionally obstructs the conduct of an investigation;
- Sanctions or intimidates another employee who has reported a possible violation.

BUSINESS STANDARDS

Connections Consult and Connections Technologies main business standards include:

- Commitment to adopt a policy of zero tolerance for any form of corruption;
- Commitment to act ethically, with integrity, fairness and excellence in dealing with all business partners and expects to receive the same commitment from partners;
- Implement the necessary measures so that all employees avoid personal or professional activities and financial transactions that are in conflict or that have the appearance of a conflict with those of the companies and its business partners;
- Commitment to take appropriate measures to deter fraud;
- Commitment to maintain appropriate records and records during the Connections Consult and Connections Technologies operations;
- Commitment to maintaining the companies trade secrets and confidential information and expecting the same commitment from business partners.

INTEGRITY IN BUSINESS

The companies conduct their business activities with fairness and integrity at all times.

In all the business activities of the companies, both the letter and the spirit of the applicable national and international laws are observed. Regardless of the country in which the employees operate on their behalf, they must carefully and diligently protect the Connections Consult and Connections Technologies integrity and must comply with the legal and regulatory requirements of the countries in which companies operate. Employees must also comply with any and all internal procedures and policies of the business partner in which they operate.

The Companies are subject to strict anti-corruption laws, including Law no. 78/2000 for the prevention, detection and sanctioning of corruption and EU Council Framework Decision 2003/568 / JHA on combating corruption in the private sector and the Criminal Code.



ZERO TOLERANCE AGAINST ANY FORM OF CORRUPTION

The Companies have a Zero Tolerance approach to any direct or indirect, active or passive, form of corruption. In particular, the following practices are expressly prohibited by the Code as well as by anti-corruption legislation:

- Bribery;
- Illegal commissions, hidden in the payment of contracts;
- The promise to offer or give, directly or through a third party, to a person exercising a managerial function or activity of any kind for a private sector entity, an undeserved advantage of any kind, for himself or for a third party, in order for that person to fulfill or refrain from performing an act, in violation of his obligations;
- The fact that a person, in the exercise of a management function or activity, in any form, for a private sector entity, requests or receives, directly or through a third party, an undeserved advantage of any kind, for himself or herself or for a third party, or the fact of accepting the promise of such an advantage in order to perform or refrain from performing an act, in violation of its obligations;
- Gifts, entertainment, hospitality.

BRIBERY. ILLEGAL COMMISSIONS

Illegal commissions are a form of bribe, represented by the payment of a part of the value of the contracts to the persons who decide to grant or sign a contract or to obtain another type of advantage for the Companies.

The employees of the Connections Consult and Connections Technologies, the collaborators, the independent contractors, and the business partners of the Company will refrain from any act or fact likely to generate benefits obtained illegally, through the promise of payment or payment of illegal commissions.

Connections Consult and Connections Technologies does not allow and does not tolerate any behavior and / or activities that seek to obtain results through illegal or unethical, immoral methods.

GIFTS, ENTERTAINMENT AND HOSPITALITY

Employees may not solicit, offer, or receive, directly or indirectly, gifts, gratuities, allowances / special commissions, favors or benefits from an individual or a company with which the Companies have a business relationship, if the benefit could influence the unjustifiably judging the beneficiary by creating a disproportionate obligation to return the favor or by creating the appearance of unfairness.

If this creates the appearance of a business obligation for either party, then this behavior is unacceptable.

By maintaining independence, the Companies and their employees avoid actual, apparent or potential conflicts of interest. Consequently, employees must refuse or return any invitation or gift offered whose meaning makes them feel uncomfortable or which violates the ethical principles established by this Code.

Employees who face any form of corruption, including taking or bribing, hidden commissions in the payment of services, gifts, must report the situation immediately and directly to their superior. Reporting of these incidents will be recorded and the Companies will assess the need for future action.

THE RELATIONSHIP OF THE COMPANIES WITH THIRD PARTIES

The Companies will not engage in any direct or indirect form of corruption or bribery. Zero Tolerance applies to all employees and external third parties with whom the Companies conduct business, including business partners, project or financial partners, service providers, consultants, contractors and subcontractors, or other persons acting on its behalf.

CONTRIBUTIONS AND POLITICAL INVOLVEMENT

The Companies don't make donations or political contributions.

Employees have the right to participate in political activities as individuals, on their own behalf and to bear political contributions from their own sources, as long as this does not lead to a real, apparent or potential conflict of interest situation.





CHARITABLE CONTRIBUTIONS AND SPONSORSHIPS

The Companies may, in certain cases, decide to engage in charitable actions or sponsorships in support of communities or initiatives that are in line with its guiding principles.

Charitable contributions and sponsorships must always be awarded on the basis of a strict selection process and must avoid any suspicion of misuse, conflict of interest or unjustified benefits for the benefit of their recipient.

ENVIRONMENT

The Companies are committing to comply with all applicable legal provisions regarding the environment.

The Companies make every effort to ensure that employees carry out their activities in conditions of quality, safety, continuity, flexibility and efficient use of material and human resources. Employees have an obligation to respect responsibly and seriously the principles and rules of environmental protection.

We care about the environment and therefore consider the impact of our activities on the environment. We prefer businesses with clean technologies, and we conduct our operations in a safe manner that minimizes the negative impact on the environment.

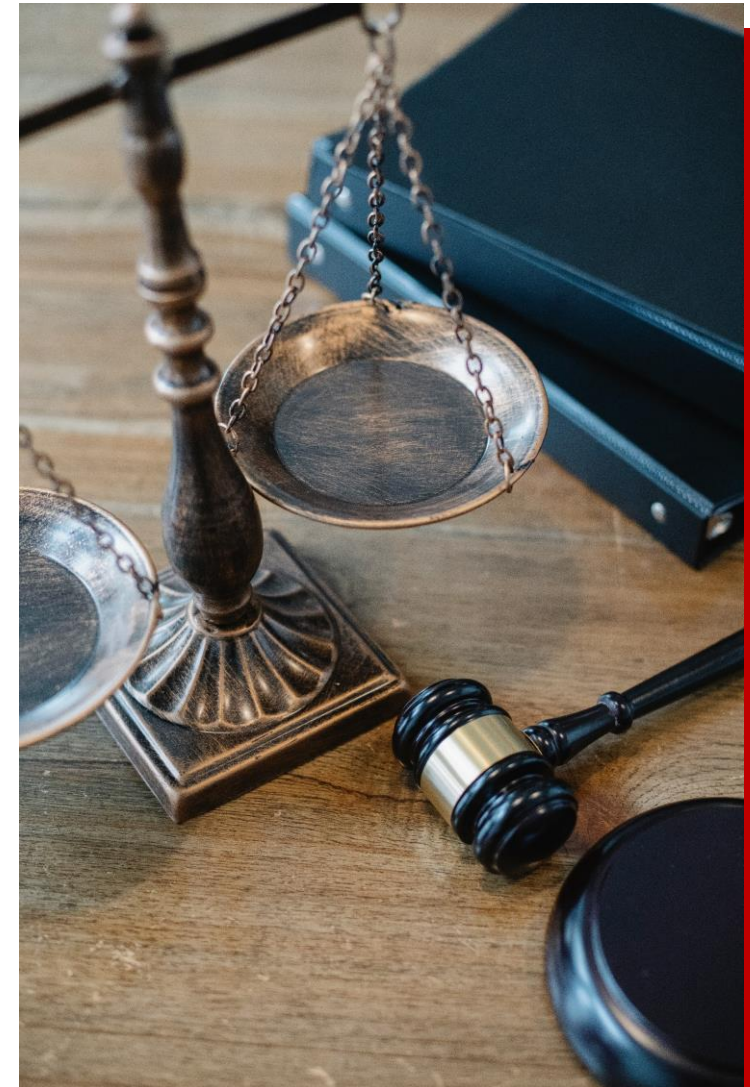
5. FINANCIAL CONDUCT

ILLEGAL OR INCORRECT ACTIVITIES

Connections Consult and Connections Technologies show Zero Tolerance for illegal or incorrect activities. All financial-accounting documents, statements and reports must be prepared carefully and correctly, in compliance with the relevant legal provisions.

The Companies consider as illegal activities and in opposition to the principles of this Code, the following, provided indefinitely:

- Forgery of any financial accounting documents;
- Fictitious payments;
- False verbal or written statements made deliberately or through fault about the Company, employees, collaborators, independent contractors and / or business partners of the both companies;
- Misappropriation of funds, assets;
- Creating or modifying printed or electronic documents with the intention of deceiving the Companies or its business partners;
- Improper use or falsification of documents with the Company`s header for illegal purposes.



CONFLICT OF INTERESTS

The Companies promote fair and loyal behavior, both professionally and personally.

The Companies are encouraging their employees, collaborators and business partners to adopt and maintain fair and just behavior and recommends avoiding any actions or inactions, acts or deeds that generate conflicts of ethics.

It is the responsibility of each employee to declare any activity, agreement, investment or interest that could conflict with the interests of the Companies or that could interfere with the obligation or ability of the employee to serve the Companies as best as possible. If an employee is not sure about the possible existence of a conflict of interest, it is his responsibility to consult his superior immediately.

CONFLICT OF PERSONAL INTEREST

The employees of both companies must avoid the actual, apparent or potential conflict of interest situation. Thus, they will avoid any situations that would allow or seem to allow his personal or private interests or the interests of family, other relatives or associates (a company he owns or has an interest in, a business partner, etc.) affect their ability to carry out their activity objectively, impartially and efficiently.



EXAMPLE OF CONFLICT OF INTEREST

In order to determine the existence of a real, apparent or potential conflict of interest, the employees should consider whether (i) their conduct is in accordance with the principles that guide the Company, (ii) perform their duties in an objective and impartial manner; (iii) their actions or decisions result in (or appear to result in) a financial or other benefit to themselves, someone with whom they have a personal relationship or a company or other entity in which they hold a stake; and (iv) they would be embarrassed to discuss the situation with the manager, any other hierarchical superior and / or colleagues.

The above list is not exhaustive. It is the responsibility of each employee to clarify whether a situation presents a conflict of interest or not.

CORRECT TRANSACTIONS

Any business conducted on behalf of the Companies must be conducted in an honest and direct manner to protect the integrity and reputation of the Companies. Our policy is to avoid distortion, manipulation, concealment, or misuse of confidential information, both its own and that of third parties obtained as a result of collaborations, and not to engage in negative discourse or unfair practices against competitors, customers, business partners, service providers and employees.



6. SALE OF OUR SERVICES

Connections Consult and Connections Technologies undertake the following commitments:

- To provide only services that it is authorized to provide by any legal, own or contracted means;
- To promote its services in a direct and honest way;
- To manage its business in a correct, professional and constructive manner.

FAIR COMPETITION

Connections Consult and Connections Technologies appreciate and promote fair and open competition. It will not enter into any business arrangement that eliminates or discourages competition or confers an improper competitive advantage.

Connections Consult and Connections Technologies proactively verify the manner in which employees, collaborators, contractors, business partners assume and apply the provisions of this Code, in order to avoid activities that include pricing agreements, boycott of business partners, rigged tenders, exclusive transactions, abuse market power, unethical conduct, non-competitive practices, the conclusion of an agreement or arrangement with competitors to share a market or customer distribution agreements, etc. All employees, business partners and employees of the Connections Consult and Connections Technologies are guided and encouraged to comply with the relevant legal regulations, in particular those of Council Regulation (EC) No 1/2003 from 16 December 2002 on the implementation of the rules on competition laid down in Articles 81 and 82 of the Treaty - Text with EEA relevance.

COMPETITOR INFORMATION

Employees have the right to be informed about the markets in which the both Companies operate, and this includes obtaining information about competitors, products, services, technologies, prices, their marketing campaigns, etc. However, this information must be collected by legal and ethical means, failing which the companies would act illegally and could be exposed to legal proceedings.

MASS MEDIA RELATIONS

The Companies don't generally allow foreign business partners to make public reference to their relationship with the Companies due to the confidential nature of our partnerships.

Examples of this include (but are not limited to): the use of the Connections Consult / Connections Technologies logo, press releases, references, mentions and / or releases published via social networks such as, but not limited to, Instagram, Twitter, Facebook, LinkedIn, or YouTube.

In some cases, it may be beneficial for both Connections Consult / Connections Technologies, its employees and/or business partners to run advertising campaigns. In these cases, such campaigns must be previously analyzed, evaluated, and authorized by our companies.

Employees who are not authorized as corporate spokespersons will not respond, on behalf of the companies, to any media investigation or initiate communications with them.



7. EMPLOYMENT POLICIES

The Companies are committed to providing a work environment characterized by respect and dignity. Employees must behave with honesty and integrity and treat others with fairness, dignity, and respect. Every employee has the right to work in a healthy, sustainable business environment that does not contain discriminatory practices and promotes equal employment opportunities. Relationships between individuals at work must be always professional, without discriminatory or harassing manifestations.

Our policy upholds Human Rights and complies with labor law, as well as any other law governing employer-employee relations. The Company does not accept any form of modern slavery (including forced labor, child labor, sexual exploitation and human trafficking). No employee may intervene or take repressive action against a colleague if the latter intends to exercise his rights under the law governing relations with the labor force or with employees.

The Companies guarantee the non-discriminatory employment of any person who meets the conditions required by a certain vacancy. The selection will be made by examination, competition, interview, or other methods chosen by the Company. The selection criteria will be related only to the specifics of the professional activity, and discrimination based on sex, sexual orientation, genetic characteristics, age, national affiliation, religion, ethnicity, race, color, political choice, social origin, disability, family situation, affiliation or trade union activity will not be tolerated.

HUMAN RIGHTS

PERSONAL DEVELOPMENT

The decision of the companies regarding recruitment, employment, development and promotion are made exclusively on the basis of the person's ability, skills, experience, behavior, performance and potential. Companies undertake the following commitments:

- Hire people who uphold high standards of ethical behavior;
- Provide employees with a fair assessment of their performance;
- Creating a work environment in which all employees feel appreciated;
- Provide employees with constructive feedback and observations so that they can develop their skills and improve their professional behavior;
- Encourage and support all employees to reach their full potential;
- To support a fair system of recognition, reward and promotion within the Companies;
- Not to refuse a promotion or an opportunity based on any form of discrimination.



USE OF COMPANY ASSETS

Employees must make appropriate use of and made available to the Company's intellectual property and physical resources and are also responsible for protecting the Company's assets, both material (movable and immovable property, personnel, confidential information, etc.), and intangible (communications networks, computer systems, intellectual property, etc.). Employees must act and take appropriate protective measures to prevent losses resulting from the deliberate actions of others, whether they occur inside or outside the Company, and to prevent situations that could result in personal injury, property damage, theft, loss, abuse or unauthorized access to goods, logical property or intellectual property (including data).

Also, jobs, facilities and physical resources must not be used to obtain benefits, advertising or support that are not directly related to the business activities of the Employees, except for charitable or other previously approved activities.

8. CONFIDENTIAL INFORMATION

The companies operate in extremely competitive markets. Therefore, employees must protect confidential information, trade secrets and other assets that are valuable to the companies. In their daily work, employees must use this information only for the purposes for which it was created.

"Personal information" is information about an identifiable person.

The Companies are determined to protect Personal Information in accordance with national and European legal provisions regarding privacy and to collect and process Personal Information only in situations relevant to the business of the companies.

In this regard, the Companies implemented technical and organizational measures designed to protect the personal lives of those with whom it comes into contact and who are subject to the Internal Policies for the protection of personal data.

The Companies took all measures to ensure that the risk of loss and / or unauthorized use of personal data is minimized. Any breach of security rules found by any of the employees and / or collaborators must be reported immediately to the Data Protection Officer of the companies.

WHERE TO CALL FOR HELP

We take our obligation to be in compliance with highly ethical business policies and practices very seriously. The purpose of the Companies is to ensure business ethics to the highest standards for them and their partners. We are also persuasive about protecting and valuing the information of our customers, employees, and business partners.

Both the employees and any collaborator, contractor and / or business partner have the right to receive information and clarifications regarding the provisions of this Code. If there are requests regarding any aspect of the Code, they can be sent in writing, via: office@connectionsconsult.ro or to the telephone number: +40 372 368 332.

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