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CODE OF ETHICS

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1. GENERAL REGULATIONS

- 1.1 The purpose of the Code of Ethics of SIA FLEXIDEA (hereinafter - the Code) is to define the principles, norms, standards and values of professional ethics and conduct that can be implemented in the performance of professional duties and that allow to assess the ethical and/or reasonable conduct of FLEXIDEA employees in their work, in their interpersonal communication, as well as in their relations with Clients, society and other institutions.
- 1.2 The Code is an essential part of the FLEXIDEA work organisation, which:
 - shows the quality of service that Clients and other stakeholders can expect with FLEXIDEA;
 - contributes to achieving the objectives of FLEXIDEA;
 - contributes to building a positive public image of FLEXIDEA.
- 1.3 The standards, principles and recommendations of professional ethics and conduct contained in the Code are binding on all officials and employees of FLEXIDEA, regardless of their position and duration of employment.
 - 1.3.1 Additional responsibilities for FLEXIDEA managers:
 - the manager sets an example for other employees through his/her professional actions, thus embodying and upholding the FLEXIDEA values, business and professional ethics;
 - the manager discusses the importance of principles of business and professional ethics with his/her employees, monitors their day-to-day implementation and takes them into account when evaluating employees;
 - the manager never encourages his or her employees to achieve business objectives in breach of ethical or legal principles.

2. BASIC PRINCIPLES OF THE CODE

2.1 Loyalty

2.1.1 Employees are loyal to FLEXIDEA and:

- in the performance of their duties, undertake to protect and not to prejudice the interests or welfare of FLEXIDEA, always considering them as paramount to private interests;
- always act in a way that maintains and builds public confidence in FLEXIDEA.

2.1.2 Loyalty is not only about fulfilling the responsibilities and instructions given by the managers, but also about mutual support, participation and advice relations with FLEXIDEA management and colleagues.

2.2 Responsibility

Employees are aware of the impact of their actions on the overall performance of FLEXIDEA and therefore each individual feels personally responsible for the quality of FLEXIDEA's work and services.

2.3 Confidence and precision

An employee shall carry out his/her work professionally and accurately and shall strive to perform it to the best of his/her ability to ensure the efficiency of FLEXIDEA's work and the quality of its services, promoting public confidence in FLEXIDEA.

2.4 Integrity

As FLEXIDEA's reputation and credibility depend on the independence and integrity of each employee, employees shall perform their duties in good faith and based on principles; they shall also, in accordance with the laws and regulations of the Republic of Latvia and FLEXIDEA's internal regulatory documents, respond and take action in any case of dishonest conduct.

2.5 Confidentiality

The employees shall not unlawfully disclose or use information coming into their possession in the course of their duties for purposes unconnected with the performance of their official duties or the performance of their specific tasks, including to retaliate against any person, institution or otherwise for private gain.

2.6 Quality

The employees strive to carry out their work in a professional, accurate, timely and creative manner, thereby ensuring the high quality and efficiency of FLEXIDEA's work and services and promoting public confidence in FLEXIDEA.

2.7 Fairness

The employees shall observe non-discriminatory, fair and equitable treatment and the rule of law for all, thus contributing to the achievement of FLEXIDEA's objectives and to its credibility.

2.8 Independence and neutrality

The employee shall be independent and neutral in his/her actions, decisions and judgements and shall comply with applicable laws, regulations and standards of ethical behaviour. The employee shall be autonomous and independent in his/her professional activities and decision-making, free from party affiliation, political movements and organisations, personal interests and external influence (interests of other individuals and legal entities, associations of persons, political, religious or social groups). In making decisions, an employee shall base his/her decisions only on objectively verified information, facts and evidence.

3. BUSINESS ETHICS

3.1 FLEXIDEA is aware of its responsibility towards its shareholders (stockholders), employees, Clients, business partners, society and other stakeholders and therefore does not violate ethical or legal principles in achieving its business objectives.

3.2 FLEXIDEA respects its competitors and treats their activities and trade secrets fairly.

3.3 FLEXIDEA is socially responsible by carrying out or participating in charitable activities, as well as by respecting the environment and using environmental resources efficiently.

4. ETHICAL COMMUNICATION AND BEHAVIOUR

4.1 Every employee understands that FLEXIDEA's reputation is built by FLEXIDEA employees in the following situations:

4.1.1 contacts and interactions with Clients and business partners (listening, responsiveness, kindness):

- face-to-face assistance;
- written communication or on the phone;
- communication via social networks and other online forums (chat rooms)
- reporting any information, including negative information;

4.1.2 contacts and collaboration with colleagues;

4.1.3 actions in accordance with the laws and regulations, FLEXIDEA's internal normative documents and other general principles of law;

4.1.4 speaking out about your employer and your workplace outside it;

4.1.5 avoiding situations outside working hours that do not conform to generally accepted norms of behaviour;

4.1.6 develop and demonstrate their professional and intellectual abilities

4.1.7 maintain and shape its appearance, etc.

4.2 Relationships with FLEXIDEA Clients and partners.

4.2.1 The employees are equally dedicated to providing a friendly and professional service to all FLEXIDEA Clients and business partners within the scope of their competence.

4.2.2 If the employee is unable to provide quality assistance to the FLEXIDEA Client or Partner within the scope of his/her competence, he/she shall identify another FLEXIDEA employee who is competent to deal with the matter.

4.2.3 In their relations with Clients and business partners, employees respect and carry out their wishes and interests, and always provide them with full information on the terms of cooperation, thus enabling them to assess the suitability and availability of the FLEXIDEA services they require.

4.2.4 Employees shall not discriminate against Clients and business partners on the basis of their financial standing, profit, the amount or type of FLEXIDEA services used, the volume of business or subjective personal attitudes towards the Client or business partner.

4.2.5 In dealing with and making decisions in relation to Clients or business partners, Employees shall base their decisions only on objectively verified information, facts and evidence.

4.3 Relations with colleagues.

4.3.1 Relationships between FLEXIDEA staff are based on respect, cooperation and fairness, regardless of position, and do not discriminate on the basis of nationality, gender, age, disability, sexual orientation, political or religious beliefs. Employees avoid arrogance and authoritarian management styles, and respect democratic norms and collegiality.

4.3.2 Employees do not take selfish advantage of the democratic working environment, collegial relations, incompetence or mistakes of other employees.

4.3.3 Employees are helpful to each other, giving and receiving the assistance they need to carry out their professional duties or to solve problems.

4.3.4 Harassing or abusive behaviour, regular psychological pressure on others (mobbing or bossing) are unacceptable.

4.3.5 An employee shall avoid uncollegial attitudes - intrigues, mood influences, gossip, slander and hypocrisy.

4.3.6 Discussions are held in a spirit of mutual listening and understanding, thus encouraging a diversity of reasoned views.

4.3.7 Employees resolve conflicts between themselves through constructive cooperation aimed at finding the best possible solution to the situation.

4.3.8 Employees do not make unjustified reprimands in the presence of other employees, but seek to express constructive criticism to each other in a correct manner, pointing out specific mistakes and actions to be taken to remedy the deficiencies.

4.3.9 Employees honestly admit their unethical or wrongful behaviour and make amends.

4.3.10 FLEXIDEA management:

- keeps FLEXIDEA staff regularly informed of development results and prospects;
- promotes a professional working atmosphere;
- promotes the professional development of staff;
- prevents intrigue, factionalism and favouritism;
- expresses criticism of mistakes only on an individual basis;
- prevents any discriminatory treatment of employees, using as a criterion only the professionalism and attitude of employees towards the performance of their duties.

4.4 Telephone and electronic means of communication.

4.4.1 An employee is obliged to respond fully and within the scope of his/her competence to verbal and electronic mail requests received from Clients in the context of his/her duties.

4.4.2 When answering the phone, please state the name of FLEXIDEA and your name.

4.4.3 When an employee leaves the workplace, it is necessary to ensure that the telephone forwarding function is switched on or that another employee answers the telephone.

4.4.4 An employee must ensure that in his/her absence, if it exceeds one working day, the person sending the message to the employee's e-mail address receives information about the employee's absence and an indication of the contact person who is replacing the absent employee.

4.4.5 Employees shall not use the FLEXIDEA e-mail address for personal or other non-work related matters.

4.5 Employee behaviour on social networks.

4.5.1 When using a social networking site (social network, forum, etc.), an employee shall assess whether its content encourages violation of the law or expresses hateful, including anti-state, ideas and opinions. An employee shall refrain from participating in social media where his/her mere presence may give rise to the impression that the employee personally endorses such ideas and opinions.

- 4.5.2 Before publishing information on social media, an employee shall assess whether the information to be published contains information and facts which may disclose confidential information, give rise to misconceptions or raise doubts about unlawful data processing.
 - 4.5.3 An employee shall not express an opinion that may be publicly associated as a FLEXIDEA opinion. This also applies to comments in online media.
 - 4.5.4 An employee shall not make statements that would objectively cast doubt on the employee's loyalty, civic and moral position.
 - 4.5.5 An employee is personally responsible for the content of the entry or comment made. When sharing news or information, an employee shall assess whether it is true and reliable and, if in doubt, refrain from further dissemination. The deliberate dissemination of fake news is not allowed.
- 4.6 External communication.
- 4.6.1 FLEXIDEA's official position in the public arena is expressed through the FLEXIDEA Board or by those employees who have been authorised to do so by the FLEXIDEA Board. This is necessary to provide the public with clear, unambiguous and reliable information on FLEXIDEA's operational policy and its implementation.
 - 4.6.2 The expression of personal opinions by any public figure does not reflect the official opinion of FLEXIDEA.
 - 4.6.3 In their dealings with the public, employees, as individuals, are concerned about the reputation of FLEXIDEA and therefore refrain from making statements that would allow the public to question an employee's loyalty or defame FLEXIDEA, which would be considered unethical and unacceptable conduct.

5. CONFIDENTIALITY OF INFORMATION

- 5.1 Employees are aware that FLEXIDEA's reputation and the achievement of its objectives depend on the security of information, therefore each employee shall respect confidentiality in all his/her activities and shall take care to protect information at all levels of activity, neither taking nor tolerating any action that could adversely affect the security of FLEXIDEA's information.
- 5.2 Information shall not be considered confidential information if FLEXIDEA has expressly and unambiguously referred to it or given it a public status or if it cannot be regarded as a trade secret in accordance with statutory requirements.
- 5.3 An employee is obliged to contact FLEXIDEA management if he/she is unable to determine the confidential status of a file, information or message. Until FLEXIDEA has given clear and unambiguous information about the status of the file, information or message, it shall be considered confidential.
- 5.4 All information made available to employees is for the sole purpose of carrying out the work of FLEXIDEA and is the property of FLEXIDEA.
- 5.5 It is the responsibility of an employee to report to his/her line manager any misconduct or suspicious behaviour by other employees or inadequate security of information systems that compromises the security of FLEXIDEA information.
- 5.6 Upon termination of the employment relationship, the employee shall return to FLEXIDEA all confidential information in his/her possession and shall cease all use of the confidential information. The obligation of confidentiality shall survive the termination of the employment relationship and shall continue indefinitely, except where a time limit is imposed by law or regulation. An employee will take all necessary and appropriate measures to ensure that third parties do not have access, directly or indirectly, to confidential information.

6. CONFLICT OF INTEREST AND PERSONAL BUSINESS

- 6.1 A conflict of interest is a situation in which an employee, in the performance of his/her duties, is required to make a decision, participate in a decision or take other action related to his/her duties that affects or may affect the personal or financial interests of that employee, his/her relative, a person emotionally linked to the employee (such as friends, cousins, spouses, classmates, neighbours, etc.) or a business partner.

- 6.2 FLEXIDEA employees shall not, in the performance of their duties, make or participate in any decision or take any other action related to their duties which affects or may affect the personal and/or material interests of the employee or any third party, thereby impairing or otherwise adversely affecting the interests, business or reputation of FLEXIDEA.
- 6.3 Employees shall avoid situations in which they have or may have a conflict of interest in the performance of their duties and shall report to their line manager where they have reasonable grounds to suspect or have objective information concerning a conflict of interest.
- 6.4 FLEXIDEA shall ensure that the departments carrying out activities between which a conflict of interest arises or may arise are independent of each other.
- 6.5 Employees shall refrain from side jobs, combining jobs and engaging in commercial activities that may create a potential, perceived or real risk of conflict of interest or damage the reputation of FLEXIDEA.
- 6.6 Employees shall refuse to accept gifts in any transaction related to FLEXIDEA, and shall not accept invitations to participate in events where a potential conflict of interest is suspected or may cast doubt on the impartiality of the performance of a duty or task or on FLEXIDEA's performance.
- 6.6.1 The following shall not be considered as a gift:
- flowers;
 - souvenirs, books or representational items, provided their value does not exceed EUR 100;
 - awards, prizes or distinctions provided for in laws, regulations or legislation;
 - any benefits and guarantees provided by FLEXIDEA to the employee in the performance of his/her duties, in accordance with the procedure laid down by the laws and regulations;
 - services and various discounts where publicly available.
- 6.7 If the employee is not sure whether the gift can be accepted, he/she shall consult the FLEXIDEA management or refuse to accept the gift.
- 6.8 Employees care about FLEXIDEA's reputation and refrain from engaging in any suspicious transactions, even when conducting personal business.
- 6.9 In any negotiations with another potential employer, as well as when taking up a new position after termination of employment with FLEXIDEA, employees shall refrain from any conduct that may give rise to suspicion of abuse of their position with FLEXIDEA or a conflict of interest.

7. REPORTING

- 7.1 Any employee has the right to submit (including anonymously) to the FLEXIDEA Board a complaint or report of non-compliance by another employee with the requirements of the Code. The data of an employee or other person who has reported or submitted an application concerning an alleged violation of the Code shall not be disclosed to other persons, except where such disclosure is required by law or regulation.
- 7.2 The Board shall consider reports and complaints received about non-compliant conduct by employees no later than two weeks from the date of receipt.