



HealthScience
Clinical Research Excellence

TFS Global Code of Ethical Conduct

Committed to our values

Dear Fellow Employees.

Since our foundation 25 years ago, TFS' growth and success are based on the core values:

Trust, Quality, Flexibility, Passion.

Trust is one of the most important values. We do not refer only to Trust of our clients, but also of our workers, Business Partners, patients participating in the clinical research and as a whole society. Our employees can trust that TFS as a company is committed to creating a safe, healthy and diverse working environment that respects human, and employees' rights, with no place for forced labor, any act of discrimination, or harassment.

Our clients can trust that TFS is conducting business transparently and ethically, protecting confidential information and avoiding any situation that may lead to any conflict of interest, gifts, entertainment that may raise bribery or corruption concerns.

Patients and Business Partners can trust that TFS upholds human rights within our operations in compliance with all applicable laws and regulations. TFS' potential for impacting human rights encompasses patient safety, conduct of clinical trials and using appropriate third-party suppliers.

Our clients, Business Partners and society can trust that TFS conduct business complying with all applicable environmental regulations, operating in an environmentally responsible and efficient manner.

This TFS Global Code of Ethical Conduct, shows principles and give guidance for all employees to ensure high ethical standards are followed at TFS. Please do not treat this Code only as a set of written rules, but more as a guide to help us to continuously improve to do the right thing for our patients, regulators, clients and society.

Of course, no Code or policies can cover every situation. Therefore, I highly encourage you to familiarize yourself with the Code and ensure that you understand and comply with the guidelines and policies set forth herein and raise any questions you may have using available channels. It is the responsibility of each of us to know, understand TFS Code of Ethical Conduct, and conduct our day-to-day activities according to its principles TFS core values, and address compliance issues immediately when they arise.

We must always do the right thing. I firmly believe that by working together, we can achieve our goals. Be proud of the work you do, and remember that your integrity defines who you are.

Thank you for your continued commitment to TFS and ethical behavior.

Bassem Saleh

CEO



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TFS Global Code of Ethical Conduct

Introduction

TFS has a strong commitment to corporate sustainability, the Code of Conduct is the starting point where TFS' value system and principles-based approach to conducting business are recorded. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labor, environment and anti-corruption.

TFS adheres to the principles set out in:

The Universal Declaration of Human Rights



The fundamental Conventions of the International Labour Organization



GRI Standards



The United Nations Global Compact Principles



United Nations (UN) Global Compact's 10 principles

This Code is based on the Ratos Code of Conduct and the United Nations (UN) Global Compact's 10 principles, which are in turn based on the UN Universal Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the UN Convention against Corruption.

Why do we have a code?

The Code of Conduct outlines:

- Our expectations and responsibilities regarding employees' professional conduct towards their colleagues, supervisors, clients, vendors and overall organization.
- The professional conduct expected from all TFS employees including ethical behavior; integrity and consistent honesty, objectivity independence, and due care/diligence.
- That TFS promotes freedom of expression and open communication within a well-organized, respectful and collaborative environment.
- The location of relevant documents, services and other resources related to ethics within TFS.

What if i don't find an answer in the code?

If you're ever in doubt about a course of action, ask yourself:

- Is it against the law?
- Is it unethical?
- Could it damage TFS' global reputation?
- Would I be embarrassed to read about it in the media?

If YES, stop and consult your manager who can help you find a way to handle the situation.

Legal & Compliance Team can provide legal advice and guidance if the requirements of the Code are unclear in any respect.

Why do we have a Code, and why must we follow it?

- To continue to operate and maintain our reputation as a company, creating an open and honest environment.
- The Code can't, however, describe every real situation that might arise and sometimes the right answer is not obvious.
- Corrective and preventive steps might include training, counseling and disciplinary actions up to and including termination of employment.
- It is what we stand for and what we expect from each and every employee.



Scope

The Code applies to all TFS employees regardless of employment agreement or rank. In the same way, TFS' Suppliers are required to accept [TFS' Supplier Code of Conduct](#).

This Code of Conduct reflects our values and the culture at TFS, and it reflects the UN Principles.

Values

TFS is committed to transparent and ethical behavior and we strive to ensure that everything we do is guided by our values and in compliance with our Code, policies, and with the governmental regulations and regulatory framework within which we operate.



Trust

It's about confidence, reliability, and fulfilling expectations at every stage.

TFS' implements policies to ensure TRUST of our clients, business partners and clinical trials participants:

- WhistleBlowing Policy
- ABAC Policy
- Insider Trading Policy
- Global Alcohol and Drug Policy
- Data Protection Policy
- Data Protection SOP
- Handling of Suspected Fraud or Misconduct SOP



Quality

This is our standard and constant objective: quality of performance, delivery, and results.

TFS ensures employees are aware of, and properly trained on, the relevant laws, regulations and TFS policies that govern the business activities in which they engage on behalf of TFS'.

- Follow Quality Manual and Quality Policy
- Policies
- SOPs
- WIs



Flexibility

Supporting clients throughout their development journey, responding to challenges with agility focused on a successful outcome.

- Global Ethics and Diversity Policy



Passion

Our professionalism is fueled by dedication and a desire to deliver excellence.

- Employee of the Month Policy
- Values Ambassadors Policy

Human rights

PRINCIPLE 1:

TFS supports and respects the protection of internationally proclaimed human rights

TFS will comply with all applicable laws and respect internationally recognized human rights, wherever we operate.

In the workplace (see [Global Ethics and Diversity Policy](#)):

- By providing safe, positive and supportive working environment, characterized by mutual respect, good mental, social and physical conditions for all employees.
- By guaranteeing freedom of association.
- By avoiding all forms of discrimination and harassment.

In the community:

- By fostering opportunities for girls to be educated to empower them it.

TFS is a supporting partner of Plan International's Because I am a Girl was a global campaign to transform girls' lives through education.

BECAUSE I AM A GIRL 



PRINCIPLE 2: TFS makes sure its business partners are not complicit in human rights abuses

- TFS has explicit policies that protect the human rights of workers in its direct employment ([Global Ethics and Diversity Policy](#)) and throughout its supply chain ([Supplier Code of Conduct](#)).
- TFS respects people, patients' safety and human rights. TFS employees are expected to treat colleagues and clients alike, with respect.
- TFS complies with the employment laws and regulations that apply in all the countries in which we operate.
- TFS' potential for impacting human rights encompasses patient safety, conduct of clinical trials and using appropriate third-party suppliers.
- TFS offers our employees fair and reasonable working conditions:
 - Our employees are our most important resource and relationships must be based on mutual respect and trust.
 - TFS recognizes the value of its employees and recognizes that its success is achieved through their knowledge, experience and efforts.
 - TFS practises diversity and inclusion, building trust and enhancing our work environment with the best, most qualified candidates.

The conditions of employment offered to employees must meet the minimum requirements in national law and/or collective agreements as well as relevant ILO conventions. TFS makes every effort to pay fair salaries and remuneration in accordance with relevant norms in the locations in which TFS has affiliates.



Labor laws

PRINCIPLE 3:

TFS upholds the freedom of association and the effective recognition of the right to collective bargaining

In the workplace

- We respect our employees' right to form and join a trade union of their choice, form work councils and engage in labour negotiations, including collective bargaining without fear of intimidation or reprisal, in accordance with national law.
- Some of our offices have Worker Councils that are participating actively in open dialogue with Human Resources to continuously improve working conditions at TFS.
- We provide workers' representatives with appropriate facilities to assist in the development of effective collective agreement; and we do not interfere while worker representatives carry out their functions, to build good relations between management and workers.



At the bargaining table

- TFS recognizes representative organizations for the purpose of collective bargaining.
- Use collective bargaining as a constructive forum for addressing working conditions and terms of employment and relations between employers and workers, or their respective organizations.
- Address any problem-solving or other needs of the workers and management, including restructuring, training, redundancy procedures, safety and health issues, grievance and dispute settlement procedures, disciplinary rules, and family and community welfare.
- Provide information needed for meaningful bargaining; and
- Balance dealings with the most representative trade union to ensure the viability of smaller organizations to continue to represent their members.

PRINCIPLE 4: TFS is in favor of the elimination of all forms of forced and compulsory labor

- We do not accept forced labor or other forms of involuntary labor at our workplaces.
- We make available employment contracts to all employees stating the terms and conditions of service, the voluntary nature of employment, the freedom to leave (including the appropriate procedures) and any penalties that may be associated with a departure or cessation of work.
- We write employment contracts in languages easily understood by workers.
- TFS prohibits business partners from charging recruitment fees to workers.
- TFS monitors supply chains and subcontracting arrangements.
- We comply with all applicable human rights laws, statutes, regulations and codes including but not limited to the UK Modern Slavery Act 2015.

What is Modern Slavery?

Human trafficking involves recruiting, harbouring or transporting people into a situation of exploitation through the use of violence, deception or coercion and forcing them to work against their will.

Forced labor is any work or service that people are forced to do against their will, under threat of punishment and for which the person did not volunteer.

What are examples of signs to look out for?

- Confiscation of identity papers, passports, or education certificates.
- Withholding wages.
- Lack of official employment status.
- Abusive working conditions.
- Physical and sexual violence.
- Debt bondage, i.e. loans that have to be repaid before the employee can end his/her contract.
- Recruitment fees, i.e. a person has paid a recruitment firm for the job and must work until the debts are repaid.
- Restrictions of movement, e.g. employees not allowed to leave company premises.

PRINCIPLE 5: TFS supports the effective abolition of child labor

- TFS is aware of countries, regions, sectors, economic activities where there is a greater likelihood of child labor and responds accordingly with policies and procedures ([Supplier Code of Conduct](#)).
- TFS has a zero-tolerance policy towards forced labor, slavery and human trafficking in line with ILOs Conventions (ILO Convention 138 on the Minimum Age, and Convention 182 on the Elimination of the Worst Forms of Child Labor).
- We do not employ any person under the age of 15 or any applicable higher statutory minimum age.
- TFS uses adequate and verifiable mechanisms for age verification in recruitment procedures.
- We exercise influence on subcontractors, suppliers and other business affiliates to combat child labor ([Supplier Code of Contract](#)).



PRINCIPLE 6: TFS eliminates discrimination in respect of employment and occupation

In the workplace ([Global Ethics and Diversity Policy and Employee Handbook](#)).

TFS is a positive non-discriminatory workplace in which people are the most valuable asset.

- Employees may always immediately report any type of harassment or unacceptable behaviour to a Line Manager and / or Local Human Resource Representative or through Whistle-B system.



Health and safety

- TFS is committed to a safe and secure working environment for all employees, consultants, visitors and patients.
- TFS acknowledges the massive impact mental health has on our daily lives.
- Employees should be familiar with and comply with local safety and environmental regulations and any additional instructions from Health Authorities in their regions.
- TFS works in the best way as set forth by the World Health Organization and local public health authorities.

Environment, sustainability and corporate social responsibility

PRINCIPLE 7: TFS supports a precautionary approach to environmental challenges.

Our Code of Conduct and practice confirms TFS' commitment to care for health and the environment ([Code of Conduct – Sustainability Report](#)).

TFS has policies and guidelines on the consistent application of the approach towards environmental issues throughout the company ([Environmental Policy and Sustainability Report](#)).

TFS aspires to improve the two-way communication with stakeholders, in a pro-active and transparent manner from an early stage to ensure effective communication of information about uncertainties and potential risks.

Clinical research

- TFS ensures that services meet all ethical, scientific and regulatory requirements.
- Our reputation depends on our integrity and ability to perform services with quality and honesty.
- Our commitment applies to interventional and non-interventional studies, and to real world evidence studies.



Patient safety and data integrity

Patient safety and data integrity are our top priorities. In our daily work integrity means that WE DO THINGS RIGHT to assure patient safety and data integrity.

This Code is written with the intent of developing an environment of trust, where all individuals are responsible and accountable for ensuring patient safety and data integrity.

What is integrity?

Integrity is simply acting in an honest manner, in compliance with the law and in accordance with high ethical standards and principles set out in this Global Ethical Code of Conduct. In our daily work we are all committed to do our best to do the right thing.

Cornerstones:



As a contract research organization (CRO), we are required to conform to regulations laid down by global regulatory authorities which are designed to protect the rights, safety, dignity and well-being of subjects and the reliability and robustness of the data generated in clinical trials and to define the way clinical trials are designed, managed and reported such as:



Unwanted behaviours, such as deliberate data falsification, unauthorised changes, destruction of data, or other conduct that compromises data quality will be addressed promptly. Examples of unwanted behaviours and attitudes are documented in TFS SOP ([SOP-GEN06 Handling of Suspected Fraud or Misconduct](#)) and will be handled according to it. Conforming behaviours will be recognised appropriately during appraisal.

Our internal policies and procedures encourage personnel to bring instances of possible breaches to the attention of senior management without consequence using the whistleblowing mechanism ([see POL-CORP03 Whistleblowing Policy](#)).

PRINCIPLE 8: TFS undertakes initiatives to promote greater environmental responsibility



PRINCIPLE 9: TFS encourages the development and diffusion of environmentally friendly technologies



BUSINESS ETHICS

Anti-bribery, including gifts and entertainment

PRINCIPLE 10:

TFS works against corruption in all its forms, including extortion and bribery

TFS has anti-corruption policies and programmes within their organization and their business operations; ([POL-CORP04 Anti-Bribery & Corruption Policy \(ABAC\)](#)).

TFS has zero tolerance for all forms of corruption and makes active efforts to ensure that it does not occur within the TFS Group avoiding any corrupt practices.

All employees and Associated persons (i.e board of directors, officers, self-employed contractors):

- Must act in compliance with international laws and regulations relating to bribery, corruption and illicit payments, including, the US foreign corrupt Practices Act, the UK Bribery Act 2010 and any other national regulation.
- Are expected to act responsibly with honesty and integrity in dealing with other employees and external parties.
- Exercise due diligence in all scenarios and ensure that actions serve a legitimate business purpose and do not compromise the independence of healthcare professions with whom we work.

What is corruption?

The abuse of a position of trust for one's own or the company's gain, for example through the use of bribes.

What is a bribe?

A gift or other benefit that might influence another person, as part of their employment or duties, to show improper favor to the giver.

Bribery and corruption distort the market, interferes with free competition, and violate laws that carry significant penalties for the companies and individuals involved.

External parties include healthcare providers, healthcare institutions, regulatory, governmental and public officials, organizations, authorities, vendors, suppliers, customers and any other entity or person which is not part of TFS.

To avoid fraud we follow ABAC and the following rules:

- Pay external parties only for legitimate services.
- Only make reasonable payments that represent fair market value for legitimate services.
- Creating and retaining accurate documentation to support such payments.
- Prohibiting payments to government officials made to expedite or obtain the performance of routine, non-discretionary governmental actions, known as facilitation payments.

This does not prevent TFS employees or Associated persons from receiving or offering rewards designed to retain and promote good business relationships with customers and other business partners provided that such rewards are modest, openly accepted and otherwise compliant with this Global Ethical Code of Conduct and other internationally accepted codes on gifts, rewards and other benefits in business.



It is forbidden to offer, promise or give as well as request, accept a promise of or receive a bribe.

Gifts, hospitality and entertainment

Please remember that a conflict of interest may arise when you provide or receive gifts or entertainment to or from customers, business partners, suppliers, government employees, or other person or organization.



You should reject any gift that...

- Is offered or accepted in exchange for receiving or giving something in return likely to improperly influence the recipient in the exercise of their professional duties or in another manner risk embarrassing the company or the employee in the event they become public knowledge.
- Offered or accepted to secure an improper advantage.
- Would violate accepted business practice.
- Consist of money, securities, cash loans, other types of personal payments in the form of discounts, commissions, bonuses or fees
- Is excessive i.e. has an unreasonable value or consist of pure leisure or vacation trips.
- Are offered to people employed in the public sector in conjunction with imminent or ongoing procurement or decisions which constitute the exercise of authority.



How to detect that gift is not acceptable?

- Is the gift “modest” or “customary”? – to define it is to exercise good judgement, in case of doubts, contact Line Manager: Usually modest value is considered to be less than 50 Eur or USD.
- Is the gift more than a nominal value?
- Does the vendor regularly give gifts?
- Would the gift potentially impact or influence business objectivity?

If in doubt about any gift, hospitality, conflict of interest, or any conduct that may be inappropriate contact your HR Manager or TFS Compliance Officer at Compliance.Officer@tfscro.com.

Fair competition

Employees in TFS must comply with all relevant competition rules and refrain from concluding unlawful anti-competitive agreements as well as exchanging unlawful price and/or market information with competitors. We trust that our services will succeed in a competitive marketplace and a fair market benefits us. We compete on the merits of our services and do not take actions that are illegal under the competition laws, such as colluding with competitors.

We treat our suppliers in a professional manner and choose suppliers on the basis of objective criteria because this is a complex area, it's critical to know what's required and also consult with Legal & Compliance as needed.

For you, this means:

1. Use only legitimate methods to gather information about competitors.
2. Do not exchange commercially sensitive information.
3. Unless provided for in TFS policies and processes, don't control or restrict the prices or terms set by an independent supplier, or customer for our services.

What is commercially sensitive information?

It includes:

- Prices, surcharges, costs, margins, or discounts.
- Terms of services or profitability.
- Business plans.
- Market forecasts, strategies or service development plans.

Sharing, receiving, or exchanging this type of information could be prohibited even when it is informal, such as in conversation with a former colleague or friend who now works for a competitor. If you have questions about whether a conversation is appropriate, discuss it with Legal & Compliance in advance.



Conflicts of interest

A conflict of interest occurs when we allow our personal interests to interfere with our responsibility to TFS or to give the appearance that our responsibility to TFS is compromised.

When we allow outside activities or relationships to cloud our judgment, or interfere with our responsibilities to TFS, we harm not only our company, but also our co-workers, clients and others who rely on or place their trust in us. The same holds true for interests or investments held by members of our families.

To avoid conflict of interest you should follow this guideline:

Ask yourself:

1. Will I personally gain something or will a family member benefit from my involvement in this activity based on my role or information I share from TFS?
2. Am I or my close family engaged in a business that competes with TFS in any way?
3. Is my ability to make sound and unbiased business decisions impacted by this activity?

In case you have any outside activities, financial interests or business relationships that may present an actual or perceived conflict of interest please inform your Line Manager.

Who are Family members and close relationships?

Your family members are your spouse or partner, parents and parents-in-law, siblings and their partners, children and grandchildren and their partners, nieces and nephews and relationships similar of your partner.

Remember your private relationships can influence your decisions therefore it is important to be careful about TFS business decisions that involve close personal relationships.

Avoiding conflicts of interest...

... drives performance by ensuring that we make decisions in the best interests of our customers and the business.

... drives trust in our business by demonstrating that we are an honest and reliable partner.

... supports profitability and effectiveness by ensuring we choose the suppliers and vendors who offer the greatest value.

To prevent such conflicts of interest you should:

- Avoid supervising or taking part in the hiring or promoting family members.
- Avoid holding a position with access to or influence over performance appraisals, salary information or other confidential information related to a family member.

Insider trading

Insider trading is a stock market offence concerning the use of privileged information, not yet made public, to buy or sell company shares or other securities.

While working at the TFS Group, you may come across inside information that relates to TFS or TFS customer's inside information. Any time you have access to inside information, you are subject to legal and regulatory duties and violation of these duties may constitute a criminal offense.

For you, this means:

1. Don't use inside information to buy or sell, for your own account or for the account of a third party, directly or indirectly, TFS' or TFS customer's shares or related securities (insider dealing).
2. Don't recommend or induce anyone else to engage in insider dealing.
3. Don't make any unauthorized disclosure of inside information.
4. Follow our procedures on internal reporting of inside information as well as notification of unintentional disclosure.

Employees are expected to contact TFS Legal in case of doubt. For more details please see [POL-CORP05 Insider Trading Policy](#).

What is inside information?

Inside Information is non-public information which, if made public, would be likely to have a significant effect on TFS or TFS' customer share price or the price of any other financial instruments.

Inside information can include:

- Unexpected significant changes in order books, order intake or in delivery of products caused by, for instance, order cancellations.
- Acquisitions or divestitures of significant business operations.
- Insolvency of strategic suppliers.
- Major operational risks or disturbances in the production system.
- Product quality problems or recalls.
- Unexpected considerable changes in financial results.
- Innovative products or processes.
- Legal disputes or government investigations.



TFS is politically independent and our employees work in the best interests of the company

- TFS employees shall always work in TFS' best interests and avoid all acts that might be perceived as favoring any company, organization, individual or other stakeholder at TFS' expense.
- Employees shall avoid all types of activity that violate the company's interests or have a negative effect on the employee's judgement and integrity.
- Private agreements to do assignments for related parties (e.g., potential/existing clients, vendors, competitors) are not allowed.
- TFS is politically neutral and does not use funds to support political campaigns or for other political purposes.

What are political activities?

For the purposes of this Code, "political activities" means a wide range of actions, some of which we list below.

Remember, you can always take action or make contributions on your own, as an individual. But you can't use TFS resources or imply company support of activities like:

- Running for office.
- Campaigning or fundraising for a political candidate.
- Volunteering time or donating to a political party.
- Lobbying.
- Signing or organizing statements, petitions, or letters.
- Public advocacy or statements regarding political issues.

TFS does not accept any form of criminal activity

Q&A:

If something is legal, is it automatically OK?

Even if a particular activity or behavior is legal, it may not be acceptable in a business context.

- For example, alcohol consumption is legal in many countries, but it is wholly unacceptable to be under the influence of alcohol at work ([Global Alcohol and Drug Policy](#)). Always consider how others might view your behavior – or how you might view similar behavior in others.
- Paying for sex and use of certain drugs has been decriminalized in some countries and regions.
- However, they remain illegal in most countries and TFS employees on business assignments or travel are not permitted to engage in such activities during or outside of working hours, regardless of the prevailing law. As well as asking whether a certain activity is legal, TFS employees should also consider whether it is acceptable and how it would be perceived by others.

Care for the company's assets

Our employees respect TFS' property

- TFS has both physical assets (office facilities, equipment, etc.) and intellectual property (computer systems and programs, concepts, etc.).
- Our assets, including communication systems, may only be used for legitimate business purposes and not for personal gain or gain for a third party.
- The use of computer equipment shall be in accordance with prevailing [POL-IT S03 Acceptable Use Policy](#). TFS employees have a duty to protect TFS property and report any damage, theft and misuse of company assets.
- Comply with local expense report procedures and instructions, and do not claim private expenses as business expenses.

Technology resources

- TFS computer systems are critical to our success and everyone who uses them (including contract workers and third parties) shall do so in a secure and appropriate manner.
- We are always all responsible for using IT resources in a professional manner and must never use them to engage in illegal, offensive or inappropriate behavior.
- TFS computers shall not under any circumstances be used to access pornographic or other illicit material.
- We are personally responsible for safeguarding access to, and appropriate use of, our company's IT resources.

Validated computerized systems

- We are committed to ensuring that computerized systems that support processes subject to GxP regulations are validated in relation to their potential risk to patient safety, product quality and integrity of GxP regulated records.
- We have overall responsibility to ensure GxP systems are always appropriately validated and maintained in a validated state and used in a compliant manner, and ready for inspection by regulatory authorities at any time.

This includes GxP systems used or provided by third party suppliers on our behalf.

Use of social media

- Social media includes any digital communication channels that allow individuals to create and share content, post comments, opinion, insights, experiences and facilitates conversations and interactions online between groups of people. Social media forms an important part of our lives, both professionally and in private life.
- TFS Employees must remember to comply with TFS policies in their use of social media and related TFS content and assets. See [BPOL-COM02 Social Media Policy](#).



Confidentiality of information

One of our Core values is that TFS', our client's and vendor's information (e.g., financial, client, procedural and other proprietary information) remains secure.

- You must always keep all this information in confidence to prevent harm and to protect from inappropriate or unauthorized access or disclosure.
- You are obliged to maintain confidentiality even after the termination of employment or consultancy work.

Intellectual property

TFS protects Intellectual Property of TFS and our customers and vendors.

- You must carefully protect any intellectual property (i.e. trade secrets, inventions, or designs).
- Do not publish or disclose them unless you have specific written authorization to do so.
- If the information belongs to a third party, you must follow any agreements with that party, including on use or disclosure.
- You must report any suspected or alleged unpermitted use of intellectual property of TFS or of a third party in line with TFS' instructions, policies and SOPs.

For confidential information and intellectual property you must:

- Follow the requirements in the [POL-GEN04 Information Classification Policy](#) and [POL-GEN02 Data Protection Policy](#).
- Mark and handle information as appropriate to its status.
- Do not give out information by phone or email in response to unexpected requests, including employee information, home addresses, phone numbers, or travel plans.
- Protect Confidential and Strictly Confidential information when working off-site.
- Apply all precautions to ensure that any non-public information about TFS or its clients or vendors is kept confidential and only revealed for legitimate business purpose or by law enforcement.
- Ensure confidentiality agreement is in place before sharing information.
- If you have access to, you must safeguard it from inappropriate disclosure and only use it in ways that are permitted.



Data privacy

TFS respects personal information and handles it carefully.

Private data can identify or reasonably be used to identify someone.

Names, contact information, government-issued identification numbers and medical records need to be protected, and must not be shared with anyone inside or outside of TFS that does not have a business need to use it. This applies to information on TFS employees and information we collect about others with whom we interact, such as study participants.

In the course of conducting business, we collect and store personal information about employees, business partners, patients, healthcare professionals, consumers and others, such as addresses, birth dates and financial, medical and other information.



When we collect and process personal information, we must comply with applicable laws and Company privacy policies:

- Personal information should be collected only for legitimate business purposes, shared only with those who are permitted access, protected in accordance with security policies and retained only for as long as necessary.
- TFS respects personal information that we obtain or use in information processing.
- Our management and the management of each affiliate are responsible for ensuring that personal data are handled in accordance with the highest standards of integrity and applicable privacy laws and regulations.
- We safeguard personal data that people entrust to us so that they are not vulnerable to harm resulting from its misuse and we respect each other's privacy.
- Any personal employee information we collect, store, maintain or use must be handled responsibly.
 - We also must ensure that third parties with access to personal information are contractually obligated to protect it in accordance with applicable data security standards.
 - Our Data Protection Officer supports the company to ensure that all our operations and business comply with current legislation on data privacy.
 - TFS performs the corresponding risk analysis and, where appropriate, a Data Protection Impact Assessment.

For more information please consult [POL-GEN02 Data Protection Policy](#) and [SOP-GEN09 Data Protection](#).

Accounting and financial reporting

TFS provides transparent, accurate and timely information of high quality

- TFS shall have accurate accounting records that complies with applicable laws, regulations, accounting standards and norms.
- Given Ratos' majority stake in TFS, financial information and other share price sensitive information must be communicated in accordance with applicable laws, stock exchange rules (including the listing agreement) and other regulations.

For you, this means:

1. Be honest and accurate when you report or record information about our business.
2. If you submit or approve expenses, ensure they accurately reflect the transaction and comply with company policies and procedures.
3. Never misstate facts when recording a transaction or enter information that you know is incorrect.
4. If you notice an error in a financial record, or suspect fraud has occurred, report it immediately.

Reporting honestly and accurately...

... drives performance by ensuring that senior management is making decisions on the basis of accurate and up-to-date information.

... builds trust by demonstrating to the market that we are honest and reliable.

... protects against fraud and ensures that TFS funds are being used to support the company's strategic interests.

TFS vendors

TFS carefully selects its vendors and performs qualifications audits to ensure that all our vendors and suppliers act in accordance with standards and values that align with the principles set out in this Code.

- We choose our suppliers and vendors based on quality and compliance standards, price, delivery, service and reputation.
- When selecting suppliers and partners, we consider whether or not they agree to follow principles set out in [TFS' Supplier Code of Conduct](#) or have their own code of conduct with the similar principles.
- We deal with our vendors fairly, honestly and openly.

Remember to:

- Follow TFS SOP requirements for evaluating and approving vendor/supplier ([SOP-GEN05 Vendor Selection and Management](#)).
- Make payments only for contracted services. Check received invoice to ensure that it accurately reflects the services received.
- Ensure that all fees are reasonable in line with market fair value and clearly documented.
- Avoid creating any conflict of interest.
- Do not authorize any supplier or vendor to make any payment that may result in any unlawful act (i.e. bribe, fraud).

Speak Up!

If you know about something that doesn't seem right, or which violates this Code of Conduct, we want you to speak up. Often times, early reporting can help resolve an issue quickly and minimize harm.

How do I raise a concern?

To express a concern, you can:

- Talk to your line manager, or your manager's manager.
- Talk to a relevant functional group, like HR, Finance, Legal & Compliance and Data Protection Officer.
- Access TFS Whistle channel at: <https://report.whistleb.com/en/tfs>.

Can I report anonymously?

- Yes, as long as anonymous reports are permitted by local law.
- However, we encourage you to identify yourself when raising a concern. This allows TFS to obtain all the facts, properly investigate your report, and enter into a confidential dialogue with you.
- Even if you identify yourself, every effort will be made to keep your identity strictly confidential.

What happens after I raise a concern?

- Once you make a report, TFS will investigate the situation and take appropriate actions.
- If you raise a concern in good faith, TFS will not tolerate any retaliation against you.
- This is true regardless of the outcome of the investigation.

