

# Code of Conduct

## Introduction

Galleon is committed to high standards of business ethics and sustainability. This Code of Conduct is based on the [UN Global Compact's ten principles](#).

It expresses the expectations that Galleon holds for itself, its distributors, and suppliers, identified herein as 'the organisation'.

Galleon expects distributors and suppliers to, upon reasonable notice, allow Galleon access to relevant premises and documentation to verify compliance with this Code of Conduct.

## 1. Compliance with laws

The organisation must operate in full compliance with all laws and regulations applicable to its business.

## 2. Labour standards

### No use of forced labour

The organisation must not engage in or support the use of forced labour.

The organisation must not engage in or tolerate the use of corporal punishment, mental or physical coercion and abuse.

### Minimum age requirements

The organisation must not engage in, or benefit from, the use of child labour, in accordance with the [ILO convention 138](#).

### Non-discrimination

Decisions on hiring, promotion, development and compensation are to be based on the employees' abilities and skills related to the job and must never be based on irrelevant factors, such as gender, age, ethnic or national origin, religion, disability, sexual orientation, union membership or political affiliation.

### Freedom of association and collective bargaining

The organisation shall respect the right of employees to freely associate and bargain collectively.

### Wages and working hours

Employees of the organisation are to be compensated fairly and, as a minimum, to comply with legal minimum standards. Working hours shall comply with national laws.

## Health and safety standards

Employees of the organisation are to be offered a safe and healthy working environment. Adequate health and safety policies and procedures shall be established and followed.

## 3. Environment

There shall be sustainable development and an effort to reduce the negative environmental impact of activities, products and services through a proactive approach and responsible management. The organisation shall continuously work to minimize the environmental risks, the use and emission of hazardous substances and promote resource efficient solutions.

## 4. Business ethics

### Anti-corruption

The organisation shall refrain from all forms of corruption, extortion and bribery, and specifically ensure that all payments or other benefits offered or made to public officials, private sector employees or any other party comply with applicable anti-corruption laws and regulations.

### Business courtesies

The organisation shall compete only on the merits of its products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, any offering or receipt of any gift or business courtesy must be permitted by law and regulation, and not violate the rules or standards of the recipient's organisation and are consistent with reasonable market place customs.

### Conflict of interest

The organisation shall avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in its dealings with Galleon. Galleon must be informed of any situations of actual or potential conflicts of interest between the personal interests of those involved in the dealings and the interests of Galleon.

## 5. Information protection

Sensitive information shall be properly handled, including confidential, proprietary and personal information. Information should not be used for any other purpose than for which it was provided. Intellectual property of Galleon and others shall be respected.

## 6. Trade compliance

### Export control

Business practices must be in compliance with applicable laws and regulations governing the export, import and retransfer of products, components, software and technical data and assistance. Only truthful and correct restriction information shall be provided to Galleon and is expected to adhere to applicable embargoes and sanctions aiming at maintaining or restoring peace and security.

### Conflict minerals

Where applicable, exercise reasonable due diligence concerning its use of conflict minerals and the source of these minerals and respond in a timely manner to Galleon's request for information on these activities and findings.