

CICO CODE OF ETHICS FOR SUPPLIERS / Update 02 – 05 - 2015

CICO is committed to maintaining high Ethical Standards in our business, whether conducted internally by CICO employees or externally by the third parties that we engage. This **Code of Ethics for Suppliers** is intended to ensure that subcontractors, freelancers, suppliers, and other third parties (“Our Suppliers”) understand and agree to comply with the following standards in all business dealings related to CICO. Our Suppliers are expected to communicate these standards to all applicable individuals performing services for CICO or our clients. Questions, concerns, or potential violations of these standards must be communicated to the Listen – Up Helpline +32 (0) 3 257 27 27 or the CEO.

CICO IS COMMITTED TO HONESTY

We build trust with the Industry by providing the information necessary for informed and responsible decision making.

- **Communications** – Our Suppliers must adhere to the highest standards of accuracy and transparency in advancing the interests of CICO’s clients and must never intentionally disseminate false or misleading information or omit critical information that is essential to avoid misinformation.
- **Documentation** – All business documentation, including but not limited to, invoices, agreements, and other financial or operational records, must be prepared accurately and appropriately reflect the nature and substance of all underlying transactions, payments, and events. Our Suppliers must not hide, fail to record, or make false entries in connection with any such business records.

CICO IS COMMITTED TO TRANSPARENCY

While a lack of transparency can sometimes yield short – term results, it can call into question the integrity of communications and create an unacceptable level of risk for our reputation and that of our clients. Our Suppliers must not act in any way that may appear to be an attempt to deceive public opinion when performing services for CICO or our clients. The following are just a few examples of how Our Suppliers should display transparency:

- By proactively disclosing their identity and affiliation with CICO and the client they may be serving when communicating through blogs or other online media.
- By refusing to pay or provide any other hidden reward in exchange for an expectation of coverage.

CICO IS COMMITTED TO FAIR DEALING

We Deal Fairly with clients, competitors, peers, vendors, public officials, the media, and the general public. Promoting healthy and fair competition among professionals preserves an ethical climate while fostering a robust business environment.

- **Improper Incentives** - Our Suppliers must not directly or indirectly offer bribes, kickbacks, or anything else of value that could be interpreted as an attempt to fraudulently or unethically obtain or retain business on behalf of CICO. Business gifts and entertainment must meet applicable legal, ethical, and cultural norms to preserve the free flow of unprejudiced information.
- **Intellectual Property** - Our Suppliers must respect and preserve intellectual rights in the marketplace.
- **Confidential Information** - The nature of our work often gives us access to confidential information that is not available to the public, which, if disclosed, could be useful to competitors or harmful to us or our clients. Our Suppliers must protect confidential, "insider," or other sensitive information related to CICO and current, former, and prospective clients. They may not use such information to further their own interests or in violation of applicable insider trading regulations.

CICO ENSURES BUSINESS ACTIVITY ALIGNS WITH THE INTERESTS OF ALL STAKEHOLDERS, CLIENTS, EMPLOYEES, AND PARTIES WITH WHOM WE INTERACT

We serve the public interest by acting as a Responsible Advocate for our clients. We provide a voice in the marketplace for ideas, facts, and viewpoints that facilitate informed public debate and decision-making. Our Suppliers business activities should be guided by a balanced consideration of the interests of all stakeholders, including our clients, employees, and the general public. Our Suppliers may not unduly favor the interests of one to the detriment of another, or of society at large.

Care must be taken to avoid any action that may discredit our client, CICO, or our profession.

- **Rules of Engagement** – Our Suppliers must respect the customs, rules, practices, and codes of conduct that apply to our industry and practice areas in all countries where we operate, including those related to our clients, colleagues, and fellow professionals.

Suppliers must act in a manner that preserves the integrity of the channels of public communications that are used, and respect the independence, rights, rules, and guidelines established by the information media.

- **Conflicts of Interest** – Our Suppliers must avoid actions and circumstances that appear to compromise good business judgment or that create real, potential, or perceived conflicts between personal and professional interests when performing services for CICO or our clients.

Our Suppliers are required to notify CICO of any relationships they have with any CICO employee, officer or director, or any other potential conflicts that may be identified.

- **Health and Safety** – Our Suppliers must provide a safe and healthy work environment for their employees.

- **Environment** – CICO encourages Our Suppliers to consider the environmental impact of goods and services provided in business dealings with CICO. This includes, but is not limited to, minimizing carbon footprint through effective travel, use of recycled materials and recycling of waste products, responsible wastewater and solid waste disposal, resource utilization reduction, and so on.

CICO STRIVES TO MODEL BEST PRACTICES IN ALL AREAS OF OUR BUSINESS

We acquire and responsibly use specialized knowledge and experience, and in doing so build mutual understanding, credibility, and relationships among an array of institutions and audiences.

- **Qualifications and Expertise** – Our Suppliers should only accept work for which they are suitably skilled and experienced. Where additional expertise is required, they should collaborate with the CICO account team to determine the best means of obtaining the necessary skill base or resources to serve our clients needs. Our Suppliers should stay informed

and educated about practices in the profession to ensure ethical conduct and delivery of quality products and services for CICO and its clients.

CICO DOES NOT VIOLATE LEGAL OBLIGATIONS

Obeying the law, in letter and spirit, is the foundation on which CICO's ethical standards are built. In providing goods and services to CICO or our clients, Our Suppliers must respect and obey the laws of the nations, regions, and cities in which they operate, including but not limited to applicable anti - corruption and anti - money laundering statutes. Our Suppliers acknowledge that CICO is incorporated in Europe (Belgium) and are therefore aware that services provided to CICO or its clients are subject to all applicable local and regional laws and regulations as well as those of Belgium.

Thank You for your attention.