



Code of Conduct

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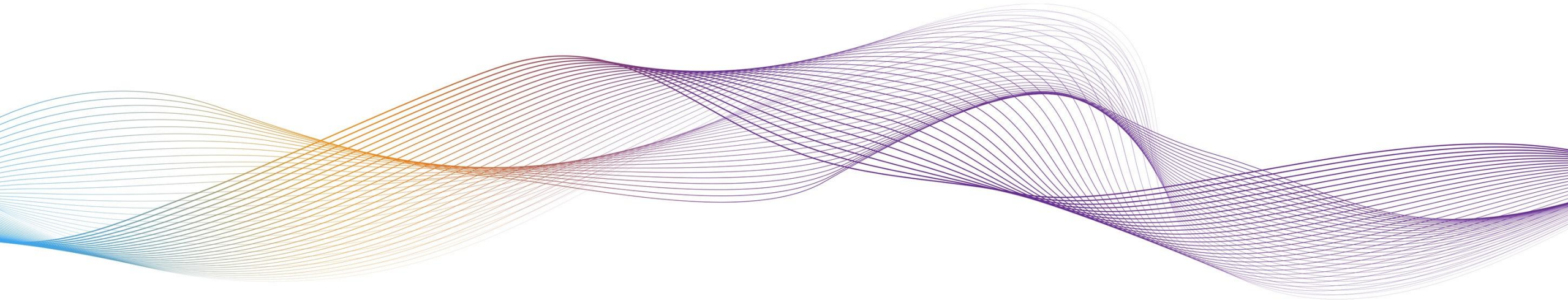
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Preamble

The Lingaro Group's greatest strength lies in its Team. United around our **Core Values of Technology Excellence, Customer Focus, Collaboration, Autonomy, and No Barriers**, Lingarians have immense potential to drive the company's success, support each other's professional development, and create an organizational culture that people want to belong to.

To fully realize this potential – especially as Lingaro continues to grow rapidly – it is important to clarify expectations as to how we should translate our **Core Values** into everyday behaviour both among ourselves and towards external stakeholders, especially our Customers and Business Partners.

Accordingly, this **Code of Conduct** sets behavioral standards for all Lingarians, wherever they are, whatever their roles are, and whomever they are working with.

We ask each and every Lingarian to read, understand, and follow this Code. Let's continue working together to achieve great things in an outstanding workplace that all of us create, respect, and we are passionate about.

We shape our present and future environment.



Core Values

We are a values-driven company

Our Core Values guide us as we build a workplace, we are proud of while staying true to ourselves, our colleagues, and our customers. These values are behind everything we do, from making strategic decisions with partners to hiring people who belong here and promoting top performers.

Our Core Values are key factors in our company's continued success. In your professional capacity as a Lingarian, you are expected to abide by them at all times.



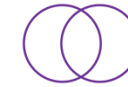
Technology Excellence

Technology excellence is in our DNA. We lead the way by harnessing the power of data and innovation to transform the businesses that we work with.



Customer Focus

Client satisfaction is our #1 priority. We go an extra mile to exceed expectations. Our can-do attitude, top expertise, flexible approach, and dedication build trust.



Collaboration

By fostering kindness, loyalty, and respect in our diverse community, we build strong relationships. We can always count on mutual help within our capacity to achieve Lingaro's goals.



No Barriers

We cherish a culture of open communication and direct contact, from Interns to Executives. We believe in sharing ideas, knowledge & inspiration, without unnecessary bureaucracy.



Autonomy

Upholding the highest standards of ethics, integrity, and professionalism, we are entrusted with significant freedom to advance the best interest of Lingaro and our Customers.



We ensure a respectful workplace

We cherish our diversity

We strongly believe that today's most innovative technology work is being done in diverse, inclusive environments where competence and authenticity matter. We are building a community where we all feel safe, valued, and comfortable with who we are. We respect all of our colleagues regardless of their religious beliefs, ethnicities, genders, sexual orientations, political views, personal relationships, or physical capabilities. Our job roles are defined by know-how, attitude, and skills - not personal identities, views, or beliefs. We are all at different stages of our careers and lives; workplace seniority is not a license to be disrespectful of others.

We respond whenever we see that our colleagues are not receiving the proper respect. Our Diversity, Equity & Inclusion Ambassadors stand ready to listen and promote those principles at Lingaro

More information about our approach to promoting Diversity, Equity & Inclusion at Lingaro can be found [here](#).

We create a safe workplace together

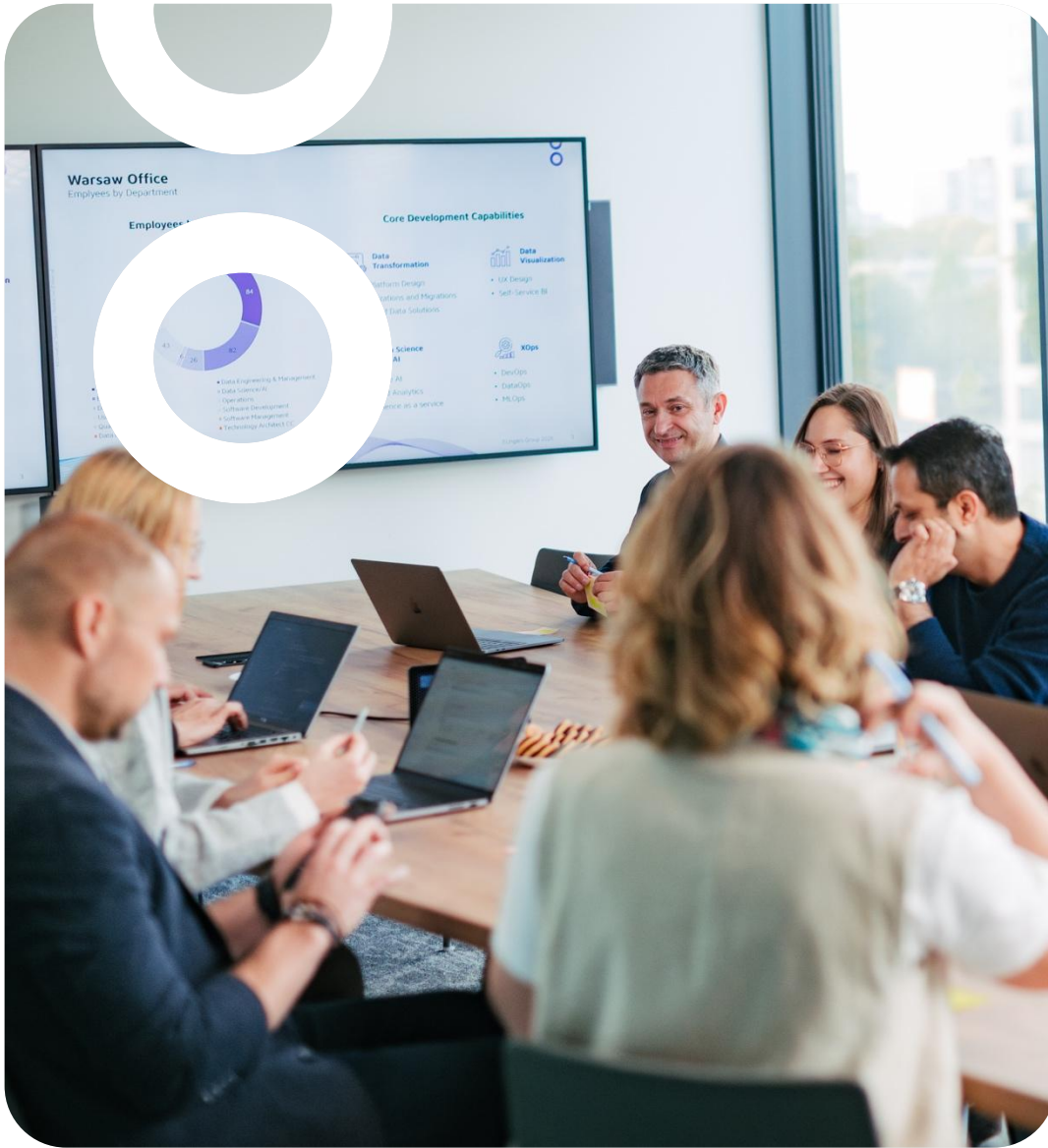
We treat others as we would like them to treat us. We are politely respectful to coworkers, clients, external partners, competitors, and anyone else we may interact with as Lingarians.

We cherish our culture of open communication and informal, friendly relations among each other. Between informality and incivility, however, there is a clear line that we do not cross.

Under no circumstances do we tolerate:

- Workplace mobbing.
- Sexual harassment.
- Violence and aggressive behavior.

[Click here](#) for more guidelines.



We ensure a respectful workplace

We pay particular attention to being courteous in the language we use when:

- Giving feedback. We are constructive, discreet, and fair. We stick to objective facts and speak directly and promptly to the right person.
- Giving recognition. Whether it is to an individual or a team or both, we give credit where it is due.
- Using social media. In personal posts, we make it clear that we are expressing personal views. We are respectful when mentioning customers, suppliers, competitors, or partners.

We encourage and expect every Lingarian, regardless of their role in the organization, to speak up if they consider any conduct, practice, or policy to be illegal, harmful, or inconsistent with this Code in any way. We hear and address such opinions without retaliation or any other harmful consequences for Lingarians who voice their concerns.

We dress appropriately

When on the job, our appearances show respect to colleagues and customers. Our clothes are clean and respectable. Casual or smart casual outfits will be appropriate in most circumstances. Clothes worn in accordance with religious or cultural traditions are welcome. There are no exceptions for teleconferences.

For more information, [click here](#).



We are true professionals

We make commitments we deliver on

Whomever we are making a commitment to – including clients, partners, other Lingarians, and even competitors (e.g., acting within a multivendor Customer’s environment) – we ensure that we have the authority and capability to deliver on it.

We always act in our customers’ best interests

Our customers’ best interests may be explicitly defined within the scope of a project – or not. We aim to ethically and pragmatically understand, anticipate, and act in accordance with as many of these interests as possible.

We try to understand our customer counterparts’ individual roles in order to help them perform as well as possible in it. Where possible, we take workload off their shoulders so they can focus on their jobs, not ours. We help them keep up with market news, acquire expertise, and learn about innovative solutions to their challenges – whether Lingaro can provide these solutions yet or not.

We are transparent and honest

We share information truthfully and openly with the right people. There are no exceptions for hard truths. We own up to mistakes, acknowledge limitations, and ask for help when we need it. We describe our roles, competencies, and experience factually.

We approach risk responsibly

We understand that doing business always comes with risk to be considered and managed, assessing consequences of our actions. For recommended best practices, [click here](#).

We price our offerings appropriately

Our pricing is always clearly justifiable to customers. It reflects our detailed understanding of their requirements and satisfies our own business needs.

We are respectful of competitors

We treat our competitors with dignity, fairness, and respect. When making comparisons, we avoid emphasizing their weaknesses, making direct comparisons, and badmouthing in general.

Instead, we highlight our strengths, our unique competencies, and the key benefits customers can get when working with us. We stick to objective facts and assessments that are fair, defensible, and methodically sound, e.g. from well-respected third-party sources. We choose our words carefully, especially on social media platforms.

We are true professionals

We follow all laws and company policies

We adhere to all company policies and comply with applicable laws including, for example, those governing labor relations, data processing and privacy, competition, taxes and finances, competition and trade, and intellectual property.

In day-to-day business, we pay particular attention to avoiding conflicts of interest with customers involving:

- Bribery.
- Money laundering.
- Gifts and entertainment.
- Human rights. We respect all human rights as recognized by the United Nations and do not cooperate with organizations using child or slave labor.

- Trade sanctions. We comply with applicable trade sanction laws and regulations that refrain from engaging in any transaction with a party or country sanctioned by the United Nations, the European Union, or the United States.

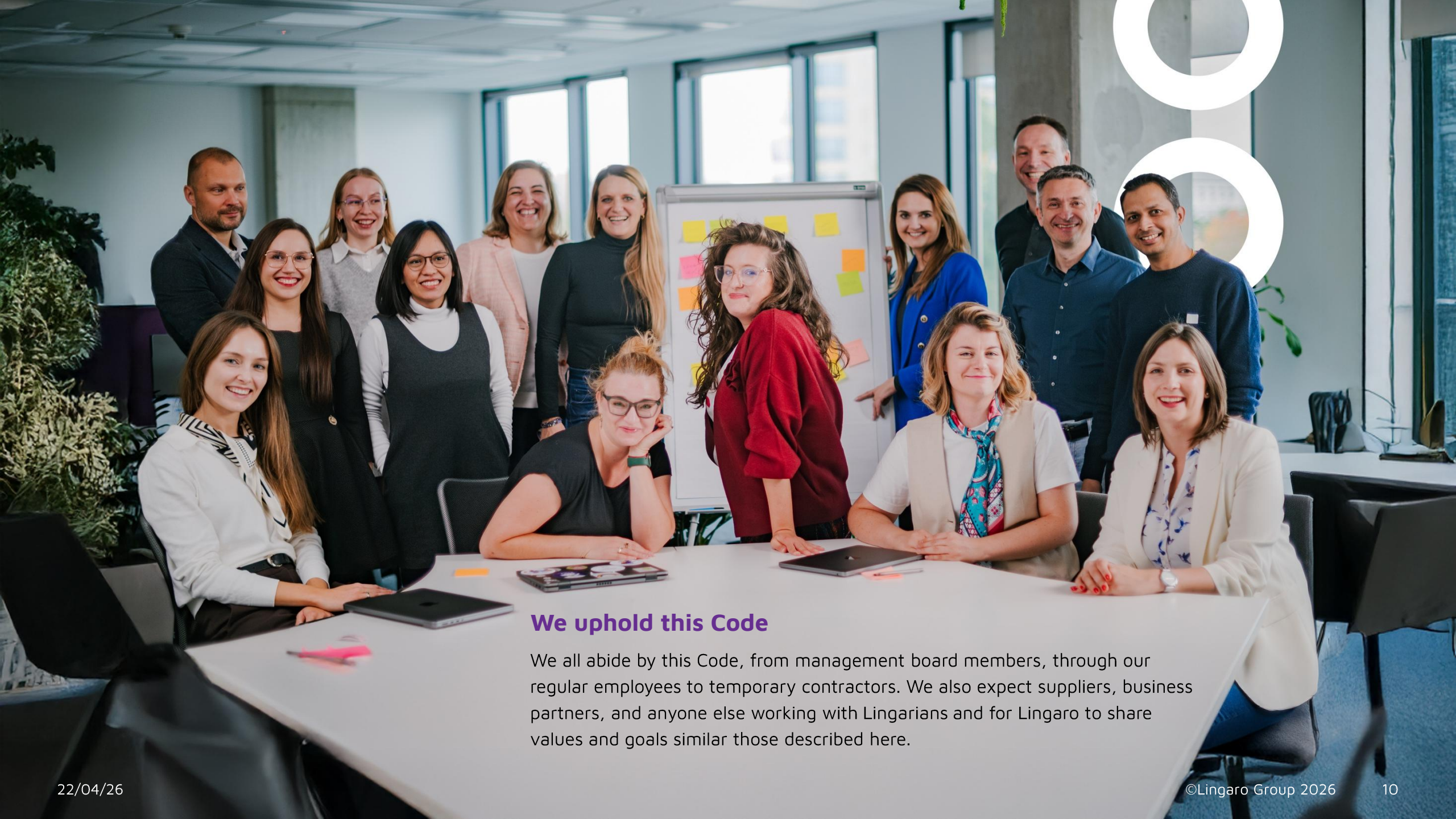
For more guidelines, [click here](#).

We play fair

Our competition with other vendors is fair, open, and friendly. We do not collude to fix prices, allocate markets, or seek to gain an unfair advantage in any other way.

When gathering intelligence on competitors, we ensure that our methods are legal and ethical. We use, for example, competitors' websites, third-party research, or public announcements. We do not obtain information through deception, threats, or any other dishonest means.





We uphold this Code

We all abide by this Code, from management board members, through our regular employees to temporary contractors. We also expect suppliers, business partners, and anyone else working with Lingarians and for Lingaro to share values and goals similar those described here.



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