



# Frontline Services – Code of Conduct

## 1. Purpose and Scope

This Code of Conduct defines the ethical principles, standards, and rules of behavior that govern all activities of **Frontline Services** (“the Company”). It applies to all employees, managers, directors, contractors, consultants, and any third parties acting on behalf of the Company (collectively referred to as “Representatives”).

The Code reflects our commitment to operating as a trusted, professional, and compliant partner for global technology vendors and their ecosystems, while safeguarding our reputation, our clients, and the markets in which we operate.

All Representatives are required to understand, adhere to, and promote this Code in both letter and spirit.

## 2. Our Core Principles

Frontline Services operates based on the following five fundamental principles:

1. Integrity in all interactions
2. Transparency in relationships
3. Full regulatory compliance
4. Zero tolerance for corruption
5. Data protection commitment

These principles guide all decisions, actions, and business relationships.

## 3. Integrity in All Interactions

Integrity is the foundation of our business conduct.

Representatives must:

- Act honestly, professionally, and responsibly in all internal and external interactions.
- Avoid misleading statements, misrepresentation, or omission of material facts.
- Deliver services in accordance with agreed objectives, processes, and quality standards.



- Treat clients, partners, colleagues, and competitors with fairness and respect.

Conflicts of interest (actual, potential, or perceived) must be disclosed promptly and managed transparently. Personal interests must never interfere with the best interests of the Company or its clients.

## 4. Transparency in Relationships

Frontline Services is committed to open, clear, and transparent business relationships.

Representatives must:

- Clearly communicate roles, responsibilities, and commercial arrangements with clients and partners.
- Accurately report activities, performance metrics, and results. - Maintain truthful and complete records, including sales activities, marketing actions, and financial documentation.
- Avoid hidden incentives, undisclosed commissions, or informal agreements.

Transparency is essential to maintaining trust with clients, partners, regulators, and other stakeholders.

## 5. Full Regulatory Compliance

Frontline Services complies with all applicable laws, regulations, and industry standards in every jurisdiction in which it operates.

This includes, but is not limited to: - Commercial and contract law - Competition and antitrust regulations - Labor and employment laws - Tax and financial reporting requirements - Export control and trade compliance rules

Representatives are expected to understand the regulations relevant to their roles and to seek guidance when legal or regulatory requirements are unclear. Non-compliance will not be tolerated.

## 6. Zero Tolerance for Corruption

Frontline Services maintains a strict zero-tolerance policy toward corruption, bribery, and improper influence.

Representatives must never: - Offer, promise, give, request, or accept bribes or kickbacks. - Provide or receive improper gifts, hospitality, or benefits intended to influence business decisions. - Engage in facilitation payments, regardless of local practices. - Use third parties to circumvent anti-corruption obligations.

All business activities must comply with applicable anti-corruption and anti-bribery laws, including international standards such as the UK Bribery Act and similar regulations.



Any suspicion or evidence of corruption must be reported immediately.

## 7. Data Protection Commitment

Protecting data is a core responsibility of Frontline Services.

The Company is committed to: - Safeguarding personal, confidential, and proprietary data belonging to clients, partners, employees, and prospects. - Processing personal data lawfully, fairly, and transparently. - Limiting data access to authorized personnel only. - Implementing appropriate technical and organizational security measures.

All Representatives must comply with applicable data protection regulations, including the General Data Protection Regulation (GDPR) and any local data privacy laws. Data breaches, suspected or confirmed, must be reported immediately.

## 8. Reporting Concerns and Non-Retaliation

Frontline Services encourages a culture of accountability and openness.

Representatives are expected to report: - Violations of this Code of Conduct - Suspected illegal or unethical behavior - Breaches of law, regulation, or Company policy

Reports can be made through internal management channels or designated compliance contacts. Retaliation against individuals who raise concerns in good faith is strictly prohibited.

## 9. Enforcement and Disciplinary Measures

Compliance with this Code of Conduct is mandatory.

Violations may result in disciplinary action, up to and including termination of employment or contractual relationships, as well as potential legal action.

Management is responsible for enforcing this Code consistently and leading by example.

## 10. Commitment

By working with Frontline Services, all Representatives acknowledge their responsibility to uphold this Code of Conduct and to act in accordance with its principles at all times.

This Code supports our mission to operate as a trusted extension of our clients' organizations, delivering performance with integrity, transparency, and full compliance.

### **Frontline Services**

Integrity. Transparency. Compliance. Trust.