

## CODE OF COMPLIANCE

Founded in October 2003 under the corporate name PC30, SOLUTIONS 30 sought to provide services relating to computers and digital equipment right from the beginning. Now present in seven European Member State countries and organized around a network of local technical experts, SOLUTIONS 30 has become Europe's leading provider of support services relating to new technologies.

SOLUTIONS 30 Group's ambition is to make the technological changes that transform our daily lives accessible to everyone, individuals and businesses alike: **yesterday**: computers and the Internet; **today**: digital; **tomorrow**: the technologies that will make the world ever more connected in real time.

SOLUTIONS 30 has a reputation for excellence, honesty and integrity in its management practices and in all its business transactions. It is, therefore, of paramount importance, for SOLUTIONS 30 Group (including each subsidiary), and each of its employees and members, to preserve this reputation and maintain the relationship of confidence and trust that must exist with all the individuals and companies with whom SOLUTIONS 30 Group is dealing.

Our basic values and principles guide our conduct and set the expectations, standards and ethical practices that underpin all our dealings; therefore, the aim of this Code of Compliance in addition to the Code of Conduct shall promote the moral culture, ethical values and legal compliance which represent the cornerstone of the continued growth of SOLUTIONS 30 Group.

### 1. SCOPE

This Code of Compliance applies to all directors, officers and employees of SOLUTIONS 30 Group including its subsidiaries worldwide or all persons working for or on behalf of SOLUTIONS 30 Group. It is aimed to assess and understand the ethical and legal obligations in handling SOLUTIONS 30's activity.

Although this Code of Compliance does not cover every issue that may arise, it is intended to establish guidelines to which it can be referred about in situations where the proper course of conduct may not seem clear. It shall help each employee of SOLUTIONS 30 Group or person who works with SOLUTIONS 30 Group to take the right decisions in respect of our core values and principles of conduct.

All employees of SOLUTIONS 30 Group or person who works with SOLUTIONS 30 Group must perform their assigned duties in a diligent and efficient manner, to the best of their ability. They must act loyally towards SOLUTION 30 Group, and conduct themselves in an honest, impartial and independent manner, notwithstanding any personal interests.

### 2. RULES AND PRINCIPLES

## **2.1.Integrity and reputation are SOLUTIONS 30 Group's key assets**

SOLUTIONS 30 Group sets as cornerstone the integrity of its organization and the reputation for professional and ethical conduct of its employees as well as of other persons who work with SOLUTIONS 30 Group. It is deeply committed to the preservation of its integrity and reputation, and thus requires of all businesses: (i) good understanding of and strict compliance with applicable laws, regulations and standards in each of the markets and jurisdictions in which SOLUTIONS 30 Group operates; (ii) the on-going implementation of and adherence to this Compliance Policy.

## **2.2.Management is the owner of compliance**

Management throughout SOLUTIONS 30 Group and other persons who work with SOLUTIONS 30 Group is the owner of compliance and holds ultimate responsibility for the implementation of and adherence to this Compliance Policy. Management at all levels (i.e. executive, general and senior management) is responsible for adequate measures to implement the requirements of this Compliance Policy.

## **2.3.Management must set a good example**

Management of SOLUTIONS 30 Group at all levels must set an outstanding example and shall at the same time take all appropriate measures to ensure that all employees and members of the Group will conduct their business activities in an ethical manner, consistent legal and regulatory obligations as well as with SOLUTIONS 30 Group's Code of Conduct.

## **2.4.Compliance is a responsibility that every employee and member of the Group shares**

Compliance is a responsibility that individual employees and members of the Group share, regardless of their position within SOLUTIONS 30 Group. This implies a strong compliance commitment, good corporate liability and responsible corporate behaviour on a global basis. Each is expected to play his or her part, under the guidance of their management.

## **2.5.Information regarding compliance shall be provided to the Management on a regular basis**

Information regarding compliance such as key risks, major developments and issues, compliance incidents and recommendations for follow-up, shall be provided to the Management of SOLUTIONS 30 Group on a regular basis.

## **2.6.All businesses lines of SOLUTIONS 30 Group shall comply with this Compliance Policy**

The content of this Compliance Policy is mandatory and represents minimum standards which apply throughout SOLUTIONS 30 Group. The guidelines set out in this Code of Compliance must be observed by every one of us at all times.

## **3.COMPLIANCE RISKS HAVE BEEN IDENTIFIED AS:**

### **3.1.Risk to reputation**

Risk of damage to SOLUTIONS 30 Group's integrity or reputation as a result of negative publicity, whether founded or not, failure to act in accordance with accepted industry practices, or non-compliance with applicable laws or regulations. All transactions that present a possible risk to our reputation must be rigorously assessed within the framework of this Code of Compliance.

### **3.2.Legal and regulatory risks**

Legal and regulatory risk shall arise in case of non-compliance with the applicable laws, regulations or standards, including as a result of changes to said laws, regulations or standards. There is also a risk

that transactions may be carried out on the basis of legal opinions or documents that are subsequently found to be inaccurate.

Therefore, an efficient management of the legal and regulatory risk shall prevent: (i) financial or other consequences of litigations; (ii) losses due to unsuitable internal processes; (iii) financial consequences of a less effective control of the activities due to the increased complexity of the organization due to our geographic expansion (mergers, acquisitions, new partnerships, etc.).

#### **4. WAIVERS OF THIS CODE OF CONDUCT**

A waiver of any provision of this Code of Compliance will only be given if it is deemed absolutely appropriate under the circumstances on a case by case basis and by the competent organ depending from the circumstances.

#### **5. REPORTING ANY ILLEGAL OR UNETHICAL BEHAVIOUR**

The right to report is the power given to each employee to express themselves whenever they consider they have good reason to believe that an instruction received, a transaction under consideration or, more generally, any specific situation does not comply with the rules governing the conduct of SOLUTION 30's activities. This right may be applied by sending an email to: [compliance@solutions30.com](mailto:compliance@solutions30.com).

This right only applies to the areas covered by the Code of Conduct and the external and internal documents referred to therein as well as other policies issued by SOLUTION 30 Group.

Employees may exercise this right within the framework of their professional duties, with regard to any facts directly or indirectly brought to their attention. This right must be exercised in a responsible fashion, should not be abused and should not be defamatory.

The person to whom the employee reports the potential non-compliance will investigate the matter in strict confidence, as far as this is compatible with the requirements of the investigation.

**April 23<sup>rd</sup> 2019**

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