

# VALORISE – Code of Conduct and Etchis

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# 1 Introduction

## 1.1 About VALORISE

VALORISE is a management consultancy firm based in Slovakia. Our mission is to provide strategic insights and innovative solutions that help businesses optimize performance, enhance operational efficiency, and achieve sustainable growth. We are committed to upholding the highest standards of integrity, professionalism, and ethical conduct in all our business activities.

At VALORISE, we believe that ethical behavior is not just a legal obligation but a cornerstone of our corporate culture. By fostering a culture of transparency, accountability, and respect, we aim to build long-term trust with our clients, employees, and stakeholders. Our reputation is one of our most valuable assets, and we are dedicated to maintaining it through ethical business practices and a commitment to excellence.

## 1.2 Purpose and Scope

The VALORISE Code of Conduct and Ethics defines the ethical principles, professional standards, and compliance expectations for all employees, consultants, and business partners. This Code ensures that we conduct our operations transparently, responsibly, and in accordance with Slovak laws, international regulations, and ISO 9001 standards.

This document serves as a guide for making ethical decisions and provides a framework for addressing ethical dilemmas. It applies to all individuals working for or on behalf of VALORISE, regardless of their role, location, or contractual arrangement. By adhering to this Code, we demonstrate our commitment to ethical behavior and responsible business practices.

## 1.3 Compliance and Legal Framework

This Code aligns with local and international laws, including anti-corruption regulations, data protection policies (GDPR), and corporate governance best practices. Compliance with these principles is mandatory for all stakeholders. VALORISE is committed to maintaining the highest level of legal and ethical standards in all aspects of its operations. We regularly review our policies and procedures to ensure they remain aligned with evolving legal and regulatory requirements.

## 1.4 Responsibilities

The responsibility for upholding ethical standards at VALORISE is shared across all levels of the organization. The management team plays a critical role in setting the tone at the top and leading by example in all ethical matters. They are responsible for ensuring the implementation and continuous improvement of ethical practices within the company.

Employees and consultants are expected to uphold ethical behavior, adhere to company policies, and report any violations or unethical conduct. VALORISE encourages employees to seek guidance when faced with ethical dilemmas and provides multiple channels for reporting concerns confidentially.

Business partners and affiliates are required to align with VALORISE's ethical principles in all engagements. We expect our partners to comply with this Code and ensure that their actions reflect VALORISE's values. By working together, we can maintain a culture of integrity and trust.

## 1.5 Definitions

To ensure clarity and consistency, the following terms are defined within the context of this Code:

- **Bribery** refers to the act of offering, promising, giving, or receiving something of value to influence a decision or action. VALORISE strictly prohibits any form of bribery, whether direct or indirect.
- **Bullying** is defined as repeated, deliberate mistreatment of an individual through verbal, physical, or psychological abuse. Such behavior is unacceptable and will not be tolerated.
- **Conflict of Interest** arises when personal interests conflict with professional obligations, potentially affecting objectivity. Employees must disclose any potential conflicts of interest to management at any time they become apparent.
- **Confidential Information** includes any non-public data, such as company strategies, financial information, client data, and trade secrets. Protecting this information is a top priority.
- **Discrimination** involves the unfair treatment of individuals based on characteristics such as race, gender, age, disability, world-view or religion. VALORISE is committed to fostering an inclusive and diverse workplace.
- **Harassment** refers to unwelcome conduct, including verbal, physical, or online actions, that creates a hostile work environment. VALORISE has a zero-tolerance policy for harassment.
- **Kickbacks** are the return of a portion of money received in a business transaction, typically as a bribe. Such practices are strictly prohibited.
- **Misconduct** encompasses any violation of VALORISE policies, ethical principles, or legal requirements. Employees are expected to act in accordance with this Code at all times.
- **Retaliation** involves adverse action against an employee for reporting misconduct or unethical behavior. VALORISE guarantees protection against retaliation for whistleblowers.
- **Whistleblower** refers to an individual who reports unethical or illegal conduct in good faith. VALORISE encourages employees to speak up without fear of reprisal.

## 2 Core Values and Ethical Principles

### 2.1 Integrity

At VALORISE, integrity is the foundation of our business. We conduct all our activities with honesty, transparency, and fairness. Fraud, bribery, and corruption are strictly prohibited. All potential conflicts of interest must be disclosed and managed appropriately to ensure that our decisions are made in the best interest of the company and our clients. We believe that integrity is not just a value but a commitment to doing the right thing, even when no one is watching.

### 2.2 Excellence

We are dedicated to delivering high-quality consulting services that meet or exceed industry standards. We continuously strive to improve our expertise, processes, and methodologies to provide innovative solutions that drive value for our clients. Excellence is not just a goal but a continuous journey that requires dedication, innovation, and a commitment to lifelong learning. All stakeholders are encouraged to provide constructive feedback to improve delivery standards at VALORISE.

## 2.3 Respect & Diversity

We foster an inclusive work environment where diversity is celebrated, and all individuals are treated with respect and dignity. Discrimination, harassment, and bullying are not tolerated under any circumstances. We believe that diverse perspectives lead to better decision-making and innovation. By embracing diversity, we create a workplace where everyone feels valued and empowered to contribute their best.

## 2.4 Positive Discrimination

VALORISE is committed to ensure all individuals have equal access to opportunities, regardless of their background. While we uphold merit-based decision-making, we recognize that certain groups may face systemic barriers to professional growth. As part of our commitment to diversity, equity, and inclusion, we may take proactive measures - such as targeted outreach, mentoring, and fair representation initiatives - to support underrepresented individuals in our industry. These efforts align with our values of integrity and transparency, ensuring that every professional has the opportunity to succeed based on their skills, potential, and contributions.

## 2.5 Responsibility & Accountability

We take ownership of our decisions and actions. Employees are encouraged to act responsibly and are held accountable for their conduct. VALORISE promotes a culture where employees feel empowered to report unethical behavior without fear of retaliation. Accountability is not just about accepting responsibility for our actions but also about learning from our mistakes and striving to improve.

## 2.6 Confidentiality & Data Protection

We are committed to protecting sensitive information, client data, and intellectual property. All employees must adhere to data protection regulations, including GDPR, and ensure that confidential information is handled with the utmost care and security. Data protection is not just a legal requirement but a fundamental aspect of building trust with our clients and stakeholders.

# 3 Workplace Conduct

## 3.1 Professionalism

All employees are expected to conduct themselves with professionalism at all times. This includes adhering to company policies, respecting colleagues and clients, and maintaining a positive and collaborative work environment. Professionalism is not just about how we perform our duties but also about how we interact with others and represent VALORISE in all situations.

## 3.2 Anti-Harassment & Non-Discrimination

VALORISE has a zero-tolerance policy for harassment, discrimination, and workplace bullying (mobbing). Mobbing includes repeated, hostile, or unethical behavior that undermines an employee's dignity, well-being, or professional standing. Employees must report any incidents of harassment, discrimination or mobbing to the HR department, which will handle complaints confidentially and impartially. VALORISE is committed to providing a safe, respectful and inclusive workplace for all. We believe that everyone has the right to work in an environment free from intimidation, exclusion and undue pressure.

### 3.3 Substance-Free Workplace

VALORISE maintains a professional and safe workplace environment. The use of illegal substances or being under the influence of drugs or alcohol during work hours or while performing work duties is strictly prohibited.

Moderate alcohol consumption may be acceptable during authorized company events or celebrations, provided it does not impair professional behavior, judgment, or safety. Employees are expected to act responsibly and remain fit for duty at all times.

## 4 Ethical Business Practices

### 4.1 Anti-Bribery & Corruption

VALORISE strictly prohibits bribery, kickbacks, and unethical payments in any form. Employees must never offer, accept, or solicit bribes. Gifts and hospitality must be reasonable, and any exceeding €50 annually must be reported to the company management. However, seasonal gifts or corporate tokens of appreciation, as determined and approved by the company for clients, are not considered part of this restriction. We believe that ethical business practices are essential for maintaining trust and integrity in all our dealings.

### 4.2 Fair Competition & Conflict of Interest

Employees must avoid situations where personal interests conflict with their professional obligations. Any potential conflict of interest must be disclosed to management immediately. VALORISE is committed to fair competition and ethical business practices. We believe that fair competition drives innovation and benefits both our clients and the broader business community.

### 4.3 Procurement Integrity

All procurement processes must be transparent, fair, and properly documented. Employees must not disclose insider information to external parties or engage in any activity that could compromise the integrity of the procurement process. We believe that integrity in procurement is essential for maintaining trust and ensuring the best outcomes for our clients.

## 5 Confidentiality & Information Security & Responsible Resource Use

### 5.1 Data Protection & Privacy

VALORISE is committed to protecting the privacy and security of company and client data. Employees must comply with GDPR and ISO 9001 standards when collecting and processing information and only use it for legitimate business purposes. We believe that data protection is not just a legal requirement but a fundamental aspect of building trust with our clients and stakeholders.

### 5.2 IT Security & Responsible Use of Technology

Company resources, including email, software, and devices, must be used responsibly and in accordance with company policies. Unauthorized access to sensitive data is strictly prohibited,

and employees must take all necessary precautions to protect company information. We believe that responsible use of technology is essential for maintaining the security and integrity of our operations.

### **5.3 Responsible Use of Company Resources**

Employees are expected to use VALORISE's resources - including financial assets, equipment, software, and time - responsibly and for legitimate business purposes. Misuse, waste, or unauthorized personal use of company resources is strictly prohibited. All employees must ensure that company property is safeguarded against loss, damage, or unauthorized access. Additionally, company-provided technology, such as email, internet, and communication tools, should be used professionally and in accordance with VALORISE's IT and security policies. Responsible stewardship of resources helps us maintain efficiency, security, and operational excellence.

## **6 Health, Safety, and Well-being**

### **6.1 Safe & Healthy Workplace**

VALORISE is committed to providing a safe and healthy work environment for all employees. Workplace hazards must be reported immediately, and employees are encouraged to take an active role in maintaining a safe workplace. We believe that a safe workplace is essential for the well-being and productivity of our employees.

### **6.2 Work-Life Balance & Remote Work**

VALORISE supports flexible work arrangements, including remote work, to promote work-life balance. Employees must accurately report their working hours and maintain professionalism when working remotely. We believe that work-life balance is essential for the well-being and long-term success of our employees.

## **7 Reporting Violations & Whistleblower Protection**

### **7.1 Reporting Mechanisms**

Employees are encouraged to report unethical behavior or violations of this Code through multiple channels, including the HR department, direct managers, and a confidential reporting email. We believe that creating a safe and accessible reporting system is essential for maintaining a culture of integrity and accountability.

### **7.2 Protection Against Retaliation**

VALORISE guarantees that no employee will face retaliation for reporting concerns in good faith. Any form of retaliation will result in disciplinary action. We believe that protecting whistleblowers is essential for fostering a culture of transparency and trust.

## **8 Disciplinary Actions**

Non-compliance with this Code may result in disciplinary actions, ranging from verbal warnings for minor infractions to suspension or termination for serious offenses such as fraud,

harassment, or data breaches. We believe that consistent enforcement of this Code is essential for maintaining a culture of integrity and accountability.

## **9 Continuous Improvement & Policy Review**

This Code of Conduct will be reviewed annually to ensure its relevance, compliance with ISO 9001, and alignment with evolving industry standards and regulatory requirements. We believe that continuous improvement is essential for maintaining the highest standards of ethical behavior and corporate governance.