

Code of Conduct



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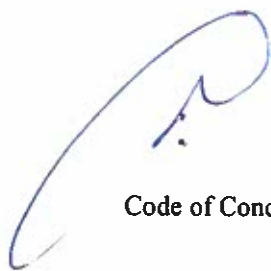




Table of Contents

General Statement of Principle	4
Rules & Regulations	5
Sexual Harassment.....	6
Conflicts of interest.....	6
Confidentiality	6
Gifts.....	7
Bribery	7
Reporting Potential Misconduct	9
Political Activities.....	8
Public Relations	8
Frequently Asked Questions.....	10
Employee Confirmation.....	12



General Statement of Principle

Fundashon Kas Popular (hereinafter referred to as *FKP or the Foundation*) is under supervision of the Financial Intelligence Unit (FIU) Curacao and therefore should promote an ethical organization. This means that FKP should adhere to the following:

- Legislation;
- Internal rules and policies;
- Policies and rules set by FIU
- Unwritten socially accepted rules of conduct.

The Compliance Officer must have a Compliance program that lists the annual signing and training related to the Code of Conduct and the integrity policy.

The code of conduct reflects FKP's commitment to lawful, ethical and moral conduct. This code serves as a guide in identifying FKP's expectations of employees as well as activities they should avoid. Each employee is expected to abide by the Code of Conduct to the fullest extent. Failure to comply with these principles will result in disciplinary action, not excluding possible termination in worst-case scenarios.

The code of conduct specifies what is and especially what is not considered ethical desirable behavior. Nevertheless, it is possible that matters may arise that have not been described, but that are contrary to ethical conduct. If such a situation arises, it is up to the compliance officer and the human resource manager to advise management on this after the compliance officer has discussed the situation with the head of department and human resource manager. Ultimately, the management decides whether the employee has complied with the code of conduct and imposes a disciplinary action if necessary.

Rules & Regulations

The following circumstances may result in disciplinary actions and in worst-case termination of an employee but are in no way meant to exclude other acts or activities by the employee that may be harmful to the Foundation.

1. Supplying false or misleading information when applying for employment, or at any time during employment. Please refer to the integrity & incidents policy.
2. Report for work either under the influence of alcohol, drugs or any other controlled substance. The use, possession, distribution of the above while working. Please refer to the ADMR policy.
3. Theft of the company's property or property of other employees.
4. Abusing or destroying company's property and other employees' property.
5. Unprofessional conduct: Fighting on company premises, intimidation, verbal abuse, threats of any kind against participants, fellow employees and management.
6. Possessing dangerous or deadly weapons on company premises or in performance of company's duties.
7. Insubordination or failure to carry out a reasonable job assignment or job request of management after being warned that failure to do so can result in termination.
8. Discrimination or harassment against members, co-workers and board because of race, religion, color, origin, sex, sexual orientation, age or disability.
9. Immoral, indecent, immature conduct or soliciting persons for immoral purposes.
10. Unjustified report to work, frequent unjustified tardiness, and absence without proper notification or leaving the office without proper authorization during working hours.
11. Any action that can place you or others in danger.
12. Extremely rude and/or degrading behavior toward customers, fellow employees, and management.
13. Unauthorized selling, buying or fundraising in the office.
14. Unauthorized use of the company's name, property or related products for promotional or solicitation purposes is strictly prohibited.
15. Unauthorized use of electronic means of communication (phone, internet)
16. Failure to follow the sickness procedure.
17. Loitering or sleeping on the job.

Please also refer to company regulations ("Bedrijfsreglement) for further rules.

In the following chapters we will discuss a number of issues that are important with regard to acting with integrity.



Sexual Harassment

Sexual harassment is unsolicited and/or repeated verbal comments, gestures or physical contact of a sexual nature which are unwelcome. This includes but is not limited to:

- Use of sexual language, suggestive comments and offensive gender-related comments or jokes in any form, including emails.
- Pressure for sexual behavior.
- Sexual activities or sexual remarks about a person's body.
- Unnecessary body contact such as patting, pinching, kissing, etc.
- Non-verbal expressions of a sexual nature.
- Physical assault.
- Demanding sexual favors with implied or overt threats concerning one's employment, compensation, promotion and/or job assignment

Any employee who is subject to sexual harassment should report such incidents directly to compliance officer. The employee will be informed that an investigation of alleged harassment will be conducted and that appropriate action will be taken.

Conflicts of interest

An employee shall be considered to have a conflict of interest if such employee, or any member of his or her direct family, has existing or potential financial or other interests which might impair, or reasonably appear to impair, the employee's independent, unbiased judgment in discharge of his or her responsibilities to the Foundation. All employees shall disclose to the Compliance Officer of any possible conflict of interest at the earliest practicable time. Please refer to the integrity & incidents policy for further details.

Confidentiality

Employees have a responsibility to maintain the confidentiality of sensitive information related to the business of the Foundation. Employees must hold in strictest confidence and not disclose to any person, any information relating to the business of the company which an employee may acquire or possess by reason of employment with the company. This includes casual conversations with family, friends and former employees of the company.

An employee shall not reveal confidential information relating to the Foundation's affairs to outsiders or to other employees not entitled to such information. An employee shall not divulge any information gained during employment in any way that would result in harm to the Foundation. Such information is the property of the company and divulging such information is equal to theft.



Failure to comply with the above-mentioned policy may result in disciplinary action, which may include termination, as well as legal action.

Gifts

A gift of money should never be given or accepted. Only business-related gifts may be accepted, gifts from customers should never be accepted. A gift of nominal value of ANG 75 may be given or accepted if it is a common business courtesy. Giving or accepting valuable gifts might be construed as an improper attempt to influence the relationship.

A gift or favor should not be accepted or given if it might create a sense of obligation, compromise your professional judgment or create the appearance of doing so. In deciding whether a gift is appropriate, you should consider its value and whether public disclosure of the gift would embarrass you or FKP.

All gifts must be reported to the Compliance Officer. All gifts are issued to the Personnel Association (PVK) which raffles them among the staff. Management may deviate and in certain cases decide that the employee can keep the gift.

Bribery

Never engage in bribery or corrupt practices. This is vital to maintaining the trust of our colleagues, clients, and others related parties. FKP does not solicit, accepts, offers, promises, or pays bribes, whether directly or through a third party. Knowing the identity of our clients and others with whom we do business and adhering to applicable standards on anti-money laundering. Please refer to the Compliance Manual.

Where we suspect criminal behavior, we take appropriate action. FKP does not conduct any activities in breach of applicable economic sanctions or undertake services which assist clients in breaching applicable sanctions laws.

A bribe is not only payment or receipt of cash. A bribe can be anything of value and can take many other forms, including:

- Consultancy fees and commissions to parties not actually performing services;
- Payments in-kind including any non-cash items of value such as travel, hospitality, entertainment, employment opportunities, and gifts;
- Employment of family members of government officials outside the normal hiring process;
- Sponsorships/donations.



Use of electronic means of communication

It is not permitted to use the Foundation's telephone, computer and internet for unacceptable personal purposes. This includes playing or downloading games, shopping, gambling or and visiting chat boxes. Listening to radio online and watching TV and other video online applications are also subject to unacceptable use.

Absolutely not allowed:

It is absolutely not allowed to use the internet or email to:

- Visit sites that contain pornographic, discriminatory, or offensive material.
- View, download or distribute pornographic, discriminatory, or offensive material.
- Visit unauthorized non-public sources on the Internet.
- Send messages anonymously or under a fictitious name.
- Send or forward threatening, abusive, sexually or discriminatory messages.
- Harassing someone.

An employee who is offered unsolicited information as mentioned above must report this to the compliance officer.

Political Activities

Political activities must be conducted on your own time and using your own resources. You must not promote any political or personal views or beliefs (including by posting or distributing notices or other materials) on or around FKP premises, and you may not indicate or suggest that you speak on behalf of FKP or that the Foundation supports your views.

Public Relations

All information disclosed outside of the company must be accurate, complete and consistent, and disseminated in accordance with FKP policies. Information about the Foundation may only be provided by the Management. The Management may designate one or more employees to do so on his behalf.

If someone asks you for information (for example, the media), be sure to notify your department head about the request. They will contact the appropriate party to ensure that the correct procedure is followed. Please do not attempt to answer these questions yourself.

Side activities

The employee is not allowed to perform other work than for his employer, unless he has received approval to do so. Outside activities cannot conflict with FKP's operations. Outside activities should be reported to the compliance officer. The compliance officer will consult this with Management, who is ultimate responsible for approving the outside activities of employees.



Reporting Potential Misconduct

If there is any suspect that an employee of FKP, or anyone acting on behalf of FKP, has engaged in illegal or otherwise improper conduct, you should report the matter to the Compliance officer.

The Compliance Officer can be contacted at compliance@fkp.cw, or the reporting service line at his/her phone extension. The employee relationship will not be affected by an honest report of potential misconduct.



Frequently Asked Questions

Q: Why do we need a Code of Conduct?

A: We believe that FKP employees are the most important 'part' of the organization. By creating open communication channels, we can ensure a positive working environment and protect an ethical business culture and our reputation.

Q: Does the management really want me to report complaints?

A: Absolutely. We even depend on it. You know what is going on in your organization, both positively and negatively. You may be able to get to know things that are unacceptable. If you report this, you keep the possible negative consequences (both for the organization and for the employees) to a minimum. By giving positive feedback, you can provide us with tools that can improve the organizational culture and results.

Q: Why do I have to report what I know?

A: We all have the right to a positive working environment. However, this also means that we must behave in an ethically responsible manner and pass it on to the right people if someone behaves in an unethical way. By working together, we can ensure a healthy and productive environment. Business misconduct puts the survival of the entire company at risk.

Q: What kind of situations should I report?

A: Conduct that you believe violates FKP's code of conduct.

Q: If I see a violation, shouldn't I just pass it on to my manager and leave it to them?

A: Yes, we think it is a good thing if you report a violation to your manager in the first instance. However, there are circumstances in which that is not the best approach. In any case, notifications can be made anonymously to the Compliance Officer and all data provided will be treated in complete confidentiality. Please also refer to the integrity & incident policy for this.

Q: I know some people that behave unethically, but it does not bother me. Then why would I report it?

A: FKP wants to stimulate ethical behavior. Any unethical behavior, at any level, is ultimately harmful to the Foundation and to all employees, including yourself. Just think of a few recent organizational scandals, and you will realize how disastrous the consequences of seemingly insignificant unethical behavior can be for an otherwise healthy organization. If you have knowledge of instances of misconduct or violations of the Code of Conduct, you owe it to yourself and your colleagues to report it.



Q: What am I expected to do with the Code of Conduct?

A: Read the document carefully at work and make sure that you understand them. If you have any questions or concerns, ask your direct manager or you can contact the Compliance Officer at his/her phone extension.

Q: Can I be retaliated against or victimized for reporting violations to the Code of Conduct?

A: FKP does not tolerate retaliation against or the victimization of anyone who raises concerns or questions regarding a potential violation of FKP's policy that he or she reasonably believes to have occurred.



FKP CODE OF CONDUCT

Employee Confirmation

The undersigned confirms that he/she:

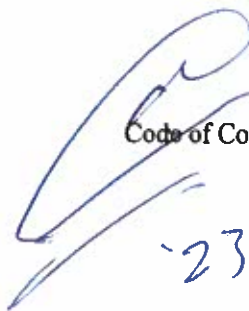
- 1) participated in the presentation of the FKP Code of Conduct
- 2) obtained a copy of the FKP Code of Conduct.
- 3) have taken notice of the content of the FKP Code of Conduct and will abide by the terms and conditions of this document.

The undersigned is aware that failure to comply with the aforementioned Code of Conduct may lead to disciplinary action on behalf of the Management of FKP.

Name Employee

Signature

Date


-23-12-2021

