



HINT CODE OF CONDUCT

'INTEGRITY IS DOING THE RIGHT THING, EVEN IF NOBODY IS WATCHING'



**‘IN OUR COMPANY
TRANSPARENCY
IS A VALUABLE
ASSET’**

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WHY THIS CODE OF CONDUCT?

Organizations are judged on the behavior of the people who represent the organization. The way we present ourselves, we offer our products and services and how we interact with our relations form the image (corporate reputation) of Hint. It is important for Hint that this image is trustworthy and transparent. The Code of Conduct is a living document that will be adjusted and / or supplemented when needed.

Not only employees of Hint represent our organization and form the corporate reputation of our organization. This image also depends on the behavior of our partners, agents and all their employees. Some things are already mentioned in rules and regulations, but may change. Other issues may not yet have been settled. For all guidelines apply: use your common sense and trade in the spirit of the Code of Conduct.

Hint expects from you and your colleagues to act with ethical behavior. Working with Hint means you know the Code of Conduct and act on it.

If the Code of Conduct is breached this has consequences, not only for you, but for every employee / relation of Hint and the company itself. Always try to look out for each other.

WHO IS RESPONSIBLE?

The responsibilities of the Code of Conduct are distributed as follows.

- You ensure that the Code of Conduct is known to you and your colleagues and set a good example.
- You act in accordance with the letter and the spirit of the Code of Conduct.
- Mind your boundaries, only execute instructions by the extent to which your own behavior matches the Code of Conduct.
- Do you see any offense? Please report it to your manager.
- When you break with the Code of Conduct you can be faced with disciplinary action. Serious offenses can even lead to dismissal.
- If prescribed by law, serious offenses will directly be made public.
- Partners and clients who are working with Hint have to stick to the rules of the Code of Conduct.

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CODE OF CONDUCT

CUSTOMER INTEREST

Our customers trust in us by choosing our products and services. Hint attaches high value to its customers, as a base of what we do, and make sure the relationship with each other is correctly. Customer interest is always on the top of our minds.

This means the following behavior:

- Act with integrity in all conditions.
- The quality of our products and services for the (intended) customers are an important value. Therefore we are perfecting products and services.
- Hint respects the privacy and freedom of expression of its customers. Customers trust Hint with information. They count on it that they can do that in confidence.
- Customer feedback is important for Hint. If customers have commented on our products, services, employees or partners, then take this seriously and tell it to the relevant department or to your supervisor. Use this feedback to improve our products, services and processes.

INTELLECTUAL PROPERTY

Intellectual property rights include trademarks, patents, know-how and trade secrets which belong to the most valuable assets of Hint.

Intellectual property is an essential strategic tool to achieve business goals and should be managed with proper care.

IT and communications may contain intellectual property. You can think about intellectual property on personal computers, mobile/desk phones and personal digital assistants. When using the IT and communication of Hint you must handle with high ethical standards. Your personal use of IT and communication of Hint should not affect productivity. Improper use of these facilities may be illegal and harmful to Hint.

OPERATING ENVIRONMENT

Hint is an inspiring, safe and pleasant working environment. Hint expects of you to contribute to an operating environment that is free of discrimination, intimidation, harassment or prejudice. As a company we give you equal opportunities, regardless of your origin, religion, sex, age, national origin, sexual orientation, disability etc.

INTIMIDATION, AGRESSION AND VIOLENCE

Hint will not tolerate (sexual) harassment, aggression or violence within the organization and will report it, if it turns out to be a criminal offense. Any form of harassment, aggression or violence can be reported to your immediate supervisor. All reports will be treated quickly, correctly, carefully and if desired, confidentially.

CONFIDENTIALITY OF BUSINESS INFORMATION

In your operating environment you will be in contact with business information, on a daily base. Much of this information does not seem to be confidential. Still, it is good to stop for a moment and make a balance what would happen if, for example, a competitor or the media would know about this information. Hint expects you to carefully deal with sensitive and confidential company information.

A few guidelines to carefully deal with sensitive company information:

- Make sure you always label documents / email with confidential information with "confidential". Then treat it as such. Do not throw confidential documents away in the regular paper tray, but use the paper shredder.
- Do not talk about confidential matters outside the company. Make sure confidential information of Hint or its partners does not go public.
- Protect confidential information to unauthorized persons by including a good password and keep this password confidential. When leaving your workspace, lock the screen of your computer, so no one can use it without you knowing it.
- Do not leave devices with confidential information unattended, for example in the back of a car or in a train.

A SAFE WORKING ENVIRONMENT

Hint offers you a safe working environment. Every workplace has its own safety rules. Living by these rules you are not only doing for yourself but also for your colleagues / partners.

COMMUNICATION GUIDELINES

Hint is open and transparent towards its employees, partners and customers. The key is to bring clarity in what we tell the world. Not everyone is in a position to judge what is and is not good to tell, there has to be sufficient knowledge available to answer correctly. Answering correctly is important to get a good reputation and maintain this reputation. For clear and consistent communication with partners and customers (letters, email etc.) you can find various rules and tools. For communication to the press, always contact the Marketing and Public Relations department.

Presentations, conferences and seminars

Giving a presentation at conferences and/or exhibitions is a good way for Hint to represent its business. At these events the media is often present, not always recognizable. Take good care of this knowledge and make sure you are prepared before joining these conferences.

Contact with the media

Contact with the media will only be maintained by the Marketing and Public Relations department, managers or specially trained staff.

Posting comments on the Internet

Posting a comment on a post on the Internet is external communication. If you want to post a comment on the Internet by using the name of Hint, you have to contact the Marketing and Public Relations department for permission. Do not harm the name of Hint by posting a comment on the Internet about Hint which is not true or will harm Hint in any way.

Responding to social media sites like Linked-In, Twitter or Facebook

Concerning social media we make a clear distinction between your private opinion and the company's opinion. For propagating the company position only employees of the Marketing and Public Relations department, managers or specially trained staff are allowed to share content. To place your private opinion, you obviously are fully responsible for your own reactions. As long as it is not sensitive or harmful business information, you publish outside working hours and you are not using Hint network or business email address.

THE RELATIONSHIP WITH SUPPLIERS / EXTERNAL PARTIES

Avoid conflicts of interest or even the appearance of conflict of interest between your personal interests and the interests of Hint.

When in doubt, ask yourself the following questions:

- Would this situation embarrass Hint or me if it appears on the front page of a newspaper?
- Would I feel uncomfortable when I would discuss this situation with my supervisor?
- Could I be favored in this situation at the expense of Hint?

If the answer to any of these questions is "Yes" then it is likely you should avoid this situation.

Think for example:

- Personal investments
- Work alongside your job at Hint
- Management positions / directorships in other companies
- Investments in business relationships of Hint
- Accepting or giving (relationship) gifts

Think carefully in these situations and avoid (the appearance of) interests entanglement. If you are in such a situation, discuss the situation with your manager before making any commitments.

Competition & market abuse

All applicable international and national laws should be respected. Making agreements with competitors, sharing sensitive company information or any other offense of these laws are forbidden and could provide major financial and image damage for Hint.

It is important for Hint to respect and act in agreement with applicable international and national laws.

Bribery and Corruption

Bribery is an act of giving money or gift giving that influences a business outcome improperly which in some countries is legal. When bribery occurs, Hint and you personally can be liable. You have to make sure that the people you work with know that bribery and corruption is out of the question. You shall never accept or offer a personal gift in return for personal or business advantage. Tell Hint if you are aware of bribery and or corruption by Hint or a relation of Hint.

When in doubt, ask yourself the following question:

- If you see that a competitor gives this gift to the customer, do you get the feeling that he might be influenced because of it?
- Would you want your colleagues, relations and family to know of your act of bribery?

EQUIPMENT AND INFORMATION

The equipment, provided by Hint, such as computers, (mobile) phones and other devices will help you in performing your tasks as good as possible. You are responsible for proper use of this equipment. Careless or improper use of this equipment could harm the whole company.

A few examples:

- Do not download computer files from the Internet during work hours which you do not need for fulfilling your work activities.
- Make sure you leave no data carrier behind with sensitive or confidential business information in a train or at any other location.
- Handle the equipment carefully.

LAWS, REGULATIONS AND INTERNAL PROCEDURES

You and your colleagues must know and act in agreement with all applicable national and international laws and regulations, and internal procedures of Hint and its relations. If there is any doubt you ask your supervisor.

Illegal or socially unacceptable activities

Illegal or socially unacceptable activities like bribery, money laundering or corruption are serious offenses. This will lead to a criminal investigation and various consequences.

REPORTING AND INFORMATION

QUESTIONS? REPORT VIOLATION?

After reading this Code of Conduct, you may have questions. Maybe you wish to report a violation.

Reporting works as follows:

- For specific questions about the Code of Conduct or advice about how to use it, you should contact your supervisor or a member of the management team of Hint.
- Are you uncertain about the interpretation of the Code of Conduct? Consult your supervisor or a member of the management team of Hint, he or she will treat your questions confidentially.
- In urgent or sensitive cases where you need confidential advice or for things that cannot be discussed with your direct manager, please reach out to one of the other managers you feel trusted with.

Determination of a violation of the Code of Conduct

If a manager discovers a violation of the Code of Conduct, the manager will confront you with this behavior. The manager may leave a note in your personnel file. If the manager has doubts about the seriousness of the offense or if he suspects any irregularity, he will report this violation to the president of Hint.

How to act when a violation occurs?

Are you in a situation where you see or suspect a conflict with the Code of Conduct? Please contact your manager.