CODE OF ETHICS

APRIL 2021 VERSION 1.1



I. FOREWORD BY THE LEADERSHIP TEAM

The Core Team designed this Code of Ethics as a means to provide Women in Ethics and Compliance Global, and its members, with the ethical values that inspire us. It sets out fundamental principles WEC Global follows, in recognition of its responsibility in creating an environment where members feel welcome, make a difference, and advance a culture of equality.

Many of the standards highlighted below reflect the individual values of integrity, fairness, and professional competencies. With our members as our biggest asset, we encourage openness, dialogue, and respect, so everyone feels free to express their ideas or concerns.

II. PURPOSE AND SCOPE OF CODE OF ETHICS

The following document serves as a guide that Women in Ethics & Compliance Global ("WEC Global", "organization" or "we") expects all officers, committee chairs, and members of WEC Global to abide by and maintain consistency with the values of the organization. All officers, committee chairs, members, affiliates (such as Friends of WEC Global), and third parties (such as sponsors, partners, and collaborators) must read and follow the Code of Ethics policy (the "Code") to uphold the highest possible standards of business conduct, social norms, regulations, and responsibilities.

This Code reflects the collective input and insights of the WEC Global officers. Please direct concerns or questions regarding the Code, its interpretation, and application to the Ethics Committee at ethics@wec-global.org. The Ethics Committee is an independent body, with no influence from the Board, that ensures the protection of the rights, safety, and well-being of all members and subjects addressed in the WEC Code of Ethics and investigates concerns regarding possible infringement of the WEC Global Code of Ethics.

This Code is made available to all officers, committee chairs, members, and nonmembers of WEC Global on the official website of Women in Ethics & Compliance Global at www.wec-global.org.

If the Code conflicts with any state or national laws in the countries where this Code is practiced, all parties and subjects mentioned must comply with the law. However, if the Code of Ethics conflicts with any state or national traditions and customs in the countries where this Code is practiced, all parties and subjects mentioned in this document must comply with the stricter of the two, while respecting the cultures and traditions of the states and countries in which WEC Global members operate and maintain a presence.

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III. PRINCIPLES OF WOMEN IN ETHICS & COMPLIANCE GLOBAL

1. OUR VALUES

WEC Global is made up of a mixture of female professionals and volunteers from all over the world who have a common interest in ethics and compliance. In coming together, we aspire to create opportunities for our members and officers to grow as professionals and as individuals within a supportive and safe environment. With this in mind, WEC Global incorporates, encourages, and exercises the following values, as these are the foundation that enables our organization's culture to thrive with every action and decision made.

1.1. Integrity

We focus on the greater good for our members and conduct ourselves ethically and honestly at all times. This is the driving force in building this network of professionals and, as we face challenges, we do so with respect and truthfulness.

1.2. Diversity

We support diversity and inclusion for all. In this organization, you are welcomed to bring your whole self so your voice can be heard. We believe in sharing our individual views and opinions with an open mind.

1.3. Purpose

We act with a united focus in our mission and our course of action, by demonstrating passion and commitment for the betterment of WEC Global and its members.

1.4. Contribution

We undertake a sense of service and responsibility in assisting all members and supporting others around us. We aim to work together towards our common goals and give support to one another along the way.

1.5. Adaptability

We answer the needs of our members by adapting to the rising and changing demands of current issues. As we provide education in the compliance and ethics community, rising cultural demands and issues can be sensitive matters. However, we adapt to the needs of our members and encourage entertainment and merriment where appropriate.

2. ACTING WITH INTEGRITY

WEC Global is a purpose-driven community-based organization that aims for inclusivity, openness, and honesty at all levels of leadership and membership. Officers and members agree to participate in fulfilling the mission of WEC Global and stimulate dialogue towards the support for gender diversity and social justice issues. This includes having a high standard of respect for everyone's personal opinions, values, and ideologies, and a high standard of respect for everyone's ideas, creativity, and quality of work.

Conflicts of interest may not always be straightforward. Whilst all members are free to join and partake in other community-based organizations that serve the same purpose as WEC Global, officers, committee chairs, and members must avoid situations where private interests interfere and/or appear to interfere with WEC Global's interests and the interests of the membership as a whole. If such a situation arises, the involved member(s) and/or committee(s) shall seek advice on the matter from the Core team or Ethics Committee, as appropriate.

3. PRIVACY AND SECURITY

Please refer to WEC Global's <u>Privacy Statement</u> for detailed information on privacy, security, and confidentiality. This document is made available to all officers, committee chairs, members, and non-members of WEC Global on the official website of Women in Ethics & Compliance Global at www.wec-global.org.

All members have the right to privacy and can trust WEC Global to guard their information with policies to limit use to the extent that serves the purpose of the organization. This includes, but is not limited to, taking precautions to prevent unauthorized distribution and identification of anonymized data, ensuring the accuracy and origins of the accuracy of data, and protecting it from unauthorized access and accidental disclosure. As a global organization, WEC Global's privacy practices are designed to comply with the requirements for data use and protection in the United Kingdom, the European Union, and the United States of America. Where there are additional legal concerns regarding fulfilling privacy laws in other jurisdictions, members are asked to refer the issue to the officers for review.

Officers, committee chairs, and members shall not disclose, share, possess or keep copies of any information received from fellow members and officers on or through our platforms without their consent. They shall not copy and share WEC Global resources that they do not own directly.

4. DEALING WITH AND REPORTING MISCONDUCT

As an organization that takes pride in its activities and capacities, WEC Global believes in continuous improvement, with high standards of transparency and trust through all processes, actions, and activities. With an open-door policy, all members are encouraged to have open communication, feedback, and discussion about any concerns with the Board, the Ethics Committee, Core team, and appropriate committee(s). It is the policy of WEC Global to accept any reports concerning suspected violation(s) of the Code or law made to the Ethics Committee. The Committee shall promptly hold an internal investigation on matters addressed in the alleged violation or misappropriation of the Code according to the procedures it adopts. Furthermore, in cases of retaliation or fear of retaliation from the Core team or fellow members, members must disclose such reservations to the Ethics Committee.

IV. VIOLATION OF THE CODE OF ETHICS

Officers and members must uphold, respect, and comply with the Code of Ethics. Whilst the following list of violations is not exhaustive, where proven they constitute an explicit violation of the Code: derogatory, offensive, and obscene behavior; harassment and misuse of power and authority; discrimination based on age, color, disability, ethnicity, nationality, race, family status, military status, gender identity, sex, sexual orientation, religion, political beliefs, medical conditions or any other inappropriate grounds; disclosing information or range of unprecedented opinion on social media that the WEC Global considers private; misuse or abuse of WEC Global's social media and communication platforms; misrepresentation of WEC Global's policies and procedures; speech on behalf of WEC Global, or use of its logo and branding unless authorized to do so. Any actions that are against laws prohibiting bribery, corruption, or the conduct of business with individuals, companies, or countries that WEC Global associates to would constitute a violation of the Code. Additionally, attempts to conceal any serious matter and/or gross breach that must be reported would serve as a breach of the Code itself.

The determination that a violation of this Code has occurred shall result in an immediate warning from the Ethics Committee and can lead to suspension or termination of the membership and/or leadership of the individual(s) involved. The Ethics Committee shall adopt a separate procedure for addressing these forms of complaints and concerns, including but not limited to conducting meetings and/or hearings with those involved impartially and affording those accused of a violation the opportunity to defend themselves. Following this, where deemed appropriate by the Ethics Committee, disciplinary measures shall be taken based on severity, intent, and reasoning behind the violations.

V. RESIGNATION, TERMINATION & SUSPENSION OF MEMBERSHIP

Any officer, committee chair, or member may resign at any point in time by contacting the WEC Global leaders in writing and informing them of the decision to resign. For officers and committee chairs, it is advised to announce the resignation two weeks before the date of effect to have enough time to arrange for election and appointment of a replacement. Membership is not transferable in any case. WEC Global has full right to suspend or terminate the membership of any member under the conditions outlined in Section IV: Violation of the Code of Ethics. If the member or officer is terminated, the former member or officer must remove all reference, documents, and records that pertain to WEC Global including, but not limited to, WEC Global logo, membership list, mailing lists, other contact lists, marketing material, digital references, and any association with WEC Global on social platforms.

Officers and members facing suspension shall not partake in meetings, events, initiatives, and projects that WEC Global hosts during the entire period of suspension. WEC Global shall also revoke rights to discuss and share content on its social platforms and communication channels during suspension periods. At the end of the period of suspension, the Ethics Committee, after due inquiry, shall declare whether those suspended may resume their membership or leadership roles in WEC Global. Furthermore, in severe situations, in particular, when there is an incident under review, the Ethics Committee shall sanction an immediate and short-term suspension until a resolution is reached.

Resignation, termination, or suspension shall not result in partial or full refunds of fees charged for events, initiatives, and ad-hoc projects that the member has paid for and attended previously. For events, initiatives, and ad-hoc projects that the member has paid for and is pending attendance, i.e., taking place at a later date, the rules applicable for partial or full refunds of fees shall be on the specific guidelines for that event, initiative, or ad-hoc project.

In the event of WEC Global membership fees being assessed in the future, resignation, termination, or suspension shall result in a prorated return of registration fees for the year in which the leaving occurs.

VI. COMMITMENT FROM THE LEADERS

At WEC Global, we believe in setting the tone from the top. In addition to the aforementioned codes and policies, the leadership team shall actively and conscientiously promote WEC Global's mission, vision, values, and set an example for best management practice and corporate citizenship.

Officers shall demonstrate integrity and work for equal opportunity. Any hindrance in the fair treatment of members and fellow officers over non-job-related factors, such as race, color, sex, national origin, or religion is not acceptable. Officers shall value integrity and corporate citizenship and seek counsel from the Ethics Committee when challenged with ethics violations.

Nepotism, self-dealing, and other related matters to conflict of interest must be avoided at all costs. All officers are clear that conflict of interest and appearance of a conflict of interest is unethical, and overlooking or participating in such matters is a violation of their duty.

