



Code of Ethics & Professional Conduct

The power of shared values

Our shared values are not an abstract ethical philosophy, but a powerful, living compass intended to guide us all toward the right decisions and correct actions, whatever situations we may encounter, whenever and wherever we are.

Preface

Illustrations by Livia Cives

This *Code of Ethics and Professional Conduct* (Code) is to be applied to personnel of Deloitte Israel & Co., each of the partnerships that are organized in Israel and partners in Deloitte Israel & Co., Brightman Almagor Zohar and Co., Almagor Brightman Trusts Holdings and Co., each of the partnerships that are organized in Israel and partners in Almagor Brightman Trusts Holdings and Co., and each of their respective subsidiaries in accordance with Israeli laws and regulations (Collectively, these entities are referred to as the "Deloitte Israel Firms.").

This Code is provided for informational purposes only. It is not intended to create, nor does it constitute, a contract or an enforceable promise of any kind with Deloitte. We reserve the right to modify, revise, discontinue, or amend any or all of this Code as appropriate, at any time, in whole or in part, for any reason, and without prior notice, consent, or approval. Deloitte retains the absolute right to terminate its personnel at any time, without cause, without prior notice, and without prior discipline, subject, if applicable, to compliance with any law and/or contract¹.

About Deloitte

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"), its network of member firms, and their related entities. DTTL and each of its member firms are legally separate and independent entities. DTTL (also referred to as "Deloitte Global") does not provide services to clients. In Israel, Deloitte refers to Deloitte Israel & Co., each of the partnerships that are organized in Israel and partners in Deloitte Israel & Co., Brightman Almagor Zohar and Co., Almagor Brightman Trusts Holdings and Co., each of the partnerships that are organized in Israel and partners in Almagor Brightman Trusts Holdings and Co., and each of their respective subsidiaries [(the "Deloitte Israel Firms.")].

Certain services may not be available to attest clients under the rules and regulations of public accounting. Please see www.deloitte.com/about to learn more about our global network of member firms.

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Introduction

The power of shared values

“Webster’s New World Dictionary definition of "ethic"”

1. the study of standards of conduct and moral judgment; moral philosophy
2. a treatise on this study
3. the system or code of morals of a particular person, religion, group, profession, etc.



Important human achievements in any field—from medicine to space, from culture to business—are rarely made by individuals working alone. Significant advances and sustained success are nearly always the result of people who, as well as working together, *believe together*. They share a clearly articulated set of common values. They subscribe to the same explicit and implicit understandings. They’re highly committed to long-term goals.

And, to each other.

Deloitte Touche Tohmatsu Limited (DTTL) member firms comprise many thousands of people all over the world, from hugely different backgrounds and cultures. But whoever you are, wherever you work, be assured that you are united with your colleagues by a set of values and core principles that all of us know, understand, share, and live by.

Our shared values

Lead the way

Deloitte is not only **leading the profession, but also reinventing it for the future**. We’re also committed to creating opportunity and leading the way to a more sustainable world.

Serve with integrity

By acting ethically and with integrity, Deloitte has earned the trust of clients, regulators, and the public. **Upholding that trust is our single most important responsibility.**

Take care of each other

We **look out for one another** and prioritize respect, fairness, development, and well-being.

Foster inclusion

We are at our best when we foster an inclusive culture and embrace diversity in all forms. We know this attracts top talent, enables innovation, and helps deliver well-rounded client solutions.

Collaborate for measurable impact

We **approach our work with a collaborative mindset, teaming across businesses, geographies, and skill sets** to deliver tangible, measurable, attributable impact.

Our shared values are not an abstract ethical philosophy, but a powerful, living compass intended to guide us all toward the right decisions and the correct actions, whatever situations we may encounter, whenever and wherever we are.

A global approach to ethics and compliance: Global Principles of Business Conduct



Together the *Global Principles of Business Conduct* and the **Deloitte US and Deloitte Israel Firm's Code of Ethics and Professional Conduct** define the Deloitte approach to building and sustaining a culture of ethics and integrity.



Deloitte commits to the *Global Principles of Business Conduct* that is based on our shared values and reflects our common underlying belief that ethics and integrity are fundamental and non-negotiable. *The Code of Ethics and Professional Conduct* ("Code") encompasses the *Global Principles of Business Conduct* and builds on them while addressing local requirements and expectations.

Every day, we seek to make an impact that matters to our people, our communities, and our clients. The *Global Principles of Business Conduct*, which have been adopted by Deloitte Touche Tohmatsu Limited (DTTL) and each of its member firms, illustrates the core expectations that our stakeholders can have of all our people across the DTTL global network of member firms.

Please note that DTTL does not provide services to clients and therefore references to clients in the *Global Principles of Business Conduct* refer to member firm clients.

We commit to serving clients with distinction.

Integrity

- We are straightforward and honest in our professional opinions and business relationships.
- We are truthful about the services we provide, the knowledge we possess, and the experience we have gained.

Quality

- We are committed to providing quality services by bringing together the breadth and depth of our resources, experience and insights to help clients address their needs and problems.
- We strive to develop outcomes that create an impact that matters for our clients.

Professional behavior

- We comply with applicable professional standards, laws and regulations, and seek to avoid actions that may discredit ourselves or our professions.
- We foster a culture of appropriate professional skepticism and personal accountability, which supports clients and drives quality in the services we provide.
- We understand the broader impact that our work has on society, our people, and our clients, and we conduct business with those interests in mind.
- We are committed to earning and sustaining the public's trust and confidence in the work we do.

Objectivity

- We are objective in forming our professional opinions and the advice we give.
- We do not allow bias, conflict of interest, or inappropriate influence of, or undue reliance on, individuals, organizations, technology, or other factors, to override our professional judgments and responsibilities.
- We do not offer, accept, or solicit any gifts, entertainment, or hospitality that we have reason to believe may be intended to improperly influence business decisions or impair objectivity.

Competence

- We use due care to match client needs with practitioners who have the competence required for their assignments.
- We foster innovation and new ideas to improve the value and performance of our services, while being mindful of the impact on society.

Fair business practices

- We respect our competitors and are committed to fair business practices.
- We receive fees that reflect the value of services provided and responsibilities assumed.

Confidentiality, privacy, and data protection

- We protect and take measures to safeguard the confidential and personal information that we hold, collecting and handling it in compliance with applicable laws, professional obligations, and our own data management policies and practices.
- We prohibit disclosure of confidential and personal information entrusted to us unless granted permission or there is a legal or professional right or duty to disclose.
- We prohibit the use of confidential information about our clients for personal advantage or for the benefit of third parties.

We commit to inspiring our talented professionals to deliver outstanding value.

Respect, diversity, and fair treatment

- We foster a culture and working environment where our people treat each other with respect, courtesy, and fairness, promoting equal opportunity for all.
- We encourage and value a diverse mix of people, viewpoints, talents, and experiences.
- We create inclusive working environments that not only address individual needs but allow our people to utilize their unique strengths.
- We do not tolerate discrimination or harassment of any nature on the grounds of gender, race, religion, age, disability, gender identity, sexual orientation, or other categories protected by local law in any of our working environments.

Professional development and support

- We invest in our people to develop the professional knowledge and skills necessary for them to effectively perform their roles.
- We help our people reach their potential through investments in personal and professional development and support programs.
- We provide a safe work environment for our people and expect our clients to do the same.

We commit to contributing to society as a role model for positive change.

Anti-corruption

- We are against corruption and neither make bribes nor accept them, nor induce or permit any other party to make or receive bribes on our behalf.
- We support efforts to eradicate corruption and financial crime.

Responsible supply chain

- We do not condone illegal or unethical behavior by our suppliers, contractors, or alliance partners.
- We select suppliers through fair procurement processes.

Social responsibility

- We contribute to society and communities by engaging with non-profit organizations, governments, and other businesses to make a positive impact on local, national, and/or global challenges.
- We support our communities in a variety of ways, such as donating money, providing pro bono client services and supporting the volunteering of time by our people.
- We support efforts to drive sustainable development and respect human rights standards.
- We recognize that our business operations and our provision of services may at times impact the environment, and we work to reduce harmful effects they might have.

Deloitte Touche Tohmatsu Limited is a UK private company limited by guarantee ("DTTL") and includes its network of member firms and their related entities (collectively, the "Deloitte organization"). DTTL and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL (also referred to as "Deloitte Global") does not provide services to clients. Please see www.deloitte.com/about for a more detailed description of DTTL and its member firms.

About values-based decision making and your responsibilities

“Merriam-Webster’s definition of “compliance”

1: conformity in fulfilling official requirements ”



The Ethics and Compliance Program for Deloitte encompasses the oversight and communications mechanisms we have in place to manage our ethics and compliance activities in collaboration with our network of DTTL member firms.

The most visible element of the Ethics and Compliance Program for Deloitte is this *Code of Ethics and Professional Conduct* ("Code"). It outlines the requirements and expected behaviors of the people of Deloitte and provides information about the US Chief Ethics and Compliance Officer, and the Israel Quality Risk Leader, the Integrity Helpline, and the many other resources available to our personnel.

Values-based decision making

Values should be an integral part of your decision making when faced with an ethical dilemma. As you consider the situation, you should ask yourself the following questions to aid in making the appropriate decision about a possible course of action:

- Are my actions illegal or unethical?
- Am I being fair and honest?
- Would I be unwilling or embarrassed to tell my family, friends, or co-workers?
- Would Deloitte’s reputation be harmed if the action were revealed in the newspapers?
- Am I personally uncomfortable about the course of action?
- Could someone’s life, health, safety, or reputation be endangered by my action?
- Could the intended action appear inappropriate to a third party?

If you are still unsure of what to do, ask questions and seek additional guidance through your function/channel leader or through other resources described in this Code.

Remember at all times, that it is our collective responsibility to seek guidance and assistance in the ethical performance and discharge of our professional responsibilities.

A duty to know, understand, and comply

It is the duty of all Deloitte personnel to know, understand, and comply with this *Code of Ethics and Professional Conduct* ("Code"), which includes the *Global Principles of Business Conduct*. Failure to comply with the Code could result in significant risk to Deloitte and its people, and it may subject that individual to disciplinary action, up to and including termination or severance of association.

Furthermore, all Deloitte personnel must comply with the Israeli Auditors Law, 5715-1955, and any regulations promulgated thereunder and any applicable (local or foreign) rules, regulations and professional guidelines (the "Accounting Codes"). The combination of Deloitte's Code and policies substantially covers the content outlined in the Accounting Codes. Therefore, by complying with Deloitte's Code and policies, you are meeting the expectations outlined in the Accounting Codes.

In addition, certain professionals may have to comply with additional requirements of certain professional codes of conduct given their specializations or certifications.

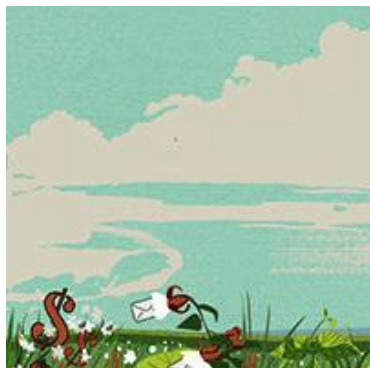
A duty to report

The Ethics and Compliance Program is designed to educate and foster an atmosphere where open communication of ethics and compliance inquiries and issues is encouraged, and to provide all personnel with a reasonable understanding of how to identify and report potential violations. Each of you is responsible for appropriately addressing—through reporting, consultation, or other means—potentially fraudulent, illegal, or unethical issues that may come to your attention.

If you observe or become aware of a potential fraudulent, illegal, or unethical act, or other violation of Deloitte policy, whether committed by a colleague, client, supplier, contractor, alliance, or others associated with or doing business with Deloitte, it is your responsibility to report the circumstances through an appropriate reporting channel, and to cooperate fully with any investigation.

Where to go for help and how to report

Nothing in this Code prohibits the reporting of violations of any law or regulation to, or discussing any such possible violations with, any governmental agency or entity authorized to receive such information, such as the Israeli Securities Authority, The Capital Market, Insurance and Saving Authority, The Banking Supervision, the Ministry of Labor Social Affairs and Social Services, or the Ministry of Defense, including by initiating communications directly with, or responding to any inquiry from or providing testimony before, any such agency or entity, or to otherwise make disclosures protected under whistleblower provisions of any law or regulation.



For assistance with ethics and compliance matters, and to report potential violations, you should contact one or more of the following:

- Your supervisor
- A Partner or Managing Director
- Ethics Trustees
- Talent/Partner Matters
- US Chief Ethics Officer
- Israel Quality & Risk Leader
- Integrity Helpline

You should turn to the Integrity Helpline in the following circumstances:

- If you believe that ethics and compliance issues are not being resolved, either through the existing managerial chain of command or other reporting options.
- If you don't feel comfortable reporting through normal channels.
- If you'd like confidential assistance on ethics and compliance issues.
- If you wish to remain anonymous when filing a report.

Practical advice: Using the Integrity Helpline

The Integrity Helpline is a confidential 24-hours-a-day, 365-days-a-year service you can access from any location. Reports may be made on either an anonymous or named basis. The Integrity Helpline is administered by a third party to maintain confidentiality and, when requested, anonymity.

Anyone can log onto or call the Integrity Helpline to request assistance or report a potential violation regarding an ethics and compliance issue. Every reasonable effort will be made to keep the identity of anyone reporting a potential violation confidential to the extent possible, consistent with good business practice. In order to assist in the investigation, those reporting potential violations are encouraged to identify themselves. However, anonymous reports will also be accepted and investigated to the extent possible.

Online: www.integrityhelp.com

By telephone: [1-809-21-4405](tel:1-809-21-4405) (within Israel)

For a list of toll free numbers in countries world-wide, visit:

www.integrityhelp.com/international

By mail:

You may send a report (named or anonymous) via the mail, to:

Adi Tal, Quality & Risk Leader
Deloitte IL Group
Azrieli Center
132 Menachem Begin St. Tel Aviv

Policies and Procedures

This Code is not intended to cover every questionable situation or dilemma that you may encounter. Rather, it is intended to provide a perspective to guide thinking, and to direct our personnel to resources for further information. For example, the internal policies established for the Deloitte Israel Firms available through the [Deloitte Policy Manual \(DPM\)](#), [Administrative Policy Releases \(APR\)](#) and [local policies](#) are intended to provide additional guidance and address risk areas in more detail.

We steadfastly oppose retaliation against anyone because he or she, in good faith, reports an ethics or compliance concern.

Our reputation starts with you

A message from Deloitte Israel leadership



Guided by our shared values, every action we take influences the trust we build and sustain—with our clients, the capital markets, our people, and our communities. A careless remark, thoughtless text or email, or ill-considered decision can erode confidence that took years to build. Simply said, trust is difficult to earn and easy to lose.

The *Global Principles of Business Conduct* and shared values adopted by the DTTL member firms are designed to provide guidance to professionals around the globe. These principles and values are an integral part of the *Israel Code of Ethics and Professional Conduct* (“Code”) and of the rigorous commitment Deloitte has made historically—and continues to make today—to sustain public trust. They will guide us in our everyday interactions with colleagues and in conducting business honorably, ethically, and with the utmost professionalism.

These core values are re-validated in times of uncertainty, of changes in the environment in which we operate and at challenging times. They chart the path for us as a compass for our behavior, and ensure that at all times we will act with integrity, professionalism and highest standards.

This Code provides detailed information, helpful guidance, and references to policies and resources to help make the right choices daily. These policies and practices must be followed at all times when carrying out our responsibilities with clients, regulators, other external stakeholders, and each other.

While policies are important, ultimately the success of our Ethics and Compliance Program is very personal: it starts with you. Each of us must make decisions every day in our work—decisions that may have wide-ranging economic, legal, and ethical implications. Whatever the circumstances and the pressures, we are always expected to act honestly and with the utmost integrity, in accordance with the highest professional standards.

After reading through each section, we believe you will gain a wider understanding of the privileges and responsibilities that come with being a part of this special place—the largest professional services organization in the world. Most importantly, you will have a better sense of your vital role and the broad support you have from the highest levels of leadership.

Thank you for committing yourselves to a trustworthy and ethically sound workplace.

Sincerely,



Ilan Birnfeld, CEO



Adi Tal, Quality & Risk Leader

About the Code

This Code is not intended to cover every questionable situation or dilemma that you may encounter. Rather, it is intended to provide a perspective to guide thinking and to direct our personnel to resources for further information.



The *Code of Ethics and Professional Conduct* (“Code”) reflects our expectations for all Deloitte personnel. The sections of the Code that follow contain ethics and compliance standards covering our responsibilities.

Ethics and compliance standards

Integrity: Our single most important responsibility

“Spirit of Law

The letter of the law is the literal, stated interpretation of the law as it's written. The spirit of the law is usually broader and reflects the intention behind the law. While usually obvious, this may not be explicitly stated. ”



The *Code of Ethics and Professional Conduct* ("Code") and the *Global Principles of Business Conduct* summarize our shared values, but ultimately, they can only be as effective as the people who implement them—you, and your colleagues. Personal integrity is the foundation of our shared values. A good starting point for judging integrity is the golden rule—are you treating others in a way in which you, yourself, would like to be treated?

In all your dealings, both personal and professional, be honest, trustworthy, candid, respectful and straightforward. Honor the spirit not just the letter of laws, rules, and regulations.

Speak up when something doesn't feel right and respond swiftly when others raise concerns. Try to do the right thing, the first time, every time. But if necessary, take time to think things over or discuss with colleagues.

Always try to exceed the expectations of clients, and each other, but don't waiver. Our commercial ambitions should never overtake our professional and ethical responsibilities. Integrity demands that we remain scrupulously truthful about the services we can provide, the knowledge we possess, and the experience we have. What we say, and what we do, should be perfectly aligned.

Should you encounter an ethical challenge—as we all do at some point—be honest. Admit it. From integrity springs transparency, and from transparency emerges that most precious, elusive, and valuable of brand qualities:

Trust. Trust in you, trust in your colleagues, and trust in Deloitte by clients, regulators, and the public at large. Each one of us must be the catalyst to make it so.

Corporate responsibility



We have a responsibility to be a good neighbor and a contributing corporate citizen in the communities in which our people work. We are committed to conducting our business activities in ways that honor ethical values and respect people, communities, and the natural environment. We continue to work toward the sustainable improvement of life, the environment, and business by:

- Rendering high-quality professional services with the utmost integrity.
- Providing a workplace that contributes to the professional growth, development, and personal success of our people.

In connection with client attest services performed by the Deloitte Israel Firms, Deloitte will conduct, and possibly limit, community activities, including the making of monetary donations, so that the obligation of Deloitte to maintain independence (both in fact and appearance) cannot be called into question.

Our people share a long tradition of supporting the communities in which they live and work. In addition to financial contributions made by Deloitte and its people, many of our people also volunteer their time to worthwhile causes. We actively offer, encourage, support, and reward volunteerism for several important reasons:

- Helping others and sharing is simply the right thing to do.
- Community involvement is a manifestation of our shared values.
- A healthy community depends on the active involvement of all who live and work there.
- Community involvement helps people become better professionals by enhancing their skills and leadership abilities outside the workplace.

In addition, we practice our responsible stewardship of the earth's natural resources by continuously looking for ways to reduce our impact on the environment, both as an organization and as individuals.

Guidance

Deloitte personnel are encouraged to engage in community involvement and keep an accurate count of hours spent in these activities both inside and outside of business hours.

Related Policies include

[Israel Discipline Policy](#)

[APR 110 Donations \(Charitable Contributions and Sponsorships\) \(ISR\)](#)

Quality of work product



Our reputation is wholly dependent not only on the integrity of our people, but also on the quality of the services provided by Deloitte. This quality expectation is very simply stated—in the perceptions of both the public and clients, the work product of Deloitte should meet all applicable professional standards.

Each person is individually responsible for the quality of the professional services provided. Commitment to quality operates at three levels: the individual, the team, and the organization. At every level, it requires a dedication to having pride in your work product and an appropriate sense of professional skepticism in the conduct of all our work.

Guidance

Quality counts at Deloitte. When you provide advice and solutions, Deloitte’s name and your name may be forever associated with those outcomes. Make sure you’re adhering to professional standards of quality in everything you do. Seek guidance from your supervisor, [Quality & Risk Management \(QRM\)](#), a partner, or other appropriate leader if you have questions.

Resources / Contacts

[Quality & Risk Management \(QRM\)](#)

Professional competence and due care



Deloitte observes its profession's standards of performance in providing professional services. In addition, it continually strives to improve the quality of services to clients and exercises due care in the management of client engagements by matching client needs with personnel who have the appropriate technical training and the competence required for their assignments. Engagements are planned and supervised using resources of both the client and Deloitte, including, where appropriate, national resources regarding technical or industry-specific questions. Reports are issued in accordance with all applicable

professional standards.

Guidance

See related policies.

Related Policies include

Refer to function-specific policies.

Resources / Contacts

Consultation



Consultation on non-routine or emerging issues or practices is generally expected. Frequent consultation with national office and industry resources is encouraged. Deloitte speaks with one voice on technical and other practice-related matters. No individual partner, managing director, or other employee is permitted to ignore a technical or other practice-related determination rendered by the National Professional Practice Director, , National Industry Leader, or the QRM

As professionals, we have a duty and an obligation to express differing points of view and appropriately resolve such matters in an open-minded and professional manner.

Guidance

See related policies.

Related Policies include

[Israel Discipline Policy](#)

[DPM 1420 Independence Policy](#)

Also refer to function-specific policies.

Resources / Contacts

[Quality & Risk Management \(QRM\)](#)

Independence and objectivity of professional advice and conclusions



In working with clients, our policy is for Deloitte to be forthright, direct, and independent in conveying advice or rendering an opinion. Prejudice, bias, conflict of interest, or undue influence of others must not be allowed to override objective professional or business judgments.

In return, clients are expected to meet the letter and the spirit of all applicable laws and regulations. There is no client or engagement that is more important than our responsibility to sustain the public trust, our commitment to do the right thing, and our concern to maintain our good reputation. We will always support the personnel of Deloitte who stand up to a client they reasonably believe may be engaging in illegal or inappropriate financial reporting or other business activities.

Guidance

There are a number of contacts who can work with you depending on the type of matter with which you're dealing. For example:

- For personal independence questions, including independence ruleset and scope, seek guidance from the [IL Independence](#) team.
- For Scope of Services matters, consult the [IL Independence](#) team.
- For engagement specific matters including those involving professional skepticism, consult your FSS-specific Professional Practice Network, the [Quality & Risk Management \(QRM\)](#) team.

Related Policies include

[DPM 1420 Independence Policy](#)

[APR 516 Gifts To and From Clients \(ISR\)](#)

[Israel Discipline Policy](#)

Resources / Contacts

[Quality & Risk Management \(QRM\)](#)

[IL Independence](#)

Independence from clients



Deloitte and its personnel are committed to complying with all laws and regulations dealing with professional independence requirements, including the Israeli Companies Law, 5759-1999, Israeli Securities Law, 5728-1968, and the regulations promulgated thereunder, and state accountancy laws and regulations.

All applicable personnel must be financially independent of Deloitte Israel audit and attest clients. For Deloitte Israel audit and attest clients, Deloitte will not render

any service nor enter into any supplier agreement that would impair independence.

Services and relationships are monitored nationally toward the achievement of these goals.

Guidance

If you have questions about whether a role, relationship, or action could impair your or Deloitte's independence, seek guidance from [IL Independence](#)

Related Policies include

[DPM 1420 Independence Policy](#)

[Israel Discipline Policy](#)

Resources / Contacts

[IL Independence](#)

Scope of services



As we offer many skills and capabilities in the professional services marketplace, naturally we want to be competitive and successful. Nevertheless, Deloitte personnel will not overstate their ability to deliver services, nor will they offer or provide any services that will damage their reputation or the reputations of clients. Their skills, experience, and desire to do the work are fairly represented in proposals to clients. They also make it a point to stand behind service commitments made to clients.

Services are delivered in a professional manner according to Deloitte policy as well as the professional standards and regulations applicable to their professions. They offer only those professional services that they are competent to perform and supervise, and only those services that will not detract from the public trust in Deloitte's independence, integrity, and objectivity.

Guidance

If you have any questions about whether Deloitte can offer a specific service to a client, then seek guidance from [IL Independence](#)

Related Policies include

[DPM 1420 Independence Policy](#)

[Israel Discipline Policy](#)

Resources / Contacts

[IL Independence](#)

Confidential and proprietary information



Our personnel have access to significant amounts of confidential information, defined as information not generally known to the public that relates to our business or is received in the course of business from our clients, our personnel, or other third parties. You are required to safeguard all confidential information against any intentional or inadvertent, unauthorized disclosure.

Unless the client has provided its specific consent, which should preferably be in writing, or there is a legal or professional right or duty to disclose, you are prohibited from disclosing confidential client information to anyone who works outside of Deloitte or the client's organization, and such disclosures should be made on a need-to-know basis.

Confidential information, including proprietary information, which has been gained through employment or affiliation with Deloitte, may not be used for personal advantage or for the benefit of third parties.

Guidance

Work with your engagement data manager, LCSP, [Confidentiality Leader](#) or [Privacy Leader](#) to protect confidential information ("CI") on your engagements and accounts.

Immediately report the unauthorized disclosure, use of, or access to confidential information by advising your engagement leadership and contacting the [Confidentiality Leader](#) and the Quality Risk Leader ([QRL](#)).

- [Learn more](#) about confidential and private information.

Related Policies include

[APR 223 Confidential Information and Other Vital Business Interests \(ISR\)](#)

[DPM 1630 Client Confidential Information](#)

[APR 310 Information Security \(ISR\)](#)

[APR 910 Privacy Policy \(ISR\)](#)

Resources / Contacts

[Confidentiality Leader](#)

[Privacy Leader](#)

[Office of Confidentiality & Privacy](#)

[Deloitte IL Help Desk](#)

Insider trading



You may, in the course of performing your duties, come into possession of “material non-public information” about clients and the companies with whom you do business. “Material non-public information” is any information that would affect the prices of securities, either positively or negatively, that is not generally available to the investing public. This information is generally referred to as “insider information.” Buying or selling stocks using “insider information” is referred to as “insider trading.”

It is illegal for any person to buy or sell any securities (i.e., stocks, bonds) based on insider information or disclose such information to others who might intend to buy or sell such securities.

Guidance

Check with the [Integrity Helpline](#) or Quality & Risk Management (QRM) prior to changing your financial positions in any financial holding where you could be perceived as having insider information. In addition, do not change your position in any financial holdings for nonattest clients you are serving.

Related Policies include

[DPM 1630 Client Confidential Information](#) (paragraph 9)

[DPM 10240-1 Restrictions on Trading in Nonattest Client Securities \(ISR\)](#)

[APR 223 Confidential Information and Other Vital Business Interests \(ISR\)](#)

Resources / Contacts

[Integrity Helpline](#)

Licensure and professional certifications



In order to deliver on the promise of exceptional client service, many of our professionals maintain professional licenses and certifications (e.g., CPA, CISA, CFA, actuary, attorney-at-law). All personnel holding professional licenses and certifications have a personal responsibility to maintain such licenses and certifications in good standing through timely renewals and (where required) the attainment of the appropriate level of continuing professional education.

All professionals of a licensed Deloitte entity who have passed the Uniform CPA Examination and have met the applicable education and experience to be licensed, should hold an active CPA license at all times.

All CPAs are required to regularly report the status of their CPA licenses through Deloitte's ICPAI/CPA database.

Guidance

Keep required licenses and certifications up-to-date.

If you have passed the CPA exam, or hold a CPA license, contact the Talent Acquisition Manager, [Shira Beit Halachmi Cohen](#), to ensure your CPA information is documented.

- If you have others questions about other types of licenses and certifications, seek guidance from your supervisor, [Quality & Risk Management \(QRM\)](#), a partner, or other appropriate national office resources.

Related Policies include

Resources / Contacts

Talent Acquisition Manager

[Shira Beit Halachmi Cohen](#)

[Quality & Risk Management \(QRM\)](#)

Government transactions and relations



Deloitte business transactions frequently involve governmental entities. The laws and regulations pertaining to doing business with governmental entities impose special rules and may have a more stringent set of requirements, not typical of other businesses. For example, providing meals or hosting social events may be acceptable for a “non-governmental” client. However, they may be restricted or prohibited when a government employee is involved. All personnel involved in providing services to governmental entities are required to adhere to the government’s ethical standards as they apply to the services provided, as well as

this Code.

We comply with all applicable rules, laws, and regulations relating to political lobbying or attempting to influence government officials.

The inappropriate use of any Deloitte asset to support a political campaign is not permitted. Individual political contributions made by partners, managing directors, and employees are a personal decision and consequently a personal expense. Such contributions are not reimbursable by Deloitte.

Guidance

It’s important to make sure that your involvement with government organizations and in political processes as a private citizen do not create conflicts in the workplace at Deloitte. For example, before you make a personal political contribution to a candidate, consult your Business Leader, functional QRM or the [ISR Anti-Corruption & Trade](#) leader for contribution guidance to determine whether such a contribution might be restricted.

To learn more about working with Israel government official, a US government official, and other non-U.S. official (Foreign Official), consult the “Anti-corruption” section of the Code.

Related Policies include

[APR 131 Gifts and Entertainment for U.S. Public Officials \(ISR\)](#)

[APR 135 Political Lobbying and Related Activities \(ISR\)](#)

[APR 515 Entertainment \(ISR\)](#)

[APR 130 Political Contributions and Related Activities \(ISR\)](#)

[APR 110 Donations \(Charitable Contributions and Sponsorships\) \(ISR\)](#)

Resources / Contacts

[ISR Anti-Corruption & Trade](#)

Anti-corruption



All DTTL member firms are committed to ethical business conduct in their global marketplaces and are against corruption in any form. Like all DTTL member firms, Deloitte expects all of its personnel, to know, understand, and abide by anti-corruption laws and internal policies applicable to the business they conduct. Any and all payments made by, or on behalf of, Deloitte must be lawful and made only for legitimate business purposes. Under no circumstances is it acceptable to offer, give, solicit, or receive any form of bribe or kickback.

Offering or providing anything of value (including, but not limited to, gifts, entertainment, hospitality, political contributions, charitable contributions, employment opportunities, and facilitation payments) to a third-party for a corrupt or inappropriate purpose could constitute an illegal bribe or kickback under applicable laws and could lead to serious civil and criminal penalties.

Guidance

Whenever you suspect that Deloitte may be involved in work with an Israeli government official, a US government official, or other non-U.S. official (Foreign Official), make sure that someone on your engagement team has consulted the [ISR Anti-Corruption & Trade](#) leader and, when needed, the QRL or designee, as necessary, for guidance on permitted and non-permitted actions.

Related Policies include

[APR 920 The U.S. Foreign Corrupt Practices Act of 1977 \(FCPA\) and Other Anti-Corruption Laws \(ISR\)](#)

[APR 940 Economic Sanctions \(ISR\)](#)

[APR 910 Privacy Policy \(ISR\)](#)

[APR 960 Export Controls Compliance \(ISR\)](#)

[APR 131 Gifts and Entertainment for U.S. Public Officials \(ISR\)](#)

[APR 135 Political Lobbying and Related Activities \(ISR\)](#)

[APR 113 Third Party Risk Management \(ISR\)](#)

[APR 110 Donations \(Charitable Contributions and Sponsorships\) \(ISR\)](#)

[APR 515 Entertainment \(ISR\)](#)

[APR 516 Gifts To and From Clients \(ISR\)](#)

Resources / Contacts

[ISR Anti-Corruption & Trade](#)

Gifts and entertainment



We strive to compete on the basis of the quality and value of services provided. You should not offer or accept gifts or payments, or undertake inappropriate activities, to facilitate any engagements on behalf of Deloitte. Entertainment of our personnel or clients that is lavish or inappropriate in nature is also not permitted.

Gifts or entertainment should not be accepted or extended by you if they could be reasonably considered to:

- Improperly influence any Deloitte business relationship with, or create an obligation to, a client, supplier, contractor, or alliance.
- Violate laws, regulations, and professional standards, or this Code of Ethics and Professional Conduct.
- Constitute an unfair business inducement.
- Cause embarrassment to or negative impact upon Deloitte.

Neither you nor any member of your immediate family should use your position with Deloitte to solicit any cash, gifts, or free services from any client, supplier, contractor, or alliance for your or anyone else's personal benefit.

Guidelines regarding acceptable gifts and entertainment include:

- Nominal gifts that are usual and customary for the profession (e.g., pens, calendars, and mugs).
- Reasonable invitations may be either extended or accepted to business-related meetings, conventions, or conferences (e.g., a product-training seminar, a business luncheon or dinner).
- Invitations to social, sporting, or other events may be either extended or accepted if the cost is reasonable and attendance serves a customary business purpose (e.g., networking) and complies with the applicable Deloitte policies.

In all cases, you have a responsibility to know and understand Deloitte's detailed guidance on acceptable entertainment. You should also be aware of the client's own policies related to allowable gifts and entertainment involving their personnel. For example, the guidelines mentioned for acceptable gifts and entertainment may not be acceptable for a government client given their strict rules and regulations.

Guidance

Before you give a gift or offer entertainment, consider whether your intent could be perceived as attempting to influence another party for unfair or corrupt purposes and is compliant with Deloitte's policies on entertainment. Don't offer the gift or entertainment until you've consulted APRs 515 and 516, and, if required, get relevant approvals.

Contact the [ISR Anti-Corruption & Trade](#) leader as necessary, for guidance on permitted and non-permitted actions.

Related Policies include

[APR 131 Gifts and Entertainment for U.S. Public Officials \(ISR\)](#)

[Local Gifts and Entertainment guidelines](#)

[APR 520 Expense Reimbursement \(ISR\)](#)

[APR 920 The U.S. Foreign Corrupt Practices Act of 1977 \(FCPA\) and Other Anti-Corruption Laws \(ISR\)](#)

[APR 515 Entertainment \(ISR\)](#)

[APR 516 Gifts To and From Clients \(ISR\)](#)

[APR 110 Donations \(Charitable Contributions and Sponsorships\) \(ISR\)](#)

Resources / Contacts

[ISR Anti-Corruption & Trade](#)

Billing for professional services

“Charge all the time you work, work all the time you charge, and code your time to the proper client or project code, and time period.

Glenn Stastny, Chief Ethics & Compliance Officer, Deloitte US ”



Our personnel are committed to properly recording hours worked and expenses incurred in our time and expense reporting systems, in accordance with our applicable policies, and allocate such charges to the appropriate project or client service charge codes. Deloitte has an obligation to accurately bill clients for fees and expenses, in accordance with the terms of their engagements.

Guidance

For questions related to time charges, contact your business leader or Talent. If you need further assistance or feel your concern is not being addressed, contact [Quality & Risk Management \(QRM\)](#) or the [Integrity Helpline](#).

Resources / Contacts

[Quality & Risk Management \(QRM\)](#)

[Integrity Helpline](#)

Use of Deloitte assets



The use of Deloitte assets for individual profit or any unlawful, unauthorized personal or unethical purpose is prohibited. Our information technology, intellectual property (e.g., copyrights, patents, and trademarks), facilities, equipment, machines, software, and cash may be used for business purposes only, including responsible and accurate expense reimbursement, and in accordance with applicable policies, except that assets such as computers, fax machines, printers, and copiers may be used for minor and incidental personal purposes provided such use is kept to a minimum and does not create any significant incremental costs, interfere with work duties, or violate any laws or Deloitte policies. The use of any Deloitte resources for personal political activities is prohibited.

Computer hardware, software, data, and facilities are valuable resources that need protection from potential destruction, theft, or misuse. These resources may also include confidential client, personally identifiable information or Deloitte information that requires safeguarding. It is your responsibility to prevent unauthorized access through the use of ID badges, passwords, or other security codes, and physical security measures (such as using computer cable locks, not leaving computers unattended in cars, and other normal precautions).

Copyrighted materials (e.g., books, music, software, and magazines) should not be reproduced, distributed, or altered without permission of the copyright owner or an authorized agent. Software used in connection with the business of Deloitte but not owned by Deloitte should be properly licensed and used only in accordance with that license and should be approved through the third-party acceptance process.

Using unlicensed software could constitute copyright infringement and may be grounds for disciplinary action.

Each partner and employee has an obligation to each other to comply with Deloitte policy with regard to the incurring of expenses for which reimbursement is sought from Deloitte.

Guidance

For questions regarding this topic, consult the [Quality & Risk Management \(QRM\)](#) or IT team, as applicable.

Related Policies include

[APR 310 Information Security \(ISR\)](#)

[APR 340 Laptop Security \(ISR\)](#)

[APR 208 Electronic Communications and Systems \(ISR\)](#)

[APR 360 Personal Digital Assistants \(PDAs\) and Other Wireless Devices \(ISR\) \[Pending\]](#)

[APR 395 Wireless Communications \(ISR\)](#)

[APR 116 Copyright – Infringement Issues \(ISR\)](#)

[APR 135 Political Lobbying and Related Activities \(ISR\)](#)

[APR 910 Privacy Policy \(ISR\)](#)

Resources / Contacts

[Quality & Risk Management \(QRM\)](#)

Records accuracy



Accurate and complete records are required for compliance with regulatory, tax, and financial reporting requirements, among other things, as well as for meeting obligations to clients. Personnel who enter information into Deloitte's business records (including, but not limited to, time, expense, and client billing records, regulatory, or other financial reports) have a responsibility to do so in a truthful, accurate, legible, complete, and timely manner and in accordance with Deloitte's policies and all legal and professional standards and regulations.

Guidance

See related policies.

Related Policies include

[APR 520 Expense Reimbursement \(ISR\)](#)

APR 521 International Travel (ISR) [Pending]

Resources / Contacts

[Billing & Expenses](#)

Records management



We will maintain all records in accordance with the legal and business requirements appropriate to our professions. To help preserve the integrity of the record-keeping and reporting systems, all personnel have an obligation to know and comply with all current applicable records retention policies and procedures. These include how data is shared, stored, and retrieved, and the circumstances under which it may be disposed.

Changes to and destruction of records are specifically forbidden in the following circumstances:

- Where prohibited by law, by government regulation, or by Deloitte policy.
- Where there exists an overriding governmental, regulatory, or contractual requirement.
- Where there is knowledge of—or anticipation of—a subpoena or other request for documents, a regulatory investigation, or a lawsuit.

We never destroy, alter, or cause the destruction or alteration of documents for any illegal or improper purpose. Records include—among other things—paper copies, electronic files, and video and audio recordings.

Guidance

See related policies.

Related Policies include

[APR 310 Information Security \(ISR\)](#)

APR 601 Records Retention Policies (ISR) [Pending]

[APR 910 Privacy Policy \(ISR\)](#)

Resources / Contacts

[Nir Rosenfeld Peled, Confidentiality Leader](#)

Truth in communications

“It takes 20 years to build a reputation and five minutes to ruin it. If you think about that, you’ll do things differently.

– Warren Buffet in “The 16 Best Things Warren Buffett Has Ever Said,” The Huffington Post, August 30, 2013.

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Our people are committed to representing Deloitte with honesty and candor. Similarly, it is our policy to communicate facts about our capabilities, policies, and people accurately and responsibly in advertisements, sales, marketing, recruiting, and all other promotional materials.

Guidance

To keep our reputation intact, the statements we make about our capabilities and experience should always be honest and accurate.

Related Policies include

DPM 10640 External Communications (ISR) [Pending]

External inquiries

Nothing in this Code prohibits the reporting of violations of any law or regulation to, or discussing any such possible violations with, any governmental agency or entity authorized to receive such information, such as the Israeli Securities Authority, The Capital Market, Insurance and Saving Authority, The Banking Supervision, the Ministry of Labor Social Affairs and Social Services, or the Ministry of Defense, including by initiating communications directly with, or responding to any inquiry from or providing testimony before, any such agency or entity, or to otherwise make disclosures protected under whistleblower provisions of any law or regulation.



You should always exercise care not to disclose confidential information through public or casual discussions with the media, government officials, or others.

External inquiries (e.g., media and regulators) must be referred to the appropriate Deloitte resource (Public Relations) for a response. This includes newspapers, magazines, trade publications, radio, television, and government inquiries, as well as any other external source seeking information about Deloitte or its clients. While it is standard policy to respond to external inquiries in an honest, candid, and appropriate manner, responses may be

limited by confidentiality requirements and other related concerns, and as such, it's required that Public Relations be contacted immediately upon receipt of such an inquiry.

When public comment is requested on proposed regulations or professional standards, communication with regulators and standard-setters is conducted through Deloitte using publicly sanctioned means.

Inappropriate or unethical efforts to influence regulation or professional oversight are not condoned.

Guidance

If a member of the news media or someone else outside Deloitte contacts you for comment about a Deloitte-related story or matter, please remember the following:

All interaction with members of the press must comply with DPM 10640-1 External Communications (ISR) [Pending].

- Deloitte Public Relations must be involved in the preparation and review of news, including corresponding with media. Contact the Communications Leader for assistance.
- To submit a Business Communication for risk consultation, consult the QRL.

It's also critical to make sure that you never disclose confidential information to anyone without the legal or professional right or duty to disclose.

Related Policies include

[APR 223 Confidential Information and Other Vital Business Interests \(ISR\)](#)

DPM 10640 External Communications (ISR) [Pending]

Resources / Contacts

[Communications](#)

Communications systems



Our communications systems, including—among other things—computers, mobile devices, email, D.Portal and Internet access, instant messaging, telephone systems, applications, other storage locations, and paper documents are the property of Deloitte and its subsidiaries. These communications systems are to be used primarily for business purposes and should be the only systems used for conducting Deloitte business.

You have a responsibility to maintain and enhance our public image and to use all Deloitte communications systems in a productive and professional manner in accordance with our policies. The integrity of these communications systems also requires that all personnel secure their personal login information in order to prevent unauthorized access to such systems.

Our communications systems may not be used for any personal use and any uses should be in compliance with the Code and applicable policies and procedures (e.g., communications systems should not be used for personal gain or to access pornographic or other inappropriate web sites). Furthermore, Deloitte reserves the right to monitor all communications (e.g., email, voice mail, computers, and documents) involving its systems consistent with applicable law.

Guidance

See related policies.

Related Policies include

[APR 208 Electronic Communications and Systems \(ISR\)](#)

[APR 223 Confidential Information and Other Vital Business Interests \(ISR\)](#)

[APR 910 Privacy Policy \(ISR\)](#)

[APR 310 Information Security \(ISR\)](#)

[APR 340 Laptop Security \(ISR\)](#)

APR 360 Personal Digital Assistants (PDAs) and Other Wireless Devices (ISR) [Pending]

[APR 395 Wireless Communications \(ISR\)](#)

[APR 135 Political Lobbying and Related Activities \(ISR\)](#)

Resources / Contacts

[Deloitte ITS Call Center](#)

Social media

With social media “word of mouth” can quickly become “world of mouth”



Social media tools—including blogs, wikis, social networks, video sharing, and community sites, among others—continue to change the landscape of the Internet as key tools for network building, collaboration, and knowledge sharing, and, as with any tool, both proper and improper uses are possible. Our people are expected to abide by basic standards—such as safeguarding confidential information and protecting the Deloitte brand—that govern all Deloitte communications, including those made via online collaboration tools. In the use of all social media, including personal social media where you might not be identified as a Deloitte person, you should be mindful of how you present

yourself and treat your audience, as well as perceptions that can be created by use of social media. Along with the guidelines and best practices for your use of social media, there are policies—the same policies that you already abide by every day at Deloitte—that you should apply as you use internal and external social media.

Guidance

Never post anything that could be deemed client confidential or Deloitte proprietary information. When in doubt, consult the [Confidentiality Leader](#), [Privacy Leader](#) and/or the [public relations leader](#), as applicable for guidance.

Related Policies include

[APR 223 Confidential Information and Other Vital Business Interests \(ISR\)](#)

[APR 910 Privacy Policy \(ISR\)](#)

[APR 208 Electronic Communications and Systems \(ISR\)](#)

[APR 310 Information Security \(ISR\)](#)

APR 360 Personal Digital Assistants (PDAs) and Other Wireless Devices (ISR) [Pending]

[APR 395 Wireless Communications \(ISR\)](#)

[APR 116 Copyright – Infringement Issues \(ISR\)](#)

[APR 135 Political Lobbying and Related Activities \(ISR\)](#)

[APR 260 Social Media \(ISR\)](#)

Resources / Contacts

[Office of Confidentiality & Privacy](#)

Honesty and trust



We believe that our people work best in a culture of trust, and we are committed to fostering and maintaining such a culture.

We expect our colleagues to perform their jobs with integrity and to conduct themselves ethically at all times. Honesty in the commitments to and dealings with each other is essential. We are each individually responsible for both the quality and the on-time completion of our own work. We must also accurately and honestly account to each other for time worked and expenses incurred (in accordance with Deloitte policy) for both internal and for client-related activities. At all times, it is the responsibility of each of us to safeguard Deloitte's confidential and proprietary information.

Guidance

If a client, co-worker or other party asks you to do something contrary to Deloitte's shared values, "serve with integrity," seek help and guidance immediately from a supervisor, a partner, the [Integrity Helpline](#), the Chief Ethics & Compliance Officer, Talent, or other appropriate resource.

Related Policies include

[APR 223 Confidential Information and Other Vital Business Interests \(ISR\)](#)

[APR 310 Information Security \(ISR\)](#)

Resources / Contacts

[Integrity Helpline](#)

Respect and fair treatment



All personnel are expected to treat their colleagues with respect. Providing a safe, healthy, and productive work environment is a priority, and you are expected to support efforts to eliminate any actions or circumstances that undermine such an environment. Unlawful discrimination, verbal or physical harassment or abuse, or offensive behavior (whether or not sexually related) by personnel, agents, or clients of Deloitte will not be tolerated.

Guidance

If you are faced with or aware of a potential issue involving respect and fair treatment, seek help from a supervisor, a partner, the [Integrity Helpline](#), the Chief Ethics & Compliance Officer, Talent, or other appropriate resource.

Related Policies include

[APR 213 Harassment \(ISR\)](#)

[Israel Non-Retaliation policy](#)

[APR 211 Equal Employment Opportunity EEO \(ISR\)](#)

[APR 515 Entertainment \(ISR\)](#)

[APR 225 Substance Abuse: Controlled Substances and Alcohol \(ISR\)](#)

[APR 226 Weapon-Free Workplace \(ISR\)](#)

[APR 227 Workplace Violence \(ISR\)](#)

Resources / Contacts

[Integrity Helpline](#)

Conflicts of interest



As professionals, we make business decisions every day. In making those decisions, we are responsible for remaining free from influence, or the appearance of influence, of any conflicting interests, and for conducting business ethically and legally. We have a duty to avoid making business decisions that place personal interests ahead of Deloitte's.

Some examples of potential conflict situations include (please note that this is not an exhaustive list):

- Acting as a director, partner, consultant, or employee of an organization that provides services, supplies, or equipment to, or is a competitor of, Deloitte.
- Holding a second job that may interfere with your employment at, or being a partner, Deloitte.
- Ownership by you, members of your immediate family, or other Deloitte partners, managing directors, or other employees of a financial interest (i.e. publicly traded stock) in a company that is a competitor of, supplier to, or client of Deloitte.
- Making hiring decisions that involve close relatives of partners and managing directors of Deloitte.

Guidance

Anytime you become aware of a potential conflict of interest that can affect the Deloitte organization, seek guidance 'early and often' from the, [Quality & Risk Management \(QRM\)](#), a partner, or other appropriate resource. Any outside employment needs to be approved according to employment agreements and Deloitte's policies.

Related Policies include

[APR 216 Nepotism \(ISR\)](#)

[APR 218 Outside Employment and Activities \(ISR\)](#)

[APR 131 Gifts and Entertainment for U.S. Public Officials \(ISR\)](#)

[APR 130 Political Contributions and Related Activities \(ISR\)](#)

[Israel Discipline Policy](#)

[APR 112 Dealing with Suppliers and Service Providers \(ISR\)](#) [APR](#)

[110 Donations \(Charitable Contributions and Sponsorships\) \(ISR\)](#) [APR](#)

[516 Gifts To and From Clients \(ISR\)](#)

Resources / Contacts

[Quality & Risk Management \(QRM\)](#)

Personal relationships



From time to time, personal relationships, romantic or otherwise, may exist or develop between two people, each of whom works for Deloitte, or between a person working for Deloitte and an employee of an attest or non-attest client. Such relationships can pose serious independence or conflict-of-interest issues, either in fact, or in appearance, in the minds of the public, clients, or our colleagues.

We recognize that these types of relationships may occur, and appropriate notification or assignment steps may need to be taken to prevent such relationships from resulting in a professional issue for the organization or the individuals involved. In accordance with our nepotism policy, such relationships may need to be reported to Talent, Partner Matters, or other appropriate leaders, to determine what, if any, notifications or assignment changes need to be made.

Guidance

Whenever a personal relationship (whether you're involved or aware of one involving others) has the potential to create a conflict of interest or impair independence at Deloitte, notify a partner, [Quality & Risk Management \(QRM\)](#), as soon as possible so contingency plans can be made.

Regardless whether a personal relationship has the potential to create a conflict of interest or impair independence at Deloitte, you may still need to report the relationship, in accordance with our nepotism policy.

Related Policies include

[Israel Discipline Policy](#)

[APR 216 Nepotism \(ISR\)](#)

Resources / Contacts

[Quality & Risk Management \(QRM\)](#)

Health and safety



We are committed to providing a safe working environment for all personnel.

We are expected to discharge our responsibilities and perform our duties in a professional manner in the workplace (or anywhere else) while conducting business.

Clients—as well as the general public—expect Deloitte personnel to provide quality, professional services while being free from the effects of drugs, alcohol, or other substances that may hinder job performance or judgment. The illegal use, sale, dispensing, distribution, possession, or manufacture of illegal drugs or other controlled substances by a partner, managing director, or other employee at the workplace during working hours is prohibited and could lead to termination or severance of association. Such conduct is also prohibited during non-working hours and outside the workplace to the extent it impairs job performance or threatens Deloitte's integrity and reputation.

On occasion, there may be events where management approves the serving of alcoholic beverages. In these cases, all appropriate liquor laws must be followed, including laws regarding the serving of alcohol to those under the legal drinking age. Consistent with our policy, intoxication and excessive drinking at these events could lead to disciplinary action including termination or severance of association.

We each are responsible for our own safety, and that of our colleagues, in the workplace. The workplace should be free from violent and abusive behavior. Threatening, aggressive, or abusive behavior towards fellow colleagues or others in the workplace will not be tolerated. Explosives, firearms, or other weapons, whether legally permitted or not, are not allowed in any of the Deloitte facilities.

Guidance

For Security-related questions, refer to the Nir Rosenfeld Peled, Security Officer

Related Policies include

[APR 226 Weapon-Free Workplace \(ISR\) APR 227](#)

[Workplace Violence \(ISR\)](#)

[APR 203 Appropriate Behavior at Events \(ISR\)](#)

[APR 213 Harassment \(ISR\)](#)

[APR 225 Substance Abuse: Controlled Substances and Alcohol \(ISR\)](#)

[APR 515 Entertainment \(ISR\)](#)

Resources / Contacts

[Office of Security](#)

Foster Inclusion



We are committed to diversity, equity, inclusion, and anti-racism. Deloitte professionals are expected to foster a diverse, equitable, inclusive, and anti-racist culture by acting consistently and in accordance with these ideals when working with our people, clients, vendors, and other stakeholders. This can be accomplished through activities such as understanding one's own personal beliefs, working to address the impact of any personal biases in the workplace, and taking appropriate action to address acts that violate our policies such as discrimination on the basis of race, gender, or other protected characteristics. Such a culture directly supports our mission to help our people and clients excel. The rich mix of individuals, viewpoints, talents, and experiences found at Deloitte is respected and valued. Our human resources policies aim for the highest standards of fairness and equal opportunity, covering recruitment and employment, promotions, team opportunities, and training programs. We are committed to compliance with all applicable laws and regulations relating to equal employment opportunity, affirmative action, harassment, and inclusion.

Deloitte is an equal opportunity employer and recruits, employs, trains, compensates, and promotes high-quality, competent, and responsible people without regard to race, religion, creed, color, citizenship, national origin, age, sex, gender, gender identity/expression, sexual orientation, marital status, disability, genetic information, reserve service, or any other legally protected basis, in accordance with all applicable laws or regulations.

Guidance

One of Deloitte's shared values, "Foster inclusion," sets an expectation that we're better as an organization when we bring diverse backgrounds, experiences, and viewpoints to the table when we serve clients and interact with each other.

Resources / Contacts

[Integrity Helpline](#)

Respect for competition



We will not pursue any competitive tactic or goal that we believe might damage our reputation or is inconsistent with our vision for Deloitte to be recognized as the best in professional services. We do not condone any attempts to gather competitive information in a deceptive, unlawful, or inappropriate manner. We honor valid non-compete agreements (sometimes known as restrictive covenants) of competitors. The restrictive covenants applicable to existing and former Deloitte personnel are also strictly enforced. Furthermore, given that our reputation is affected by the reputations of competitors, Deloitte does not condone any competitive action that could be harmful to the integrity of our competitors.

Guidance

If you encounter competitive intelligence, contact the [Integrity Helpline](#) as early as possible.

Related Policies include

None

Resources / Contacts

[Integrity Helpline](#)

Supplier, contractor, and alliance relationships



Our success depends on building productive relationships with all suppliers, contractors, and alliances based on integrity, ethical behavior, and mutual trust. Regardless of whether there is an existing or future business relationship, we select suppliers, contractors, and alliances based on the quality, price, service, delivery, and supply of needed goods and services. Procurement decisions should be based on objective business rationale, and not on personal interest or bias, through a fair, honest, and transparent procurement process. This should also be aligned with all independence or other applicable legal requirements.

Guidance

Avoid engaging third parties that may be involved in corrupt business practices, and avoid doing anything, while working with third parties, that could create a potential conflict of interest or the perception of influence or corruption. Whenever you are involved in working with third parties, consult the [ISR Anti-Corruption & Trade](#) leader and, when needed, the QRL or designee, as necessary, for guidance on permitted and non-permitted actions. All third-party relationships must be approved by Quality & Risk Management (QRM). To initiate a review, complete this [Business Relationship Acceptance form](#). Consult [Quality & Risk Management \(QRM\)](#) with questions about potential conflicts of interest.

To learn more, consult the “Anti-Corruption” or “Conflicts of Interest” sections of the Code.

Related Policies include

[Israel Discipline Policy](#)

[APR 520 Expense Reimbursement \(ISR\)](#)

[APR 910 Privacy Policy \(ISR\)](#)

[APR 920 The U.S. Foreign Corrupt Practices Act of 1977 \(FCPA\) and Other Anti-Corruption Laws \(ISR\)](#)

[APR 112 Dealing with Suppliers and Service Providers \(ISR\)](#)

[APR 113 Third Party Risk Management \(ISR\)](#)

[APR 515 Entertainment \(ISR\)](#)

Resources / Contacts

[Quality & Risk Management \(QRM\)](#)

[ISR Anti-Corruption & Trade](#)

[Business Relationship Acceptance form](#)

[Procurement](#)