

Deloitte CE
Code of
Conduct

It starts with integrity

Making an Impact that Matters

Deloitte's commitment to quality and integrity underlies everything we do – day in and day out – as we seek to **make an impact that matters** for clients, our people, and our communities.

Our Deloitte CE Code of Conduct – or *Code* – guides those efforts by clearly articulating the standards to which we all must hold ourselves, wherever we live and work.

We would like to ask all Deloitte people to read and understand the *Code*, and recognize the significance of the commitments we make.

It is essential that each of us does our part to continue building a culture that aligns with our *Code* – a culture in which we are comfortable speaking up when something doesn't feel right, in which we respond swiftly and effectively when others raise concerns, and in which we always deliver our very best effort without fail.

Our path to undisputed leadership starts with integrity, which must remain our constant guide along our journey.



Alastair Teare
CEO, Deloitte CE



John Ploem
Reputation and Risk Leader
and Ethics & Compliance
Officer, Deloitte CE

The role of the Code

Our *Code* encompasses Deloitte's Global Principles of Business Conduct, which outlines the commitments that each of us make. It is based on our Shared Values and reflects our core belief that, at Deloitte, ethics and integrity are fundamental and not negotiable.

Our Shared Values

- Integrity
- Outstanding value to markets and clients
- Commitment to each other
- Strength from cultural diversity

Acting in accordance with the *Code* is a responsibility for all Deloitte people in Central Europe. Each of us is expected to know, understand and comply with the *Code*. We also have a responsibility to raise our voice when we become aware of anything that is inconsistent with it. There can be serious consequences for non-compliance with the *Code* or related Deloitte policies, up to and including dismissal.

The backbone of the *Code* is the **Global Principles of Business Conduct** which describes the commitments that Deloitte and its people make to stakeholders around the world – **our clients, our people and society**. It is important to note that the commitments described in the Code are not set out as aspirations. They are the behaviours that our people, clients and other stakeholders can expect from Deloitte today.

Structure of the Code

We commit to serving **clients** with distinction



- Integrity
- Quality
- Professional behaviour
- Objectivity
- Competence
- Fair business practices
- Confidentiality, privacy and data protection

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



- Respect, diversity and fair treatment
- Professional development and support

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



- Anti-corruption
- Responsible supply chain
- Social responsibility

Consult, consult, consult

CE ethics reporting channels:

[CE Ethics and Compliance Officer:](#)

John Ploem

[CE Deputy Ethics & Compliance Officer:](#) Andy Newman

[Ethical Dilemmas Database:](#)

An anonymous internal tool for reporting ethical dilemmas

In complying with the standards outlined in this Code, you should ask yourself the following questions to aid in making the right 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 the reputation of DTTL or any DTTL member firm be harmed if the action was 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?

You don't have to resolve a difficult ethical decision alone. We encourage you to consult with your colleagues, line managers, leaders or member firm's normal reporting channels. In addition, formal ethics reporting channels are available at the regional and member firm level for those who seek a confidential route for consultation.

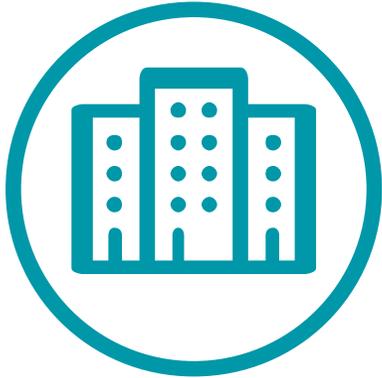
At Deloitte, we take reports of misconduct seriously, conducting investigations where necessary, and addressing issues appropriately. Retaliation against those who raise ethical concerns in good faith is not tolerated.

With strong DTTL and member firm leadership support, our *Code and CE Ethics Program* define the Deloitte approach to building and sustaining a culture of ethics and integrity.

Every day at Deloitte, we seek to **make an impact that matters** to our **people**, our **communities**, and the **clients** that we serve. The following commitments illustrate what our stakeholders can expect from our people.

Global Principles of Business Conduct

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.

Professional Behaviour

- 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 others 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.

Quality

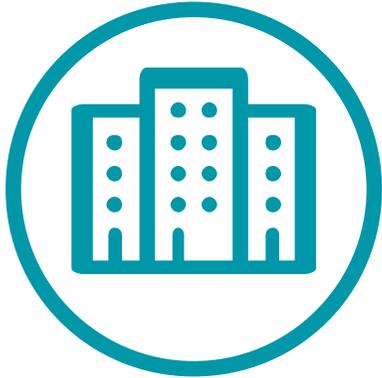
- We are committed to providing quality services by bringing together the breadth and depth of our resources, experience and insights to help clients address their needs and problems.
- We strive to develop outcomes which create an impact that matters for our clients.



More commitments to clients

Global Principles of Business Conduct

We commit to serving clients with distinction



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

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.
- An information security awareness culture is systematically built and adhered to, and our leadership commits to develop Deloitte information security management systems and focus on its further improvement.
- We are all informed and educated concerning problems around information security through a range of options including information security awareness training.

Global Principles of Business Conduct

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, view-points, 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 harassment or unfair discrimination in 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.

Global Principles of Business Conduct

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 behaviour by our suppliers, contractors and 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 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 we 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.



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