

Deloitte.



Global Principles of
Business Conduct
It starts with integrity



Contents

A message from leadership	01
The role of the Global Code	02
Global Principles of Business Conduct	03

A message from leadership

Deloitte's commitment to quality and integrity is foundational to everything we do, as we make an impact that matters for Deloitte clients, our people, and our communities.

Our Global Principles of Business Conduct – “Global Code” – guides those efforts by clearly articulating the standards to which we hold ourselves and each other, wherever in the world we live and work.

We ask all Deloitte people to read and understand the Global Code, and to recognize the significance of these commitments. Member firms have their own codes of conduct that encompass and are based on the Global Code, and also reflect local requirements. Together, these expectations should guide the decisions we make, and actions we take, every day.

Deloitte clients and stakeholders continue to trust and expect our people to do what is right. The daily decisions we make help to build and sustain that trust. We each play an important role in maintaining our ethical culture – one where people feel comfortable in seeking advice and speaking up, and one in which we actively listen and support those who ask questions or raise concerns. This individual and collective responsibility is one we should take very seriously.

With that in mind, it is essential that each of us does our part to continue building a culture that aligns with our Global Code – because for Deloitte, **it starts with integrity.**



Joe Ucuzoglu

Deloitte Global CEO

Anna Marks

Deloitte Global Chair

The role of the Global Code

The Global Code 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.

This Global Code applies across the Deloitte network and provides the foundation for how our people behave. Each member firm in the Deloitte network commits to the Global Code and, as appropriate, builds on it through more detailed codes of conduct.

In addition to local codes, the Global Code is supplemented by member firm ethics programs which provide support to build ethical judgment and decision-making skills in all Deloitte people. Each member firm has an appointed Ethics Officer, ethics training, and channels for consulting on difficult issues and reporting suspected misconduct.

Acting in accordance with the Global Code is a responsibility for all the people at Deloitte. Each of us is called upon to know, understand and comply with the Global Code, and our leaders, at all levels of the organization, are responsible to promote and encourage ethical behavior and be seen as ethical role models. We also have a responsibility to raise our voice when we become aware of anything that is inconsistent with this.

All Deloitte people should remain keenly aware of the circumstances and threats that may hinder our ability to comply with the Global Code. As threats are identified, we should use professional judgment and understanding of context to evaluate their significance and where necessary, we should apply safeguards to reduce them. We should also have an inquiring mind and be alert to new information and our own potential biases which might cause us to re-evaluate any threat to our compliance with the Global Code.

There can be serious consequences for non-compliance with the Global Code, a member firm code of conduct or related Deloitte policies, up to and including dismissal.

Consultation goes to the heart of the Deloitte culture, and avoids our people having to resolve a difficult ethical situation alone. Individuals are encouraged to consult with their colleagues, line managers, leaders or their member firm's normal reporting channels. In addition, formal ethics reporting channels are available at the Global level and in every member firm 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, the Global Code and member firm ethics programs define the Deloitte approach to building and sustaining a culture of ethics and integrity.

Our Shared Values

- Lead the way
- Serve with integrity
- Take care of each other
- Foster inclusion
- Collaborate for measurable impact



Global Principles of Business Conduct

This Global Code has been adopted by Deloitte Touche Tohmatsu Limited (DTTL) and each of its member firms. Every day at Deloitte, we seek to make an impact that matters to our people, our communities, and the clients that are serviced by those member firms. The commitments below illustrate the core expectations that our stakeholders can have of all our people across the Deloitte network.*

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 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, 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.

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

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, viewpoints, talents, and experiences.
- We create inclusive working environments that not only address individual needs, but allows 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 those 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 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.

Further details about the Global Code and Deloitte's Global Ethics program can be found on [Deloitte.com](https://www.deloitte.com)



Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited (DTTL), its global network of member firms, and their related entities (collectively, the "Deloitte organization"). DTTL (also referred to as "Deloitte Global") 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 does not provide services to clients. Please see www.deloitte.com/about to learn more.

Deloitte provides industry-leading audit and assurance, tax and legal, consulting, financial advisory, and risk advisory services to nearly 90% of the Fortune Global 500® and thousands of private companies. Our people deliver measurable and lasting results that help reinforce public trust in capital markets, enable clients to transform and thrive, and lead the way toward a stronger economy, a more equitable society, and a sustainable world. Building on its 175-plus year history, Deloitte spans more than 150 countries and territories. Learn how Deloitte's approximately 415,000 people worldwide make an impact that matters at www.deloitte.com.

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms or their related entities (collectively, the "Deloitte organization") is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, related entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication. DTTL and each of its member firms, and their related entities, are legally separate and independent entities.

© 2023. For information, contact Deloitte Global.