

Deloitte.

Global Principles of Business Conduct

It starts with integrity





Global Principles of Business Conduct

A message from Global 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") outlines Deloitte's ethical commitments and expectations for Deloitte people globally, providing for a strong foundation built upon indelible principles. At Deloitte, ethical culture and values are at the heart of our business, and we take our individual and collective responsibility to serve and uphold the public interest very seriously. Driving a comprehensive and robust approach to ethics and elevating our culture of integrity helps Deloitte people incorporate ethics and integrity in all that they do and make their best professional decisions.

We ask all Deloitte people to read these commitments, and to understand their significance. Deloitte firms have their own codes of conduct, which are based on the Global Code and incorporate local requirements. Together, these expectations inform the 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.

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



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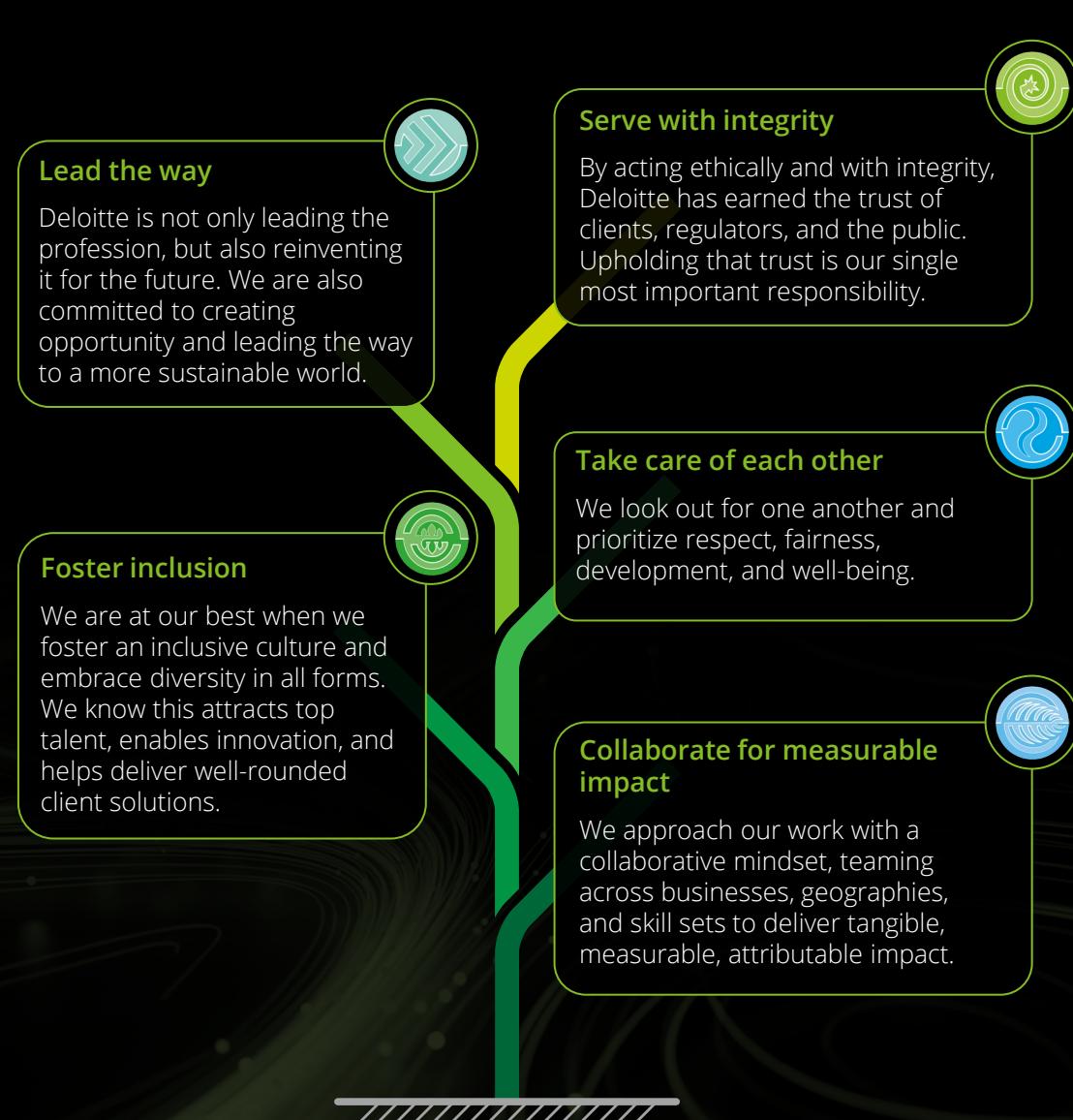
Our related commitments to our people and our clients



Our Shared Values

Our Shared Values are a set of core principles that guide our collective behavior

They set the expectations we have for one another and define how we, as stewards of Deloitte, should behave. They unite us across cultures and geographies. And, importantly, they help us earn the trust and respect of our clients, our people, and our communities.



The Deloitte environment is complex, spanning cultures, businesses, and geographies. However, Deloitte's Shared Values remain constant, and within them the belief that serving with integrity—doing the right thing—will help guide our decision making.

- Debbie Rheder, Deloitte Global Chief Ethics Officer



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Our 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.

Our Global Code applies across the Deloitte network* and provides the foundation for how our people behave. Each 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 Deloitte firm ethics programs, which provide support to build and sustain ethical judgment and decision-making skills in all Deloitte people. Each Deloitte firm has ethics training for its people and channels for consulting on difficult matters or reporting suspected misconduct.

With strong leadership support, the Global Code and Deloitte firm ethics programs define Deloitte's approach to building and sustaining a culture of integrity.

Our personal role in upholding our Global Code



Acting in accordance with the Global Code is a responsibility for all people at Deloitte. Each of us is called upon to know, understand and comply with the Global Code. Our leaders, across the Deloitte network, are expected to promote and encourage ethical behavior and decision-making and be seen as ethical role models. Additionally, we all share the responsibility to speak up when we become aware of violations of our Global Code.

We are conscious that our behavior, both inside and outside of the Deloitte workplace, in both a professional and a personal capacity, can affect our colleagues, stakeholders, and reputation. We commit to upholding these principles and treating others with respect at all times.

All Deloitte people should remain aware of circumstances that may challenge our ability to comply with the Global Code. When faced with an ethical dilemma or circumstance that is inconsistent with our Global Code, we should consider all available information to assess the situation, use professional judgment, consult with relevant stakeholders as appropriate and, where necessary, take action, including applying appropriate safeguards. We should also be mindful of our own potential biases and any new or additional information which might lead to additional action being required.

As an organization, Deloitte commits to abiding by the Global Code and expects the same commitment to quality and integrity from its suppliers, clients, contractors, and alliance partners and technology relationships, as described in our [Supplier Code of Conduct](#) and [Responsible Business Practices Statement](#).

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Our expectations for ethical leadership

Our leaders are the face of Deloitte to our people, clients, and communities. They set the tone for how we treat each other and how we uphold our ethical commitments.

Leaders, across the Deloitte network, are expected to champion and uphold our ethical culture. They are a key resource to consult on ethical matters as they arise.



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Our responsibility to speak up



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At Deloitte, everything starts with integrity. Our businesses are built on trust, and we are all responsible for protecting, preserving, and enhancing the Deloitte brand. No matter their role, our people are key in building and strengthening Deloitte's ethical culture every day, and we rely on each other to stand up for our values when something doesn't feel right.

We foster and support a "speak up" environment that encourages our people to do what is right, even when it may be more challenging. We are stewards of Deloitte's future and must lead by example with our people, with our clients, and in our communities.

All Deloitte people are responsible for reporting any noncompliance or suspected noncompliance with applicable laws and regulations, or potential fraud, illegal or unethical act, or other violation of Deloitte policy that they encounter or are made aware of – whether that be committed by a colleague, client, supplier, contractor, or others associated with Deloitte. Further details of the speak up process can be found [here](#).



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Our responsibility to speak up

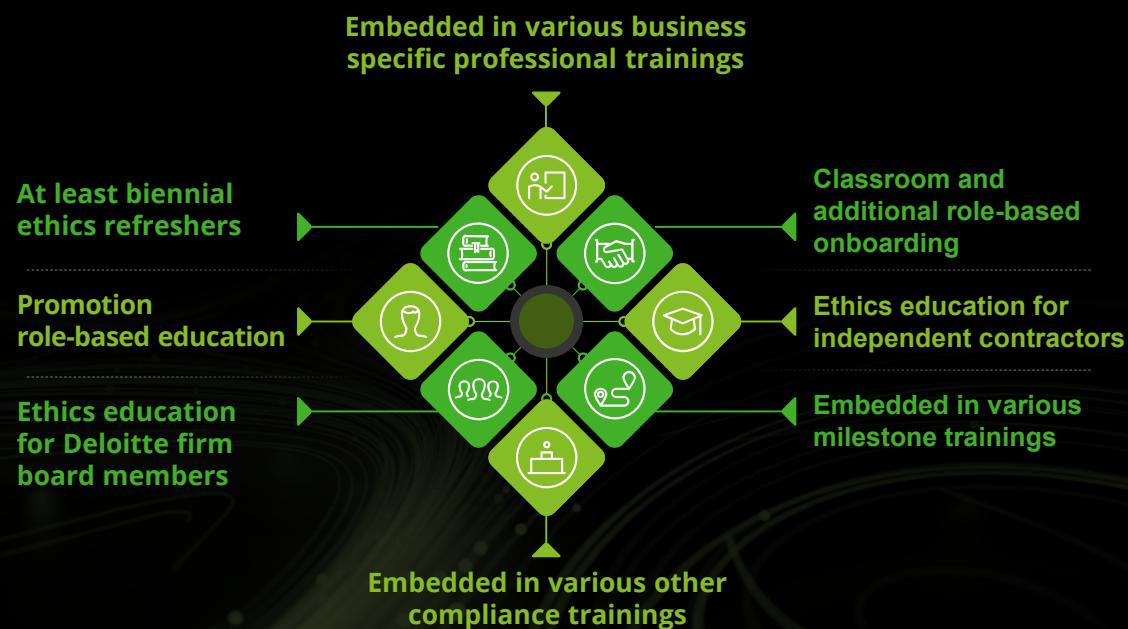
Our nature to consult

No one at Deloitte should have to navigate a difficult situation alone.

Consultation goes to the heart of the Deloitte culture, and helps prevent our people from having to resolve a difficult ethical situation alone. Individuals are encouraged to consult with team leaders or others in their chain of command, Ethics, or Talent/HR with questions. In addition, formal ethics reporting channels are available in every Deloitte firm, and at the Global level, and offer the opportunity to report or consult anonymously.

At Deloitte, we believe a strong ethics training curriculum plays a vital role in preparing our people to navigate ethical dilemmas – to understand the importance of consultation, and to have the courage to speak up in the face of misconduct.

Training programs include online courses, classroom and virtual programs, and facilitator-led interactive case discussions, all focusing on reinforcing ethical awareness, sensitivity, judgment, and decision-making skills. Ethics education is delivered to our people as both standalone trainings and embedded in other courses across various points throughout their career.



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

We take reports of misconduct seriously, conducting investigations and addressing issues promptly and appropriately.

Retaliation against those who raise ethical concerns is not tolerated.

Deloitte's **ACT** method for ethical decision making provides a framework to support our people



Take action by either consulting with a team leader or reporting the matter. Speaking up is taking action!



Global Principles of Business Conduct

This Global Code has been adopted by Deloitte Global and each of the Deloitte firms. At Deloitte, we seek to make an impact that matters to our clients, our people, and the communities in which we operate. The commitments below illustrate the core expectations that our stakeholders 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.
- We comply with applicable professional standards, laws and regulations and seek to avoid actions and behaviors that may discredit ourselves or our professions.
- We are forthright in our interaction with regulators, contributing to the dialogue and helping to drive integrity within the profession.

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 are committed to earning and sustaining the public's trust and confidence in the work we do.
- We foster a culture of appropriate professional skepticism and personal accountability, in line with professional obligations, which drives quality in the services we provide.
- We recognize the broader impact that our work has on our clients, our people, and society, and we make decisions about the work that we do, and the way we do it, with those interests in mind.



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Objectivity

- We are objective in forming our professional opinions and the advice we give.
- We do not allow bias, conflict of interest, or undue influence, to alter our interactions, or to override our professional judgments.
- We do not offer, accept or solicit any gifts, entertainment, or hospitality that may improperly influence, or be perceived 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.
- We prioritize responsible development and deployment of new technologies, including artificial intelligence, aligned with our [Ethical technology guiding principles](#), and take measures to identify, understand, and mitigate possible associated risks.



Fair business practices

- We respect our competitors and are committed to operating legally and ethically, employing fair business practices, and avoiding any appearance of anticompetitive actions.
- We record hours worked timely and accurately, and submit legitimate business-related expenses incurred in line with applicable policies and contractual arrangements.
- Our fees reflect the value of services provided and responsibilities assumed.

Confidentiality, privacy and data protection

- We take measures to protect and safeguard the confidential and personal information that we hold, collecting and handling it in compliance with our internal policies and guidance, and in accordance with applicable laws and professional standards.
- 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.

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We commit to inspiring our talented people to deliver measurable impact.

Respect, inclusion and fair treatment

- We foster a culture and working environment where our people treat each other - and are treated - with respect, courtesy, fairness, and equal opportunity for all.
- We encourage and value differing viewpoints, talents, experiences, and backgrounds.
- 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 categories protected by applicable 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 are committed to maintaining and tracking completion of continuing professional education, professional qualification and licensing requirements.
- We engage in learning honestly and complete assessments independently without seeking or accepting help from other people, sharing assessment questions or answers, or inappropriately using artificial intelligence tools.
- We are committed to fair compensation models and practices, and access to well-being support, empowering our people to thrive.
- We support a psychologically and physically safe work environment for our people and expect our clients, and other third parties with whom we work, to do the same.

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

Anti-corruption and financial crime compliance

- 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, including, but not limited to money laundering.
- We are committed to complying with applicable anti-money laundering, anti-corruption, export control, and sanctions laws and regulations.

Responsible supply chain

- We select suppliers through standard procurement processes and do not condone illegal or unethical behavior by our suppliers, contractors, alliance partners, or technology relationships, as supported by [Deloitte's Supplier Code of Conduct](#).



Social responsibility and environmental sustainability

- We make decisions about the clients we serve, the engagements we undertake, and the way we work in line with the beliefs and practices of our [Commitment to Responsible Business Practices](#).
- We engage in work with our clients, suppliers, alliance partners and technology relationships in a way that directly, and indirectly, makes a positive impact on local, national, and global challenges.
- We support our communities and the environment through philanthropic donations, pro bono services, and volunteer time of our people.
- We support efforts to drive sustainable growth in pursuit of our goal to achieve net-zero greenhouse gas emissions and our [WorldClimate](#) ambition.
- We respect and uphold human rights principles in accordance with our global [Human Rights Statement](#).

Further details about the Global Code and Deloitte's Global Ethics program can be found on [Deloitte.com](#).

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Make the call

Have an ethics issue, concern, or grievance to report? Please [reach out to the ethics officer](#) for the country where the incident took place or [report a concern](#) using the contact form.

Raise an ethics-related concern or pose an ethics-related question using the third party-operated ethics helpline, where available based on your location.

Deloitte member firm ethics officers and other key contacts.



Deloitte Speak Up: (within non-US Deloitte Firms):

<https://delottespeakup.ethicspoint.com/>

Integrity Helpline (within the Deloitte US Firms):

www.integrityhelp.com

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Speak up or consult if you have any concerns – we can all make a difference!



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Our commitment to human rights

At Deloitte, we believe all people should have fundamental human rights, including the right to equal treatment under the law. We commit to advancing the following human rights within our organization: employment and workers' rights, equal opportunity, and non-discriminatory treatment, environmental sustainability, education and skills development, anti-corruption, privacy, and trustworthy technology, in accordance with [Deloitte's Human Rights Statement](#).

Commitment to responsible business practices

Deloitte's commitment to responsible business is rooted in our Purpose—180+ years of making an impact that matters for our people, society, and clients. Our Purpose defines who we are and why we exist. [Our Commitment to Responsible Business Practices statement](#) outlines the responsible business principles we believe in and the commitments we have made. These are embedded in our policies and inform our decision making.



Ethical technology guiding principles

Deloitte's [Ethical technology guiding principles](#) provide a values-based approach to help guide our people's choices and prompt them to consider both the ethical implications of their tech-related activities and how their actions could affect end users and society. These principles reflect our collective commitment to responsible business practices and are rooted in our Shared Values.

Supplier Code of Conduct

Our expectation is that Deloitte suppliers support Deloitte's commitment to doing not only what is good for business, but also what is good for Deloitte people, and the communities in which they live and work. [Deloitte's Supplier Code of Conduct](#) defines our expectations of suppliers in the areas of human rights, labor, the environment, and integrity, ethics and anti-corruption.

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