



Empathy's Code
of Ethics and Conduct

Customers & partners



[EMPATHY.CO](https://empathy.co)



Contents

01 Labor and
Human Rights

02 Ethics

03 Environment

04 Management
Commitment

05 Empathy Holdings
Intellectual Property

06 Corrective
Action Process

Human values

ANGEL
MALDONADO

CEO & Founder
Empathy.co

Our industry -digital tech- tends to over-rationalise what a person is, objectifying the user as a lifeless thing whose behaviours are predictable. As a consequence, our industry has created some of the most unethical products that the world has ever seen.

This Code of Conduct
will **give you to
put data in-line
to human values.**





Just as we have a strict internal code of ethics and conduct for our entire team,

we urge our stakeholders to also comply with the highest ethical standards in the performance of their duties.

This is the main reason why the Empathy Holdings Compliance Committee has decided to approve and publish this code, which binds all our Customers and Partners. This Code of Conduct applies to our whole business Group, covering all the **Empathy.co** and **Motive.co** Commerce search Customers and Partners

01

Labor and Human Rights



Discrimination

Customer shall
not discriminate
against any worker

based on age, disability,
ethnicity, sexual orientation,
gender, marital status,

national origin, race, religion,
political affiliation, or union
membership, in hiring and
other employment practices.



Harassment

Customer shall
commit to a
workplace free
of harassment
and abuse.



Forced Labor

Customer shall not resort

to any sort of forced or involuntary labor



Child Labor

Customer shall employ only workers who meet the legal age

of employment in the country of operation. When such age is not defined, it must be considered to be at least 15 years.



Wages

Customer shall ensure that all workers receive at least the legally mandated minimum wages and benefits.

Customer shall pay accurate wages in a timely manner, and wage deductions shall not be used as a disciplinary measure.

Safe Place to Work

Customers will provide their employees or contractors with


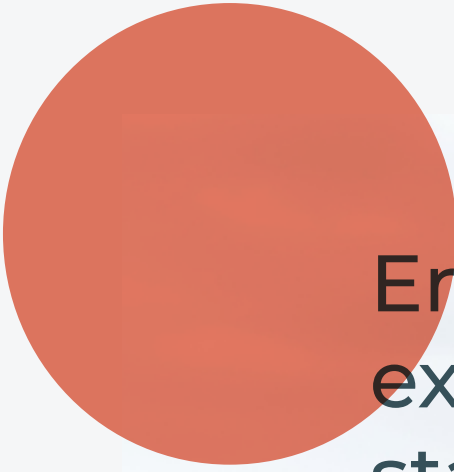
a working environment which meets the highest standards

of health and safety regulations or at minimum, local legislation, and is also free of any moral pressure.



Ethics





Empathy Holdings
expects the highest
standards of ethical
conduct in all of
our endeavours.

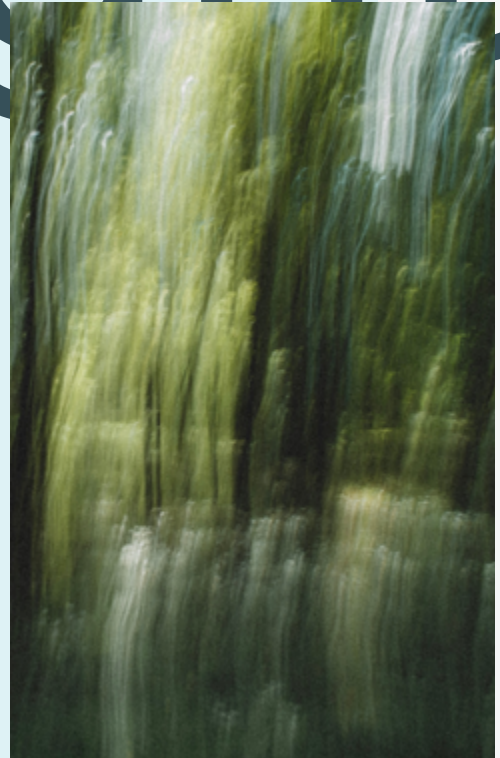


Customer shall always be ethical
in every aspect of its business,
including relationships, practices,
sourcing, and operations.

Integrity

Customer shall not engage in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage.

Customer shall abide by all applicable anti-corruption laws and regulations of the countries in which it operates, including the Foreign Corrupt Practices Act and applicable international anti-corruption laws and conventions.



Conflicts of Interest

Customers shall ensure that they do not create or encourage conflicts of interest. Fundamentally, Customers must not offer any gift or invitation of substantial value to Empathy Holdings employees.

Protection of Intellectual Property



Customer shall respect intellectual property rights and safeguard customer information. Customer shall manage technology and know-how in a manner that protects intellectual property rights.

Disclosure of Information

Customer shall accurately record information regarding its business activities, labor, health and safety, and environmental practices and shall disclose such information, without falsification or misrepresentation, to all appropriate parties.

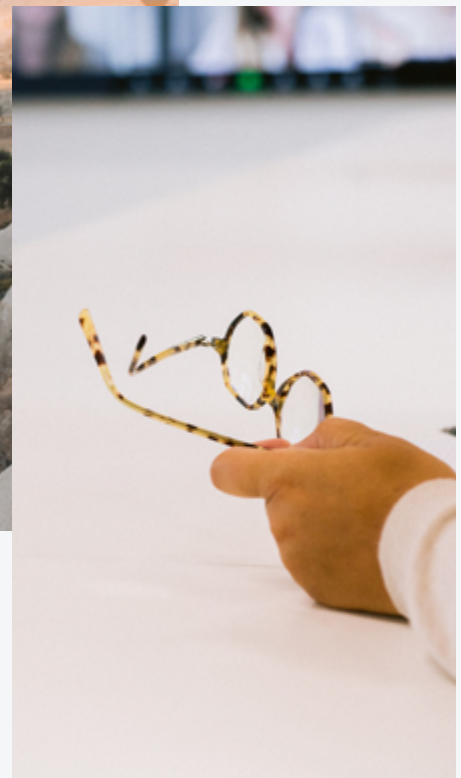


Fair

Business Standards



Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard data must be available.






Environment



Empathy Holdings
is committed to
protecting the
environment, and
environmental
responsibility
is at the
core of how
we operate.



We promote eco-sustainable initiatives (see main document). Our building is completely ecological and has its own ecological vegetable garden located on the rooftop.

We aim to work with customers who share our commitment towards protecting the environment wherever possible both locally and globally. Customers are strongly encouraged to demonstrate

outstanding commitment to protecting and restoring the environment through energy conservation, eco-design, recycling, adequate waste disposal or any other relevant means.

04

Management Commitment



Empathy Holdings holds our customers accountable to this Code and all of its standards.



Customer shall implement or maintain a management system that facilitates compliance with this Code and all applicable laws.

Customer shall perform periodic evaluations of its facilities and operations to ensure compliance with this Code and all applicable laws.

Customer shall maintain documents and records to evidence such compliance.

Empathy
Holdings
Intellectual
Property



Empathy Holding's intellectual property is an invaluable asset that must be protected at all times.

Our intellectual property includes our trademarks, trade names, brands, designs, logos, copyrights, inventions, patents, and trade secrets.



Customer is not permitted to use Empathy Holding's intellectual property without the prior written authorization from the Empathy Holdings CEO or CFO in an agreement.

Corrective Action Process



Customer shall maintain and implement procedures for timely correction of any deficiencies or violations identified by an internal or external audit, assessment, inspection, investigation, or review.

In the event that this code of ethics and conduct is violated, Empathy reserves the right to terminate the provision of the service or subscription to the product immediately.

The Client or Partner who has violated any provision of this Code shall not be entitled to indemnification or compensation of any kind in case of termination of the Agreement.





EMPATHY.CO

LONDON | NEW YORK | ASTURIAS | GALICIA