



<p style="text-align: center;">TRINIDAD AND TOBAGO COALITION OF SERVICES INDUSTRIES CODE OF ETHICS - April 2019</p>

Our Code of Ethics is designed to provide all employees, members, directors and stakeholders with specific guidance. All stakeholders are expected to embrace the principles of our Code and-

- *Act with integrity in the marketplace*
- *Show respect in the workplace*
- *Perform work responsibly*
- *Ensure ethical and environmental responsibility in business activities*

Our reputation for acting ethically and responsibly is built one decision at a time, every day, by each of us. Our Code, together with TTCSI policies, provides the information to perform our work ethically.

The TTCSI recommends that all Members implement a Code of Ethics in their own association, and by extension in their members' organizations, and encourages the use of this document as a template. We can provide assistance in crafting Codes of Ethics as well as direction to any applicable local legislation.

CONTENTS

- A – Diversity and Inclusion
- B – Human Rights
- C – Anti-Discrimination
- D – Anti-Harassment
- E – Health and Safety
- F – Substance Abuse
- G – Anti-Violence
- H – Responsible Marketing
- I – Our Customers and Members
- J – Our Suppliers
- K – Our Competitors
- L - Conflicts of Interest
- M – Anti-Corruption and Anti-Bribery
- N – Anti-Money Laundering
- O – Political Activities
- P – Business Gifts
- Q – Accurate Business Records
- R – Company Resources
- S – Confidentiality and Privacy
- T – External Communication
- U – Intellectual Property
- V – Email and Internet
- W – Code Violations



A. Diversity and Inclusion

TTCSI shall create a work environment in which employees and business partners feel valued and respected for their contributions, and will promote diversity and inclusion by:

- Respecting the diversity of each other's talents, abilities and experiences
- Valuing the input of others
- Fostering an atmosphere of trust, openness and candor

B. Human Rights

TTCSI programs and policies:

- Promote a workplace free of discrimination and harassment
- Prohibit child labour, forced labour and human trafficking
- Provide fair and equitable wages, benefits and other conditions of employment in accordance with local laws
- Provide humane and safe working conditions
- Recognize employees' right to freedom of association and collective bargaining

C. Anti-Discrimination

TTCSI employment decisions regarding employees and applicants shall always be based on merit, qualifications and job-related performance, without regard to non-job-related characteristics such as:

- Race, colour, ethnicity, or national origin
- Gender or gender identity
- Sexual orientation
- Age
- Religion
- Disability
- Any other legally protected status

D. Anti-Harassment

Harassment includes unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment. While the legal definition of harassment may vary by jurisdiction, TTCSI considers the following non-exhaustive list to be unacceptable behaviour:

- Sexual harassment
- Offensive language or jokes
- Racial, ethnic, gender or religious slurs
- Degrading comments
- Intimidating or threatening behavior
- Showing hostility towards others because of individual characteristics

No stakeholder should act in a harassing manner or otherwise cause colleagues or partners to



feel uncomfortable in their work environment. It is important to remember that harassment, sexual or otherwise, is determined by individual actions and how they impact others, regardless of intentions.

E. Health and Safety

TTCSI is committed to safeguarding the health and safety of our employees, members, visitors, contractors, consumers and communities. Our health and safety policies and procedures are designed to help staff to work safely, and concerns should be raised if someone:

- Is asked to do a task they consider unsafe
- Is asked to do a job they think they are not properly trained to perform or may harm someone
- Sees someone else performing a task that they think is unsafe or that the person is not properly trained to do
- Suspects that a vehicle or piece of equipment is not operating properly and may be unsafe
- Observes or are made aware of an unsafe condition or a potential danger to themselves or others

Safety is everyone's responsibility – everyone must insist that work be performed safely, no matter what their job entails.

F. Substance Abuse

If you work under the influence of drugs or alcohol, you pose an unacceptable safety risk to yourself and others. Drugs may include illegal drugs, controlled substances or misused prescription medication. Everyone is expected to perform their job duties free from the influence of any substance that could impair job performance.

TTCSI therefore prohibits:

- Working under the influence of alcohol, illegal drugs or controlled substances on or off-TTCSI premises
- Possessing, selling, using, transferring or distributing illegal drugs or controlled substances at any time, on or off the premises
- Working while impaired by a lawful prescription medication or over-the-counter drug

If you have a drug or alcohol problem, you are encouraged to seek assistance.

G. Anti-Violence

TTCSI has a zero-tolerance policy for workplace violence. All staff, guests and visitors are prohibited from engaging in any act that could cause another individual to feel threatened or unsafe. This includes verbal assaults, threats or any expressions of hostility, intimidation, aggression or hazing.

TTCSI also prohibits the possession of weapons in the workplace. To the full extent permitted by local law, this prohibition extends to company parking lots as well as facilities. Our zero-tolerance policy for workplace violence applies to behaviour on company premises, as well as to the behaviour of our employees engaged in TTCSI business anywhere outside of our premises.



H. Responsible Marketing

The marketing of services by TTCSI and its members must reflect TTCSI ethical standards and be truthful, readily understandable and in compliance with all laws and regulations as well as applicable policies of the sectors we represent. The facts shall never be overstated nor shall any misleading or false statements used in the marketing of the proposed service/s, so as to not misrepresent the quality or magnitude of the said service/s.

I. Our Customers & Members

Integrity in the marketplace requires each of us to treat our customers ethically, fairly, and in compliance with all applicable laws. When dealing with our customers, TTCSI and its members shall always:

- Earn their business on the basis of superior customer relations and services
- Present our services in an honest and forthright manner
- Avoid unfair or deceptive trade practices
- Deliver on our promises

Our contracts with customers shall always reflect the importance and value we place on their business, and all customer agreements shall be in writing and conform to our policies.

J. Our Suppliers

Suppliers include any third-party vendors, consultants, contractors, service providers or suppliers. The TTCSI and its members shall hold suppliers to the same standards of integrity to which we hold ourselves. An unethical or illegal act of a supplier may hurt our reputation and cause a loss of goodwill in the communities we serve. Therefore, requisite criteria in the selection process must ensure that suppliers meet acceptable standards of merit, quality of service and reputation.

K. Our Competitors

The TTCSI and its members shall:

- Never comment on competitors' products or services in an inaccurate or untruthful manner
- Only use legitimate means of obtaining competitive information
- Respect the confidential information and intellectual property rights of our competitors and other third parties
- Always comply with procurement, fair trade and other applicable laws

L. Conflicts of Interest

Our conflicts of interest policy is straightforward – we all have an obligation to act in the best interest of the TTCSI at all times. Conflicts of interest may arise when a member of the TTCSI staff or its Directors, their family members or associates:

- Engage in activities that compete with, or appear to compete with, TTCSI interests.
- Let business decisions be influenced, or appear to be influenced, by personal or family



interests or friendships.

- Use TTCSI property, information or resources for personal benefit or the benefit of others.
- Use TTCSI property, information or resources for the benefit of a member/s for whom the proper authorization has not been obtained.
- Hire, supervise or have a direct or indirect line of reporting to a family member or someone with whom there is a romantic relationship.
- Have outside employment that negatively affects job performance or interferes with TTCSI responsibilities.
- Work for, provide services to, have a financial interest in or receive any personal benefit from a supplier, customer, competitor or a company that does or seeks to do business with TTCSI if such relationship or interest could influence, or appear to influence, business decisions.

All staff and directors must disclose potential conflicts of interest to the TTCSI.

M. Anti-Corruption and Anti-Bribery

Corrupt arrangements with customers, suppliers, government officials, or other third parties are strictly prohibited. "Corruption" generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means.

Corruption may involve payments or the exchange of anything of value and includes but is not limited to bribery (bribery of a government official or commercial bribery), extortion and kickbacks.

Corrupt activities are not only a Code violation, they can also be a serious violation of criminal and civil anti-bribery and anticorruption laws.

To comply with anti-bribery laws, no TTCSI employee or Director shall ever offer, directly or indirectly, anything of value, including a gift or entertainment, to any government official or his or her representatives to obtain or retain business/contracts, influence business decisions or secure an unfair business advantage. These prohibitions apply to all TTCSI operations and to anyone acting on our behalf, including agents, consultants, suppliers and contractors.

This also includes facilitating payments. If anyone receives a request from a government official for a bribe, they must decline to make the payment and promptly report any demands for a bribe, or the actual payment of a bribe made under coercion, directly to the TTCSI Board or through appropriate legal channels.

N. Anti-Money Laundering

TTCSI complies with all laws that prohibit money laundering or financing for illegal or illegitimate purposes. "Money laundering," is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate. We shall always ensure that we are conducting business with reputable customers, for legitimate business purposes, with legitimate funds. The TTCSI shall check for "red flags" such as requests from a potential customer or supplier for cash payments or other unusual payment terms and if there is any suspicion of money laundering activities, we shall speak up and report it.



O. Political Activities

TTCSI encourages its associates to participate in their communities, which may include political activities. However, no-one may use TTCSI funds or resources, or receive TTCSI reimbursement, for personal political activities, including contributions to political candidates or parties. You should avoid even the appearance of doing so.

On occasion, TTCSI may communicate information and its opinions on issues of public concern that affect our Coalition or members. These announcements are not intended to pressure anyone to adopt certain ideas or support certain causes. Staff decisions to contribute their own time or money to any political or community activity are entirely personal and voluntary.

P. Business Gifts

The practice of giving or receiving a customer's or supplier's business gifts requires careful consideration, and before any gift is exchanged, you should determine if it is permitted under our Code and TTCSI policies. Staff and directors are prohibited from providing, offering, or receiving any gift that serves to, or appears to, inappropriately influence business decisions or gain an unfair advantage.

However, under certain circumstances TTCSI representatives may exchange business gifts that are intended to generate goodwill, provided:

- The gift is given in good faith, without expecting any return favour or improper benefit or business advantage, is of nominal value (generally under \$50USD or its equivalent), is provided openly and transparently, is given on behalf of TTCSI and not on behalf of any individual, is reasonable and customary, is given infrequently, and does not otherwise create the appearance of impropriety.
- The gift is not cash or a cash equivalent and meets all other requirements of our policies.
- The gift is permitted under the laws that apply to the recipient and the recipient of the gift is authorized and permitted to accept the gift.

“Business gifts” do not include TTCSI sponsored contests or incentive programs. In addition, business hospitality, including meals and entertainment, is not prohibited as long as the nature and frequency of the occasion is reasonable, the occasion involves the active conduct of TTCSI business and the business hospitality otherwise complies with our policies.

Q. Accurate Business Records

Our focus on speaking with truth underscores our commitment to accuracy in the TTCSI's books and records. Business records, including financial statements, contracts and agreements, must always be accurate and reflect a forthright presentation of the facts.

No matter what type of document or how insignificant it might seem, the information contained in a business record must always be truthful and complete. Financial records must reflect all components of the financial transactions and events.



All transactions, no matter the dollar amount, must be properly authorized, executed and recorded. In addition, anything provided to a government official must be properly and accurately recorded in the TTCSI's business records and we shall never:

- Falsify, omit, misstate, alter or conceal any information or otherwise misrepresent the facts on a company record
- Encourage or allow anyone else to compromise the accuracy and integrity of our records

TTCSI insists that its members adhere to the same standards of integrity in the keeping of all respective business records.

R. Company Resources

TTCSI relies on staff and Directors to use TTCSI resources honestly and efficiently. Resources include physical property, such as facilities, supplies, equipment, vehicles and Coalition funds. They also include intangible assets, such as TTCSI time, confidential information, intellectual property and information systems. TTCSI resources shall only be used for legitimate business purposes and protected from theft, loss, damage, or misuse.

The obligation to protect TTCSI funds is particularly important for those with spending authority, who approve travel and entertainment expenses, or manage budgets and accounts. They must always:

- Ensure the funds are properly used for their established purpose
- Obtain required approval before incurring an expense
- Accurately record all expenditures
- Verify that expenses submitted for reimbursement are business-related, properly documented and comply with our policies

Anyone who misuses TTCSI resources, or intentionally conceals, alters, falsifies or omits information for their benefit or the benefit of others, is committing fraud. Fraud may be motivated by the opportunity to gain something of value (such as meeting a performance goal or obtaining a payment) or to avoid negative consequences (such as discipline). Examples of fraud include:

- Altering numbers to meet productivity goals
- Presenting false medical information to obtain disability benefits
- Falsely reporting time worked to earn more pay or to avoid discipline for being late or absent from work
- Misrepresenting sales or donations of products to obtain unauthorized pricing for a customer
- Misstating financial information

S. Confidential Information & Privacy

Staff, directors, members and stakeholders may acquire certain information about TTCSI, its customers, suppliers or business partners or another third party that is confidential, competitively sensitive and/or proprietary. All should assume that this information is confidential or competitively sensitive unless there is clear indication that TTCSI has publicly released the information.



Staff shall always take reasonable and necessary precautions to protect any confidential information relating to TTCSI and not disclose any confidential business information to anyone outside TTCSI, even to members of their own families, unless the disclosure is properly authorized, and in connection with a clearly defined, legitimate business need.

This obligation of confidentiality does not prohibit anyone from raising concerns about potential violations either within the TTCSI or to Government authorities.

Personal information broadly refers to any information that identifies or relates to an identifiable person. If anyone accesses this type of information or the systems that maintain it, they must comply with all applicable policies and laws regarding the processing of such information and must:

- Only access, collect and use personal information that is authorized for legitimate business reasons
- Disclose personal information only to authorized persons who have a legitimate business reason to know the information and who are obligated to protect it
- Securely store, transmit and destroy personal information in accordance with applicable policies and laws
- Promptly report any actual or suspected violations of policies, data breaches or other risks to personal information

T. External Communication

If anyone is contacted and asked to discuss TTCSI business with any members of the press, investors or market analysts, they should refer them to the official TTCSI designated spokespersons. Similarly, when using personal social media staff and directors should be clear that you do not speak on behalf of TTCSI and should always take every possible precaution to ensure that they are not disclosing any confidential information about TTCSI or its business partners.

U. Intellectual Property

Our intellectual property is an invaluable asset that must be protected at all times and includes our trademarks, brands, designs, logos, copyrights, patents and trade secrets. No-one should allow a third party to use TTCSI trademarks or other intellectual property without proper authorization and our trademarks should never be used in a degrading, defamatory or offensive manner. Our intellectual property also includes employees' work product including but not limited to databases, research, surveys and statistical data.

V. Email and Internet

Our information technology systems constitute a critical component of our business operations and are provided for authorized business purposes. Staff may engage in reasonable incidental personal use of phone, email and the internet as long as such usage does not:





- Consume a large amount of time or resources
- Interfere with work performance
- Involve illegal, sexually explicit, political, discriminatory or otherwise inappropriate material
- Relate to outside business interests
- Violate any TTCSI policy

While it is generally not our practice to monitor employees' use of our information systems, TTCSI reserves the right to monitor, record, disclose, audit, and delete without prior notice the nature and content of an employee's activity using our company's email, phone, voicemail and / or internet.

W. Code Violations

All reports of suspected violations of this Code or the law will be taken seriously and promptly reviewed. As appropriate, the TTCSI Board or General Manager shall assign an investigator(s) to review all reported instances of alleged violations.

The investigator(s) will:

- Act objectively in determining facts through interviews or a review of documents
- Contact employees who may have knowledge about the alleged incident(s)
- Recommend corrective actions and/or disciplinary measures as specified in the Coalition's by-laws where appropriate, or take legal action in accordance with laws of Trinidad & Tobago

The TTCSI shall:

- Protect the confidentiality of the individuals involved, to the extent practical
- Inform an employee of the accusations reported against him/her at a time when such a disclosure will not jeopardize the investigation
- Where permissible, allow employees to review and correct information reported

All stakeholders shall cooperate fully with any inquiry or investigation.

-END-

