

# Code of Conduct



# Message from the Board of Directors

Our mission is to offer only to select like-minded investors trustworthy advice and holistic values-based asset management solutions, accessing the best managers globally to outperform while contributing to the common good. Within this context we have a special responsibility to act in accordance with regulatory obligations and in the best interests of our clients. In order to warrant the trust required to sustain this role, we constantly strive for excellence, client focus and clarity of roles and responsibilities. **It is through ensuring clarity, professionalism and objectivity and by supporting the ethos, identity and shared spirit that underpins our clients, that we can be entrusted with the delicate role of managing their interests.**

In this light it is of key importance that our company and we as employees act with integrity and that we continue to strive for the highest standards of ethical behaviour and governance. Our Code of Conduct outlines the expectations of ethical behaviour for all our people, including all temporary staff, consultants and interim professionals, built on the foundation of Anthos' shared set of beliefs and principles. Those values emphasise that above all we act with integrity, uphold the highest professional standards and maintain our independence.

This Code of Conduct promotes ethical behaviour and ensures that our own actions serve to reflect and reinforce our values. Importantly, our Code of Conduct provides an important resource to inform our daily work and the decisions we make, highlighting the principles we believe underpin good behaviour. While not an all-encompassing document, our Code of Conduct is here to guide us but good judgement should always be applied – this includes speaking up when you have a concern or doubt. It is imperative to continue to question and apply sound judgement when faced with dilemmas and making decisions and we should continue to support each other so we can solve these together.

Please take the time to read, understand and use our Code of Conduct. Because it matters. Every one of us at Anthos is required to comply with the Code of Conduct. We will strive to consistently meet the high standards as outlined in our Code of Conduct. Advice and guidance on the application of this Code of Conduct can be obtained from the Anthos Compliance Function as well as the members of the Board of Directors.

**Thank you for joining us in upholding our Code of Conduct and in creating the enterprise we are so proud to be a part of.**



**Jacco Maters, CEO**



**Jelle Ritzerveld, CRIO**

**"It is through ensuring clarity, professionalism and objectivity and by supporting the ethos, identity and shared spirit that underpins our clients, that we can be entrusted with the delicate role of managing their interests."**

# Contents

<b>01</b>	<b>Our core values</b>	<b>4</b>	<b>05</b>	<b>Personal conduct</b>	<b>13</b>
				Acting with integrity	14
<b>02</b>	<b>Your role</b>	<b>5</b>		Compliance statement	14
	When to speak up?	6		Communication	14
	How to report a concern	6		Politics and government	14
	Retaliation isn't tolerated	6		Conflict of interest	15
	How our Managers handle concerns	6		Personal account dealing	19
<b>03</b>	<b>About the Code of Conduct</b>	<b>7</b>	<b>06</b>	<b>Business conduct</b>	<b>20</b>
	Purpose of this Code of Conduct	8		Fair treatment of stakeholders	21
	How to make sure you make the right decision?	8		Fair competition	21
	Leading by example	9		Client care	21
<b>04</b>	<b>Workplace</b>	<b>10</b>		Handling of inside information	22
	Supporting inclusion and diversity	11		Anti-money laundering and trade sanctions	23
	Enabling respect at work	12		Investing responsibly	24
	Contributing to a safe and secure workplace	12	<b>07</b>	<b>Protection of assets</b>	<b>25</b>
				Company property	26
				Handling confidential information	27
				Protecting personal data	28

# 01 Our core values



## Purpose

We invest to support our client's positive impact to human dignity and environment sustainability.



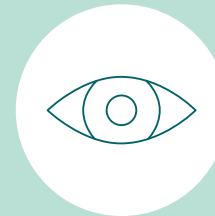
## Excellence

We continuously learn and improve our skills to provide the best asset management solutions.



## Collaboration

We reach across traditional roles to foster innovation and original thinking.



## Client focus

We reflect our clients' values in our attitude and actions.



## Passion

We bring our best selves to the office.

## 02

# Your role

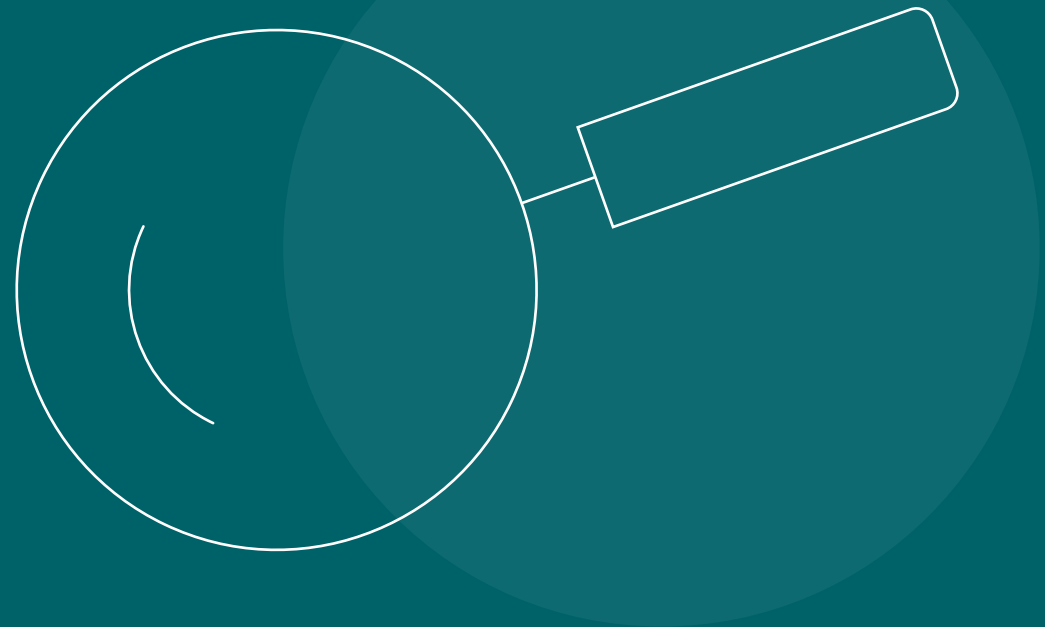
**As employees of Anthos, we have a responsibility to apply good judgement and play our part to make sure Anthos continues to be a business of which we can all be proud.**

One way to apply good judgement is to speak up when we think a decision or action does not reflect our guiding principles or is not in line with our Code. You don't need to be directly affected by an issue to raise it. When concerns are raised it helps us identify and address the matter and improve how we work.

If you suspect misconduct, discuss it with your manager, HR, the Compliance Function or any other internal party you trust. It's important not to ignore it.

Speaking up takes both courage and integrity. We will always treat any concerns you raise sensitively and are committed to investigating fully and fairly. Our people are our most important asset and we want you to feel supported when speaking up.

If a person outside Anthos speaks up, we will treat their concern equally respectfully. By speaking up, they are helping us improve our company and build a relationship of trust.



## When to speak up?

Here are some examples when you might want to seek support or report a concern:

- You believe our Code of Conduct, Policies or guiding principles have been violated
- You think someone may have been bribed or you suspect corruption
- There is a threat to a person, the environment or assets
- Someone has tried to conceal a violation

## How to report a concern

We want to make it easy and safe for our people to raise their concerns.

That's why we created a short and simple form on our intranet which allows you to report concerns anonymously. Reports are always treated confidentially and with the utmost care.

## How our Managers handle concerns

When someone comes to you with a concern, that person is trusting you with their dilemma. As a Manager, you therefore have a special responsibility to listen to them, respect them and follow up promptly and in line with our policies.

Here are some specific steps Managers can take:

- Keep an open-door policy and give the person your full attention
- Thank the person for speaking up – remember, they've just done something important for the company
- Respond respectfully and take every concern seriously, even if you disagree
- Show that you are committed to solving the problem promptly
- You have a duty to protect the person's confidentiality

## Retaliation isn't tolerated

Speaking up is brave and important and should be treated as such.

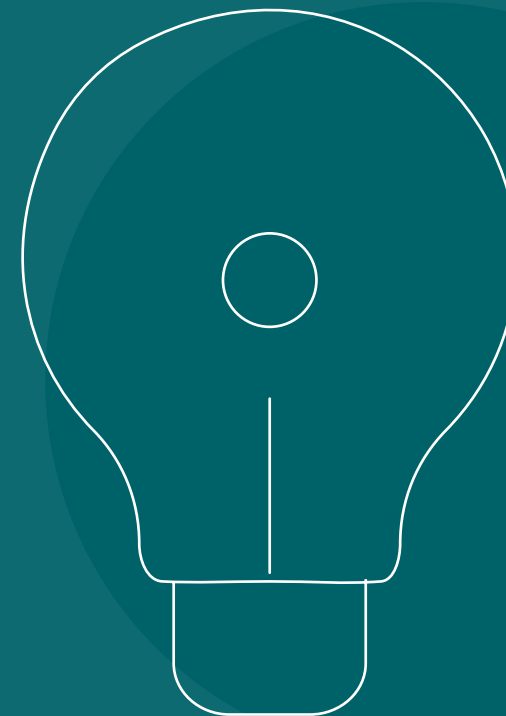
This is why we exercise a zero-tolerance policy towards any form of retaliation. When you make a report, ask a question or cooperate in any investigation, you can do so without fear of retaliation. Any retaliation will be seen as a breach of our Code of Conduct.

## 03

# About the Code of Conduct

Inadequate fulfilment of society's expectations may lead to negative public reactions, a deteriorating reputation and regulatory penalties as we are a financial institution. This may limit our business opportunities and form a threat to Anthos' reputation, earnings and capital.

In this light, regulatory bodies increasingly view regulatory compliance as a key element of corporate governance and overall risk management. Integrity is key for us and the financial sector. In order to promote the integrity of the financial sector it is important that a financial institution controls its integrity risks as part of its operations. We therefore all need to act with honesty and integrity, while taking into account the rules and regulations that apply to us.



## Purpose of this Code of Conduct

This Code of Conduct presents an ethical and behavioural framework to guide employees' responses to everyday challenges. The Code of Conduct specifies values and standards of behaviour to ensure employees working for Anthos operate in an honest and ethical manner. It also aims to ensure that our organisation's reputation is upheld. Our Code of Conduct applies to everyone within Anthos, including all temporary staff, consultants and interim professionals, regardless of their individual role, position or practice.

This Code of Conduct together with Anthos' Regulatory Compliance Manual form the Anthos Compliance framework. The Regulatory Compliance Manual sets forth the obligations, requirements, and governance arrangements that Anthos applies to mitigate its compliance risks. The Compliance Function is responsible for monitoring the correct implementation of and compliance with Anthos' Code of Conduct, e.g. performing regular checks and inspections and bringing Anthos' Code of Conduct to the attention to our employees.

## How to make sure you make the right decision?

**If the right thing to do is not clear, ask yourself:**

Would I be comfortable if my actions were made public?

Is it legal and consistent with our Code and policies?

2

Is it in line with our core guiding principles?

3

Is it in the interest of the company as a whole – not just a certain individual or group?

4

If you can answer all of these questions with "yes", the decision is usually alright. If not, it is a signal to stop and seek advice. When unsure, it's always better to ask before you act. You should never feel alone, there is always a colleague with whom you can discuss your doubts.

In case you need advice on any aspects of the Code, please contact one of the following:

- Your manager
- Your HR business partner
- Anthos' Compliance Function



# Leading by example

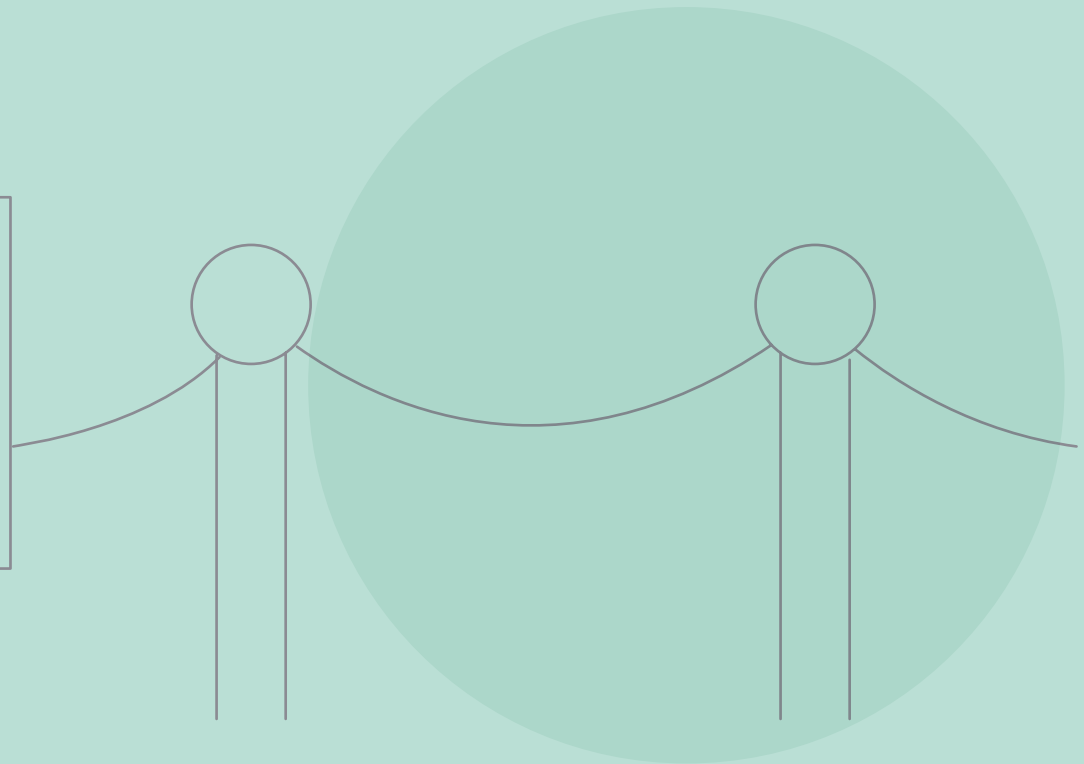
Whoever you are in the organisation, you have the unique opportunity to act as a role model among your team or peers. Leading by example and with integrity is key. Leading by example means:

- Making sure your teams understand their responsibilities under the Code and its policies
- Openly discussing the Code and reinforcing the importance of ethics and compliance with colleagues
- Creating an environment where people feel comfortable raising concerns
- Making sure everyone is trained and understands what is expected of them in the context of this Code
- Always acting promptly to stop violations of the Code or the law by those you work with

We welcome comments and suggestions for improving our Code of Conduct. If you think something is missing or can be improved, please let Compliance know.

## 04 Workplace

We work better  
together because  
of our differences,  
not despite them.





# Supporting inclusion and diversity

We work better together because of our differences, not despite them.

At Anthos, we believe in diversity of thought, which is a product of life experiences, beliefs, values and personality. These components drive how people think and act, which makes each one of us unique.

We stand for an equal opportunity workplace that is inclusive by default and strong because of its diversity. Different perspectives are welcomed and different ideas are valued and assessed on merit, not bias.

That's why we seek to engage, develop and attract the very best diverse talent: people who are first and foremost inspired by our mission and values and motivated to contribute fully to our business ambitions.

Each of us has a role to play in nurturing an inclusive environment where we can work together with mutual respect and interest in each other's different capabilities and ways of thinking. Only then will our business be able to meet the challenges and capture the opportunities of tomorrow and fulfil the performance commitments we make to all our stakeholders.

## What if?



Han's manager often mocks colleagues or makes derogatory comments in meetings. Han doesn't think this is appropriate but isn't sure that his colleagues mind, so he has not reported his manager's behaviour. Is that alright?



No. Han should report any conduct that he believes could violate our guiding principles and policies, even if he is unsure if anyone is offended.



## Enabling respect at work

A respectful workplace inspires trust and allows us all to contribute and succeed. Discrimination, harassment and unsafe working conditions diminish what we can achieve together.

Harassment, bullying and discrimination take many forms, such as:

- Unwelcome remarks, gestures or physical contact
- Display or dissemination of offensive, negative or sexually explicit content, either verbally or electronically
- Offensive, degrading or insulting statements or comments
- Verbal or physical abuse or threats

At Anthos, we cultivate a work environment that empowers everyone to do their best work. We treat our colleagues with respect and are mindful of differences in views, both in personal exchanges as well as on our digital platforms.

## Contributing to a safe and secure workplace

The safety and security of our employees in all our offices and other places of work is non-negotiable. Our places of work follow all applicable health and safety laws and regulations. We all play a part and have a responsibility in making our workplace safe, for one another. This includes being aware of all health, safety and security requirements and notices at all times.

How we contribute to a secure workplace:

- We keep our access cards safe and do not allow others to use them
- We ensure that sensitive documents are safely secured when leaving our workspace for longer periods (e.g. lunch or overnight)
- We lock our computers or otherwise deactivate them when not in use for longer periods (e.g. lunch or overnight)
- We do not tolerate working under the influence of drugs or alcohol
- We report any injury or accident at work to a First Aider and HR

Anthos wants employees to stay safe while travelling. We partner with leading medical and security risk specialists International SOS and Control Risks to provide a comprehensive suite of travel risk management services to our employees.

## 05

# Personal conduct

We all have a responsibility to act with integrity towards all stakeholders, both external and internal. This also means conducting our business activities responsibly and with integrity in our day-to-day work.

## Acting with integrity

We respect and comply with all applicable laws and do what is fair and right, while never putting our personal interests before Anthos’.

We are also mindful that our personal behaviour and the way we communicate can impact Anthos, which is why we won’t engage in activities that can diminish people’s trust in the company or its integrity.





Employees who are bound by a professional code are expected to adhere to that code as well. This Code of Conduct is considered complementary to or an elaboration of such professional codes. If you believe that a rule in the Code of Conduct is in conflict with a professional code, please contact the Compliance Function.

## Compliance statement

Each employee is required to sign a statement in which he or she declares to comply with the Code of Conduct.

Each employee will be required to sign annually a statement confirming that he or she is aware of the responsibility to act in line with the Code of Conduct and to raise concerns. In addition, compliance will provide training on a regular basis to create awareness of the Code of Conduct.

## Politics and government

At Anthos, we have a policy of strict political neutrality. We do not make donations to any political parties, organisations or individuals engaged in (partisan) politics. Engagement activities seek to influence a political decision-maker or legislator on a certain issue. If we engage with political decision-makers or legislators, we do so openly and truthfully and without gifts, entertainment or donations. Engagement activities require prior written approval from our leadership team.

On social media, make sure it is clear you are speaking for yourself and not on behalf of Anthos.

## Communication

Our communications are open, accurate and transparent, taking into account confidentiality when required.

Some helpful guidelines to ensure we communicate responsibly:

- If contacted by a member of the media, always refer those requests to our communications team
- On social media, make sure it is clear you are speaking for yourself and not on behalf of Anthos
- Always obtain permission from colleagues before posting any images of them online
- And remember, what you share publicly is often permanent

Only those authorised to do so speak on behalf of Anthos, in media, at conferences or on social media.

To check if you are authorised, you can reach out to Marketing & Communications.



# Conflict of interest

We will act in the best interest of clients, the Anthos Funds and the fund participants.

Anthos will take all reasonable steps to avoid conflict of interests and, when this cannot be avoided, to identify, manage and monitor and, where applicable, disclose those conflicts of interest in order to prevent them from adversely affecting the interests of its client, the Anthos Funds and/or the fund participants and to ensure that these are fairly treated. Conflicts of interest might arise if one or multiple key stakeholders have different interests at the same time. These conflicts of interest see to conflicts between the following key stakeholders (not limited):

- Anthos, its relevant persons, and Anthos Fund/ its fund participants;
- an Anthos Fund/ its fund participants and another Anthos Fund/ its fund participants;
- an Anthos Fund/ its fund participants, and another client of Anthos;
- Anthos and its clients;
- Anthos and COFRA Group and/or clients of Anthos.

If we don't navigate potential conflicts of interest carefully and responsibly, these situations can impact the decisions we make, erode trust within teams and harm our reputation with our stakeholders. Even the perception of a conflict of interest can be damaging. Failing to act can also be a conflict of interest.

Conflicts of interest can happen in many situations. When in doubt, you can always consult the Compliance Function. Please ensure that you inform the Compliance Function about any potential conflict of interest immediately. Reference is made to the Regulatory Compliance Manual and the Conflict of interest policy for more information.



## External appointments

While we welcome opportunities for our employees to broaden their horizons in functions outside the organisation, we must make sure these do not lead to a conflict of interest and seek approval from our management before accepting. Such external functions may include external committee memberships, public office positions, political positions, supervisory board or advisory positions.

The general rule is that you may not accept any external appointments, including but not limited to executive or non-executive directorships or consultancy positions, whether paid or on a voluntary basis, in organisations with which Anthos has business dealings. In any case, you should inform the Compliance Function and your line manager in writing. If you are offered an external appointment, you should never accept it before receiving the Compliance Function's written consent.

Furthermore, you are required to immediately report in writing any change in your external appointment to the Compliance Function. The key factor in assessing whether approval can be given is whether a position might entail, or could arouse the suspicion of, a conflict of interest with your position within Anthos, the Group in which it operates or in your relation to clients.

## Gifts, entertainment and anti-bribery

Like any business, we understand that exchanging common business courtesies like gifts, entertainment or hospitality, is part of how we build strong working relationships with our business partners and customers. But we do so responsibly and always apply good judgement.

Gifts and hospitality must never influence business decisions made by employees and must not place them under any obligation to accept an invitation for hospitality in any kind of entertainment from a client or a (prospective) business partner as this might influence their decisions or even gives the impression that such influence exists. As such, gifts and entertainment are permitted when they are:

- Of nominal value
- Infrequent
- Unsolicited
- Reasonable

We make sure that the gifts and entertainment we accept or provide do not amount to bribery or give the appearance that we are exchanging courtesies to gain any improper business or personal advantage. In any event, gifts and entertainment should be reported in accordance with our procedures, even if declined.

Prior approval from your manager and subsequently the Compliance Function must be obtained before accepting a gift of hospitality with a nominal amount of more than 100 euros (or the equivalent in another currency) to ensure that gifts and entertainment, offered or received, do not give rise to a conflict of interest.

### Things to be aware of...

- Gifts can be any object, cash or cash equivalent (voucher), favourable loan or anything else of value
- Entertainment may involve lunches or dinners, sports events, travel or lodging or other hospitality
- Bribery means giving, offering or promising anything of value to influence a business decision
- Facilitation payments are small amounts paid to public officials to expedite routine or administrative actions such as issuing licences or visas



**Where we draw the line:**

- We never accept nor give cash
- We don't accept or offer anything that might appear to place us under any obligation or that can harm (or be perceived to harm) our independence, either personal or of the company
- We don't make or receive facilitation payments to or from anyone
- We don't permit any hospitality, entertainment or gifts in the case of public officials
- We don't tolerate any of the above behaviour from anyone acting on behalf of Anthos

Reference is made to the Regulatory Compliance Manual and the Conflict of interest policy for more information.

**Personal relationships at work**

Embarking on a relationship with someone at work can potentially become a conflict of interest, especially if both work in the same reporting line. This may include a close friendship or romantic relationship. At Anthos, we know how much value being part of a family can bring. That said, where personal relationships could impact our decision making or hiring, or could lead to the appearance of a conflict of interest, we should come forward to discuss these with our HR business partner or manager. They will help assess possible ethical implications and possible solutions.

## What if?

**Q** One of the suppliers that Noura has been working with for many years sends her a gift basket for Christmas which she estimates to be worth over 150 euros. Can she keep it?

**A** Not without approval. Noura should check with her manager first and also the Compliance team to see if this is in line with our policies.

## What if?

**Q** Natasha is on the organising committee of one of our annual internal events and would like to hire her sister-in-law's catering company to help her out as she is starting her own catering business. What should Natasha do?

**A** Though there would be no personal gain for her, Natasha should refrain from suggesting her sister-in-law's company to the organising committee. We should avoid all perceptions of conflicts of interest.

## What if?

**Q** A former colleague of Alexei has invited him to sit on the board of his new start-up. Alexei enthusiastically says yes as it won't interfere with his Anthos working hours. Is that okay?

**A** Alexei should first check with his manager and the Compliance Function before accepting the role. It's not just about the working hours... depending on the nature of the role and the company, this could be a conflict. It's better to check.

## What if?

**Q** Daniela's husband has just been hired by one of Anthos' advisors and put in charge of handling the Anthos client relationship. Daniela doesn't know if she needs to flag this because she works in a department that won't work directly with him. Should she flag it?

**A** Yes, Daniela should flag this to the Compliance Function as this could represent a conflict of interest.

We never accept  
nor give cash

## Personal account dealing

You should exercise utmost care in handling information that you know or can reasonably be expected to know and which is to be regarded as inside information or other confidential market information.

Inside information can be defined as information of a precise nature, related (directly or indirectly) to an issuer of financial instruments or related to trading in those instruments which has not been made public, and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or the related derivative financial instruments.

The term financial instrument is broad and covers instruments such as securities (e.g. stocks and bonds), money market instruments, participation rights in investment institutions, options, futures contracts, swaps and other derivatives contracts that relate to securities, financial contracts for calculating differences, etc. The foregoing applies in particular to transactions in financial instruments executed by yourself or on your behalf as an individual for your own account or for the account of a third party (so-called private investments).

It is a criminal offence to deal, advise or encourage another person to deal in any securities about which you have inside information. It is also a criminal offence to pass on any such information other than in the proper course of your employment. In this light you are bound by specific rules when executing private investments.

The following principles apply with regard to private investment transactions:

- Possession of inside information obtained through your job must be reported immediately to the Compliance Function
- You must execute your private investment transactions with utmost care so as to avoid at all times creating the impression of using confidential business information or insider information
- You may never – for your own account or for the account of a third party – conduct or attempt to conduct or arrange a transaction in a financial instrument in the event that you possess information not known or not yet known to the public:
  - a) regarding a situation that exists, or an event that took place or will take place and
  - b) that is sufficiently precise to influence the price of the financial instrument in a way that a reasonable investor would likely use to (partly) base his/her investment decisions on
- If you possess inside information you are also strictly forbidden to:
  - a) pass on inside information to third parties other than during the normal course of work, profession or business and on a need-to-know basis only or
  - b) advise or encourage third parties to conduct, arrange or refrain from transactions in the financial instruments concerned
- No private transactions may be conducted in response to, or in anticipation of, orders by Anthos or its clients
- In any situation you are required to contact the Compliance Function if you are unsure how to act

## 06 Business conduct

We deal fairly with all our stakeholders.





## Fair treatment of stakeholders

By treating our stakeholders fairly and honestly, we maintain the trust and respect of all our stakeholders.

This means that when we represent Anthos, we do not take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any unfair practice.

## Fair competition

Our business success is based on the quality of our people, services and products. We recognise that competition is good for innovation and for our customers. It keeps us on our toes.

At Anthos, we are known for competing fairly at all times, which has earned us the trust of our business partners and other stakeholders, enabling us to be a force for good in the way we conduct business.

We believe in the principle of fair competition, and refrain from any anti-competitive activities, i.e. behaviour that restricts competition in a certain market. We only enter into agreements, understandings or engagements that are permitted under applicable competition laws.

## Client care

At Anthos we are committed to act in the best interests of our clients and fund participants at all times and refrain from acts that may harm the integrity or transparency of the financial markets. We consider fair treatment of clients and fund participants central to Anthos' corporate culture. Our clients receive services suitable for them, taking into account their personal circumstances, they are provided with clear information and are kept appropriately informed during the relationship. We act honestly, fairly, professionally and with due skill, care and diligence when providing our services to clients and fund participants.

We take reasonable care to ensure the suitability of the services we provide to clients. For this purpose we ensure that we are familiar with our clients' backgrounds, their needs, objectives, knowledge and experience in relation to the services involved. Reference is made to the Client service policy for more information.

## Handling of inside information

In your business communications you should not mislead, write speculative opinions, exaggerate, engage in casual conversation about sensitive or confidential matters or joke about serious matters.

To avoid any form of market abuse within Anthos, the following conduct is strictly forbidden:

- From time to time, we may become aware of material, non-public information about our company or other companies in advance of the public (known as inside information). Using such inside information before it is made publicly known for trading purposes (such as buying or selling securities) is forbidden.
- Share inside information or engage in “tipping” activity – using material information to advise our friends, relatives or anyone else on trading decisions.
- Dissemination of false or misleading information. It is forbidden to disseminate information that gives, or is likely to give, a false or misleading impression of a financial instrument if the disseminating person is aware, or could reasonably be expected to be aware, of the information being false or misleading, and
- Manipulating transactions or markets

Material information is considered “public” only after it is published on our websites or by the media. If in doubt, we always check with the Compliance Function to ensure that any vital information we possess has been made public before acting on this information. Reference is made to the Market abuse policy for more information.

## What if?



Tom overhears a colleague discussing Anthos’ interest in investing in a publicly traded company that is showing signs of growth potential. Tom’s brother invested in this company but recently told Tom he was going to sell his shares. Tom wonders whether he can tell his brother to hold on to those shares a little longer given the information he heard... Is this ok?



No, that is not ok. The information Tom overheard is not public and therefore cannot be shared with anyone, including his brother. If he did, that would be considered “tipping” and in breach of our insider trading policy.

# Anti-money laundering and trade sanctions

We do not condone any illegal activities, such as money laundering, and will do our utmost to detect and report such activity where we might come across it.

It's therefore important that we are aware of the signs of money laundering, reduce our exposure and promptly report anything suspicious. One way to make sure we do not aid covering up money laundering activities is by taking the time to know our contract parties and their reputations for following the law. We do this by performing thorough AML/CTF due diligence as outlined in the AML and sanctions policy. Reference is made to the Regulatory Compliance Manual and the AML and sanctions policy for more information.

If we suspect we have reasons not to engage with a certain contract party, we immediately notify the Compliance Function to discuss next steps. At all times, we want to avoid aiding or appearing to be aiding (knowingly or not) in money laundering.

Any business that becomes involved with criminal money will suffer severe reputational damage, possible criminal prosecution and, in the case of a financial services business, may lose their licence to operate.

Money laundering is the process of transferring illegally obtained funds (money) through transactions that appear legitimate, with the intention of concealing the original illegal source of the money. For example, someone profiting from illegal drug trafficking may try to hide the illicit funds gained by placing them in an investment fund.

## Red flags:

- A party has a cash intensive business
- A party requests that funds be transferred to an unrelated third party
- A party is a shell company and refuses to disclose the owner's identity
- Transactions appear to have been structured such as to avoid government reporting requirements
- A party lacks general knowledge of its industry



At Anthos, our mission guides every investment decision we make.

## Trade sanctions

We respect trade sanctions and embargoes as imposed by the United Nations, European Union and the Netherlands. We do not engage with parties on their restricted lists, who may have been identified as being involved in weapons trade, terrorism, human rights violations or corruption. Therefore we perform a sanction screening regarding the contract parties as part of the initial and ongoing AML/CTF due diligence.

## Investing responsibly

At Anthos, our mission guides every investment decision we make. Some of our investments focus primarily on delivering healthy financial returns but these are done in accordance with clear environmental, social and governance (ESG) guidelines that guard against negative effects and seek to enhance positive effects for people and planet.

As evidence of this commitment, Anthos is signatory to the UN backed Principles for Responsible Investment, which include a public commitment to incorporate ESG issues into investment analysis, decision-making and ownership practices.

## What if?

**Q** Johanna is about to sign a key contract with a new IT service provider. Because of the project's urgency, she wants to accelerate the sign-off process, but her colleague advises her to wait for all background checks on the new provider to be completed before signing off. Should she listen?

**A** Absolutely. We never engage in any contracts without having done the appropriate screenings and checks. This is to make sure we are not aiding any money laundering activity.



07

# Protection of assets

Protecting our company's property and assets, both tangible and intangible, is important. We do our best to not lose, damage or misuse it.





Zuiderhof, Amsterdam

## Company property

Protecting our company's property and assets, both tangible and intangible, is important. We do our best to not lose, damage or misuse it.

Our property includes real estate and equipment, as well as IT systems (such as our networks, laptops, mobile phones), intellectual property (patents, trademarks and brands) and company information (data, including know-how, financial data, business plans and supplier or customer details).

We must physically and digitally protect our assets and avoid unauthorised access to our systems, networks and other resources. We take care not to reveal any passwords or accidentally allow access to any of these.

### We protect our IT systems and equipment

- We keep our items such as our laptops and phones in secured places
- We password protect our devices at all times
- We lock our laptop screens when we walk away from our desk
- If a laptop or other device is lost, stolen or damaged we immediately notify the IT team

### We protect intellectual property (IP)

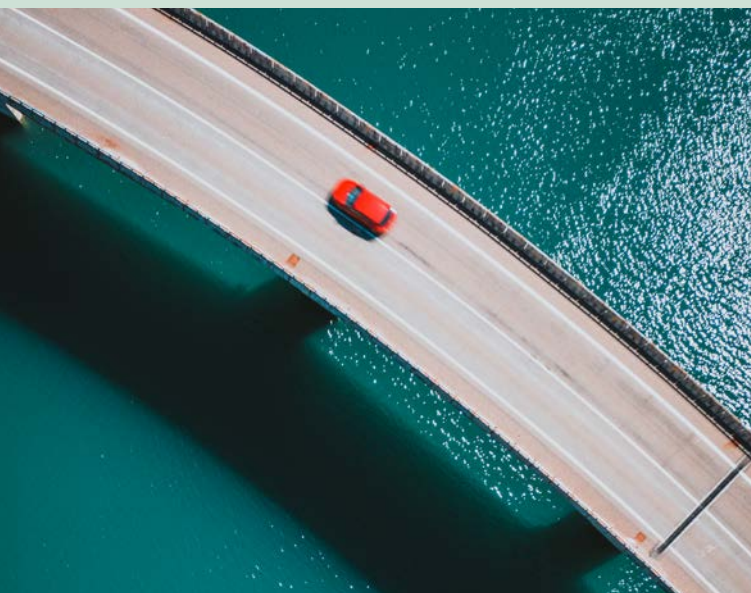
- We safeguard Anthos' IP from unauthorised disclosure and misuse
- We notify IT and Legal immediately if we suspect a breach or unauthorised access to our IP
- We respect the intellectual property rights of others

### We use digital company property responsibly

- We are all responsible for maintaining the integrity of the Anthos network and digital property
- We use our computers and other devices professionally, applying good judgement at all times
- Company IT resources may be used for personal matters as long as it doesn't impact our work
- We take care not to respond to unsolicited and suspicious emails, and report them to the IT service desk
- We don't tolerate the use of company assets to access, view or share inappropriate content, including sexually explicit, offensive, discriminatory or otherwise inappropriate content
- We also do not tolerate the use of company assets to commit cybercrime or any other illegal activity

## Handling confidential information

We handle confidential information, such as trade secrets, with utmost care and always seek to protect it from disclosure to any unauthorised persons. This includes the confidential information of our colleagues, customers, business partners as well as any information about our ultimate beneficial owners.



### How we protect confidential information:

- We use confidential information only for company purposes
- We store confidential information only on company-approved devices
- We share it with colleagues only on a need-to-know basis
- We never share it with anyone outside of Anthos, except in specific situations and only after having obtained permission from the Compliance Function

We take great pride in protecting and preserving the confidentiality of all information.

## What if?

**Q** Zubair is travelling for work but has forgotten his laptop's charger. When his battery dies, he decides to use the hotel's public computer to read his work emails and work on the end-of-year financials which are due that week. Is this alright?

**A** While Zubair can access his work emails, he should not be working on confidential documents on a public computer. While inconvenient, it is too risky to do so.

## Protecting personal data

As with any other company, we will come into possession of various kinds of personal information and data.

We take great pride in protecting and preserving the confidentiality of this information to maintain client trust and to comply with all applicable data privacy laws (such as GDPR in the EU).

Improper use of personal data is a violation of a person's privacy. The manner in which data are processed is therefore subject to strict conditions:

- We process personal data only for predefined purposes and when regulations allow us to do so
- We keep data only for as long as we need it and for the intended purpose(s) for which we collected it
- We ensure that only those with the right access can read, copy or edit the information
- If providing personal information to third parties, we ensure that all privacy rules are observed actions such as issuing licences or visas

## What if?

**Q** Joe sends an email to all the company's suppliers in the "To" field instead of in the "Bcc" field. When he realises his mistake, Joe sends another email apologising and asking all recipients to delete the previous one. Is that enough?

**A** That was the right thing to do, but not enough. The first email breached data privacy law. Joe must inform his manager and Compliance straight away, as the data privacy authority might need to be informed.

## What if?

**Q** Greta was emailing personal employee data to her colleague Marcus in HR when she realises she sent it to another Marcus who works at another company. Should she wait to get a response before deciding what to do about the mistake?

**A** No. Greta should report such a data breach immediately to her manager and the Compliance Function.

Invest forward,  
inspire change.

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