ATANA

Legacy Awaits

Code of Conduct

How we behave and do business responsibly

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Message from the Board

Atana is an independent, employee-owned company that integrates engineering, design, consultancy, software, and technology to deliver exceptional value to our clients.

Our Purpose, *To design a world that works for everyone in it*, reflects our responsibility to create a positive impact on the world. This begins with our behavior and how we conduct our business.

We recognize that our values are increasingly tested in today's fast-changing world. We face challenges such as disrespectful behavior in the workplace, unethical business practices, and operating in environments where human rights and anti-corruption standards are weak. Additionally, the digital landscape presents growing concerns regarding privacy, data security, and misinformation.

This Code of Conduct is designed to help us navigate these challenges. It outlines how we conduct our business globally, what we stand for, and what we expect from our business partners.

The Code establishes twelve ethical principles that define the standards of behavior required to ensure we act responsibly. While our values guide how we aspire to behave, we recognize that clear answers are not always available. Therefore, we encourage open discussions to address dilemmas and reach appropriate solutions.

We ask all employees and partners to read, understand, and embody the Code of Conduct. In cases of potential non-compliance, speaking up is always the right course of action.

Thank you,
Anke Mastenbroek
Chief Executive Officer

We take pride in being part of something bigger than ourselves – building not just infrastructure, but legacy.

Our Purpose

To design a world that works for everyone in it.

We care deeply about our people, our clients, and society at large. We take responsibility for having a positive impact on the world and we constantly challenge ourselves and others to develop sustainable solutions to local and global issues.

We feel the urgency and are committed to accelerating the measurable benefits we deliver. We act with integrity and transparency and hold ourselves to the highest standards of environmental and social governance.

We are diverse and inclusive. We will not compromise the safety or well-being of our team or communities – no matter the circumstances.

We actively collaborate with business partners and stakeholders in projects and initiatives, together. Our actions, big and small, will drive the positive change the world needs and will enhance society now and for the future.

Our Values

Our values are a clear articulation of who we are, what we stand for, and how we show up in the world.

1. Be more than a partner

- We make the time to understand your goals, objectives and workflows; to go beyond the brief.
- We are proactive and adaptable, guiding through complexity, change and new technologies.
- We prevent problems before they arise—you feel the difference when working with us.

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2. Feed curiosity and maintain optimism

- We believe in a happier, fairer, greener world—so we seek opportunities for growth and success.
- We never stop learning, choosing growth over comfort.
- We look beyond today to meet tomorrow's challenges boldly.

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3. Clarify the complex

- We act as an anchor for clients in a volatile world—digging deep and asking thoughtful questions.
- We go beyond the basics to deliver clarity, insight, and understanding.
- We improve processes even when it's difficult or inconvenient.

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4. Champion integrity

- We act in the best interests of individuals, communities, and projects.
- We reject corruption and keep our promises.
- We take a long-term view—never sacrificing lasting value for short-term wins.

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5. Demonstrate technical excellence

- We work with the best people and partners—excellence has a rhythm, and we keep pace.
- We don't stop at 'good enough'—we pursue thoughtful, precise results.
- We act with care, considering the lasting impact of our work.

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6. Make diversity-driven decisions

- We have the courage to do things differently.
- We value divergent views and create inclusive spaces for authenticity.
- We reject stereotypes and narrow perspectives.

Our Ethical Principles

How we must behave to do business responsibly and with integrity

Integrity is of utmost importance to us, and we comply with the following ethical principles and expect our business partners to do the same.

1. We behave appropriately and treat each other with respect

Respectful behaviour is essential in all our interactions.
While perceptions of appropriateness may vary depending on culture, context, or individual perspectives, inappropriate behaviour from colleagues or business partners will not be tolerated.

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2. We promote equality, diversity and inclusion

We are committed to providing an enriching and inclusive work environment where individual skills, strengths, and perspectives are valued and amplified. We do not tolerate discrimination based on gender, age, sexual orientation, religion, physical ability, or nationality.

We embrace diversity of thought and view it not as a goal, but as a means of achieving our objectives. We value all employees and are committed to continuously strengthening their sense of belonging.

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3. We speak up without fear of retaliation

We encourage employees, business partners, and anyone affected by our activities to raise concerns about unethical behavior, dilemmas, or complaints. Speaking up is always the right action.

All reports will be investigated in accordance with the procedures outlined in our Compliance Integrity Management System. Employees may report concerns to their line manager, Local Compliance Officer, or anonymously. via the SpeakUp whistleblowing tool: https://atana.speakup.report

Our anti-retaliation policy ensures that no one should fear reprisal for raising a concern in good faith. Individuals who report misconduct will not face dismissal, negative performance reviews, or any other adverse consequences. Whether allegations are substantiated or not, Atana guarantees that no individual will suffer retaliation for speaking up.

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4. We reject all forms of corruption, including bribery, fraud or money laundering.

Corruption amplifies inequality and undermines both society and our company. While legal and business environments may present challenges, we will always comply with our internal standards and policies. These prohibit any form of corruption or improper activity for corporate or personal gain. We do not offer, give, promise, accept, or solicit bribes, facilitation payments, or any other improper benefits.

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5. We never influence outcomes through gifts, hospitality or other benefits

Improperly offering or accepting benefits can create the perception of unfairness or even unlawful conduct. To prevent this, we have clear policies defining the conditions under which gifts, hospitality, or other benefits may be considered acceptable.

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6. We compete fairly and in compliance with the law

We support and promote fair competition in all markets where we operate. We strive to win projects on merit and always comply with competition laws. We do not engage in practices such as price fixing or other anti-competitive behaviour.

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7. We respect human rights and comply with labour and employment laws

We adhere to the International Bill of Human Rights, the Ten Principles of the UN Global Compact, and the UN Guiding Principles on Business and Human Rights. We uphold International Labour Organisation (ILO) standards and have zero tolerance for modern slavery, human trafficking, or any form of forced labour.

We affirm our commitment to children's rights and explicitly condemn child labour. In line with ILO Convention No. 182, we are committed to eliminating the worst forms of child labour. Employment age must comply with the ILO Minimum Age Convention (1973).

We actively promote fair working conditions, respect the right of association in line with prevailing laws, and safeguard the dignity and privacy of every individual. We do not tolerate inappropriate treatment of employees. We ensure fair wages and compliance with all relevant national minimum wage and working hours legislation.

Furthermore, we expect our clients, suppliers, and subcontractors to uphold Atana's policies and international human rights standards.

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8. We are committed to quality, health, safety and the environment

We deliver products and services that exceed client expectations and add lasting value to their businesses. We are committed to the highest standards of health and safety for our employees, clients, and partners. This commitment is embedded in our culture and implemented through policies, procedures, and continuous improvement practices.

We also lead in sustainability. We expect our employees and partners to share this commitment to protecting people and the planet. We comply with all applicable national and international requirements in the areas of quality, health, safety, and environmental management.

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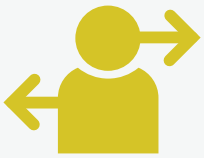
9. We avoid conflicts of interest



Our clients rely on us for independent and objective advice.
To maintain this trust, we avoid situations where personal or business interests could create an actual or perceived conflict of interest.

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10. We protect privacy and personal data

We handle project information, company records, employee details, financial information, and data entrusted to us by stakeholders responsibly and in compliance with applicable privacy legislation and our internal privacy policy.

We are committed to safeguarding this data and ensuring it is processed in accordance with the highest standards of integrity, confidentiality, and accountability.

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11. We uphold the highest standards of information security

As a knowledge-driven company, we recognise the importance of protecting our information systems to safeguard the interests of our clients, employees, and stakeholders. Our policies and procedures ensure the security of information resources and systems.
Every employee and business partner shares responsibility for keeping our systems secure and maintaining stakeholder trust.

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12. We respect and protect intellectual property and confidential information

We are committed to protecting our own confidential information and intellectual property, as well as that entrusted to us by employees, business partners, and other stakeholders. Misuse or unauthorised disclosure of such information is strictly prohibited.

Overview Of Our Ethical Principles

We conduct our business with integrity

1. We behave appropriately and treat each other with respect.
2. We promote equality, diversity, and inclusion.
3. We speak up and do not retaliate.
4. We do not accept any form of corruption such as bribery, fraud or money laundering.
5. We never influence a result by offering or accepting gifts, hospitality or other benefits.
6. We compete fairly and within the law.

We protect the interests of our stakeholders

7. We respect human rights and local labour and employment legislation.
8. We are committed to quality, health, safety and the environment.
9. We avoid conflicts of interest.
10. We follow privacy legislation.
11. We are committed to the highest standard of information security relevant for our industry.
12. We respect and protect intellectual property and confidential information.

How our 12 Ethical Principles are assured

To ensure compliance with this Code of Conduct, Atana has embedded a Compliance Integrity Management System supported by a dedicated Compliance Programme. The Board of Directors holds overall accountability for the integrity of the company, while the Local Compliance Officer is responsible for managing the Compliance Integrity Management System, which is certified against ISO 37001 (Anti-Bribery Management System) and ISO 37301 (Compliance Management System).

Furthermore, we are guided by:

OECD Guidelines for multinational enterprises.
ISO 26000 Guidance on Social Responsibility.
ISO 37001 (anti-bribery management system).
ISO 37301 (compliance management system).
International Labour Organization (ILO)standards.

ATANA

Legacy Awaits

Thank you