

JASPER **COLIN**

CODE OF CONDUCT

Ethics, Integrity & Professional Excellence

August 2025



Our Foundation

Purpose and Values

Message from Our Founder & CEO

Dear Colleagues,

When I started this company 18 years ago, I had one simple belief: if we stay curious, work hard, and treat people with honesty and respect, we can build something meaningful. Today, with more than 500 colleagues across North America, Europe, and Asia, that belief continues to guide everything we do.

As we've grown, our responsibilities have grown with us. The world around us is changing quickly, and our clients and communities expect us to operate with clarity, fairness, and accountability. Meeting those expectations is not just good business — it is who we are.

Our Ethics & Code of Conduct reflects the standards we choose to live by. It outlines the way we make decisions, the way we collaborate, and the way we show up for each other and for the people who trust us. It's not a document we read once — it's a commitment we uphold every day.

At Jasper Colin, integrity is not an aspiration; it's a practice. It shows in how we communicate, how we handle information, and how we own our actions. Each of us contributes to the culture we are building, and each of us has the power to strengthen the reputation we have worked so hard to earn.

Thank you for being part of this journey and for continuing to embody the values that make our organization strong. I am proud of what we have achieved — and even more excited about what we will build together.



Amit Choudhary

Message from Legal & Compliance Team

Dear Team,

In our industry, trust isn't just a value - it's the backbone of our reputation and the permission we earn to handle sensitive information every day. As a global market research organization operating across multiple regions and regulatory environments, we have a responsibility to uphold the highest standards of legal compliance, privacy protection, and ethical conduct.

Our Ethics & Code of Conduct is more than a set of rules. It is a reflection of who we are as professionals. It reminds us that integrity shows up in the decisions we make when no one is watching and in the consistency with which we treat our clients, respondents, partners, and one another.

Every day, we work with personal data - sometimes highly sensitive information. This requires unwavering commitment to GDPR principles, strict adherence to ESOMAR and industry guidelines, compliance with our ISO-certified processes, and diligence in safeguarding PII and PHI. These aren't just regulatory requirements; they are promises we make to the people who trust us with their information.

No policy or manual can address every scenario you may face, which is why judgment, transparency, and accountability matter just as much as procedure. If you ever find yourself unsure, pause and ask.

I am here — along with the entire Legal & Compliance team — to support you, guide you, and help ensure that we continue to earn the trust placed in us, every single day.

Introduction & Scope: The Code, Our Purpose, and Who Must Follow It

This Code of Conduct (the "Code") serves as the primary resource for upholding the ethical and legal standards required of every individual who represents Jasper Colin.

- **Our Purpose:** To build a meaningful company grounded in curiosity, hard work, honesty, and respect, and to deliver trusted insights that empower our clients.
- **The Role of the Code:** To provide guidance on ethical decision-making, reinforce our commitment to integrity, and protect the firm's reputation in the global marketplace.
- **Scope of Applicability (Who Must Follow It):** This Code applies to all Jasper Colin professionals—including partners, employees (full-time, part-time, temporary), and contractors (collectively, "We," "Our," or "Jasper Colin Professionals")—in every region and in all aspects of their work. We also expect our third parties (vendors, suppliers, and partners) to adhere to the standards outlined in our [Supplier Code of Conduct](#).



The 5 Principles of Professional Conduct

Build Trust in How We Do Business

We anchor our market research practice in the following principles:

- **Honesty** – Transparent communication and truthful representation of insights.
- **Objectivity** – Unbiased data collection, analysis and reporting.
- **Professional Competence & Due Care** –
 - Research conducted with rigor, accuracy and qualified expertise.
- **Confidentiality & Compliance** – Protection of client and respondent information in line with ESOMAR, GDPR, HIPAA, and all applicable privacy standards.
- **Collaboration** – Integrated teamwork across regions, functions and methodological specializations.
- **Respect** – Ethical engagement with clients, respondents and partners at every stage of research.

Trust is central to market research. It shapes the quality of data we collect, the insights we deliver, and the decisions our clients make. We uphold this trust through the following practices:

Honesty

We communicate transparently, ensuring our methodologies, sample structures and findings are presented clearly and truthfully. We never misrepresent data or outcomes.

Objectivity

Our work is grounded in neutrality. We minimise bias in study design, sampling, questioning and analytics so that clients receive insights that reflect reality- not assumptions.

Professional Competence & Due Care

We take on projects we are qualified to execute and apply disciplined research processes—from recruitment to quality checks—to deliver reliable, defensible insights backed by expertise.

Confidentiality & Compliance

We safeguard respondent and client information with strict data controls, adhering to ESOMAR ethics, GDPR principles, and HIPAA requirements wherever applicable.

Collaboration

Our global and cross-functional teams work together seamlessly to bring diverse perspectives, cultural understanding and specialized knowledge to every engagement.

Respect

We value every stakeholder- clients, respondents, vendors and colleagues. We uphold fairness, dignity and ethical practices across the research lifecycle, from recruitment to reporting.

Our Commitment to Each Other

(The Workplace)

We are committed to fostering a professional, supportive, and inclusive environment where every Jasper Colin Professional is treated with respect, dignity, and fairness. Our collaboration across global teams is fundamental to our success.

Culture of Respect and Non-Discrimination

- **Inclusion, Diversity, and Fair Treatment:** We value the diversity of our workforce—including differing backgrounds, cultures, and thoughts—as a competitive advantage. We select and promote our people based on their qualifications and merit.
- **Prohibition of Harassment, Bullying, and Discrimination:** We have a zero-tolerance policy for harassment, discrimination, intimidation, bullying, or disrespectful behavior of any kind. This applies regardless of an individual's race, ethnicity, color, age, sex, sexual orientation, gender identity or expression, disability, or any other characteristics protected by law.
 - This includes unwelcome advances, persistent demeaning through words or actions, or the display/distribution of offensive material.
- **Non-Retaliation:** We prohibit retaliation against any person who raises concerns or participates in an investigation in good faith. Retaliation is serious misconduct and will not be tolerated



Safe and Professional Working Environment

- **Health and Safety:** We take appropriate measures to protect the safety of our people and provide a safe working environment free of abusive, violent, threatening, or other disruptive behavior.
- **Substance Abuse:** We do not tolerate the use, possession, or distribution of illegal drugs, or reporting for work under the influence of drugs or alcohol.
- **Principle of Neutrality:** We uphold the principle of political, religious, and philosophical neutrality in the working environment with our teams, clients, and other stakeholders.
 - Professionals are prohibited from proselytizing or attempting to impose their religious, philosophical, or political beliefs on others in the working environment through their words, attire, or behavior.
 - While outer signs and symbols of a religious, philosophical, or political nature are allowed, they must be in accordance with this Code and not be offensive, discriminatory, or divisive.

Professionalism and Company Assets

- **Accuracy in Financial Records:** We demonstrate integrity by accurately recording our time and expenses as incurred. We will not reduce or inflate hours or submit false claims.
- **Learning and Development:** We commit to continuous professional growth by investing in our people's professional knowledge and skills.
- **Integrity in Training and Exams:** Acting with integrity means completing all training, assessments, and exams independently and without unauthorized or inappropriate assistance. We do not tolerate cheating in any form.
- **Use of Company Assets:** We respect and protect the information and physical and electronic assets we have access to, including protecting them from malicious threats and accidental loss.

Our Commitment to Clients and Society

Our dedication to integrity extends beyond our internal teams to define how we interact with clients, respondents, partners, competitors, and the global community.

Integrity in Client Service

- **Professional Standards and Competence:** We use due care to ensure our practitioners have the competence required for their assignments. We commit to high quality in our services and strive to deliver outcomes that create a measurable impact.
- **Objectivity and Independence:** We are objective in forming professional opinions and advice. We do not allow bias, conflict of interest, or inappropriate influence to override our professional judgments.
- **Conflicts of Interest and Sensitive Situations:** We proactively identify, evaluate, and address interests and relationships that create or might be perceived as creating, threats to our objectivity.
 - Conflicts of Interest include situations where personal or firm interests could impact our objectivity or where we are on opposite sides of the same matter.
 - Sensitive situations are those where competing client interests risk creating a serious commercial or reputational issue for Jasper Colin.



Anti-Corruption and Fair Competition

➤ Zero Tolerance for Bribery and Corruption:

We never engage in bribery or corrupt practices, whether directly or indirectly through third parties. We will not offer, accept, solicit, promise, or pay bribes, including facilitation payments.

- A bribe can be anything of value, not just cash, such as consulting fees, employment opportunities for family members of officials, or gifts.

➤ Gifts, Hospitality, and Entertainment:

We do not offer, accept, or solicit any gifts, entertainment, or hospitality that may be intended to improperly influence business decisions or impair objectivity.

- We will not accept for our personal benefit goods or services of more than nominal value from suppliers, potential suppliers, or other third parties.

➤ Fair Business Practices:

We respect our competitors and are committed to fair business practices. We will not enter into agreements to unlawfully restrict competition, set prices, or allocate clients or markets. We receive fees that reflect the value of the services provided.



Protecting Information and IP

- **Confidentiality and Data Protection:** We protect and safeguard all confidential and personal information entrusted to us, adhering strictly to applicable laws (like GDPR) and industry codes (like ESOMAR). Our duty of confidentiality continues even after our departure from the firm.
 - We prohibit the disclosure of confidential information unless granted permission or where there is a legal or professional right or duty to disclose.
- **Intellectual Property and Copyright:** We comply with copyright and intellectual property laws. We must obtain permission before circulating copyrighted material, and attribution is always required to avoid plagiarism.
- **Prohibition of Insider Trading:** "Insider trading" is expressly prohibited. We must never trade on or inappropriately disclose inside information (non-public information about a company) for personal advantage or for the benefit of third parties.
- **Responsible Use of AI Systems:** We recognize the potential of Artificial Intelligence Systems (AI Systems), including Generative AI, and commit to using them responsibly and impartially, ensuring transparency in their usage.

Our Role in the Community and Compliance

- **Social Responsibility:** We contribute to society and communities by engaging with organizations to make a positive impact. We support efforts to drive sustainable development and respect human rights standards. We work to reduce the environmental impacts of our business operations.
- **Compliance with Laws and Regulations:** We comply with all applicable laws and regulations, including those pertaining to:
 - Anti-money laundering and economic sanctions.
 - Labor and employment laws.
 - Our tax filings must be managed with accuracy and in good faith.
- **Learning and Development:** We commit to continuous professional growth by investing in our people's professional knowledge and skills.
- **Responsible Supply Chain:** We select suppliers through fair procurement processes and do not condone illegal or unethical behavior by our suppliers or contractors.

Accountability and Speaking Up

Our commitment to integrity is realized through our collective responsibility to identify, report, and address any conduct that is inconsistent with this Code, our values, or the law.

Ethical Decision-Making

No policy can cover every scenario. When faced with an ethical dilemma or a situation that "doesn't feel right", we encourage you to pause, consult, and use a simple decision framework, such as the following questions:

- **Recognize the Event:** Does the situation align with Jasper Colin's Purpose and Values? Am I being asked to do something that feels wrong or illegal?
- **External Impact:** Would the reputation of Jasper Colin be harmed if this action were revealed in the news media?
- **Consult and Test:** Would I be willing or embarrassed to tell my family, friends, or co-workers about this action?
- **Act:** Consult again if necessary, and act only when you are confident in your decision and always in good faith.



Reporting Misconduct

- **The Responsibility to Speak Up:** Speaking up is the foundation of our ethical culture. Every Jasper Colin Professional has a responsibility to express concerns and report situations that don't seem right, even if the concerns involve senior people.
- **Commitment to Non-Retaliation:** Retaliation against those who raise ethical concerns in good faith is not tolerated. Retaliation is serious misconduct, and any professional who takes retaliatory action will be held accountable.
- **Available Reporting Channels:** We want our people to choose a channel that is most comfortable for them. Concerns can be raised through:
 - Your Manager or Supervisor
 - Human Resources (HR)
 - Legal & Compliance Team (or Office of General Counsel – OGC)
 - Risk Management (RM)
 - The Jasper Colin Ethics Helpline: A secure, confidential reporting channel that allows for anonymous reporting where permitted by law.

Consequences and Accountability

- **Investigations:** All concerns raised will be handled with appropriate confidentiality. We are committed to conducting appropriate, timely, and objective investigations.
- **Accountability:** Anyone who violates this Code, local policies, or procedures will be held accountable. This includes those who direct or approve violations, or who have knowledge of them and do not promptly escalate them.
- **Disciplinary Action:** There can be serious consequences for non-compliance with the Code or related Jasper Colin policies, up to and including dismissal.