



# ***Code of Business Conduct and Ethics – Golden Five LLC***

## **Standards of Business Conduct and Ethics**

Our standards reflect our culture and values, and the principles that guide our behavior. Our employees use these standards to understand what is required of them, get help when needed, and make good decisions that build trust and empower our customers and partners to achieve more.

Our Standards of Business Conduct emphasizes the role that each of us plays in building trust, and the approach you should take in making decisions. When we apply these principles in our daily work, we can move forward with confidence in our ability to make good decisions that build trust and empower our customers and partners to achieve more. We achieve more when we apply our culture and values to build and preserve trust with our customers, governments, investors, partners, representatives, and each other.

## **Our Teams**

We continually talk to our teams about ethics and integrity, and we are clear that we expect work to be done ethically. We lead by example, by modeling ethical decision-making. We ensure our teams know that for results to matter, they must be achieved the right way. We make sure our teams know we will listen, even if they have something difficult to say.

Part of building a culture of trust is learning to speak up when something's not right, so that we can address the problem.

Raising a concern should be as easy as possible. That's why there are a variety of ways to tell us when something's wrong. Reports can be made anonymously through mail or email, always with the right of staying anonymous. They can be made to a team member, team leader, CTO or CEO, any level that any person feels comfortable to report to. The concerns will be taken to the CEO and/or CTO to review and action if required. We will always respond respectfully and take every concern seriously, even if people disagree. We are committed to solving the problem. We will always take steps to protect the person's confidentiality, avoid discussing the conversation with others on our team.

## **Never Make Improper Payments**

We are truthful and transparent in our interactions with customers, and do not influence their decisions through improper payments. Corruption harms our customers in many ways, including sometimes causing them to pay more than they should. Winning and preserving customers' trust every day is more important than any benefit we might get from doing business improperly.

## **Compete Fairly**

The way we compete is as important as the result we achieve. Healthy competition and fair business practices put our customers first by giving them access to a variety of products and services at fair prices. Competing fairly ensures that we meet our business objectives with our integrity intact.

## **Respect Laws Around the World**

We operate around the globe and respect the laws wherever we do business. This helps us to build trust with governments, strengthen the communities where we live and work, and contribute to a fair society where we enjoy the protection of these same laws.

## **Choose Suppliers with Integrity**

We rely on our supplier relationships for our success. To achieve our mission, we need suppliers that are as committed as we are to building trust with our customers, that will do great work, and that will follow the law.



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## **Upholding These Standards Employees' Responsibilities**

We expect all our employees to uphold these Standards, Our Policies, and the Law. They must read, understand, and comply with these Standards, and the policies, laws, and regulations that apply to their job. They are responsible to speak up when you see possible violations of the Standards, policies, and legal and regulatory requirements. They must be truthful, and cooperate fully in any internal investigations. They must never conceal or destroy information. Understanding and committing to comply with our Standards. Failing to read or attest to the Standards does not excuse you from these responsibilities. The Board of Directors and management is responsible for overseeing the Ethics and Compliance documents and compliance with these Standards.

Applicability the standards apply to all "employees," which means its Board of Directors, and all employees, directors and executive officers. These Standards are important to us. Violation of these Standards may result in disciplinary action, up to and including termination of employment. Only the Board of Directors may waive a provision of the Standards for a director or executive officer. Any waiver that is granted to a director or executive officer will be publicly disclosed.

## **Prevention**

To prevent compliance issues from arising in the first place, we focus on promoting a culture of ethics and integrity. We do this through creating a culture of compliance throughout our company, and through our Standards of Business Conduct, policies, and training.

## **Privacy**

We respect our customers privacy and keep all data confidential, protected and encrypted. We also take reasonable steps to prevent its access by unauthorized persons.

## **Detection**

We detect potential compliance issues in several ways, including monitoring through our team members and investigating concerns reported by employees and others. Compliance is a team effort, every employee is responsible for upholding our standards, fostering the culture of compliance in their team and partners, and reporting concerns.

## **Remediation**

We assess the root cause of problems, and continually enhance our controls and processes to minimize the risk of recurrence. We discipline employees who violate our policies and standards, regardless of their level, and we stop doing business with partners and suppliers who don't meet our ethical standards.

## **Contact**

Code of Business Conduct and Ethics Contact: You can mail or email us at the below addresses

Address:

Golden Five LLC  
Kind Attention: COBC Department  
1379 West Park Western Drive, Suite 572  
San Pedro, CA, USA 90732

Or

Email: **COBC@GoldenFive.net**



# **Code of Business Conduct and Ethics – Golden Five LLC**

**Ethics Agreement** - Every Employee of Golden Five LLC signs the following “Ethics” agreement.

## **Purpose**

To communicate the integrity, objectivity, confidentiality, trust, and professionalism expected of Golden Five Employees, as well as, to provide a means for Golden Five Employees to pledge their commitment to these principles.

## **Clients**

1. I will serve my clients with integrity, competence, and objectivity; And, I will use a professional approach at all times, placing the client’s best interests above all others. Our Standards of Business Conduct build trust.
2. I will treat client information that is not public knowledge as confidential and take reasonable steps to prevent its access by unauthorized persons.
3. I will keep the client informed of the project status and not knowingly misrepresent the facts; And, I will share this information even if it is unfavorable and may jeopardize the assignment.

## **Engagements**

4. I will only accept assignments for which I am qualified by my competence and experience; And, I will only assign staff or engage colleagues with the requisite knowledge and expertise.
5. I will ensure the objectives, scope, work plan, and fee arrangements have been established and agreed to by the client before accepting an assignment.
6. I will avoid conflicts of interest and disclose any situations that may influence my objectivity; And, I will offer to withdraw from an assignment if my objectivity should become impaired.

## **Fees**

7. I will agree in advance with a client on the basis for my fees and expenses; And, I will charge fees and expenses that are reasonable, legitimate, and commensurate with the responsibilities accepted and the services delivered.
8. I will disclose to clients any fees or commissions that I may receive for recommended goods or services, as well as, any financial interests in those goods or services.

## **Profession**

9. I will respect the intellectual property rights of my clients and other Golden Five Employees; And, I will not take advantage of proprietary or privileged information, either for use by myself or others, without permission.
10. I will not advertise or promote my consulting services in a deceptive manner; And, I will not misrepresent or denigrate other Golden Five Employees or consulting firms.
11. I will use properly licensed software on my computer and distribute documents that comply with copyright laws; And, I will not knowingly participate in activities that are in violation of legal statutes or regulations.

I agree to adhere to this Code of Ethics and pledge my commitment to uphold its principles.

Signature: \_\_\_\_\_ Name: \_\_\_\_\_ Date: \_\_\_\_\_

Although this Code of Ethics addresses specific areas, its fundamental spirit can be expressed very simply: “If the client knew what I did, and why I did it, would I still take the same action?”