



Code of Conduct

KWF Consulting | KWF Editorial

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www.kwco.com

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Introduction

This document codifies KWF's fundamental values of integrity, ingenuity, and impartiality.

Our relationships are built on open communication, our services delivered at peak performance, and our counsel offered with objectivity and originality. Honesty and fairness also underpin our interactions with colleagues, and other firms including our vendors and competitors.

We forthrightly represent our capabilities, hold client information in the strictest confidence, and avoid conflicts. Our clients always come first. Diplomacy and flexibility are integral to our achievements. We are not hierarchical but rather inclusive. KWF adapts to the market, our clients, and each other.

Promoting a healthy work-life balance is a founding principle at KWF. Employees work full time or part time, and most have flexible schedules. Since founding KWF in 2000, our organization of now 100 employees is 100% virtual—everyone works from their home offices, across more than 20 states.

KWF's code of conduct frames everything we do every day. The following sections are comprised of the formal policies we have in place to provide us with guidance for handling specific situations.

Policies

The purpose of establishing clear policies is to prevent unethical behavior and conflicts of interest, or the perceptions thereof, and to protect our reputation for conducting business with integrity.

A message from our Managing Director

At KWF, we are dedicated to serving our clients and all others according to the highest standards of ethical conduct. Our Code of Conduct reflects the company culture we have developed over the past two decades and serves to guide KWF's unwavering commitment to professional excellence delivered continuously with adherence to the utmost levels of morality and integrity.

To uphold our hard-earned reputation, we must place client interests ahead of the company's, preserve client confidences, and maintain an independent perspective. Our ongoing success depends on each of us observing these principles, uncompromisingly doing what is right, and earning the trust of our clients and colleagues every day in every way.

This Code of Conduct applies to all KWF personnel and governs all aspects of our business practices and relationships. In our work, we will inevitably encounter situations in which ethical choices must be made. Consultation with your manager or our Compliance Officer is expected if there is any question about what to do, as is speaking up (without fear of retribution) if we come upon anything that is incompatible with our professional values.

Please let me or Jennifer Rowley, KWF Compliance Officer, know if you have any questions or suggestions.

Sincerely,

Cara

Cara S Rivera
Managing Director

We are committed to a supportive work environment, where employees have the opportunity to reach their fullest potential. Employees are expected to do their utmost to create a workplace culture that is free of harassment, intimidation, bias, and unlawful discrimination.

Please read the Employee Handbook. The Handbook covers in greater detail how we should conduct ourselves at work.

Gifts | entertainment | hospitality

KWF never gives gifts, entertainment, or anything of value in exchange for business or personal gain.

We do not accept gifts, entertainment, or anything of value from current or potential vendors, suppliers, customers, employees, or any other individual or organization, with the following exceptions:

- Items of nominal value (eg, t-shirts, pens, bags) offered to all event attendees.
- Food and beverages offered to employees during client-hosted meetings, and food, beverages, and entertainment offered to attendees of industry events.
- Reasonable holiday gifts of food to be shared by employees, and reasonable flowers or food given to an employee to express congratulations, well wishes, or sympathy.
- Appropriate gifts from countries where such gift giving is customary (such gifts should be declared to the Compliance Director to further assess the circumstances).

Bribery | corruption | fraud

We do not engage in any form of bribery or corruption, whether it be directly, passively, or through a third party such as an agent or distributor.

KWF does not bribe public officials and does not accept bribes in any manner. We do not accept and will not make any form of facilitation payments. Kickbacks are not allowed or accepted. No political contributions will be made by the company, and our charitable contributions are never used to facilitate or conceal acts of bribery.

KWF keeps accurate business records, does not mischaracterize or mislabel transactions in its books and records; and ensures that timesheets, travel and expense reports, financial statements, customer billing, and other records are truthful and accurate.

We comply with the laws and regulations in every country in which we conduct business.

Conflicts | perceived conflicts

In keeping with our wholehearted commitment to the success of each and every client, we take all necessary steps to preserve our impartiality.

KWF is a relatively large firm operating in a relatively small industry, and we perform a wide variety of services for our clients. We take the following precautions and make the following disclosures on the occasions when we identify a potential conflict of interest or perceive that a conflict of interest may arise:

- All staff sign non-disclosure agreements and maintain the confidentiality of client information obtained in the course of providing services.
- Before KWF agrees to work concurrently with competitor clients on similar projects, it obtains the consent of both parties. If both consent, the representations proceed. The same manager will not be responsible for, or assigned to, both projects. Where possible, the managers of the two projects will be from different business units.
- Prior to signing our service agreement, RFP clients are advised that we have worked, and sometimes still work, with several publishers and some service providers. KWF has established separate business units, staffed and managed separately, so that no one working with a client to evaluate a prospective publisher or service provider also manages the publisher or service provider relationship.
- Clients will ask us to handle an employee recruiting assignment on occasion. We do not approach an individual working for a client for the purpose of inquiring whether he or she is interested in the open position with another client, but we do announce the opening to the publishing community in an effort to elicit nominations of interested individuals.
- Although confidentiality prohibits the disclosure of the type of project on which we are working with a client, all client names and hyperlinks are available at www.kwfco.com.
- Employees are not permitted to work privately or for a different organization in a manner that interferes with the company's business.
- No one is allowed to have influence over the hiring, employment, or appraisal of any individual with whom they have an intimate personal relationship.



Compliance contact

For your questions or to report any concerns regarding KWF conduct, please contact the KWF Compliance Director:

Jennifer (Jenny) Rowley
Compliance Director/Operations Director
617 671 5079
jennifer.rowley@kwfco.com

No Retaliation

No one should be concerned about any form of retribution for reporting a potential violation of this Code. KWF welcomes your comments and concerns at any time, as we are completely committed to conducting ourselves according to the highest standards of ethical conduct.