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9. **INTRODUCTION**

Qix Sia (hereinafter referred to as "Qix" or the "Company") is an international digital platform-based fintech company issuing its cross border digital currency.

 Qix introduces a revolution in the digital payments, being the first social community which allows its customers to monetize their profile and data by customized gamified solutions.

 The Company is part of a major growth industry and operates in a context that involves international customers and business partners.

The present code (hereinafter referred to as “Code of Ethics”) expresses the set of values, principles and rules that the Company should comply with in the conduct of its affairs.

The principles and the dispositions of the Code of Ethics are binding on the employees, including the members of the management bodies of the Company and on third parties who enter into relationships with the Company (partners, distributors, suppliers).

1. **RULES OF CONDUCT**

**2.1 Compliance with the law**

We are committed to operate in full compliance with laws and regulations effective in all the countries where we carry out our activity.

**2.2 Electronic Money Association membership**

Qix is full accepted member of the Electronic Money Association (hereinafter the “EMA”), the trade body for electronic money issuers and innovative payment service providers.

This is a guarantee of competitiveness and compliance with laws, regulation and good practices for electronic payment undertakings.

The EMA, in fact, is involved in the negotiation of a number of payment-related European Directives, regulations and implementing legislation and develop industry good practice in areas of compliance and customer service.

**2.3 Values of Qix**

Qix, in carrying out its business activity, is constantly inspired by some core values:

- TRUST: we act with integrity and respect, encouraging fairness and openness

- SIMPLE INFORMATION: we provide our customers with clear and simple information about Qix products and services, including fee and other charges

- AGILITY: we act with a sense of urgency and our products are fast and easily accessible

- SECURITY: our customers can rely on our ability to protect the value of their money

- INNOVATION: innovation is the key characteristic of Qix, that aims to revolutionize digital payments world.

**3. OBLIGATIONS TO EMPLOYEES**

**3.1 Diversity and equal employment opportunities**

Qix promotes diversity among its employees, considering it as an essential value to creativity and business growth.

The Company is committed to ensure equal employment opportunities.

Every decision concerning employees, including hiring, recruiting, training, evaluation and advancement, is based uniquely on the ability to perform their job, without regard to age, race, color, gender, national origin, religion, sexual orientation, marital status, condition of pregnancy, genetic information, disability or any other legally protected characteristics.

Qix rejects any form of irregular work and exploitation as well as any kind of forced labour and child labour.

**3.2 Workplace free from harassment**

We attempt to create a work environment free of discrimination and harassment.

Harassment is an offensive conduct - whether in person or by other means - that interferes with an employee's ability to work and can involve sexual conducts or references to personal characteristics.

Racial offenses, off-color jokes and sexual advances should be avoided between members of the same sex or the opposite sex, between employees and third parties, in the office or at off-site work-related events.

**3.2 Safe and healthy workplace**

Qix ensures a healthy, safe and secure workplace.

Meeting this commitment is the responsibility of each Qix employees, who are expected to follow Company safety and security procedures.

Employees also are responsible for working safely to avoid risk to themselves and others, identifying and reporting unsafe working conditions or breaches of security.

**4. OBLIGATIONS TO THE COMPANY**

**4.1 Conflict of interest**

We should all act in the best interest of Qix and make every effort to avoid our personal interest to conflict, or appear to conflict, with our Company's interests.

A conflict of interest may occur when our outside activity or personal interest conflict or appear to conflict with our responsibility in the Company or when we use our position in the Company in a way that may create a conflict between our personal interest and the interest of Qix.

A conflict of interest arises when we or our family members or other close persons could receive personal gains as a consequence of our position in the Company, as well as when one of our relatives is hired due to our influence in the Company.

It is possible to hold positions outside Qix as long as this position does not interfere with our ability to perform our job for the Company.

 Consequently we must avoid employment or business relationships with business partner or competitor of Qix. We also must abstain from any outside business relationship or investment that might influence decision we make on Qix's behalf.

**4.2 Transparency in books and financial records**

It is an essential Qix responsibility, and all Qix employees, to ensure that our accounts and financial records are always complete, accurate, timely and comprehensible.

No Company document should be never falsified, backdated or improperly altered and all transactions should be lawful, recorded in the proper account and in accordance with Company internal controls.

It’s also our responsibility to make open and full disclosure to outside accountants in connection with any audit or review of the Company’s financial statements.

**4.3 Protection of Company assets and confidential information**

Qix tangible and intangible assets should be protected from damage and misuse and must be used only for ethical and legal purposes that benefits Qix and its shareholders.

We are provided with access to Company systems and electronic facilities in order to realize our business objectives. In turn it’s our duty to protect these systems and facilities by using them only for business purposes and not for personal activities that interfere with the operation of the network or that generate costs to Qix.

Business-related information shall be treated as confidential and can be disclosed only if specifically authorized.

Particular attention must be given to Qix’s intellectual property, that represents meaningful investments that are critical to our Company’s success. Therefore information concerning Qix’s intellectual property should never be disclosed to anyone who does not have a business reason to have such information.

Before disclose such information, when authorized, we must use a non-disclosure agreement or other confidentiality provision approved by the Company.

The obligation to preserve Qix’s intellectual property continues even after the termination of the employment relationship with the Company.

**4.4 Insider trading**

Inside information is specific confidential information that, if made public, could significantly impact Qix’s or another company’s stock price.

This information may include financial announcements, management changes, new products launches, significant customer or client relationships, anticipated mergers, acquisitions or divestitures.

This type of inside knowledge cannot be used to obtain financial advantage when buying or selling stocks and cannot be communicated to someone who may trade on it.

When in possession of this information employee must refrain from disclosing it, except to colleagues or third parties who have a valid business reason to receive it.

We should not “tip” others (family members, friends or anyone else) by giving them such information so they can trade in stock, either for themselves or on our behalf.

**4.5 Bribery and corruption**

At Qix any form or corruption, including bribery and extortion, is not tolerated.

Employees must abstain from offering or accepting undue payments, gifts, entertainment or other benefits.

It is always forbidden to promise, give or receive gifts in the form of cash or equivalent payment methods or any other kind of negotiable securities.

The prohibitions apply to any payments made to or at the request of any third party, but especially government officials, which are of particular concern due to the existence of specific anti-corruption laws in the countries in which we operate.

**4.6 Anti money-laundering and terroristic financing**

The Company is committed to the international fight against money laundering and the financing of terrorism, opposing any conduct that could be considered as supportive of these crimes.

Qix is aware of the proposals to amend the European Anti – Money Laundering Directive to include digital currencies and is following closely the legislative evolution, even through the Electronic Money Association’s work.

**5. OBLIGATIONS TO CUSTOMERS**

**5.1 Protection of customers privacy**

Protection of all personal information entrusted to Qix by its consumers is one of our most essential commitment.

Personal data are collected, processed and shared in accordance with European and local law.

The Qix privacy policy sets forth how the Company collects, uses and protects consumers personal data and is available on the Company website and in the Qix application.

Privacy options and preferences stated by the owner of any personal information should always be respected.

We do not share customers information with third parties unless previously communicated to data subjects and unless there is a business reason to do so.

Data protection depends not only on the compliance with the law but also on the effective security of information systems.

Our network and IT systems are structured in a way that ensures a high level of protection of consumers personal data.

**5.2 Security of money transactions and cash reserves**

Qix has the primary obligation to safeguard the value of the digital currency used by the customers in the Qix platform.

The Company holds 100% secure deposits and the value of the Qix digital currency is linked to regulated fiat currencies.

All the rules concerning cash security are governed by an internal Policy adopted by Qix.

Qix, pursuing the obligation of transparency towards its customers, has made available information concerning the security of its digital currency on the Company website.

**5.3 Advertising and marketing**

Every advertising message and marketing materials must be accurate, objective and in compliance with laws governing misleading and comparative advertising.

Advertising and marketing using social media should be also compliant with such laws and with our Social Media Policy.

**6. OBLIGATIONS TO PARTNERS AND OTHER BUSINESSES**

**6.1 Fair competition**

Competition must be based on fair commercial practices.

We should act honestly in the dealings with Qix business partners, avoiding conducts aimed at restricting free and fair competition.

It is forbidden to discredit competitors or their products or services or to manipulate or present a distorted view of reality in order to obtain illicit gains.

It should be avoided even the appearance of agreeing with a competitor to limit competition, so we must avoid speaking with competitors about, for instance, agreements to divide markets or territories, pricing policies, marketing or strategic plans, boycotting competitors, suppliers or customers.

**6.2 Intellectual property of others**

Qix must safeguard the confidentiality of trade secrets – ours and those of our business partners.

The Company respect the trademarks, copyrights and patents of others, avoiding to infringe their intellectual property rights.

In particular employees should be careful to always obtain permission to reproduce or distribute copyrighted material.

**6.5 Supplier selection**

The Company is committed to select suppliers after accurate due diligence and exclusively on the basis of principles of fair competition and on the quality of the products and services offered.

The quality of products and services should be assessed against ethical criteria regarding labour and human rights.

In the relations with suppliers Qix employee are required to act fairly, transparently and straightforwardly and to avoid situation of conflict of interest.

**7. RELATIONSHIPS WITH MEDIA**

Relationships with the press, media, and more in general, the external subjects, must be maintained only by specifically designated functions.

External communication must follow the principle of truth, honesty, transparency, prudence and must be aimed at fostering the knowledge of Company policy, programs and projects.

Qix employees are requested to abstain from publicly commenting on rumors about the Company, if not confirmed by official sources.

Particular attention should be given in posting information on social networks, which involve spreading data to a wide audience of people. For more information about this issue the Social Media Policy should be consulted.

**8. VIOLATIONS AND SANCTIONS**

Conducts undertaken by Qix employees in violation of single behavioural rules deduced from the present Code of Ethics are considered disciplinary offences and may result in disciplinary actions up to and including termination of employment.

Any course of conduct undertaken within contractual relation by co-workers, consultants, partners, counterparts or other extra-company entities, which is in contrast with conduct guidelines set out in the present Code of Ethics may lead, through appropriate clauses application, to resolution of the contractual relation.