



## Code of Conduct

At the Implico Group we pride ourselves on maintaining a culture of integrity, respect, and ethical behavior. Our Code of Conduct outlines the fundamental principles that guide our employees, management, and partners in upholding the highest standards of conduct and complying with all applicable laws and regulations. This code serves as a foundation for our relationships with customers, suppliers, stakeholders, and each other. By adhering to this code, we reinforce our commitment to excellence and the core values that define our organization.

If anyone becomes aware of any potential violations of this Code of Conduct, they are encouraged to report them to their supervisor, Human Resources, or through our anonymous Whistleblower Hotline. Retaliation against individuals reporting in good faith is strictly prohibited.



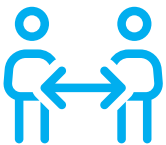
## Compliance with Laws and Regulations:

All employees and representatives of the Implico Group must comply with local, national, and international laws, regulations, and standards applicable to our business operations. Any potential violations must be promptly reported to the appropriate authority within the Group. Without any exception, the Implico Group will sanction any violation against legal provisions.



## Ethical Behavior:

Integrity lies at the heart of our business practices. We expect our employees and partners to conduct themselves honestly, ethically, and transparently in all business dealings. This includes avoiding conflicts of interest and acting in the best interests of the company and its stakeholders.



## Respectful Work Environment:

We are committed to providing a work environment that fosters respect, diversity, and inclusion. Discrimination, harassment, or any form of disrespectful behavior will not be tolerated. We promote a culture of fairness, equality, and open communication.



## Confidentiality and Privacy:

Employees and representatives are contractually obliged to and must protect confidential information, trade secrets, and customer data entrusted to them during their tenure at the Implico Group. Unauthorized disclosure or use of such information is strictly prohibited.



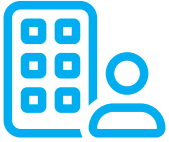
## Health, Safety, and Environment:

We prioritize the health and safety of our employees and the communities in which we operate. We are committed to conducting our business in an environmentally responsible manner, complying with all applicable health, safety, and environmental regulations.



## Anti-Corruption and Anti-Bribery:

Benefits in the form of invitations or gifts are only permissible or may only be accepted or granted if they serve a legitimate business purpose and do not constitute consideration for an unlawful advantage. An inappropriately high value or exceeding the limit of customary business practice of a benefit is prohibited. We maintain a zero-tolerance policy for bribery, corruption, or any unethical practices. Employees and representatives must not offer or accept bribes, kickbacks, or any form of improper advantage.



## Conflicts of Interest:

All employees must avoid situations that could create conflicts of interest between their personal interests and those of the company. Any potential conflicts must be disclosed promptly to the appropriate management.



## Human Rights Commitment:

At the Implico Group, we are steadfast in our commitment to upholding and respecting human rights as recognized by international laws and standards and beyond that. We believe that every individual deserves to be treated with dignity and fairness, and we are dedicated to ensuring that our business practices do not infringe upon or contribute to human rights abuses. We are committed to providing an inclusive and diverse workplace, free from discrimination based on race, color, religion, sex, gender identity, sexual orientation, national origin, age, disability, or any other protected characteristic. We promote a work environment that values the unique contributions of every employee and encourages mutual respect and understanding. We strictly prohibit the use of forced, bonded, or involuntary labor in any part of our operations, including our supply chain. Similarly, we do not employ or support child labor in any form.



## Gender Equality:

At the Implico Group, we are dedicated to fostering a workplace that embraces gender equality, diversity, and inclusion. We recognize that gender equality is not only a fundamental human right but also an essential driver of business success. Our commitment to gender equality extends to all aspects of our operations, from recruitment and promotions to training and development opportunities. We provide equal employment opportunities to all individuals, regardless of gender, and ensure that hiring decisions are made solely based on qualifications, skills, and experience. We are committed to creating an inclusive workplace that empowers employees of all genders to thrive and advance their careers. We have zero tolerance for any form of gender-based discrimination, harassment, or bullying. This includes but is not limited to inappropriate comments, unwanted advances, or offensive behavior based on gender.



## Protection of Company Assets:

We deal responsibly with company assets of all kinds, and this applies in particular to our greatest asset: our Intellectual Property. But also with products, working materials or IT equipment, for example. Employees and representatives are responsible for safeguarding company assets and using them solely for legitimate business purposes.



## **Fair Competition:**

We promote fair competition and comply with all antitrust and competition laws. Unfair business practices, including price-fixing, bid rigging, and market allocation, are strictly prohibited.



## **Supply Chain Responsibility:**

We expect our suppliers and partners to adhere to similar ethical principles and conduct their business with integrity.



## **Consequences of Non-Compliance:**

Violations of this Code of Conduct may result in disciplinary action, up to and including termination of employment or termination of business relationships, as appropriate.

## **Conclusion:**

This Code of Conduct reflects the commitment of the Implico Group to ethical business practices and guides us in building a responsible, respectful, and sustainable organization. Every employee, contractor, and partner is responsible for upholding these principles and fostering a positive work environment. By adhering to this code, we strengthen the foundation of trust upon which our success is built.