

A large, stylized green circular graphic on the left side of the page, composed of several overlapping rings in different shades of green, creating a sense of depth and movement.

Code of Conduct.

Expereo contact:

Legal department

Email: legal@expereo.com



1 CODE OF CONDUCT

Expereo is committed to acting with honesty and integrity, in accordance with high ethical and legal standards in all business dealings.

This Code of Conduct (the “**Code of Conduct**”) lays out the minimum principles on which Expereo conducts its business activities.

This Code of Conduct applies to all directors, shareholders, officers, and employees of Expereo (hereinafter together “**Expereo employees**”).

In addition to Expereo employees, we expect our contractors, consultants, agents, vendors, suppliers, customers and other third-party business partners, including their directors, officers, employees, agents and subcontractors, (hereinafter together “**Expereo Suppliers and Customers**”) to abide by similar principles as those set out in this Code of Conduct in their business activities.

Legal Compliance

All laws, rules, and regulations applicable to Expereo’s operations and business activities shall be adhered to at all times.

Employment

Expereo is committed to respect human rights and to treat its employees, suppliers, customers, and any other business partners with dignity and respect.

Fair employment practices

Expereo is seeking a workplace that is characterized by openness, respect, and trust.

Expereo follows labor laws, respects workplace rights, and promotes good working conditions for all employees. Expereo does not make use of child or forced labor.

Discrimination, sexual harassment, or other intimidation, aggressiveness, violence, and bullying are unacceptable behavior and will not be tolerated by Expereo.

Expereo strives to attract employees from different backgrounds and does not discriminate based on race, color, age, gender, gender identity or expression, sexual orientation, language, religion, political or other opinions, disability, national or social origin, or birth.



Personal data

Expereo respects the privacy of Expereo Employees (if applicable) and processes personal data of individuals only where there is a legitimate business purpose and in accordance with applicable privacy legislation.

Expereo respects that personal information may be protected by privacy legislation, which Expereo takes into consideration and complies with. The information Expereo holds and processes concerning Expereo employees will be used for management and administrative use and to pursue its legitimate business interests unless otherwise agreed on an individual basis.

Health, Safety, and Environment

Working conditions

Expereo follows the relevant employment law regulations to ensure a healthy, safe, and productive work environment.

Expereo is working to take effective measures to prevent the risk of workplace accidents and has established clear rules and procedures for safety and health at the workplace.

Expereo respects workplace rights and promotes good working conditions to its employees.

Environment

Expereo complies with applicable environmental regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained and their operational and reporting requirements followed. Expereo tries to act wisely in its energy use and tries to ensure sustainable sourcing practices in all aspects of our activities starting from the office supplies.





Fair Business Practices

Conflict of Interest

A conflict of interest arises when personal interests affect the ability to act or make decisions in the best interest of Expereo. Expereo avoids situations in which a conflict of interest, or the appearance of a conflict of interest, could arise between the interests of Expereo and a possible personal interest.

Gifts and Hospitality

Gifts and entertainment, including travel, conferences, events, services, benefits, and other valuables, are often accepted or given as a gesture of goodwill to consolidate and foster valuable business relationships. However, Expereo does not offer or accept gifts or hospitality that may influence business decisions or create dependency.

Charitable donations and political contributions

Expereo is neutral toward political parties and political candidates and follows the relevant international treaties and national legislation on lobbying. Expereo does not provide support to political parties, either in the form of direct financial support or in the form of paid time.

Competition

Expereo values free and fair competition and therefore complies with competition laws in all jurisdictions where Expereo operates.

Integrity, bribery

Expereo conducts its business with integrity and honesty without engaging in corrupt practices such as extortion or acts of active or passive bribery. Expereo will not, whether directly or indirectly, offer, promise or give anyone a financial or other advantage with the intention of inducing the recipient to perform a function or activity improperly or securing an improper advantage of any kind for Expereo.

Expereo does not engage in the practice of facilitation payments to speed up or secure the performance of routine government action.

Transparency

Financial records

Expereo records all financial, administrative, operational, and commercial information accurately, completely, consistently, and makes sure that its records include no false, artificial, or misleading content. Expereo keeps records of transactions in a transparent, accurate, complete manner.



Security

Expereo requires Expereo employees to keep safe, maintain the proper condition, and protect against any unauthorized use of all Expereo equipment and property they may use during their business with Expereo.

Confidential Data, Communications

Communications

Expereo's company name and logo are important assets for the company's identity. Inquiries from the media or other parties related to business activities, results, plans, or public policy positions should always be referred to Expereo's spokesperson or department in charge of public relations.

Communication with external parties on behalf of Expereo, no matter through what media, should be done in a proper and respectful manner. Personal reviews or comments on facts, partners, or other circumstances relating to Expereo are directly improper and are not permitted.

Expereo Suppliers and Customers shall not publish any communication about their business relations with Expereo without Expereo's prior written consent.

Confidential information

Expereo uses and protects confidential information in a professional manner and treats all confidential information disclosed to Expereo with the same level of care.

All Expereo employees shall maintain the confidentiality of all confidential information they receive or obtain access to in their capacity as Expereo employees or Expereo Suppliers and Customers.

Confidential information includes, among other things, any non-public information concerning Expereo, its operation, employees, financial condition or performance, prospects, and its intellectual property ("IP"). IP is information owned by Expereo, including copyrights, patents, trademarks, trade secrets, design rights, logos, and similar intellectual property rights. Expereo safeguards its IP against improper disclosure and/or unauthorized use.

Whistle blowing

Expereo fosters a culture of integrity in which serious wrongdoings at work are prevented and measures are taken necessary to reduce the risk on incidents. In order for employees to speak out and disclose serious wrong doing by Expereo, it is important that Expereo employees are aware of their rights and possibilities.



Reporting Code of Conduct Violations

Seeking guidance

Ask questions before undertaking any action that may violate any applicable law, rule, regulation, Expereo's policies or other provision of the Code of Conduct. Employees should contact Expereo's Legal Department at legal@expereo.com with any concerns.

Reporting Concerns

Expereo encourages everyone to speak up when they suspect violations of the Code of Conduct or other procedures or regulations. Reporting can be done via whistleblow@expereo.com.

General

Conclusion

Expereo seeks to employ people and do business with companies who believe that honest and ethical behavior is not only good business, but also the right thing to do. We expect our customers and suppliers to cooperate with our reasonable request for information, certifications, and/or audit access. When there is a concern, our practice is to work with our business partners. We may be able to identify possible improvements. However, when an issue cannot be corrected or a business partner is unwilling to engage, we reserve our right to end our relationship.