XMLdation Code of Conduct

Communicated to all employees and contractors annually.

Purpose and Scope

Our Code of Conduct policy outlines expectations regarding behavior towards colleagues, customers and the environment. Our company goal is to conduct business in a way that respects human rights law, ensures a healthy and safe environment, encourages environmentally friendly solutions and follows ethical business practices. We promote open communication and aim to foster a well-organized, respectful and collaborative environment. We aim to work with suppliers that have similar values.

The policy applies to all employees. The term employee in this document refers to employees and contractors.

Customer Service

The Company goal is to provide great customer service. We expect employees to be responsive as well as well-organized, respectful and collaborative.

Customer Complaints Handling

Customers can communicate complaints:

- through Company support email or ticketing system;
- to their primary contact point or relationship manager.

Complaints are handled in the first instance by the relationship manager at the Company. We expect employees to communicate all complaints to the Company Management team.

Customers can also escalate complaints to the Management team and CEO.

Management of customer complaints data records is defined in Data Record Categorisation.

Protection of Company Property

We expect employees to treat Company property, whether material or intangible, with respect and care, and follow the Acceptable Use policy included in the Company Security Policy.

Data Protection

We expect employees to be aware of data protection laws in relation to PII (personally identifiable information), and customer owned data. **Company does not own Customer data, and must work to ensure there are no breaches of Customer data**.

PII information is confidential under data protection regulations, and breaching this legal requirement of confidentiality may be treated as a criminal offence.

Web Usage

Employees may use the internet for work-related activities and for limited personal use.

Employees should not use the internet for illegal, unsafe, or non-work-related activities that compromise security, productivity, or the organization's reputation.

Social Media and Online Tools

Social media and online tools encompasses online forums and communities such as LinkedIn, StackOverflow, and ChatGPT.
All employees are required to uphold the Company's confidentiality policies across all social media platforms and online tools.
When utilizing Company social media accounts, employees are expected to represent the Company in a manner that safeguards our brand and reputation, and is in alignment with our policies and code of conduct.
Employees who engage with Company posts through their personal social media accounts should be mindful of the potential impact on the Company's brand and reputation.

We ask employees to take special care regarding all their activity on professional social media forums since they are associated with the Company in these forums. LinkedIn in particular is critical to Company's brand, reputation and visibility in the marketplace.

ESG - Environmental, Social and Governance Responsibility

For environmental responsibility

- We encourage environmentally friendly solutions as part of business activities e.g.
  - use public transport when travelling
  - follow the principle of reduce, re-use and recycle
  - use third parties who also encourage environmentally friendly solutions in their business activities (e.g. of our cloud service provider and office providers)

For Social responsibility

- We promote a diverse and inclusive workplace and are committed to a nondiscriminatory approach in relation to gender, race, ethnicity, national origin, age, sexual orientation or

identity, education or disability

- We try to foster a well-organized, respectful and collaborative work environment
- We contribute at least annually to a suitable charity

For Governance

- We implement this code of conduct
- We take account of our customer's requirements for ESG compliance in their suppliers

Fraud

We expect employees to be ethical and responsible when dealing with Company finances, products, partnerships and customers.

Fraud covers items including:

- Theft of Company property
- Creating false or misleading financial records
- Using or disclosing commercial or customer-related data without authorisation
- Purchasing items for personal use with Company funds

We expect employees to report suspected or discovered fraud to the Management team. All information received will be treated confidentially.

The Management team will investigate all reports of suspected or discovered fraud.

Anti-bribery and Corruption

We don't allow bribes for the benefit of any external or internal party.

Small gifts are allowed. For example, if an external party presents at a conference alongside the Company for no fee, it is good to give the presenter a small gift.

Whistle blowing

We promote open communication, including communication on suspected wrongdoing. Employees are encouraged to raise concerns they have with individuals on the Company management team, including the CEO.

Code of Conduct required by Company Customers

Company customers are large financial institutions. These financial institutions require compliance on code of conduct statements in vendor contracts. In addition to the code of conduct statements included above, contracts also cover:

- anti money laundering

- conflict of interest
- anti-slavery and human trafficking

We expect employees to inform Company Management team if they identify that these items are relevant for conduct of Company business.

Selection of Suppliers

When selecting suppliers, we expect employees to consider whether the suppliers are committed to similar values as those laid out in our code of conduct and in the code of conduct of Company Customers.