

## CODE OF BUSINESS CONDUCT

Chapter 4, its subsidiaries, and its affiliated entities operate across diverse global markets and jurisdictions. At all times, we adhere to national as well as international laws and regulations. Additionally, we uphold industry-specific codes of conduct. Our commitment is to conduct our business affairs with utmost ethics and integrity.

- The officers and employees of all entities within the Chapter 4 Group recognize their responsibilities to all stakeholders, including shareholders, clients, employees, and suppliers.
- Transparent and accurate communication of business information is paramount, adhering to local regulations and ensuring non-discriminatory practices.
- Employment decisions are based solely on qualifications and merit, devoid of any discrimination based on race, religion, nationality, gender, sexual orientation, age, disability, or any other protected characteristic.
- Chapter 4 maintains a safe and respectful workplace environment, strictly prohibiting sexual harassment, discrimination, or any form of offensive behavior.
- Substance abuse in the workplace is strictly prohibited, as is the possession, use, or distribution of illegal drugs.
- Confidentiality of all business and client-related information is rigorously upheld. Insider trading and misuse of confidential information for personal gain are expressly prohibited.
- Data protection laws and industry standards are strictly adhered to in safeguarding consumer, client, and employee data.
- Work produced by Chapter 4 shall not contain content offensive to public decency and shall consider the impact on minority groups. Misleading work, especially regarding social, environmental, and human rights issues, is prohibited.
- Prior to engaging with clients or projects, Chapter 4 evaluates the potential risk to its reputation, especially concerning associations with clients engaged in human rights abuses.
- No activities conflicting with Chapter 4's interests or obligations to the company are permissible for personal gain.
- Bribery in any form, including gifts or favors, is strictly prohibited, with comprehensive staff training and communication of this policy.
- Entertainment and minor gifts are permitted unless otherwise restricted by the client's policy.

- Acceptance of goods or services of significant value from suppliers, potential suppliers, or third parties for personal benefit is prohibited.
- Conflicts of interest, whether personal or familial, within Chapter 4's business or with suppliers and third parties, are to be disclosed and managed appropriately.
- Corporate contributions to political entities require prior written approval from the Chapter 4 Management Board.
- Chapter 4 is dedicated to making positive societal and environmental impacts through ethical marketing practices, respect for human rights, environmental stewardship, community engagement, employee development, and risk management in the supply chain.

Further details are outlined in our **Sustainability Policy** and **Human Rights Policy Statement**.

1<sup>st</sup> May 2024  
Vienna, Austria