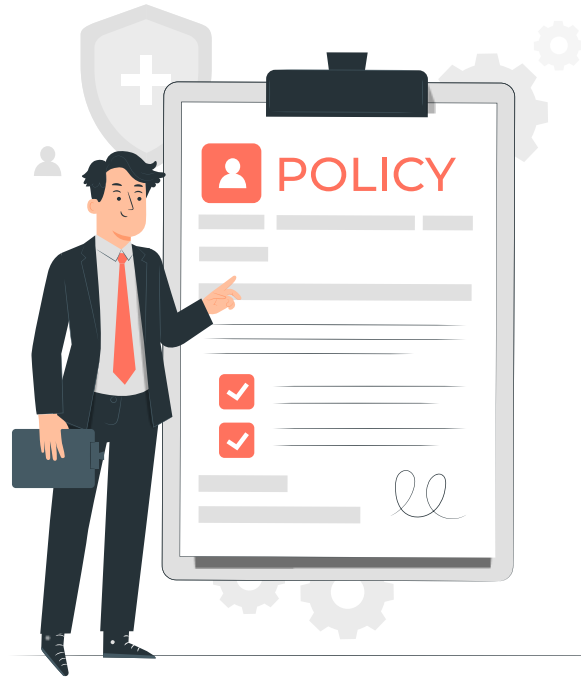


Code of Conduct and Ethics Policy

General Conduct Expectations

At Acuiti Labs, we expect all employees to conduct themselves in a manner that reflects the highest standards of integrity, professionalism, and ethical behavior. Our reputation is built on the trust and confidence of our clients, partners, and colleagues, and it is our collective responsibility to uphold these values.



Purpose of Code

The purpose of the Acuiti Labs Code of Conduct & Ethics is to outline the fundamental principles and expectations that guide our actions and decisions. This Code is designed to ensure that all employees, contractors, and partners understand and adhere to the highest standards of ethical conduct, integrity, and legal compliance in all aspects of our business operations. By establishing clear guidelines, we aim to promote a culture of honesty, respect, and accountability, which is essential for maintaining the trust of our people, clients, stakeholders, and the communities we serve.

Scope and Applicability

This Code of Conduct & Ethics applies to all employees, contractors, and third-party partners of Acuiti Labs, regardless of their location or role within the company. It encompasses our operations across all locations where Acuiti Labs operates, ensuring that our practices are consistent with local laws and regulations in each region. The Code provides a framework for ethical decision-making and sets the standards for behaviour in various situations, including interactions with colleagues, clients, suppliers, and other stakeholders.

How to Use the Code

The Code of Conduct & Ethics is a comprehensive document designed to guide your behavior and decision-making processes.

Here are some key points on how to effectively use this Code:

- **Reference:** Use this Code as a reference whenever you are unsure about the appropriate course of action in a given situation. It provides general guidance and directs you to additional resources and channels of communication available within the company.
- **Understand:** Make sure you thoroughly understand the principles and policies outlined in this Code. If you have any questions or need clarification, do not hesitate to consult your manager or the Human Resources (HR) department.
- **Apply:** Apply the principles of this Code in your daily work activities and interactions. It is not just a set of rules but a guide to help you make ethical choices.
- **Seek Guidance:** If you encounter a situation that is not explicitly covered by the Code or if you are unsure about the ethical implications of a particular action, seek guidance from your manager, or HR.

Annual Review and Acknowledgment

To ensure that the Code of Conduct & Ethics remains relevant and up-to-date with the latest laws, regulations, and best practices, it will be reviewed annually. This review will consider changes in the legal environment, business operations, and industry standards across all regions where we operate.

As part of this annual process, all employees will be required to:

- Review the updated Code to understand any changes or additions.
- Acknowledge in writing that they have read, understood, and agree to comply with the Code.
- Complete any mandatory training programs related to the Code to reinforce their understanding and commitment to ethical conduct.

Core values and Key Characteristics

Our core values and key characteristics are set out in the "Company Overview" section of this handbook. These should guide all of our business endeavours.

Workplace Conduct

General Conduct Expectations

At Acuiti Labs, we expect all employees to always maintain the highest standards of professional conduct. This includes:

- **Professionalism:** Employees must perform their duties with competence, diligence, and integrity. This means being punctual, reliable, and respectful in all interactions.
- **Compliance:** Adherence to all company policies, procedures, and applicable laws and regulations is mandatory. Employees are responsible for understanding and following the rules that apply to their work.
- **Respect and Courtesy:** Treating colleagues, clients, and stakeholders with respect and courtesy is essential. Disrespectful behavior, such as using offensive language or engaging in unprofessional conduct, is not tolerated.
- **Honesty and Transparency:** Honesty in all dealings, both internal and external, is expected. Employees must avoid any form of deceit, fraud, or misrepresentation.
- **Confidentiality:** Safeguarding company, client, and colleague information is crucial. Employees must handle sensitive information with care and prevent unauthorized disclosure.

Anti-Bullying and Harassment

Acuiti Labs is committed to providing a workplace free from bullying and harassment. Such behavior undermines the integrity of our work environment and will not be tolerated. Please see the Anti-Sexual Harassment and the Equal Opportunity and Anti-Discrimination Policy for further information about the types of behaviour that will not be tolerated by Acuiti Labs in relation to harassment.

- Definition: Bullying is offensive, intimidating, malicious or insulting behaviour (often involving the misuse of power) that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Harassment includes any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.
- Examples of Bullying:
 - Verbal abuse or shouting
 - Threats, intimidation, or humiliation
 - Spreading malicious rumors or gossip
 - Deliberately undermining a competent worker by overloading with work or constant criticism

Employees who believe they are being bullied or harassed should report the behavior to their manager, the HR department, or through the company's confidential reporting channels, including by emailing antiharassment@acuitilabs.com. All reports will be investigated promptly and thoroughly, with appropriate action taken.

Workplace Violence Prevention

Acuiti Labs is dedicated to maintaining a safe and secure work environment. Workplace violence, including any act or threat of physical violence, harassment, intimidation, or other threatening disruptive behavior, will not be tolerated. Country-specific addendums contain further information as relevant to location.

Our policy includes:

- **Zero Tolerance:** Any form of violence, whether actual or threatened, is strictly prohibited. This includes any behaviour which makes the other person feel threatened.
- **Reporting:** Employees must report any acts of violence or threats of violence immediately to their manager or the HR department. In cases of immediate danger, employees should contact security or law enforcement.
- **Preventative Measures:** Acuiti Labs will take reasonable measures to prevent workplace violence, including training employees on how to recognize and report potential threats and ensuring the physical security of our premises.
- **Response and Investigation:** All reports of workplace violence will be taken seriously and investigated thoroughly. The company will take appropriate action, which may include disciplinary measures, to address and prevent recurrence.

Substance Abuse Policy

Acuiti Labs strives to provide a safe and productive work environment. The use of alcohol, drugs, or any controlled substances in the workplace poses a risk to the health and safety of employees and to the security of company property.

Our policy includes:

- **Prohibited Conduct:**
 - Possession, use, or distribution of illegal drugs or controlled substances on company premises or while conducting company business, whether during normal working hours or otherwise.
 - Working under the influence of alcohol, illegal drugs, or controlled substances.
 - Abuse of prescription or over-the-counter medications that impairs an employee's ability to perform their job safely and effectively.

- **Testing:** Acuiti Labs reserves the right to conduct drug and alcohol testing in accordance with applicable laws and regulations. This may include pre-employment screening, random testing, and testing following workplace accidents or incidents. Country-specific addendums contain further information as relevant to location.
- **Assistance:** Employees struggling with substance abuse are encouraged to seek help. The company may provide support through employee assistance programs or referrals to appropriate resources.
- **Disciplinary Action:** Violations of the substance abuse policy may result in disciplinary action, up to and including termination of employment.