

Afiniti Code of Conduct

www.afiniti.com

CEO's Introduction

Our Code of Conduct sets clear expectation for every Team Member and holds all of us – especially our Leaders – accountable for meeting our legal and ethical commitments. **The Code reflects Afiniti's Ways of Working and our core values.**

The trust we have built with our key stakeholders and each other could be jeopardized if we lose sight of our company values. This is why I am asking you to join me in our commitment to act with the highest levels of integrity in everything you do.

Living these values means holding ourselves – and each other – accountable. I ask you not only to read and acknowledge the Code, but also to commit to acting with integrity in everything you do.

If you ever see or suspect misconduct or policy breaches, I encourage you to use our [Speak-Up hotline](#). Every concern will be thoroughly reviewed, and confirmed breaches may carry significant consequences.

It is your responsibility to read, understand, and follow the Code as it applies to your role. If you have questions, please reach out to your manager, the People Team, or Ethics & Compliance.

Thank you for your commitment to upholding our values, and for helping make Afiniti a place where we can all thrive.

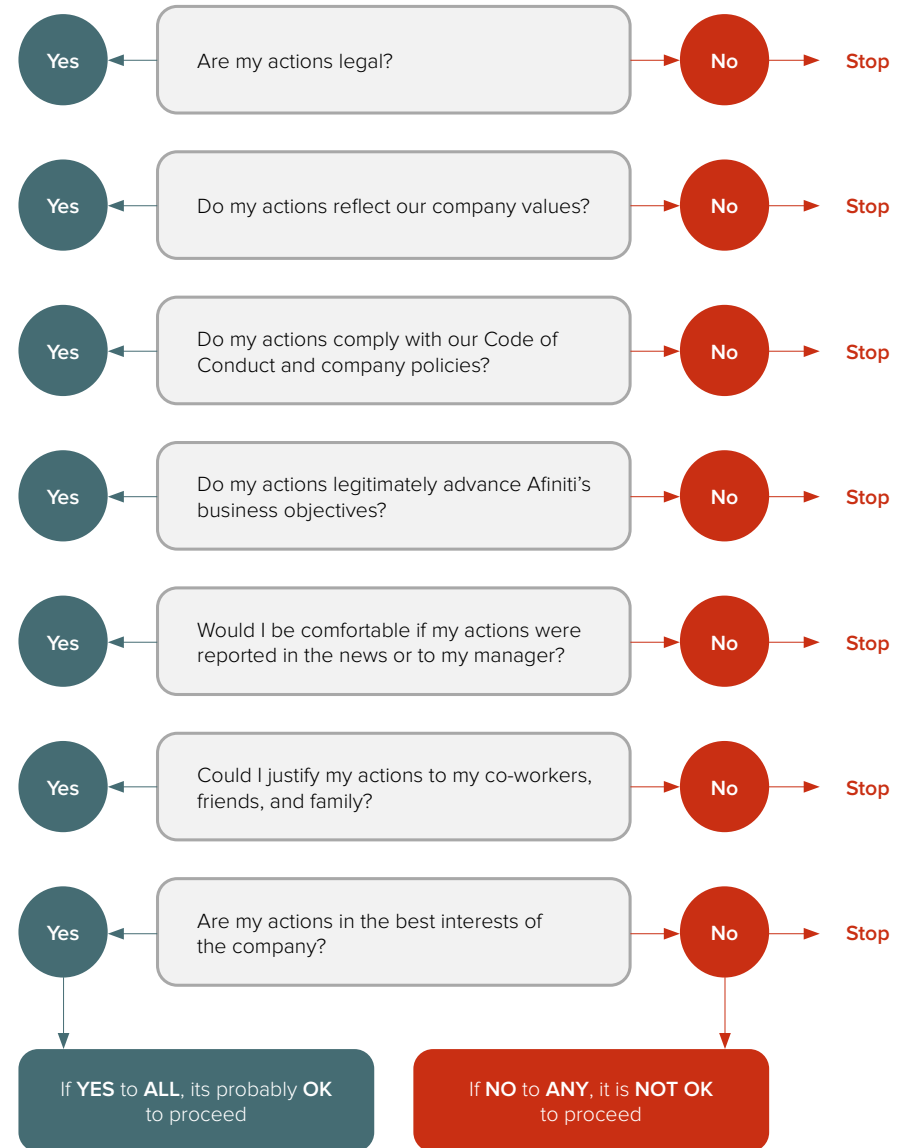
Jerome Kapefus
CEO, Afiniti

“Afiniti's success is built on our people, our innovation, and our commitment to always doing the right thing.”



Ethical Decision Making

We are all accountable for our behavior at work. When you face a situation not covered in our Code of Conduct, ask yourself these questions before taking action.



Still not sure? Seek help and be accountable
Contact the Compliance Team at compliance@afiniti.com

Table of Contents

05 About the Code



07 Building Trust with Our People

Your Responsibilities	08
What Leaders Must Do	08
Did You Know? Your Use of Afiniti Resources.....	08
Fair Employment Practices	09
Afiniti Prohibits Harassment	09
Q&A: Equity and Inclusion	09
Conflicts of Interest	
Business Opportunities and Outside Activities	10
Did You Know? Personal Relationships	11
Environmental Health and Safety	12
Drug & Alcohol-Free Workplace	12

13 Building Trust with Our Partners

Improper Payments and Bribes	14
Bribes Take Many Forms	14
Money Laundering	14
Q&A: Gifts & Entertainment	14
Government Relationships	15
Protect Afiniti's Political Neutrality	15
Did You Know? Intermediary Diligence	15
Protecting Others' Data	15
Respect Third-Party Intellectual Property	16
Sales and Advertising	16
Did You Know? The Value of Values.....	16

17 Building Trust with Our Stakeholders

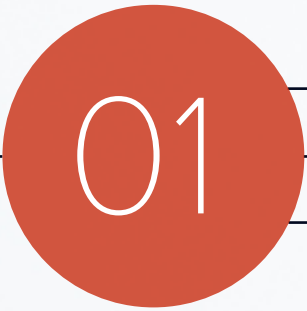
Maintaining Accurate Records	18
Commitment to Fair Competition and Antitrust Laws	18
Gathering Competitive Information	18
Did You Know? Communicating Thoughtfully.....	18
Company Assets and Resources	19
Intellectual Property	19
Confidential and Proprietary Information	19
Q&A: Confidential and Proprietary Information	19

20 Building Trust with Our Communities

Compliance with the Law	21
International Trade Controls	21
Anti-Boycott Laws	21
Human Rights in the Workplace and Supply Chain	21
Charitable Contributions	21

How to Report
Concerns

Pg 22



01

About the Code

Afiniti's Code of Conduct ("Code") applies to all individuals employed or engaged by Afiniti, Ltd., (or any of its direct or indirect subsidiaries, including any entity which hereafter becomes or ceases to be, as applicable). For purposes of this Code, all such entities collectively are referred to as "Afiniti."

**Building Trust
with Our People**

**Building Trust
with Our Partners**

**Building Trust
with Our Stakeholders**

**Building Trust
with Our Communities**

**How to Report
Concerns**

About the Code

Building Trust with Our People

- Your Responsibilities
- Fair Employment Practices
- Conflicts of Interest
- Environmental Health & Safety

Building Trust with Our Partners

- Improper Payments & Bribes
- Government Relationships
- Protecting Others' Data
- Sales & Advertising

Building Trust with Our Stakeholders

- Maintaining Accurate Records
- Commitment to Fair Competition & Anti-Trust Laws
- Company Assets & Resources

Building Trust with Our Communities

- Compliance with the Law
- Human Rights in the Workplace & Supply Chain
- Charitable Contributions

How to Report Concerns

About the Code

At Afiniti, we are committed to the highest standards of ethical business conduct and the practice of business by all applicable laws, rules, and regulations. These ideals drive our decision to adopt the following Code of Conduct (this “Code”) and a host of other policies governing the conduct of our employees, officers, and directors.

The Executive Leadership Team has overall responsibility for ensuring the Code complies with our legal and ethical obligations. The Compliance Team has primary and day-to-day responsibility for implementing this Code, dealing with any queries about it, and monitoring its use within the Afiniti

Compliance program, to ensure it is effective in promoting ethical conduct and mitigating risk on behalf of Afiniti.

We strive to promote honest and ethical conduct; ensure compliance with applicable governmental laws, rules, and regulations; and provide guidance to help employees recognize and deal with ethical issues.

Note: *The Code cites several of Afiniti’s policies which can be found in the Documents section of your Paycom employee self-service page.*





02

Building Trust with Our People

Building trust with our people is a critical step to achieving our goals. We need to know we can rely on each other; that we surround ourselves with the best people for the job at hand; that we maintain a safe environment for meaningful work; and that the goals of our teams have our undivided attention.

**Building Trust
with Our People**

**Building Trust
with Our Partners**

**Building Trust
with Our Stakeholders**

**Building Trust
with Our Communities**

**How to Report
Concerns**

About the Code

Building Trust with Our People

• Your Responsibilities

- Fair Employment Practices
- Conflicts of Interest
- Environmental Health & Safety

Building Trust with Our Partners

- Improper Payments & Bribes
- Government Relationships
- Protecting Others' Data
- Sales & Advertising

Building Trust with Our Stakeholders

- Maintaining Accurate Records
- Commitment to Fair Competition & Anti-Trust Laws
- Company Assets & Resources

Building Trust with Our Communities

- Compliance with the Law
- Human Rights in the Workplace & Supply Chain
- Charitable Contributions

How to Report Concerns

Chapter Resources:

Substance Abuse in the Workplace Policy

Reporting and Anti-Retaliation Policy

Anti-Nepotism Policy

Protected Status: An individual's sex, race, color, national origin, age, religion, disability status, sexual orientation, genetic information, gender identity, pregnancy status, and any other legally protected characteristic.

Immediate Family: a parent, sibling, child, mother- or father-in-law, son- or daughter-in-law, or brother- or sister-in-law, as well as any relative with whom a close personal relationship exists.

Your Responsibilities

You can build trust by first understanding your responsibilities as a member of Afiniti.

Each of us has a responsibility to understand and live by this Code, as well as all other company policies, procedures, laws and regulations in each country we operate in. At Afiniti, we start with the belief that we're all here to do our best – but it can still be helpful to have a reminder of what ethical behavior looks like. That's what this Code is all about – being confident we're all on the same page when it comes to living our values every day.

Who is Covered? Your Personal Commitment

In this Code, “we”, “our” and “you” refer to employees, including temporary workers and advisors or consultants working at Afiniti or on behalf of Afiniti, its officers, and directors. We expect advisors, consultants, contractors, and vendors to adhere to the standards set out in this Code and to share our commitment to our values.

You are required to seek guidance if you have questions or concerns, and you must cooperate fully in any investigation of suspected violations of the Code or other Afiniti policies.

The Code can't cover every situation you may encounter. Ultimately, this Code is about how we build trust by doing what's right by each other, what's right by our customers and partners, and what's right by the communities we're part of. You'll notice that occasionally the Code refers to a number of Afiniti's other policies and guidelines. You can find these policies in the Document section of your Paycom employee self-service page.

What Leaders Must Do

Afiniti's People Leaders are expected to take an active role in living our values through their actions

and personally leading compliance efforts. This means you encourage a culture where compliance is expected and ethical behavior is the norm. You must not ask any employee to break the law, or violate Afiniti's values, policies, and procedures.

The Bottom Line: When you violate our Code, you put yourself, our employees, and Afiniti at risk. These actions compromise the trust we aim to foster within our teams, and may subject you to disciplinary action up to and including termination of employment.



Did you know? Acceptable use of Afiniti Resources

- Do not use Afiniti resources or property for anything illegal or that violates Afiniti policy.
- Do not install or use computer files or software not licensed by Afiniti or approved by management, or use approved software that violates the license agreement or copyright agreement.
- Do properly label and carefully handle confidential, sensitive, and proprietary information, and secure it when not in use.
- Do understand your use of Afiniti property. Afiniti may monitor the use of our premises, equipment, devices, computers, network, applications, software, and similar assets and resources, in accordance with legal requirements and company guidelines.
- Do keep your desks clear and secure when not in use, and always protect your passwords.

About the Code

Building Trust with Our People

- Your Responsibilities
- Fair Employment Practices

- Conflicts of Interest

- Environmental Health & Safety

Building Trust with Our Partners

- Improper Payments & Bribes
- Government Relationships
- Protecting Others' Data
- Sales & Advertising

Building Trust with Our Stakeholders

- Maintaining Accurate Records
- Commitment to Fair Competition & Anti-Trust Laws
- Company Assets & Resources

Building Trust with Our Communities

- Compliance with the Law
- Human Rights in the Workplace & Supply Chain
- Charitable Contributions

How to Report Concerns

Chapter Resources:

Substance Abuse in the Workplace Policy

Reporting and Anti-Retaliation Policy

Anti-Nepotism Policy

Protected Status: An individual's sex, race, color, national origin, age, religion, disability status, sexual orientation, genetic information, gender identity, pregnancy status, and any other legally protected characteristic.

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Fair Employment Practices

You can build trust by always seeking top talent, recognizing the impact of unconscious bias, and not allowing it to unduly influence your decisions when choosing to hire or promote within your team.

Diversity is a huge asset for Afiniti and contributes to a culture of respect. We value both the similarities and differences in our people and recognize that diversity builds a stronger, more creative, and resilient organization.

Afiniti complies with all applicable employment legislation and does not discriminate in any aspect of employment, including recruiting, hiring, compensation, training, apprenticeship, promotions, upgrading, demotion, downgrading, transfer, layoffs, reductions in force, or terminations.

Afiniti Prohibits Harassment

Prohibited harassment can take many forms, all of them unacceptable, including:

- Jokes, insults, threats, and other unwelcome actions about a person whether or not it is regarding their Protected Status.

- Unwelcome sexual advances, requests for sexual favors, and other unwelcome verbal, visual, or physical conduct of a sexual nature, or the display of sexually suggestive objects or pictures.
- Verbal, visual, or physical conduct that denigrates or shows hostility or aversion toward an individual because of their Protected Status and that has the purpose or effect of creating an intimidating, hostile, or offensive work environment, that unreasonably interferes with another's work performance, or otherwise adversely affects an individual's employment opportunities.

Afiniti will promptly investigate all complaints of harassment and take appropriate corrective action when a violation is determined to have occurred.



Q&A: Equity and Inclusion

Q: How can I be sure my decisions about hiring or promoting are fair?

A: Human Resources will help you set up clear job descriptions and objective evaluation criteria to ensure your hiring and promotion process is fair. We also offer a range of training courses and, as part of this, you'll need to complete unconscious bias training, which can help you be more aware of the assumptions we all tend to make when meeting new people.

About the Code

Building Trust with Our People

- Your Responsibilities
- Fair Employment Practices
- **Conflicts of Interest**

- Environmental Health & Safety

Building Trust with Our Partners

- Improper Payments & Bribes
- Government Relationships
- Protecting Others' Data
- Sales & Advertising

Building Trust with Our Stakeholders

- Maintaining Accurate Records
- Commitment to Fair Competition & Anti-Trust Laws
- Company Assets & Resources

Building Trust with Our Communities

- Compliance with the Law
- Human Rights in the Workplace & Supply Chain
- Charitable Contributions

How to Report Concerns

Chapter Resources:

[Substance Abuse in the Workplace Policy](#)

[Reporting and Anti-Retaliation Policy](#)

[Anti-Nepotism Policy](#)

Protected Status: An individual's sex, race, color, national origin, age, religion, disability status, sexual orientation, genetic information, gender identity, pregnancy status, and any other legally protected characteristic.

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Conflicts of Interest

You can build trust by demonstrating your unwavering commitment to our collective goals.

You may have a conflict of interest when your personal interests affect judgment, objectivity, or responsibilities owed to Afiniti. Our business decisions must be based on sound judgment, which is why you must avoid situations that create, or appear to create, these conflicts. You should not represent Afiniti, or otherwise be involved in business decisions, if you, a family member, or a close friend have a related financial interest.

Our business decisions must never be for personal gain. Accepting gifts, other than those of nominal value, from customers or suppliers (including prospective ones), particularly if you are making decisions on Afiniti's behalf, can also create conflicts for you.

You also have a responsibility to ensure that your other employment, activities, or service will not interfere with your work at Afiniti. You may not work, including advising, for any competitor, customer, or supplier of Afiniti, or selling products or services in competition with Afiniti, while you are an employee or engaged by Afiniti. If you are involved in a situation that could be a conflict of interest, real or perceived, you must promptly disclose it to the Legal or Compliance departments.

Business Opportunities and Outside Activities

Additionally, outside of your regular compensation or other employee benefits, you or a member of your "immediate family" or household may not accept business opportunities, commissions, or advantageous financial arrangements from a customer, vendor, or business partner of Afiniti. This includes the purchasing of goods or services from Afiniti's suppliers on terms other

than those available to the general public; taking advantage of any business opportunities that you learn about in the course of your involvement with Afiniti; or accepting any offer to participate in an initial public stock offering from firms doing, or seeking to do, business with Afiniti.

Even when unintended, the appearance of a conflict can have adverse effects. For example, accepting an officer or director position with industry, public bodies, government-owned businesses, or political office may classify you as a 'Politically Exposed Person,' which creates a disclosure obligation for Afiniti. Before accepting such opportunities, speak with the Legal or Compliance departments to allow for proper and objective assessment of any risks to Afiniti.



About the Code

Building Trust with Our People

- Your Responsibilities
- Fair Employment Practices
- **Conflicts of Interest**
- Environmental Health & Safety

Building Trust with Our Partners

- Improper Payments & Bribes
- Government Relationships
- Protecting Others' Data
- Sales & Advertising

Building Trust with Our Stakeholders

- Maintaining Accurate Records
- Commitment to Fair Competition & Anti-Trust Laws
- Company Assets & Resources

Building Trust with Our Communities

- Compliance with the Law
- Human Rights in the Workplace & Supply Chain
- Charitable Contributions

How to Report Concerns

Chapter Resources:

Substance Abuse in the Workplace Policy

Reporting and Anti-Retaliation Policy

Anti-Nepotism Policy

Protected Status: An individual's sex, race, color, national origin, age, religion, disability status, sexual orientation, genetic information, gender identity, pregnancy status, and any other legally protected characteristic.

Immediate Family: a parent, sibling, child, mother- or father-in-law, son- or daughter-in-law, or brother- or sister-in-law, as well as any relative with whom a close personal relationship exists.

Investments

You may invest in the shares of publicly traded companies, subject to the restrictions discussed here. Investments in private entities are also allowed, except where the entity competes with, does business with, or is seeking business with Afiniti or its affiliates.

Neither you nor members of your “immediate family” or household may make or hold an investment in any private entity that competes with, does business with, or is seeking to do business with Afiniti or its affiliates without the approval of the Compliance Team. Investment may be prohibited if it could impair your ability to act solely in the best interests of Afiniti.



Important: It is your duty to disclose potential conflicts of interest, and failure to do so may result in disciplinary action.

Did You Know? Personal Relationships

Your relationships in the workplace may also create an actual or perceived conflict of interest. When one person in a sexual, romantic, or close family relationship is in a position to make or influence employment decisions affecting the other, you must disclose this information to Human Resources so they may help resolve the situation.

About the Code

Building Trust with Our People

- Your Responsibilities
- Fair Employment Practices
- Conflicts of Interest

Building Trust with Our Partners

- Improper Payments & Bribes
- Government Relationships
- Protecting Others' Data
- Sales & Advertising

Building Trust with Our Stakeholders

- Maintaining Accurate Records
- Commitment to Fair Competition & Anti-Trust Laws
- Company Assets & Resources

Building Trust with Our Communities

- Compliance with the Law
- Human Rights in the Workplace & Supply Chain
- Charitable Contributions

How to Report Concerns

Chapter Resources:

Substance Abuse in the Workplace Policy

Reporting and Anti-Retaliation Policy

Anti-Nepotism Policy

Protected Status: An individual's sex, race, color, national origin, age, religion, disability status, sexual orientation, genetic information, gender identity, pregnancy status, and any other legally protected characteristic.

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Environmental Health & Safety

Your efforts to maintain a safe and healthy work environment are another way you can build trust.

Afiniti has rules and procedures designed to provide a safe and healthy work environment and to meet applicable health and safety laws. You must be aware and diligently follow these rules and procedures, which includes immediately reporting any unsafe situations or acts to your manager or work coordinator.

We do not tolerate threats, intimidation, and violence. Afiniti is also committed to operating in a safe manner that minimizes environmental impact. We aim to comply with all applicable environmental laws and regulations, including related licensing and permitting. You should immediately report any concerns about any unsafe conditions or activities by Afiniti or its suppliers which may have negative environmental impacts.

Drug & Alcohol-Free Workplace

Afiniti strives to maintain a drug and alcohol-free workplace and prohibits the possession, use, or

other illicit activities, involving illegal controlled substances, on Afiniti premises and at Afiniti-sponsored functions and events. This includes social events when you are out of the office but "on Afiniti time" (e.g., travel), wherever Afiniti work is being conducted, when dealing with clients, when appearing as an identifiable representative of Afiniti, and in any setting where such activity carries a reasonable likelihood of reflecting adversely on Afiniti.

Afiniti may authorize the limited social use of alcohol during specified events, such as during approved client entertainment. You are required to exercise good judgment and abstain from drinking when your judgment or professional performance may be materially impaired, or there is a reasonable likelihood that the confidence of others in your professional performance will be undermined.



A photograph of three business professionals—two women and one man—shaking hands in front of a modern building with large windows. The man is in the center, wearing a dark coat over a light blue shirt and tie. The woman on the left is wearing a dark blazer, and the woman on the right is wearing a grey blazer. A red circle with the number '03' is in the top left corner, and white wavy lines extend from it across the top of the image.

03

Building Trust with Our Partners

Our partners are essential to the ongoing success of our business. We build trust with our partners by showing them the same respect we expect in return. We protect our integrity by not putting undue pressure on counterparties; maintaining transparency in any dealings we may have with government entities and officials; and protecting others' intellectual property as if it were our own. We also strive to market our offerings responsibly and accurately.

**Building Trust
with Our People**

**Building Trust
with Our Partners**

**Building Trust
with Our Stakeholders**

**Building Trust
with Our Communities**

**How to Report
Concerns**

About the Code

Building Trust with Our People

- Your Responsibilities
- Fair Employment Practices
- Conflicts of Interest
- Environmental Health & Safety

Building Trust with Our Partners

- Improper Payments & Bribes
- Government Relationships
- Protecting Others' Data
- Sales & Advertising

Building Trust with Our Stakeholders

- Maintaining Accurate Records
- Commitment to Fair Competition & Anti-Trust Laws
- Company Assets & Resources

Building Trust with Our Communities

- Compliance with the Law
- Human Rights in the Workplace & Supply Chain
- Charitable Contributions

How to Report Concerns

Chapter Resources:

[Anti-Corruption Policy](#)

[Travel and Expenses Policy](#)

Improper Payments and Bribes

You can build trust by demonstrating your integrity as it relates to the issue of bribery. We believe that no gift, favor, or entertainment should be accepted or provided if it will obligate, or appear to obligate, the receiver. Bribery in any form is always prohibited.

You must be committed to doing business ethically, and always with the utmost integrity and transparency. It is always prohibited to give or accept bribes, inappropriate, lavish, or repeated gifts, or other benefits, even if acceptable by local custom. You may not request or solicit gifts or services, or request contributions from vendors, suppliers, or other business partners, unless those contributions are for charitable organizations specifically supported by Afiniti.

Afiniti is committed to doing business only with third-party intermediaries who have strong reputations for ethical behavior and compliance with the law. Only enter into relationships with proposed intermediaries who will (or reasonably may be expected to) interact with government officials after a risk-based and documented due diligence review, and approval by the Compliance Team.

Bribes Take Many Forms

You must reject offers of cash, gifts, meals, entertainment, travel, and anything else of tangible or intangible value (such as employment opportunities or charitable contributions) when provided to improperly obtain or retain business or any other improper advantage.

Indirect bribery, where bribes are paid through a third-party intermediary – such as an agent, consultant, distributor, franchisee, supplier, adviser, representative, or joint venture partner – is also prohibited. Accordingly, we expect that all of our third-party intermediaries comply with applicable anti-corruption laws, our Code of Conduct, and the Anti-Corruption Policy.

Money Laundering

Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery, and fraud. Anti-money laundering laws of the United States and other countries, as well as international organizations, require transparency of payments and the identity of all parties to transactions. Afiniti is committed to full compliance with anti-money laundering laws throughout the world and will conduct business only with reputable customers involved in legitimate business activities and transactions.



Q&A: Gifts & Entertainment

Q: What are the rules around giving and receiving gifts and entertainment?

A: You must reject offers of cash, gifts, meals, entertainment, travel, and anything else of tangible or intangible value (such as employment opportunities or charitable contributions) when provided to improperly obtain or retain business, or for any other advantage. In general, providing or accepting normal sales promotion items, occasional meals, or other non-cash items of minimal commercial value is permitted. For more complex situations, please contact the Legal team.

About the Code

Building Trust with Our People

- Your Responsibilities
- Fair Employment Practices
- Conflicts of Interest
- Environmental Health & Safety

Building Trust with Our Partners

- Improper Payments & Bribes
- **Government Relationships**
- **Protecting Others' Data**
- Sales & Advertising

Building Trust with Our Stakeholders

- Maintaining Accurate Records
- Commitment to Fair Competition & Anti-Trust Laws
- Company Assets & Resources

Building Trust with Our Communities

- Compliance with the Law
- Human Rights in the Workplace & Supply Chain
- Charitable Contributions

How to Report Concerns

Chapter Resources:

[Anti-Corruption Policy](#)

[Travel and Expenses Policy](#)

Government Relationships

Just as we do in our other partnerships, you can build trust with government-owned entities and officials by maintaining transparency and appropriately responding to requests for information.

You must always volunteer accurate and honest information when responding to government requests for information, whether they relate to taxation, licensing, food safety, occupational safety, health, labor practices, environmental protection, or any other regulated area.

We strive to develop and maintain relationships with elected and appointed public officials and government agencies and apply the highest ethical standards to these interactions.

Protect Afiniti's Political Neutrality

Although you may be responsible for handling these types of issues, you should never represent Afiniti or Afiniti's views on legislative, regulatory, or policy issues unless you have approval in advance from the Afiniti Legal department. Any contact with the government to influence legislation, regulations, or decision-making may constitute lobbying and may require special registrations or disclosures. You should seek the Legal department's advice if you believe your actions on behalf of Afiniti could have political implications.

You may support the political process through personal contributions or by volunteering your time to the candidates or organizations of your choice. These activities, however, must not be conducted on Afiniti time or involve the use of any Afiniti resources such as telephones, computers, or supplies. You may not make or commit to making political contributions on behalf of Afiniti without the prior approval of the General Counsel.



Did You Know? Intermediary Diligence

You must contact the Afiniti Compliance Team before hiring any third-party intermediary who will interact with U.S. and non-U.S. government agencies (as well as state-owned or controlled agencies). These interactions may pose additional risks and require additional compliance steps to be taken.

Protecting Others' Data

You can build trust by treating our partners' data with the same care as we treat our own.

In the course of business, we may collect, use, store, hold, share, or process personal information about employees, business partners, customers, and others in compliance with applicable local laws.

We have a responsibility under data privacy laws and regulations to handle personal data with care, protect the private information that is provided to us, and use it responsibly and lawfully.

About the Code

Building Trust with Our People

- Your Responsibilities
- Fair Employment Practices
- Conflicts of Interest
- Environmental Health & Safety

Building Trust with Our Partners

- Improper Payments & Bribes
- Government Relationships
- Protecting Others' Data
- Sales & Advertising

Building Trust with Our Stakeholders

- Maintaining Accurate Records
- Commitment to Fair Competition & Anti-Trust Laws
- Company Assets & Resources

Building Trust with Our Communities

- Compliance with the Law
- Human Rights in the Workplace & Supply Chain
- Charitable Contributions

How to Report Concerns

Chapter Resources:

[Anti-Corruption Policy](#)

[Travel and Expenses Policy](#)

Only access information when you have a business reason, and know you must also take steps to protect the information against unauthorized use or release. Vendors or other outside parties who have authorized access to this information are also responsible for protecting this information and should be monitored for compliance.

Respect Third-Party Intellectual Property

You must ensure that the use of any third-party intellectual property is appropriate. For example,

third-party intellectual property rights must be respected when preparing advertising or promotional materials, using the name or printed materials of a third party, or operating a third-party software program on an Afiniti device. Furthermore, you may not disclose, to Afiniti, or ask others to disclose, confidential information or trade secrets of others (e.g., former employers) to Afiniti.

Sales and Advertising

You can build trust with our Sales and Advertising partners by acting ethically, honestly, and without bias.

You may make comparisons between our products and our competition when necessary, but all claims must be factually accurate and easily verified. Making false or misleading remarks about our products or our competitors or their products, services, or employees is inconsistent with our values.



Did You Know? The Value of Values

A sense of shared values can play a major role in developing new partnerships. Like people, companies want to work with like-minded organizations that apply equal emphasis to operating ethically and responsibly. By demonstrating our culture of compliance in activities such as sales and advertising, we can communicate to prospective partners that we are mindful of the risks within our industry and that we have taken steps to mitigate those risks.





04

Building Trust with Our Stakeholders

Our stakeholders have a material interest in the success of our business — and are just as important as our people and partners. Their investment in Afiniti is a demonstration of their trust. We honor that trust by maintaining accurate records, competing within the market ethically and honestly, and ensuring the proper use of company assets and resources.

Building Trust
with Our People

Building Trust
with Our Partners

Building Trust
with Our Stakeholders

Building Trust
with Our Communities

How to Report
Concerns

About the Code

Building Trust with Our People

- Your Responsibilities
- Fair Employment Practices
- Conflicts of Interest
- Environmental Health & Safety

Building Trust with Our Partners

- Improper Payments & Bribes
- Government Relationships
- Protecting Others' Data
- Sales & Advertising

Building Trust with Our Stakeholders

- Maintaining Accurate Records
- Commitment to Fair Competition & Anti-Trust Laws
- Company Assets & Resources

Building Trust with Our Communities

- Compliance with the Law
- Human Rights in the Workplace & Supply Chain
- Charitable Contributions

How to Report Concerns

Chapter Resources:

[Afiniti's Confidential Information Policy](#)

[Afiniti's Global Competition Policy](#)

[Contact legal@afiniti.com](mailto:legal@afiniti.com)

Records: Records ordinarily maintained including payroll, travel and expense reports, accounting and financial data, performance records, electronic data files, emails, etc.

Intellectual property: Creations protected by laws and treaties including copyrights, patents, trademarks, trade secrets, design rights, logos, know-how, etc.

Maintaining Accurate Records

Accurate and reliable records are not only crucial to our business, but they also help us build trust. They contain the essential data that guides our business decision-making and strategic planning.

You must maintain complete, accurate, and reliable records in all material respects. There is never a reason to make false or misleading entries.

Undisclosed or unrecorded funds, payments, or receipts are inconsistent with our business practices and are prohibited.

Commitment to Fair Competition & Antitrust Laws

You can build trust by showing we do not seek competitive advantages through illegal or unethical business practices such as bid rigging, price fixing, or other collusive conduct with competitors.

You must never take unfair advantage of anyone through manipulation, bribes, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice. Such conduct may raise anticompetitive concerns and can result in severe monetary and potentially criminal penalties in certain jurisdictions. Instead, you should endeavor to deal fairly with Afiniti's customers, service providers, suppliers, competitors, and employees, and compete based on innovation, price, service, and quality.

When dealing with competitors, avoid discussion of competitive information such as price, discounts, any terms or conditions of sale, or research and development initiatives, which may give the appearance of an improper agreement. Do not seek or make agreements related to market share, geographic allocation, or bids.

Gathering Competitive Information

You may only gather information by legal means, and must never use any illegal or unethical means

to get information about other companies. Do not steal or improperly use trade secret information. Do not suggest or ask others to disclose trade secrets, especially new employees hired by a competitor.



Did You Know?

Communicating Thoughtfully

Afiniti competes on the merits of its products and services and prioritizes fairness with customers and suppliers. You should always emphasize Afiniti's independent decision-making in both internal and external communications, and avoid language that could incorrectly suggest a concerted action with other parties.

About the Code

Building Trust with Our People

- Your Responsibilities
- Fair Employment Practices
- Conflicts of Interest
- Environmental Health & Safety

Building Trust with Our Partners

- Improper Payments & Bribes
- Government Relationships
- Protecting Others' Data
- Sales & Advertising

Building Trust with Our Stakeholders

- Maintaining Accurate Records
- Commitment to Fair Competition & Anti-Trust Laws
- **Company Assets & Resources**

Building Trust with Our Communities

- Compliance with the Law
- Human Rights in the Workplace & Supply Chain
- Charitable Contributions

How to Report Concerns

Chapter Resources:

[Afiniti's Confidential Information Policy](#)

[Afiniti's Global Competition Policy](#)

[Contact legal@afiniti.com](mailto:legal@afiniti.com)

Records: Records ordinarily maintained including payroll, travel and expense reports, accounting and financial data, performance records, electronic data files, emails, etc.

Intellectual property: Creations protected by laws and treaties including copyrights, patents, trademarks, trade secrets, design rights, logos, know-how, etc.

Company Assets & Resources

You can build trust by protecting company assets such as intellectual property and confidential information.

Treat Afiniti assets with the same care you would if they were your own, and only use Afiniti resources to conduct Afiniti business. You must not commit theft, fraud, extortion, blackmail, or embezzlement using Afiniti property.

Intellectual Property

Intellectual property is among Afiniti's most valuable assets. You must assist in protecting Afiniti's intellectual property, in accordance with Afiniti's Confidential Information Policy, your Employment or Contractor Agreement, any applicable non-disclosure agreements (NDAs), and as otherwise instructed.

Proprietary and Confidential Information

In carrying out Afiniti's business, you often learn proprietary or confidential information about Afiniti or its affiliates, and their respective customers, prospective customers, or other third parties. Do not disclose confidential information, except when disclosure is authorized or legally mandated, and use confidential information solely for the business purpose for which it was conveyed.



Q&A: Proprietary and Confidential Information

Q: What types of information are considered proprietary or confidential?

A: All information of any nature in any form, written or oral, tangible or intangible, pertaining in any manner to the business of Afiniti or its employees, customers, clients, suppliers, vendors, or other business associates not generally known outside of Afiniti, whether such information is developed or otherwise acquired by Afiniti.

Examples of confidential information include:

- Slide decks or any Afiniti product documentation that has not been cleared for public distribution
- Source code and documentation
- Emails, messages, and screenshots
- Personal information of Afiniti's employees, clients, and suppliers
- Business strategies
- Financial performance, valuations, and projections
- Trade secrets
- Any other non-public information concerning Afiniti
- Information from third parties that was conveyed with the expectation that it will be kept confidential





05

Building Trust with Our Communities

As a global company, our actions must reflect our commitment to conducting business ethically and with integrity everywhere we operate. This is how we build trust in our communities — by complying with applicable local laws, by standing up for human rights, and by supporting charitable causes.

**Building Trust
with Our People**

**Building Trust
with Our Partners**

**Building Trust
with Our Stakeholders**

**Building Trust
with Our Communities**

**How to Report
Concerns**

About the Code

Building Trust with Our People

- Your Responsibilities
- Fair Employment Practices
- Conflicts of Interest
- Environmental Health & Safety

Building Trust with Our Partners

- Improper Payments & Bribes
- Government Relationships
- Protecting Others' Data
- Sales & Advertising

Building Trust with Our Stakeholders

- Maintaining Accurate Records
- Commitment to Fair Competition & Anti-Trust Laws
- Company Assets & Resources

Building Trust with Our Communities

- Compliance with the Law
- Human Rights in the Workplace & Supply Chain
- Charitable Contributions

How to Report Concerns

Chapter Resources:

[Afiniti's Anti-Corruption Policy](#)

[Afiniti's Modern Slavery Act Statement](#)

Compliance with the Law

You help us build trust by ensuring we are conducting business by applicable laws and regulations.

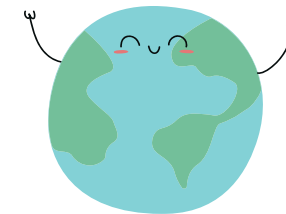
You must comply with the requirements of all applicable laws and regulations in each of the countries where we do business. This is mandatory and is not subject to business priorities or individual discretion.

International Trade Controls

We comply with all applicable export control, sanctions, and customs laws and regulations. We also ensure that we do not engage in any prohibited dealings in or with countries or persons that are subject to comprehensive U.S. sanctions. You should escalate any transactions that may violate applicable trade control laws.

Anti-Boycott Laws

We comply with all laws and regulations regarding boycotts and refuse to comply with restrictive trade practices or requests prohibited under the United States or other applicable local laws. These may include requests for information, action, or inaction to support or reinforce a boycott. Make sure all agreements, purchase orders, and letters of credit are inspected and approved to eliminate these provisions. You must contact the Legal Department if you receive any request to participate in such boycotts, as such requests may need to be reported.



Human Rights in the Workplace & Supply Chain

Afiniti only uses voluntary labor, and expects the same of our supply chain.

We seek to work with suppliers that comply fully with all employment laws (including ensuring that workers all are above the minimum working age), share our commitment to respecting human rights and to providing equal opportunity in the workplace, and implement effective measures to remedy any

adverse human rights and fair labor impacts. We stand against forced labor, human trafficking, and prison labor, and expect our suppliers to do the same. Employees should immediately report concerns about forced labor or human trafficking at Afiniti or concerning our suppliers.

Charitable Contributions

You help us build trust by remaining politically neutral when conducting charitable activities on behalf of Afiniti.

Afiniti supports community development throughout the world. You may contribute to these efforts, or may choose to contribute to organizations of your own choice. However, as with political activities,

you may not use Afiniti resources to personally support charitable or other non-profit institutions not specifically sanctioned or supported by Afiniti.



06

How to Report Concerns

Building Trust
with Our People

Building Trust
with Our Partners

Building Trust
with Our Stakeholders

Building Trust
with Our Communities

How to Report
Concerns

About the Code

Building Trust with Our People

- Your Responsibilities
- Fair Employment Practices
- Conflicts of Interest
- Environmental Health & Safety

Building Trust with Our Partners

- Improper Payments & Bribes
- Government Relationships
- Protecting Others' Data
- Sales & Advertising

Building Trust with Our Stakeholders

- Maintaining Accurate Records
- Commitment to Fair Competition & Anti-Trust Laws
- Company Assets & Resources

Building Trust with Our Communities

- Compliance with the Law
- Human Rights in the Workplace & Supply Chain
- Charitable Contributions

How to Report Concerns

Chapter Resources:

[Afiniti's Reporting and Anti-Retaliation](#)

[Policy for Additional Information](#)

How to Report Concerns

Disciplinary action, up to and including termination and/or legal proceedings, may result from any failure to comply with:

- The Code.
- Applicable laws, rules, or regulations.
- Any other Afiniti policies and related standards.



If you know of or suspect a violation of applicable laws or regulations, this Code, or any of Afiniti's policies, you must immediately report it to your supervisor or the Compliance Team (Compliance@afiniti.com).

You may also report violations through Afiniti's confidential and anonymous reporting hotline, **Speak Up at Afiniti** (<https://report.whistleb.com/en/afiniti>).

Anyone who reports a violation will be treated with dignity and respect and will not be subjected to any form of retaliation for reporting in good faith. Retaliation against anyone who provides information, or otherwise assists in an investigation or proceeding, regarding any conduct that they believe in good faith constitutes a violation of applicable laws or regulations, this Code or any Afiniti policy, is prohibited, and will, in itself, be treated as a violation of this Code.

See Afiniti's **Reporting and Anti-Retaliation Policy** for additional information.



WAIVERS OF THE CODE

Waivers of the Code for directors and executive officers may be made only by the Board of Directors and must be promptly disclosed as required by law and regulation.

NOT AN EMPLOYMENT CONTRACT

The Code does not alter the terms or conditions of your employment with Afiniti. It does not constitute an employment contract or an assurance of continued employment.

NO RIGHTS CREATED

This Code is a statement of the fundamental principles that govern the conduct of the company's business. It is not intended to and does not create any rights in any employee, client, supplier, competitor, shareholder, or any other person or entity.