



CODE OF CONDUCT



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CODE OF CONDUCT

The Enreach Code of Conduct is a set of principles and expectations that aims to guide and inspire the conduct or behavior of all Enreach colleagues.

Please find below the overview of Enreach Code of Conduct Principles, which are detailed out in every chapter of this document.

Roles & responsibilities

Statutory Board: Oversees ethics & compliance program, reviews material risks, and receives regular reporting from Compliance.

Managing Board: Owns implementation of policies, training and controls; allocates sufficient resources; sets ethical tone.

General Counsel/Group Compliance Officer: Designs and maintains the program; monitors adherence; conducts/oversees investigations; reports material issues to Statutory Board and Managing Board.

Circle Leads/Managers: Ensure team understanding and adherence; escalate concerns; support investigations and remediation.

All Employees & Contractors: Read and follow the Code and policies; complete mandatory training; avoid conflicts; report suspected violations via approved channels.

Suppliers/Partners: Must adhere to equivalent standards; contracts may include audit rights and termination for non-compliance.

We respect each other.

Together we achieve our goals while we treat each other with respect and dignity, as Enreach is a safe workplace in which we foster diversity and inclusion, and which is free from discrimination, harassment, sexism or intimidation in any way.

We take care of ourselves and others.

We care about the mental and physical health and work-life balance of all colleagues. We care about a trustworthy and confidential environment, in which there is respect for people's privacy; Enreach fosters a secure environment in which data of people and sensitive content is handled with respect for information security, confidentiality, and privacy.

We act responsible and with integrity.

We value integrity and play fair, ethical, and always abide by applicable laws and regulations. This means we avoid conflict of interest, we do not bribe, do not use or accept gifts to wrongfully influence business partners or colleagues, and never use illegal or unethical methods to gather information.



We take care of our environment.

We care about doing business in a sustainable way. We do an ongoing effort to spot opportunities to reduce the impact that any of our business activities have on our local and global environment.

We have open and honest communication.

We believe open and honest communication amongst all colleagues and with external partners is crucial for a healthy work environment. Enreach finds it important to have open communication channels for 'daily' communication, and for situations in which the Code of Conduct is violated. For the latter we provide low threshold and safe communication channels (like e.g. the whistleblower option).

INTRODUCTION TO THE CODE OF CONDUCT

This Code of Conduct is Enreach' guideline to help the employees of Enreach, (sub-) contractors and business partners to make sound decisions in doing their job. We have a responsibility to establish and maintain business relationships based on integrity with each other and our business partners. This Conduct provides a moral compass for working together and doing business in an integer way.

This Code of Conduct sets fundamental principles of law and ethics governing the way that Enreach does business and we work together internally. These principles are applicable when our employees work with external partners or stakeholders; both the employees should feel safe, as the business partners who work with us.

This Code is not the exclusive source of guidance and information on Enreach' expectations, but it serves as the basis for other Enreach policies and guidelines. For example, we find in most Enreach countries HR rules and regulations in alignment with the local labor law.

The Enreach Code of Conduct sharpens what is good and bad company behavior. We ask all to role model the described principles, and when violated to address this with your Circle Lead or Manager, HR, the local Trust Person or follow the whistleblower procedure. We will not tolerate retaliation against any colleague at Enreach who reports or participates in an investigation of a possible violation of our Code, policies or the applicable laws and regulations.

Enreach expectations for responsible conduct are applicable to all parties who work on behalf of Enreach, including, but not limited to, its employees, partners, contractors and other representatives that act on behalf of Enreach. In the case there are local country laws which differ from the Enreach Code of Conduct, then the local laws prevail for employees working in those countries. In case the Enreach Code of Conduct is more strict than the local law, then the Code of Conduct prevails.



ENREACH'S PURPOSE AND CORE VALUES

Create Contact Magic

The Code of Conduct is of special importance as it is an important fundament to achieve **Enreach Purpose of 'Create Contact Magic'**. This Purpose reflects the impact we want to create with our customers and in the way we collaborate with each other. Adhering to the Enreach Code of Conduct brings us closer to achieving our Purpose.

Core values: open, exciting, beyond

The Enreach Code of Conduct builds on the Enreach core values: Open, Exciting and Beyond.

- **Open** Openness is at the heart of the Enreach culture. Curious and caring, we listen and ask why; eager to work across teams. We are transparent and always present with one another.
- **Exciting** Every individual can contribute to an exciting workplace by creating a safe and positive place where everybody can be themselves at work. This means we do not create formalities and bureaucracies where this is not needed; we are personal and approach colleagues with a smile and constructive feedback to bring things forward.
- **Beyond** We tick unlike any other company. Bold, up for challenging the status quo: we push unconventional thinking. Experiment and dare to make mistakes and continuously learn. We want to take leadership, amaze and go out of the box.

WE RESPECT EACH OTHER

Diversity and inclusion

Enreach is dedicated to equal employment opportunity without regard to race, color, religion, gender, national origin, age, disability, sexual orientation or other protected characteristics.

Enreach is committed to the equitable treatment of all employees and qualified applicants for employment. Employment decisions will be based on business reasons, such as qualifications, demonstrated skills and achievements.

Enreach values the difference of diverse individuals from around the world, and each employee will treat each other with respect and fairness at all times. Enreach employees will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee.



We prohibit forced labour, human trafficking and child labour within our operations and supply chain; we conduct risk-based due diligence on salient human rights risks and remediate adverse impacts.

Safe workplace free from harassment, intimidation and bullying

We expect and encourage everyone to provide and maintain a safe work environment free from discrimination, psychological or sexual harassment, intimidation and bullying. We do not tolerate unlawful and inhumane behavior towards each other. This includes any inappropriate conduct or comment by any person that would cause another colleague to feel humiliated or intimidated.

Examples of prohibited behavior are (but not limited to):

- Verbal or written conduct such as naming, humiliating remarks, slurs, or sexual advances, invitations, or sexual comments.
- Visual conduct such as derogatory or sexually oriented posters, photography, cartoons, drawings, emails, or gestures.
- Physical conduct such as assault, unwanted touching, intentionally blocking normal movement, interfering with work because of gender, race, color, religion, national origin, age, disability, sexual orientation, or other protected characteristics.
- Threats or demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss.
- Offers of employment benefits in return for favors.

Be yourself and mindful of others

We are curious and open minded about new ideas and progress; we explore new grounds and actively look for innovative solutions. We flavor our days with positivity, humor and joy. We are all individuals. Being yourself is not only encouraged but celebrated within Enreach. We believe authenticity is key to Create Contact Magic and creating a welcoming and inclusive environment, and this extends to personal clothing style.

We encourage individuals to express their personality and individuality through their attire, at the same time we ask our employees to be mindful of their appearance and personal hygiene. We believe that clothing is a way of expression and 'being you'. We also ask you to recognize there are times of flaunting and times to dress up a bit. For example: please don't wear flipflops when meeting with customers. However, we do not impose a dress code and trust our employees to use their own judgement in deciding what is appropriate for their role and the momentarily circumstances.

Drugs and alcohol

Use of alcohol at the workplace or the use of drugs adversely affects the job performance and can risk the health and safety of others and ourselves. Enreach employees will therefore not work or report to work under the influence of alcohol, illegal drugs or controlled substances. Use of alcohol of drugs may



never impact the ability to do the job, endanger others or themselves, or reflect adversely on Enreach reputation.

According to local custom and law, norms relating to alcohol consumption during business entertainment or work-related social events, vary greatly. When alcohol is consumed in these type of events, then still it should not impact one's ability to do one's job effectively, lead to inappropriate behavior, create a danger to employees or others (impacting driving is an example), or violate local law or a customer rule or policy. All employees are expected to behave responsibly in this regard and Enreach will take appropriate action if they do not.

All employees are prohibited from possessing, selling, purchasing, using, manufacturing, distributing, or offering to others any illegal drugs or controlled substances while on company business or on company premises. This prohibition does not include legally obtained medications or prescriptions used as directed by a medical practitioner. Subject to applicable law, any employee found using, selling, purchasing or possessing illegal substances on company or customer property or during work time may be dismissed.

WE TAKE CARE OF OURSELVES AND OTHERS

Work-life balance, mental health and physical health

At Enreach, we are all responsible for maintaining a safe workplace by following safety and health rules and practices. All employees are responsible for immediately reporting accidents, injuries and unsafe equipment, practices or conditions to the designated person. Our policy forbids retaliation against any employee who, in good faith, reports a suspected violation of law or policy.

Enreach is committed to:

- Protecting, and striving for improvement of, the mental and physical health, work life balance, safety and security of our people at all times
- Planning for, responding to and recovering from any emergency, crisis and business disruption

The commitments listed are in addition to any applicable local laws and regulations. For further details, please consult the (local) Enreach HR rules.

Responsible AI, information security, confidentiality and data protection

Responsible AI We develop and deploy AI and advanced technologies lawfully and safely, respecting fundamental rights. For high-risk AI uses, we implement risk management, data governance, transparency, human oversight, robustness and cybersecurity controls, and conduct



fundamental-rights impact assessments as required. Consult Information Security or Compliance before acquiring, integrating or launching AI features to confirm classification and documentation. We ensure human-in-the-loop for decisions with significant impact on individuals or rights.

Confidentiality and integrity Enreach and its employees process data and content with respect for information security, confidentiality and privacy. All employees are required to protect and maintain confidentiality and integrity of any information disclosed to them by business partners, customers or other 3rd parties. Information, including personal data, is to be handled according to existing contracts, local and global business practices and statutory law. Personal data, customer's confidential information and other confidential data will be stored in a secure environment.

Privacy Enreach has a special focus on privacy, and its processing of personal data shall be subject to the care and awareness which is required according to law and regulations and with special consideration for information that might be sensitive, regardless whether the data refer to customers, employees, suppliers or others. As a European based company, Enreach complies with EU data protection regulations.

Dealing with information We build trust by being honest, caring and reliable. We respect each other, our customers and partners. We achieve our business goals with integrity. No employee shall use any illegal or unethical methods to gather competitive information. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent or inducing such disclosures by past or present employees of other companies is prohibited. Enreach aims for a high common level of cybersecurity across the EU. Where applicable, we meet governance, incident reporting and supply-chain security laws and regulations.

WE ACT RESPONSIBLY AND WITH INTEGRITY

Regulatory compliance

Sanctions & Restricted Parties: Enreach complies with EU, Member State and where applicable UK/US sanctions. We do not engage, directly or indirectly, with sanctioned persons/entities. We screen counterparties and do not facilitate circumvention. Employees must use approved screening tools before onboarding customers, resellers, distributors or suppliers. Escalate any potential match to Compliance before proceeding.

Export Controls (Dual-Use): We comply with EU dual-use rules for exports, transfers, brokering and technical assistance, including intangible transfers (cloud, downloads, remote access). We seek Compliance approval before cross-border transfers of controlled items, software or technology. We do not email or remotely share controlled technical data to non-EU locations without clearance.



Competition/Antitrust: Enreach strictly prohibits anti-competitive conduct (price-fixing, market sharing, bid-rigging, exchange of competitively sensitive information, abuse of dominance). We do not discuss prices, margins, customer lists, bids, or market allocation with competitors. If a competitor raises such topics, end the conversation immediately and inform Compliance.

Anti-Corruption: Enreach has zero tolerance for bribery and facilitation payments. Gifts, hospitality, sponsorships and donations must be lawful, proportionate and transparent. Enreach aligns controls with respective antibribery laws including US FCPA, UK Bribery Act and others. Pre-approve gifts/hospitality to government officials; record all approved benefits. Third-Party Due Diligence: Perform risk-based due diligence of partners and suppliers; include compliance clauses and audit/termination rights in contracts.

Telecommunications & Industry-Specific Legislation: As a provider of communications services, Enreach complies with all applicable telecom regulations in jurisdictions where we operate. This includes obligations under national laws and EU frameworks governing:

- Service continuity
- Legal interception and cooperation with lawful requests
- Data retention and privacy requirements
- Consumer protection

Conflicts of interest and dealing with gifts

Enreach values integrity, and this is its most valuable asset. As an employee, you are expected to act in the best interests of Enreach and avoid situations that may cause a conflict of interest. A conflict of interest can arise when competing loyalties could cause you to prioritize personal benefit for yourself, friends, or family at the expense of Enreach or its partners.

To avoid conflicts of interest, ask yourself if the action you're considering could provide an incentive for you to benefit yourself or others at the expense of Enreach. If the answer is "yes," then it is likely a conflict of interest, and it should be avoided. You should disclose any interest, relationship, or activity that may create a conflict of interest, and you may be required to stop any conflicting behavior as part of your job.

Conflicts of interest can occur in various situations, including (but not limited) to the following:

- **Private activities:** Enreach employees may not engage in outside employment activities that conflict with the company's interest.
- **Family members and close relationships:** No employee may use personal influence to get Enreach to do business with a company in which their family members or friends have an interest. Employees should disclose any close relationship that might make it appear they could favor another company to the disadvantage of Enreach's interests.



- **Board memberships:** Serving on a board of directors or board of trustees or similar body for an outside business or organization requires advance approval.
- **Business or investment opportunities:** Enreach employees may not allow their investments to influence, or appear to influence, their independent judgment on behalf of Enreach.

Enreach is committed to dealing legally and ethically and complies with all applicable anti-bribery laws. Although exchanging courtesies in the form of minor gifts or meals might promote goodwill, it is important to realize that misunderstandings can occur, especially when an exchange occurs during or near the negotiation of a business deal.

Acceptance of questionable gifts can expose Enreach to legal risk. Employees must not solicit or accept anything of value that could create the appearance that they or Enreach are being influenced into doing business. It is critical that nothing of value is ever offered, promised, or given (directly or indirectly) to influence or obligate the recipient to reciprocate for the benefit of Enreach. Such behavior is prohibited. Employees should politely decline any such offer and promptly contact the Compliance officer or other designated person.

- **Giving and receiving gifts:** can sometimes give the appearance of being improper or may even be illegal. No gift may be offered or accepted by Enreach employees if it is illegal or will create a feeling of obligation, compromise judgment or appear to improperly influence the recipient. Specifically, Enreach employees must take care not to violate any laws and regulations with respect to the receipt of gifts and/or entertainment by government employees. Enreach' employees should not provide any gifts or entertainment to any government employee or official unless they have received the prior written approval of Enreach.

Enreach employees and their relatives, life companions, and other people with whom they have a close personal connection must not accept any gift in kind, payment, loan, vacation, or other privilege from current or prospective customers, vendors, competitors, or partners, where (1) accepting the gift, etc., would prejudice Enreach's business interests, or (2) accepting the gift, etc., would allow an impression of unjust advantage to arise, or (3) the gift, etc., is unlawful or contrary to ethical principles.

- **Charitable donations:** Enreach will not offer charitable donations, community investment, or political contributions to obtain or retain improper personal or business advantage or to dissuade or encourage others from failing to act in connection with the performance of their duty. Enreach will also not offer charitable donations if there is a close relationship between a customer and the charity.



- **Sponsoring:** is a payment in form of money or physical objects given by Enreach to increase the company's awareness, for example, using the logo or the name. All sponsorships must be transparent, documented in a written contract, intended for a serious business purpose and be equivalent to Enreach' received value. Payments may not be promised, offered, or rendered to anyone, to gain a business advantage or to pursue an inappropriate purpose.
- **Entertainment of Enreach employees:** Unless prohibited by law or the policy of the recipient's organization, Enreach may accept entertainment (social events), including transportation and lodging, that is reasonable in the context of the business and that advances the company's interests. If an invitation seems inappropriate, the employee must turn down the offer or pay the true value of the entertainment themselves.
- **Entertainment by Enreach:** Unless prohibited by law or the policy of the recipient's organization, Enreach may provide entertainment, including transportation and lodging, that is reasonable and suitable in the context of the business. If employees have a concern about whether providing entertainment is appropriate, they will discuss it with their Circle lead or HR in advance. Entertainment of government officials may be prohibited by law. In these circumstances, the employees are advised to consult the Group Compliance Officer in each instance to ensure that such activities do not violate the law.



WE TAKE CARE OF OUR ENVIRONMENT

Enreach recognizes its role in reducing the impact that any global business has on the local and global environment. We believe that it is important for all people to aim to minimize their impact on our planet, we therefore aim to reduce our environmental impact each day through the measures described below:

1. We aim to implement sustainable practices designed to ensure the health and safety of our employees, stakeholders, and our direct and indirect environment.
2. We aim to promote adoption of sustainable commuter and business transport options such as train, electric cars, cycling or walking.
3. We aim to reduce the impact on the environment by our business travel by ensuring that only necessary journeys are undertaken, and we promote online alternatives.
4. We aim to hold multi-location remote meetings when possible.
5. We aim to reduce waste by increasing the amount of recycled or reused material. Thus, we concentrate on reuse and safe disposal.
6. We aim to power all our offices with renewable energy and, if possible, we will install solar panels on as many offices we have.
7. We aim to find and implement measures to further reduce our carbon emissions and environmental footprint.

WE HAVE OPEN AND HONEST COMMUNICATION

Open and honest conversations

Many problems may be solved with open and honest communication without immediately resorting to formal steps. Preferably we have an open dialogue in which mutual perspectives are explored and both come into a constructive problem solving modus. However, if that seems impossible or makes you uncomfortable or unsafe: don't hesitate to seek help from others within or outside the company!

Reporting and aftercare

Enreach is committed to ensuring a workplace where employees can report violations without fear of retaliation. We encourage employees to promptly report concerns, anonymously or otherwise, in accordance with this Code of Conduct. We ask all colleagues not to turn a blind eye to (possible) misconduct. Instead, address and report it.

Below sets out options you have to report and provides information on confidentiality, how your protection is ensured if you are the reporter or the person involved, as well as the different processes,



depending on your role in the reporting. Note that you may choose your own method of reporting, the options below are meant as a guideline.

Reporting (Whistleblowing)

If you become aware of conduct that leads you to reasonably believe that there is a violation of Enreach's Code of Conduct, legal or ethical obligations have been breached, you must immediately report it to relevant persons around you. There are different options for reporting:

1. Consider resolving the issue with an open conversation between you and the other party, or:
2. Talk to your Circle lead/manager and/or HR, or:
3. Talk to a Trust person
4. Report it via the Whistleblower link on the intranet or Enreach website.

In some Enreach countries we have a local designated internal and or external Trust Person to share your concerns anonymous. Enreach has 2 designated internal Trust persons in the Group, which can be approached by any employee in the Group, in case you cannot find your way in your country. The names can be found on the Enreach Sharepoint (intranet).

Please note these Trust Persons will not take any action without your consent and will primarily lend you a sympathetic ear and will try to advise you to the best of their knowledge on next steps inside or outside the company (depending on the reported issue).

Investigation

All reports will be promptly addressed and pending the case the appropriate and thorough investigation will take place. Information disclosed before and during the investigation will remain confidential to others and the alleged offender, including the identity of the reporting employee, except as necessary to conduct the investigation and to take any action required by law.

All employees have a duty to cooperate in investigations of misconduct related to work. Failure to cooperate may result in disciplinary action, up to and including termination of employment. If it is determined that a violation has occurred, Enreach will take appropriate action that is proportionate to the misconduct. Steps will also be taken to prevent further violations.

No Retaliation

As stated in the introduction of this code: **Enreach shall protect and shall not retaliate against any person who makes a report or participates in an investigation in accordance with this policy.** There shall never be any form of retaliation towards reporters. Anyone should feel completely safe to report suspected misconduct. In case of doubt: speak up and reach out. Never remain silent, no matter what the issue is.



Enreach protects individuals who report concerns under the EU Whistleblower Directive and the Dutch Whistleblower Protection Act. Retaliation in any form is strictly prohibited. All reports will be handled with confidentiality.

- Acknowledgement of a report will be provided within 7 days, and feedback on follow-up actions within 3 months, unless justified delays apply.
- Under law, there is a presumption against retaliation; Enreach must demonstrate that any subsequent actions are unrelated to the report.

Questions & Information

This Code does not anticipate every situation you may encounter, nor does it remove the need for using common sense of professional judgement. When in doubt, ask the following questions:

- 1. Is this legal?**
- 2. Is this in line with our Code of Conduct?**
- 3. Would I feel comfortable discussing this beforehand with my family or colleagues?**
- 4. Would I want to read about this in the news or on social media?**
- 5. Would I accept full responsibility for this decision?**

If your answer to any of these questions is "no" or if you are uncertain, stop, speak up and seek guidance. You can contact your manager, Compliance/Legal.

More information about our ethics and integrity efforts can be found at www.enreach.com