



Code of Ethics and Business Conduct



THE POWER OF CONNECTION

boltech.io



Message from our CEO

Every day, we demonstrate the power of connection to our partners, customers, and the outside world.

As we work towards our mission of building the world's leading technology-enabled ecosystem for protection and insurance, our bolttech Code of Ethics and Business Conduct ('Code' or 'Code of Conduct') ensures that we hold ourselves accountable to the highest ethical standards that our partners, customers, and stakeholders rightly expect from us.

Our Code reflects our bolttech values and encompasses the principles that guide our day-to-day work as leaders, employees and contractors of an international insurance technology business.

I encourage you to read and uphold this Code and consider the impact of your actions on our customers, partners, stakeholders and each other. Our commitment to it – and our values – will help us build an even better bolttech that attracts the best talent as well as valuable partners and loyal customers.

Best wishes,
Rob Schimek
Group Chief Executive Officer

Please do remember that you are not alone in the pursuit of ethical conduct.

Your managers and leaders are trained to answer your questions about how to handle a situation or report a concern. Please feel free to reach out to the Compliance department or use our dedicated helpline, completely safe in the knowledge that your concerns will be safely handled with sensitivity, understanding, and without any repercussions to you personally.

Thank you for your support in upholding our bolttech values and this fundamental Code.

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Introduction to the Code

We have developed this Code of Ethics and Business Conduct (“Code of Conduct” or “Code”) as a source of guidance and as a proof of our commitment to building a strong risk culture based on ethical and transparent principles, as well as promoting sound overall governance, risk management and fair treatment of customers and partners. This Code has been approved by the Group Board of Directors and is reviewed annually by Group Compliance.

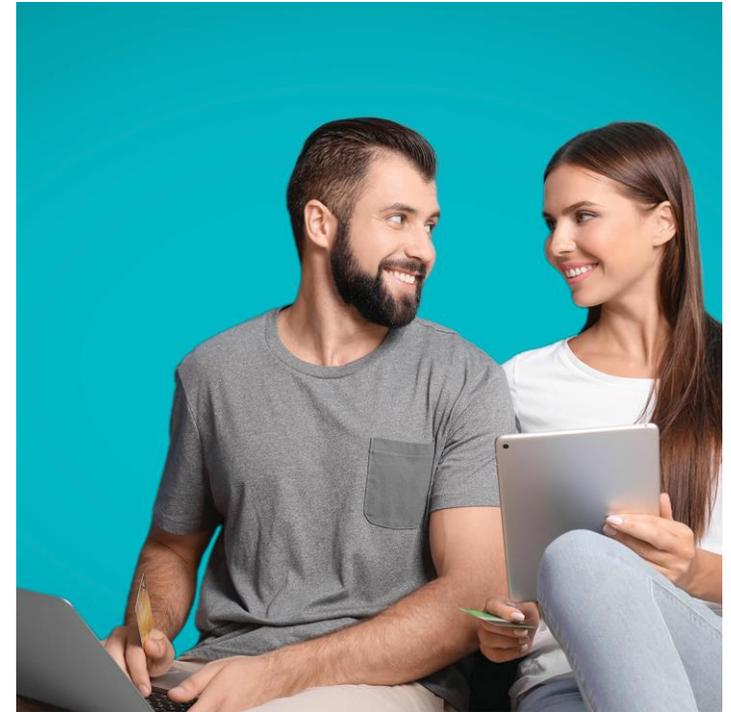
While no Code can cover every situation or challenge that we might encounter, we hope that the principles explained here provide you with the guidance you need to make an informed decision for any circumstances requiring ethical judgement.

This code applies to:

- **All bolttech Group's directors, officers and employees, including but not limited to permanent, part-time, temporary and contract employees**
- **All bolttech companies, its subsidiaries and controlled affiliates, as approved by the local Board of Directors**

All bolttech employees are expected to abide by the spirit of this Code and any applicable contractual provisions when carrying out their obligations under their contracts with bolttech.

Other third-party business partners, such as suppliers and contractors are also expected to abide by the spirit of this Code and to any applicable contractual provisions when performing services for, or on behalf of, bolttech.



Our Personal Commitment

Everyone in bolttech will be given access to this Code at the start of employment and will be asked to complete online training once a year to re-acknowledge the understanding of the Code and its contents.

The Code needs to be read in conjunction with the more detailed policies or guidelines that are in place at Group and country level. For details about these policies or guidelines you can check directly on our Digital Workspace or ask Group and local Compliance for clarifications.

In case of failure to comply with the standards contained in this document you may be subject to disciplinary action, up to and including dismissal, and possibly face legal penalties.

It's therefore extremely important to read this Code carefully and ensure that its contents are understood.

Leaders should discuss regularly the topics in this Code with employees, and make sure that employees understand how to adhere to the Code through one-to-one meetings, team meetings and with an open-door approach.



Where to Go for Help?

A culture of honesty includes our ability to speak up when we feel that something is wrong.

We take every effort to keep reports confidential and always operate on a basis of non-retaliation.

We will never take action against someone for making a disclosure to us in good faith and we do not tolerate retaliation.

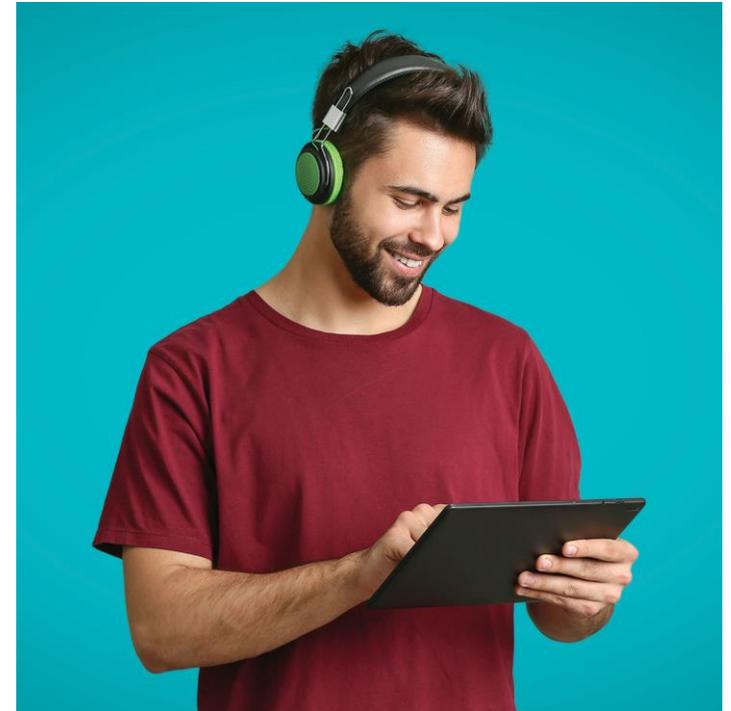
You can now express concerns or report violations by submitting a report via completing the online form on the boltech **Ethics Helpline** [here](#), or by calling our dedicated **Hotline** (local numbers can be found [here](#)).

Alternatively, you are encouraged to refer any concerns regarding suspected illegal, unprofessional, fraudulent or other unethical behaviour to:

- Group Compliance by writing to: **group-compliance@boltech.io**
- A member of your **local Compliance, Legal or People Department** by approaching them directly

All reports made by any of the above mean will be kept confidential and will not allow any form of retaliation against the person speaking-up in good faith.

If you feel that your questions or concerns have not been appropriately addressed, you should direct your complaint to the Group Compliance Officer or the Group General Counsel, whose contact information is in Digital Workspace.



The Code's Guiding Principles

By upholding this Code, we can ensure bolttech's continued success and maintain our reputation and brand. Regardless of our individual role in the company, whether we are directors, officers, managers, employees or bolttech's contractors, we are expected to always adhere to this.

Underpinning this Code are our Five Guiding Principles and by embracing these daily we can consistently uphold our Code.

01

Honesty and Integrity

02

**Awareness and
Responsibility**

03

**Openness and
Transparency**

04

Professionalism and Respect

05

**Socially and Environmentally
Responsible**

1.

Honesty and
Integrity

1. Honesty and Integrity

Acting with honesty and integrity means we follow all applicable laws and regulations and do what is fair and right when conducting our business.

We are expected to act with common courtesy in all of our business dealings.

Our success should be the result of the hard work and dedication of our people and we **reject bribery and corruption** as a way of building our business relations.

We should always consider and do what is fair and ethical in all circumstances and **refrain from putting personal interests above the company or our customers and partners**.

We do not tolerate dishonest or unethical behaviour and, as part of this, we **respect the intellectual property of others**.



Key Topics related to Honesty and Integrity principle

1.1 Reject Bribery and Corruption

1.2 Conflicts of interest

1.3 Intellectual Property

1.1

Rejecting Bribery and Corruption

1.1 Rejecting Bribery and Corruption

Bribery and corruption are prohibited under laws and regulations applicable to boltttech in the territories where it operates.

Anti-bribery and corruption laws prohibit us from offering, giving, or receiving, anything of value to gain an improper business advantage. This means that we cannot provide anything - including high value gifts, cash, lavish meals or entertainments, excessively favorable discounts or terms, in return of personal and/or business advantages.

boltttech understands that exchanging common business courtesies is an essential part of building strong working relationships with our business partners but, we must always use our best judgment when doing so and follow the local Policy or internal rules defined in the entities of operation.

We are also prohibited from making facilitation payments, which are unofficial payments made to speed up, obtain or secure an obligation that is already owed to us (for details of how to treat this type of payments, please refer to the local Policy or internal set of rules defined by your entity of operation).

Our rules on bribery and corruption extends to commercial entities (such as persons working for private businesses) as well as government officials. We should pay special attention to government officials because anti-corruption legislations often focus on improper payments to them and the penalties for such payments can be severe.

It can often be difficult to identify who qualifies as a government official, but it is our responsibility to determine whether parties involved in a transaction are defined as such. If you have any questions, reach out to your manager or follow the rules described by your local Policy or procedure.



1.1.1 Rules for Gifts and Entertainments

We should make sure that the gifts and entertainments we provide and receive do not give the appearance that we are exchanging courtesies to gain any improper personal or business advantage and should not be used to influence the decisions of partners to do business with us.

Detailed information about approval processes and thresholds for gifts and entertainments can be found in the local Policies in place in the entities of operation or by asking for approval to Group Compliance.

Generally, gifts and entertainment are permitted when they are:



Of low nominal value (not lavish or overly expensive)



Infrequent



Unsolicited



Reasonable, customary, and lawful



Respectful of local and cultural sensitivities



Allowed by the policies of bolttech and the exchanger's organisation

1.1.2 Examples of Gifts and Entertainments

Acceptable Gifts Include:

- bolttech corporate promotional items such as calendars, pens, coffee mugs, etc.
- Non-individualized food hampers
- Tickets to ordinary events (such as sporting, artistic or cultural events) where employee(s) and third party(ies) of bolttech are attending
- Invites to events such as seminars and conferences from third party(ies) (e.g. a consultancy firm), for which the topic of the event is in line with employees' working activity
- Certain activities assessed with low bribery risk such as a reasonable business dining arranged at short notice (which might also be acceptable with post-approval)

Prohibited forms of gifts and entertainment Include:

- Travel or accommodation not related to normal business activities
- Cash gifts or cash equivalent such as stocks, bonds, gift vouchers certificates, tec.
- Invitations to particularly expensive cultural or sporting events, such as World Cup finals, where the giver or the receiver is not present
- Gifts or invites that would be considered to be lavish by the receiver, such as first-class air tickets and 5 stars hotel booked for a junior staff of our counterpart
- Invitations to conferences, seminars or similar events followed by lavish and individualized activities that occur prior to or after the event and are unrelated to the event itself (e.g. green-fee entrance for a weekend of golf after a conference)
- Gifts, entertainment or anything of value that involve activities, products, services or venues that might embarrass, or that might be considered of bad taste

Note that the above lists are not exhaustive and approval processes and thresholds for gifts and entertainments should always follow the rules included in the local Policies in place in the entities of operation or given by Group Compliance.

1.1.3 Rules for Political and Charitable Contributions

As part of a reputable global corporation, individuals may look to us to provide political or charitable contributions to a variety of causes. We cannot support these causes using bolttech funds, resources or assets, or with reference to bolttech's name without prior approval from Group Compliance.

While contributing to political and charitable causes can be a worthy endeavour, a donation could be perceived as a bribe when given in a certain business setting or when happening at the same time of a transaction into which bolttech is involved.

You may provide these types of contributions using your own funds and resources without reference to bolttech's name, as long as the contribution is not related to gaining a business advantage for bolttech.

For details about any type of contributions, whether financial or in any kind, to political parties or organizations or to individual politicians or to charitable organizations, please contact Group Compliance.



1.2

Conflicts of Interest

1.2. Conflicts of Interest

Fulfilling our clients' needs and meeting our stakeholders' expectations requires our full attention on a daily basis. To maintain our dedication, we need to avoid conflicts of interest that could limit our ability to carry out our responsibilities for bolttech.

A conflict of interest is most typically a situation where an employee or contractor has a private or personal interest which may influence – or appear to influence – his/her independence and objective judgment at work. **Examples of conflict of interest** can be found below:



Competitors

Serving as a director, holding significant financial interest or working for bolttech's competitors is a conflict of interest, because your loyalty would be divided between both companies and there may be a clash of interests on some matters. In addition, working for a competitor limits your time to conduct work for bolttech and creates a risk that business and products plans, or other confidential information could be revealed.



Relatives

Hiring relatives to work for bolttech is not prohibited, but relatives must be recruited under the same process and criteria as other candidates. If you have a relative that is interested in working for bolttech, speak to the People department about them and they will instruct you on the appropriate next steps.



Business Partners

Steering business to specific firms or business partners can also be a conflict of interest, especially if you have an interest in, or hold a relationship with that firm or business partner.



Third Parties

If you know of a potential service provider that bolttech should consider for an engagement or transaction, ensure that they undergo the same review process as every other potential third party. Note that accepting a gift or entertainment during such review process could also create an actual or perceived conflict of interest.



Customers

Conflicts of interest relating to customers may arise when an employee or a third-party representative of bolttech has an interest in the outcome of products/ services provided to a customer, which might potentially undermine the customer's reasonable interest in the outcome. Some common examples are advanced commission and offering aggressive sales incentives to the sales forces.

1.2.1 Corporate Opportunities

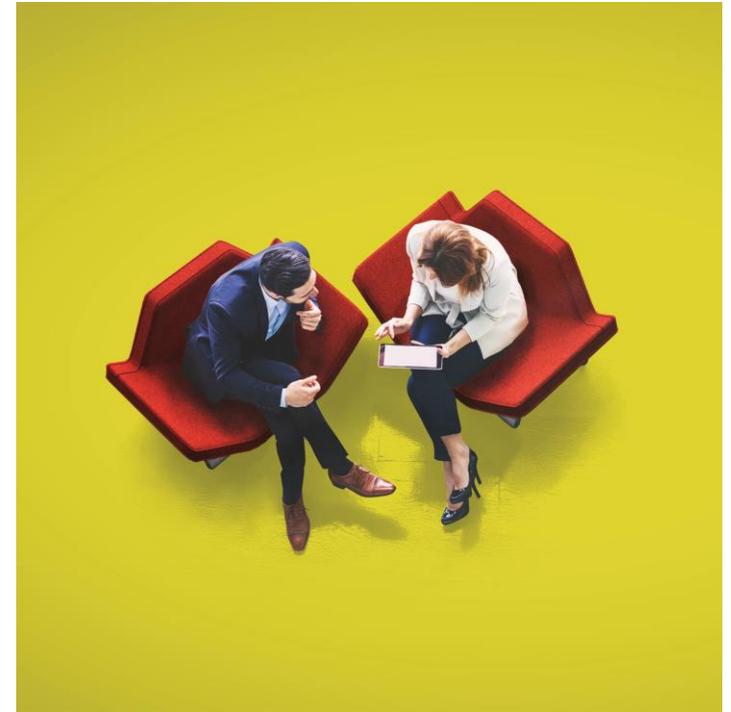
Corporate opportunities are business opportunities that a person encounters as an employee of bolttech. You cannot take these opportunities to enrich yourself personally, unless bolttech has informed you that the company will not be pursuing the opportunity and has consented to you taking the opportunity.

1.2.2 Disclosing a Conflict of Interest

If a situation or opportunity arises that could potentially cause a conflict of interest to your role as a bolttech employee, you must disclose the conflict of interest to bolttech.

Disclosing a potential conflict of interest does not necessarily mean that bolttech will bar you from engaging in an activity. Rather, disclosure provides us with a chance to review the particular circumstances and communicate with you on whether you can safely pursue the situation or opportunity.

All employees and contractors are required to complete the Declaration of Conflicts of Interest. Contact your Department Head or Compliance for more information.



1.3

Respecting Intellectual Property and Copyright

1.3. Respecting Intellectual Property and Copyright

An important part of doing business with integrity means respecting our own and others' intellectual properties. Intellectual property relates to a variety of confidential information possessed by boltech and our competitors and external parties.

Respecting intellectual property rights means that we should only gather information that is publicly available and through legal and ethical means.

Intellectual property includes, but is not limited to:

-  **Business Plans**
-  **Pricing Information**
-  **Market Research**
-  **Copyright Information**
such as software, images, publications and notes

In addition to gathering information properly, we should only access information and materials that we have a right to use.

For example, when putting marketing materials together, we can only use images that we have a licence for, such as pictures from our company image bank.

The same is true for the software that we use on our computers and music we use in commercials and videos.

If you have any questions about whether certain information or materials can be used for boltech business, please contact your manager.



2.

Awareness and Responsibility

2. Awareness and Responsibility

Acting with awareness means that we all must take the time to be familiar with the policies and procedures that relate to our particular role and always act within our authority.

At bolttech, we specialize in insurance products and services that can assist individuals, families and companies across multiple geographies. Having a versatile set of products and services also means that we will attract a diverse group of customers and partners which could, in limited cases, attempt to utilize our products and services for illegitimate reasons such as to **laundering money** or **financing terrorism** or, in other instances, may attempt to pay in ways that could contravene applicable laws and regulations related to **trade economic sanctions**.

To guard against the above-mentioned **financial crimes**, we should gather as much information as possible about a customer or third party and make responsible decisions as to which customer and third party we are comfortable working with.

Finally, acting with awareness it also means that we must refrain from **engaging in anti-competitive activities** or from **abusing of the internal information** for personal gain.

Acting with responsibility means that, while we are not expected to know everything, we must not hesitate to ask questions to our line manager or Compliance when we aren't sure what to do.

Key Topics related to Awareness and Responsibility principle

2.1	Anti Money Laundering (AML)	2.4	Know Your Customer and Partner
2.2	Counter Terrorism Financing (CTF)	2.5	Anti-Competitive Activities
2.3	Trade Economic Sanctions	2.6	Insider Dealing

2.1

Recognising and Avoiding Money
Laundering

2.2

Recognising and Avoiding Counter-
Terrorist Financing

2.1 Recognising and Avoiding Money Laundering

Money laundering is the process of transferring illegally obtained money through legitimate avenues, to conceal the original source of the money. For example, someone profiting from illegal trafficking may try to buy an insurance policy to hide the fact that the earnings originally came from illegal activities.

As a responsible company, we need to ensure that our customers are not buying our products with illegally obtained funds as a means to launder money. We must gather sufficient information from customers to satisfy ourselves that they are who they say they are, and remain alert to any potential suspicious circumstances that can arise during the lifetime of a customer or commercial arrangement.

Any failure by us to identify customers planning to utilise bolttech services to launder money could lead to bolttech being held responsible for assisting in these crimes.



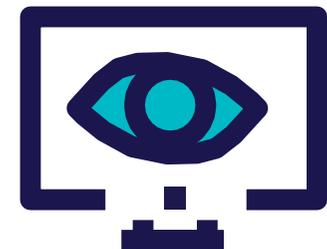
2.2. Recognising and Avoiding Counter-Terrorist Financing

Another risk we must be aware of is customers using our products and services to finance terrorist groups.

Governments are constantly checking to see how terrorists finance their schemes, and as a result terrorists are always searching for new, underhanded ways to support their causes.

Using insurance products is one way terrorists covertly finance their causes. As a reputable corporation, we do not want to serve such customers or be associated with them in any way.

Just as with money laundering, we need to learn about who our customers are. We should find out as much information as possible about who the insurance products and pay-outs are benefitting.



2.3

Trade and Economic Sanctions

2.3 Trade and Economic Sanctions

Beyond money laundering and terrorism concerns, we want to ensure that our customers, their intended beneficiaries and payees are not sanctioned or blacklisted persons or entities.

Trade and economic sanctions refer to the restrictions or suspension of economic or commercial relations or financial sanctions against specified individuals, countries and businesses issued by international governing bodies as well as local sanctions regulations with the aim to protect national security interests, or to protect international laws, and defend against threats to international peace and security.

The types of sanctions measures put in place can vary widely and could include financial restrictions, import/export restrictions and travel bans.

Most countries possess lists of individuals and organizations that should not be dealt with for a variety of reasons, such as operating out of a sanctioned country, past criminal history, human rights violations, etc.

Sanctions are created by a variety of international, regional and state bodies that include, for example, the United Nations, the European Commission, the US Department of the Treasury, etc.

The creation of sanctions by multiple bodies within the international system means that there can be various layers of sanctions which may need to be considered in any one scenario.

It is our responsibility to determine whether customers or their related parties are sanctioned or on any watch lists.

Dealing with listed individuals or organisations is a violation of international economic sanctions regulations and carries heavy penalties for bolttech and our employees.



2.4

Know Your Customer and Partner

2.4 Know Your Customer and Partner (KYC)

In order to help detect and prevent financial crime risks, bolttech should gather sufficient information on both prospective and existing customers and partners for due diligence purposes in order for bolttech to be able to satisfy that the customer is who they say they are, taking into account the products and services being provided by bolttech. This is known as the Know-Your-Customer (KYC) process.

For customers and partners, it is vital to ensure that the relevant KYC information is collected and available when entering the relationship. Thus, arrangements will have to be made with bolttech partners and intermediaries to ensure that this can be provided. Relevant data should consist as a minimum of full name and address, and where possible date of birth. A minimum level of KYC data is also required for completing sanctions screening.

Minimum level of data/information should include the following:

-  **Identity check at time of engagement**
-  **Background checks including “negative media”**
-  **Results of name screening for Sanctions and CTF purposes (and for AML if required by the local applicable regulations)**

This is not an exhaustive list. Please seek guidance from your Department Head or local Compliance for guidance on carrying out the KYC process.

2.5

Competing Fairly in the Marketplace

2.5 Competing Fairly in the Marketplace

Our success depends on our hard work, knowledge and innovative products, rather than engaging in unfair business practices such as dividing markets and price fixing.

Competition laws and our policies prohibit us from engaging in anti-competitive activities that would harm customers and endanger our long-term success.

Anti-competition practices such as anti-competitive agreements, abuse of market power, and anti-competitive mergers and acquisitions are prohibited by several laws and could carry severe penalties for our company and employees.

Dividing markets involves agreeing with competitors to distribute market shares to each company by, for example, deciding to deal only in certain territories and preventing the customers from having alternative solutions and lower prices in their local markets.

Price fixing involves an agreement among competitors to set prices for certain types of products or services. Price fixing is against the law because customers expect prices to be determined by supply and demand and other market forces, rather than on agreements entered into by competitors.

As part of upholding our Code, we should refrain from speaking to competitors about:

- Our business activities or plans;
- Customer data and insights;
- Our product pricing including premiums, deductibles, pay-outs, discounts and other price-related items;
- Any future products or marketing plans.

Seek advice from the Compliance department before initiating any discussions or meetings with competitors.

2.6

Insider Dealing

2.6 Insider Dealing

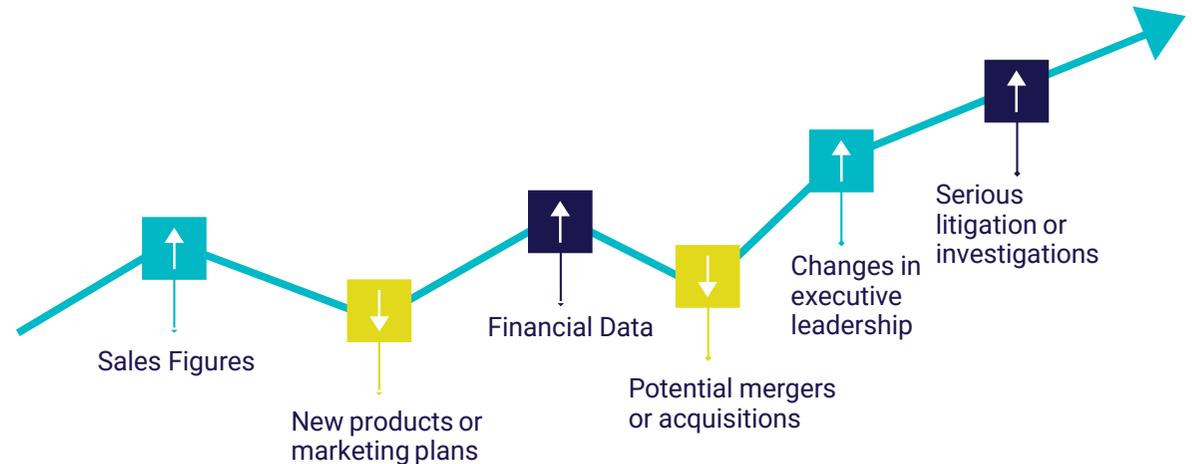
Our industry is always changing, with new products constantly in development to meet the challenges and opportunities that life presents. As employees of bolttech, we may become aware of important, potentially trend-setting, information about our company or other related companies earlier than the public does.

We cannot use material information before it is made known to the public for trading purposes such as buying or selling stocks. We also cannot engage in ‘tipping’ i.e. using material information to advise our friends, relatives or anyone else on trading decisions.

As informed and responsible employees, we must check with the Compliance department to ensure that any vital information we possess has been made public.

More information can be found by reaching to Group Compliance.

This kind of information is often referred to as “material information” and includes, but is not limited to:



3.

Openness and Transparency

3. Openness and Transparency

Conducting our work in an open and transparent manner is about more than just being honest and it is related to:

- Protecting our company's reputation by keeping **accurate records** of our business dealings;
- Managing personal **data** of our clients, employees and third parties with the right level of **protection and confidentiality**;
- **Treating our customers, partners and each other fairly** and being transparent in our operations;
- Presenting our products and services objectively, without exaggerations or withholding information from customers, regulatory authorities or from each other.



Key Topics related to Openness and Transparency principle

3.1 Accuracy of Records

3.2 Data Protection and Privacy

3.3 Treat Customers Fairly

3.4 Use of Social Media Responsibly

3.1

Accuracy of Records

3.1 Accuracy of Records

Maintaining accurate records helps to:

- **Identify improper transactions**
- **Confirm that transactions with customers are carried out according to our standards**
- **Meeting industry regulations on proper accounting practice**
- **Forecast future opportunities more clearly**
- **Meet internal and external audit review procedures**

We must also properly manage our records. Record management is important to meet industry regulations and to comply with the requests of internal and external auditors, who can help to ensure that our company is meeting our financial goals.

The most important part of maintaining accurate records is to follow our approved accounting procedures. This includes submitting accurate documentation related to our job duties (such as time sheets and expense reports) and records of dealings with customers.



3.2

Data Protection and Privacy

3.2 Data Protection and Privacy

A key element of our responsibilities relate to protecting confidential information. By protecting our data, we can maintain our competitiveness in the market and demonstrate to customers that we are a trustworthy and valuable partner. We take great care in protecting personal information.

Confidentiality of Employee Information

We may have access to private and personal information of bolttech employees, including contact information and compensation details. In accordance with all applicable data privacy laws, we only release personal information if legally required.

As an employee of bolttech, you may also have access to personal employee data such as name, address, email, credit card, bank details and other information. You are required to treat this information confidentially during your employment with us and afterwards and to follow the rule of our Data Protection Policy.

Confidentiality of Customer Information

At bolttech, we understand the close relationships we must build with our customers to provide products that can truly enrich their lives.

We also understand that through our roles, we will come into possession of various kinds of personal information. We take great pride in preserving the confidentiality of this information to maintain client trust and to comply with all applicable data privacy laws.

Confidential information of bolttech:

- **Should only be used for company purposes**
- **Should only be shared with colleagues on a need-to-know basis**
- **Should never be shared with anyone outside of bolttech (unless the Compliance department permits you to share the information, such as when a Non-Disclosure Agreement is in place or when required by government authority).**

More information can be found in your local Data Privacy Policy in place or through Compliance department.

3.3

Treating Customers Fairly

3.3 Treating Customers Fairly

At bolttech, we are committed to delivering our brand values to every person who engages with the brand, so they consistently receive a positive customer experience. The core principle in this regard is to ensure fair treatment of our customers.

We should always act with good faith towards our customers and partners and place the interests of clients before all other considerations whenever appropriate. We must never make inaccurate, misleading or deceptive statements to induce a client to enter into a business relationship.

Facilitating a fair environment also means that customers are able to freely voice their concerns. We must ensure we provide customers and partners with clear information and an accessible means to express their opinions, or to complain or dispute any issue that may arise throughout the course of their business relationship with us. We must handle these concerns with due care and objectivity. Any feedback that we receive – positive or negative – is valuable in improving our products, services and other processes, as it serves to enhance our overall customer experience.

3.3.1 Fair Sales and Marketing Practices

We should always present our products accurately and take the time to describe the key features, benefits, exclusions and risks.

Anyone selling our products whether directly or on our behalf, must provide customers with full and complete information pertaining to our products and services, our business and all other relevant details. Managers should review the sales practices of all employees to ensure that communications regarding our products are truthful and accurate.

We always accurately present products to customers – not just during sales interactions – through the use of approved marketing materials which must be clear, fair and not misleading. There must be no misrepresentations of any kind, whether intentional or not.

To adhere to this practice you should spend time thoroughly understanding our products. When you have questions or need more information, seek out information from your manager.

3.4

Using Social Media Responsibly and Making Public Statements

3.4 Using Social Media Responsibly and Making Public Statements

We may be able to utilise certain social media platforms to promote or raise awareness of bolttch's products and services. The Customer Experience department will advise us on who can communicate with social media on behalf of bolttch.

When we use social media we should be respectful of bolttch and each other. We must never reveal confidential information through social media or present the official opinion of the company without prior approval. All of the guidelines about confidential information apply when using social media.

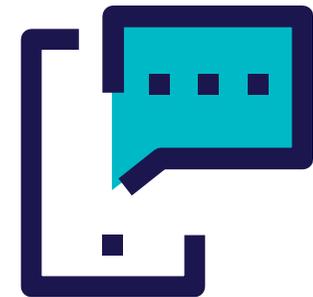
We must take individual responsibility for our online image and the content we publish. Be thoughtful about how we present ourselves on social media, pay attention to the choice of words and its implication, and ensure all postings are factual, substantiated and authorised.

Think before you post and remember that the internet never forgets.

No one other than Group Communication has responsibility for making public statements about bolttch.

In limited circumstances, selected individuals may be authorized to speak to the media or make public statements on behalf of bolttch with pre-approval from Group Communications.

If you have any questions, please seek advice from your manager, the Customer Experience or Group Communication departments.



4.

Professionalism and Respect

4. Professionalism and Respect

Acting with professionalism and respect is an important part of working for our company.

We value the welfare of our colleagues, customers and partners, and genuinely strive for our company's collective success.

We can achieve these goals by maintaining a safe and healthy workplace, promoting a workplace that's rich in diversity, where people of all backgrounds, race, color, religion, gender, age and disabilities are accepted and embraced.

We encourage innovation, ideas and improved ways of doing the work, but never at the expense of doing the right thing towards our customers, our partners and each other.

Boltech do not tolerate bullying or harassment.

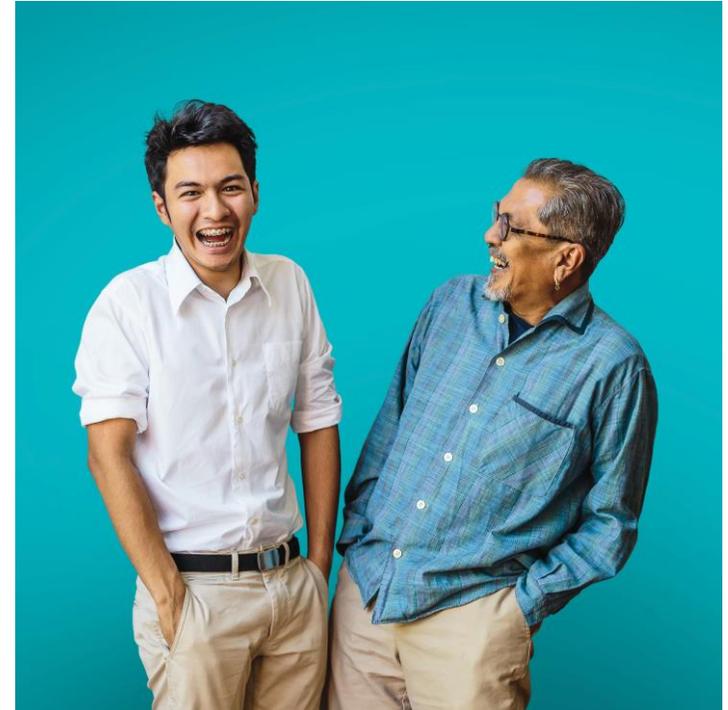
Key Topics related to Professionalism and Respect principle

4.1

Workplace Safety

4.2

Discrimination and Harassment



4.1

Workplace Safety

4.1 Workplace Safety

The health and safety of our employees is one of our top priorities. We provide a work environment that promotes employee safety and well-being, and employees are required to follow our safety policies to help maintain this environment.

Please be aware of your surroundings at all times. If you have a concern regarding our work premises, or if there's something you think can be improved or made safer, or you're worried about either your health or the health of another employee, please let us know. We want to hear from you – we take any concerns raised to us very seriously.

We expect employees to be sober while on work premises or when carrying out work engagements in off-site locations. You must not be under the influence of alcohol or drugs (regardless of whether they are legal or not) while conducting bolttech business.

At company social events or during off-site meetings with customers or partners, alcohol may be consumed in moderation.

If you have any questions regarding our safety policy, please speak to your manager.



4.2

Harassment and Discrimination

4.2 Harassment and Discrimination

Our offices are staffed by people of many nationalities and ethnicities. We speak a variety of languages and our business partners and customers are a diverse group as well. At our core, we are an international company that embraces diversity.

Our work environment fully supports this dynamic. We do not tolerate any form of discrimination or harassment.

Discrimination is treating someone differently due to their age, race, colour, nationality, ethnicity, gender, sexual orientation, marital status, medical or physical condition or disability, or some other unique characteristic. At bolttech, we embrace the unique qualities of all of our employees, customers and partners, and treat everyone with respect at all times.

We do not discriminate during recruitment and build our workforce based on the merit of each candidate.

Harassment includes verbal, physical or sexual behaviour towards another person which causes them discomfort or intimidates or marginalises them. We do not tolerate harassment towards each other, our customers, business partners, or candidates interested in joining bolttech.

Our principle of Professionalism and Respect means that we treat each other fairly and work to embrace our international culture. Part of upholding this principle means taking the initiative to report any incidents of discrimination or harassment to the People department, your manager or the Compliance department.

If you are the subject of harassment or discrimination, you may feel uncomfortable or intimidated to speak up. We are here to support you, and if you are not ready to speak up, talk to another employee about your situation and approach us together so we can help you and find a solution.

You can always express concerns or report violations by:

- **submitting a report by filling an e-form via the bolttech Ethics Helpline [here](#);**
- **calling the hotline and report the case with the help of intake specialist (local numbers can be found [here](#))**
- **writing to: group-compliance@bolttech.io**
- **reaching out to a member of your local Compliance, Legal or People Department by approaching them directly**

All reports made will be kept confidential and we do not accept or allow retaliation against any person making a disclosure in good faith.



5.

Socially and Environmentally Responsible

5.1

Social Responsibility

5.1 Social Responsibility

We are committed to supporting the communities around us, backing charities and philanthropic causes, and upholding human rights.

To support our local communities, we should stay aware of relevant issues affecting people around us. Where we can, we want to empower local communities' financial sustainability. Our company may organise events such as hikes, walks and charity drives to fundraise for important issues. We encourage you to join these events.

We may back charities and support certain causes using boltttech's name or resources. We only support these causes if approved by our leadership. You may personally support specific causes using your own funds and resources, and without reference to boltttech's name, as long as your intention is sincere and never to gain a business advantage for our company.

We also support the promotion of human rights. This means that:

- **We pay wages and provide benefits in alignment with local laws**
- **We do not hire under-age individuals**
- **We do not work with customers, agents or business partners that are known violators of human rights**
- **We allow people to be part of organisations as they see fit, as long as the organisation is allowed locally and does not disrupt their or our ability to carry out work for boltttech**



5.2

Environmental Stewardship

5.2 Environmental Stewardship

Being environmentally responsible is expected of everyone working for a reputable company like bolttech. It means we manage our business activities responsibly, avoid negative impact on the environment, reach out to the community to give back, and support noble and just causes.

We believe that our business has a positive impact on people and for the same reason we should ensure that our work also has a positive impact on the environment.

Much of our work is focused on helping families, and by supporting sustainability efforts, the world can be a better place for future generations.

To impact the environment positively, there are many things we can do, for example:

- **Recycle where possible**
- **Limit waste by printing thoughtfully and re-using materials where possible**
- **Dispose of unneeded materials responsibly**





THE POWER OF CONNECTION

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