

ANNEX 2 – CODE OF CONDUCT & ANTIBRIBERY POLICY

EXECUTIVE SUMMARY

Our Code of Conduct (“**CoC**”) reflects our commitments to meet the expectations of our stakeholders as a responsible company, employer and partner and contains the fundamental principles and rules concerning ethical business conduct. We believe that how we achieve our business results is as important as the achievement itself. The Internet CoC forms an integral part of the terms of employment of all team members of Internet.

This Internet Code of Conduct was introduced by Internet in May 2018 and is applicable to all operations and team members of Internet.

THE CODE OF CONDUCT

Internet promotes the societal and environmental values of the United Nations Global Compact within its entire company structure, thus affiliates and employees. The Internet Code of Conduct (the “CoC”) is based on the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights and other international standards or accepted good practices.

Internet requires its employees to comply with the standards defined in the CoC. Internet follows principles for ethics, labour rights, health, safety, and environment.

- Internet staff training programs are consistent with these principles
- Internet believes that society and business are best served by responsible business behaviours and practices. Fundamental to this belief is that business should not only operate in compliance with applicable laws, rules, and regulations, but that our behaviours address underlying societal concerns.
- The CoC does not replace local laws. Internet expects its team members to operate in compliance with applicable laws, rules, and regulations in addition to the standards contained herein
- The CoC states that Internet employees shall not bribe anyone, and this policy sets forth the respective principles and rules and how they must be implemented.

A glossary of terms used can be found at the end of this document.

RESPONSIBLE HIRING AND WORKING CONDITIONS – ETHICAL STANDARDS

We commit to provide our team members fair and competitive wages based on performance and ethical conduct. We protect team members from unfair or unethical working conditions, including bonded, forced, child labour, or unsafe working conditions.

We treat our team members fairly, equally, and respectfully. We expect team members to demonstrate respect toward each other and we do not tolerate any form of harassment or discrimination.

The evaluation of an employee's performance considers both achievement on objectives as well as adherence to the Internet value and behaviours. Constructive dialogue between the associate and supervisor on goals, priorities and development needs is an essential part of the Internet performance management process.

We offer opportunities for our team members to develop, grow and continuously improve their individual skills to strengthen the competencies of Internel.

We recognise that every employee is entitled to freedom of opinion, expression, and speech, provided these do not interfere with the associate's ability to fulfil their job responsibilities or conflict with the CoC.

Human Rights

All employees shall be committed to treat team members with dignity and respect. The labour elements include:

Freely Chosen Employment: Internel shall not use forced labour, including, involuntary prison labour or engage in any form of slavery or human trafficking.

Child Labour and Young Employees: Internel shall not use child labour. The employment of young employees below the age of 18 is not permitted.

Non-Discrimination: Internel shall provide a workplace free of harassment and discrimination for reasons such as race, colour, age, gender, ethnicity, disability, religion, political affiliation, pregnancy, sexual orientation or marital status.

Fair Treatment: Internel shall provide a workplace free of and with no threat of harsh and inhumane treatment, including sexual harassment or abuse, corporal punishment, mental or physical coercion or verbal abuse of employees.

Wages and Working Hours: Internel shall pay its employees according to applicable laws and communicate in a timely manner the basis upon which they will be paid and whether overtime is required, and the wages for such overtime.

HEALTH, SAFETY AND ENVIRONMENT

Internel expects its employees to understand the applicable Health, Safety and Environment standards for its specific services. The effectiveness of the protection needs to be verified by trained and experienced internal or external trainers.

Health and safety

Hazard Information and Employee Protection: Internel shall have programs and systems in place to provide employees with safety information relating to hazardous materials and education to protect them from potential hazards. Hazardous materials can include but are not limited to products, solvents, cleaning agents, and wastes.

Emergency Preparedness and Response: Internel shall develop and distribute emergency plans across their facilities and minimise the potential impact of any emergency by implementing suitable emergency plans and response procedures.

Environment

Environmental Authorisations: Internel shall have processes to conform with applicable environmental laws and regulations. Required environmental permits, licenses, information registrations and restrictions shall be obtained, and their operational and reporting requirements followed.

Waste and Emissions: Internel shall have processes in place to ensure the safe handling, movement, storage, recycling, or management of waste. Any generation and disposal of waste, emissions to air and discharges to water, with the potential to adversely impact human health or the environment shall be appropriately minimised, properly managed, controlled and/or treated prior to release into the environment.

TRANSPARENCY, FAIRPLAY, COMMITMENT TO LAWS AND REGULATIONS

We are open and transparent with respect to our business principles and practices and comply with applicable laws and regulations.

Financial integrity

We do not compromise our financial integrity. Financial risks and operational measures are appropriately reviewed and approved. We provide timely, accurate and complete financial information to shareholders and financial authorities. We maintain effective controls over financial reporting to ensure complete/accurate financial records.

Business continuity

We believe that business continuity management is critical for our customers, team members and other stakeholders, and is part of responsible management practice. In the event of an emergency or significant business disruption, we are committed to doing our utmost to ensure uninterrupted supply of key services.

Safeguarding company assets

We work to protect assets of Internel against threats. This applies to our team members, reputation, intellectual property, information, services, property, and other assets. We properly use and maintain assets of Internel and ensure that they are protected from misuse, loss, theft, and waste.

Marketing practices

We market and sell our services in compliance with all applicable rules and regulations, and in line with high ethical standards.

Fair Competition: Internel shall conduct its business consistent with fair and vigorous competition, employ fair business practices, as well as comply with all fair competition and antitrust laws and regulations.

Data privacy and information security

We respect the privacy rights of our team members, customers, and other stakeholders. We inform individuals of collection and processing of their personal data, allowing them to make informed decisions and exercise their rights.

We collect and process personal data for specific and legitimate business purposes only and secure such data against unauthorised access. We protect the confidentiality, integrity, and availability of critical information, regardless of its form and location.

Data Privacy and Information Protections: Internel shall establish and maintain adequate personal data and information security protection for the information that Internel, and any third parties acting on its behalf, process. Internel will operate in a manner that is consistent with applicable data protection/privacy laws for the protection and security of all information, including Personal Information.

We have policies and procedures in place which address technical and organisational security, as well as to ensure the protection, confidentiality, integrity, and availability of information against accidental, unauthorised, or unlawful loss, destruction, alteration, disclosure, use or access. Such policies and procedures include the Data Security Policy and the IT System Management Policy ▶ *Documents 3.7.1 and 3.7.2, latest versions.*

HOW TO REPORT POTENTIAL MISCONDUCT

Employees who report potential misconduct or who provide information or otherwise assist in any inquiry or investigation of potential misconduct will be protected against retaliatory action. Misconduct is any conduct that violates the Internel CoC and/or external law or regulation.

Identification of Concerns: All employees should be encouraged to report concerns or illegal activities in the workplace, without threat of reprisal, intimidation, or harassment. Internel shall investigate and take corrective action if needed.

Employees with knowledge of potential misconduct, or receiving a report of misconduct, must notify their direct report or Management and report the issue in person, by phone or e-mail, without further disseminating the information.

THE ANTI-BRIBERY POLICY

Bribery means offering, giving, or promising (or authorising someone to offer, give, or promise) an improper benefit, directly or indirectly, with the intention of influencing or rewarding the behaviour of someone to obtain or retain a commercial advantage.

Bribery can take a variety of forms – offering or giving money or anything else of value. In fact, even common business practices or social activities, such as the provision of gifts and hospitality, can constitute bribes in some circumstances.

Anti-bribery and Corruption: Internel and its employees shall not bribe any public official or private person and shall not accept any bribes. No intermediaries, such as agents, consultants, advisers, or any other business partners, shall be used to commit acts of bribery. Internel does not distinguish between public officials and private persons so far as bribery is concerned: bribery is not tolerated, regardless of the status of the recipient. Internel and its employees shall comply with applicable laws and regulations and industry standards related to anti-corruption.

How to behave....

Situations when team members receive, agree to receive, request, or accept a financial benefit or anything else of value shall be reported immediately to the direct report.

Definition of Gifts, Hospitality and Entertainment

Gifts are benefits of any kind given to someone as a sign of appreciation or friendship without expectation of receiving anything in return. They include 'courtesy gifts', which are small gifts given at recognised occasions like weddings, or special times of the year like Christmas.

Hospitality generally includes refreshments, meals, and accommodation. Entertainment generally includes attendance at concerts and sports events.

How to behave...

Gifts, hospitality, and entertainment are never offered, promised, or provided with the intent of causing the recipient to do something favouring or from doing something disadvantaging to Internel and its employees. Gifts, hospitality, and entertainment are modest, reasonable, and infrequent, so far as any individual recipient is concerned.

Do not provide entertainment to any participant to Internel business meetings, seminars, or comparable events, unless the entertainment is an appropriate and incidental part of such events. Do not pay for the entertainment, hospitality, or travel costs of anyone who accompanies an invitee to an Internel business meeting, seminar, or comparable event.

Before giving a gift or providing hospitality or entertainment to anyone, consider whether the reputation of Internel, yourself, or the recipient is likely to be damaged if news of the gift, hospitality, or entertainment appeared in public. If this would embarrass either Internel or the recipient, do not proceed.

MONITORING AGAINST OUR STANDARDS

Adherence to the standards contained in this Bribery Policy is one of the criteria used in the Internel employee selection and evaluation process. Internel expects its employees to adhere to applicable legal standards and any higher standards contained herein.

GLOSSARY OF TERMS

Data Protection Laws/Legislation:

- a) the EC Data Protection Directive (Directive 95/46/EC);
- b) all other existing or new applicable laws/regulations relating to or impacting on the processing of Personal Data of a data subject and/or its privacy.

Human Trafficking: The transporting, harbouring, recruiting, transferring, or receiving of persons by means of threat, force, coercion, abduction or fraud for Labour or services.

“Personal Data/Personal Information”:

- a) any information relating to an identified or identifiable person, including without limitation electronic data and paper-based files that contain information such as name, home address, office address, e-mail address, age, gender, family information, profession, education, or salary;
- b) non-public personal information, such as national identification number, passport number, social security number, driver's license number;
- c) health or medical information, such as insurance information, medical prognosis or treatment, diagnosis information or genetic information; and including coded clinical trial patient data;

- d) sensitive personal information, such as race, religion, disability, trade union memberships or sexuality, and;
- e) any data or information that is qualified as Personal Information or Personal Data under the applicable Data Protection Legislation.

Affiliates and Employees: Includes any Internal party, company, partnership, or other entity controlled by, or under common control of Internal. For such purpose, the term "control" means the holding directly or indirectly of 50% or more of the common voting stock or the ordinary shares in, or the right to appoint 50% or more of the directors or officers of, the said company, partnership or entity or the ability to otherwise control the management decisions of such other entity. Employees are personnel and/or employees employed by any such affiliate as outlined before.

Employee: Any employee, director, team member, staff, or personnel engaged or employed by a affiliates and employees, including agency employees, whether on a permanent, temporary, or casual basis.