

# CODE OF CONDUCT

**INTEGRITY**  
ALWAYS,  
EVERYWHERE.





## OUR PURPOSE AND VALUES

### 01

#### LIVING THE CODE

7 Scope

### 02

#### BUSINESS CONDUCT

- 9 We Promote Compliance with Applicable Laws
- 9 We Avoid and Manage Conflicts and Potential Conflicts of Interest
- 10 We Do Not Engage in Bribery or Corruption
- 10 We Comply with Anti-Money Laundering Legislation
- 10 We Respect Economic Sanctions, Embargoes and International Trade Laws
- 11 We Compete Fairly
- 11 We Do Business with and Through Reputable Third Parties

### 03

#### PEOPLE

- 13 We Do Not Use Child or Forced Labour, Human Trafficking or any form of Slavery
- 13 We Respect Freedom of Association
- 13 We Treat Others with Respect and Do Not Discriminate
- 13 We Foster an Inclusive Working Environment
- 14 We Do Not Tolerate Intimidation or Harassment
- 14 We Use Company Assets and Resources in a Responsible Manner
- 14 We Protect Our Reputation
- 14 We Recognise and Respect Personal Privacy

### 04

#### ENERGY, ENVIRONMENT, HEALTH & SAFETY

- 16 We Protect the Health and Safety of Others and Ourselves
- 17 We Implement Environmental Protections in Our Processes
- 17 We Produce Safe and Environmentally Friendly Products

### 05

#### COMMUNITY AND SOCIETY

- 19 We Aim to Deliver the Highest Value to Our Customers
- 19 We Objectively Select Our Suppliers
- 20 We Maintain Transparent Relations with Public Institutions
- 20 We Participate in Public Matters in an Appropriate Manner
- 21 We Are Active Members in the Communities in Which We Operate
- 21 We Are Fair, Honest and Open in Our Communications

### 06

#### INTERNAL CONTROL AND RISK MANAGEMENT SYSTEM

- 23 We Have Adopted Processes for Our Financial Reports, Accounting and Tax Records
- 24 We Handle "Inside Information" Appropriately and Lawfully
- 24 We Safeguard Our Confidential Information

### 07

#### A CULTURE OF COMPLIANCE & ETHICS

- 26 We Encourage Speaking Up
- 26 We Foster Continuous Learning

## Our Purpose and Values

IDV Group's Purpose and Values are a source of energy, creativity and unity for all of us working for and with our Company, as we continue on our shared journey of growth.

Our **Purpose** is the cornerstone of our business: it reflects the reason our Company exists and illustrates how our products and services positively impact our customers, stakeholders and the communities where we operate.

We at IDV Group have adopted **five core Values** that guide our actions and the way we work, helping us fulfil our Purpose.

HOME OF OUR  
PEOPLE AND  
THAT POWER  
BUSINESS  
TO ADVANCE  
SUSTAINABLE



# 01 LIVING THE CODE



IDV Group is committed to the highest standards of integrity in all its operations, always and everywhere.

These standards are outlined in our Code of Conduct, a living document that guides us to conduct business in accordance with all applicable laws and ethical principles, and in alignment with our Company Purpose and Values.

Our Code of Conduct supports us in acting responsibly for the collective benefit of our Company, our stakeholders and our communities.



## Scope

The Code of Conduct is an important part of our governance framework and applies to all employees of IDV Group N.V., its subsidiaries and joint ventures in which the Company holds a controlling interest. It guides our behaviour and in principle also applies to anyone acting for or on behalf of the Group.

In addition to our Code of Conduct, the Group has established Company Policies that supplement and are an integral part of the Code and may apply to our jobs. These documents are available on the IDV Group website at [www.idvgroup.com](http://www.idvgroup.com) and on the Company Intranet. They can also be consulted with our local Human Resources representatives.

We all – and with particular relevance, our leaders and managers – play a critical role in **leading by example** through behaviours and day-to-day decisions that respect the Code of Conduct and embody the true essence of our Purpose and Values.

IDV Group endorses the UN Declaration on Human Rights, the relevant International Labour Organization (“ILO”) Conventions, and the Organisation for Economic Co-operation and Development (“OECD”) Guidelines for Multinational Enterprises. Accordingly, the Code and the Policies are intended to be consistent with such guidelines.



### Important note:

Nothing contained in or implied by the Code creates or should be deemed to create or constitute a legal obligation on the part of IDV Group. The provisions of the Code are subject to change from time to time and do not create any right to employment.

# 02 BUSINESS CONDUCT



We are committed to conducting business and behaving in a manner consistent with our core Values.

The IDV Group Policies are in place to promote high standards of integrity through honest and ethical behaviour.

This applies to dealings with Company customers, suppliers, partners, service providers, competitors, employees and anyone else with whom we interact while performing our jobs, ensuring that we always do what is right.

## **We Promote Compliance with Applicable Laws**

Everyone working for and with the Group must comply, both in letter and spirit, with all applicable laws, rules and regulations in the places where the Company operates.

The legal consequences of not complying with laws can be severe and may include fines, imprisonment of those involved, and loss of privileges or disqualification. In addition, failure to comply with such laws can have a damaging effect on our Company's reputation.



We are not expected to know every detail of all the applicable laws, rules and regulations: our Legal and Compliance function is available to answer any questions or provide clarification.

## **We Avoid and Manage Conflicts and Potential Conflicts of Interest**

Everyone working for and with IDV Group has the responsibility to safeguard the integrity of the Company's business decisions by ensuring they are made solely on the basis of what is best for the Company and are not improperly influenced by personal interests. A conflict of interest arises in any situation where there is a potential for divided loyalties between our personal interests and our obligations to IDV Group. While a situation constituting an actual conflict of interest is never acceptable, we must avoid situations involving a potential conflict of interest or even the appearance of such a conflict. In addition, we may not circumvent this Policy by using other people to indirectly do what we are prohibited from doing ourselves, such as making an improper investment through a family member or friend.

We are all qualified to identify when there is a personal conflict and are required to disclose actual or potential conflicts of interest before any activity or decision involving that conflict of interest are undertaken, allowing the Company to determine how to best address the situation.

## We Do Not Engage in Bribery or Corruption

We are required to comply with all applicable anti-corruption laws and related Policies.

Anti-corruption laws prohibit direct or indirect payments, or a promise to pay, of anything of value to any governmental employee/official, political party, party employee/official, or candidate for political office for the purpose of influencing an official act or decision to obtain or retain business for the Company.

Other anti-corruption laws go further and prohibit such payments to anyone, including non-government officials. In addition, anti-corruption laws prohibit a company and its employees from asking or instructing anyone to pay a bribe, kickback or improper payment on their behalf.



Some of the anti-corruption laws that apply to us: OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions; Italian Legislative Decree n. 231/2001; U.S. Foreign Corrupt Practices Act; UK Bribery Act; French “Loi Sapin II” and Spanish “Ley Organica 10/1995”.

## We Comply with Anti-Money Laundering Legislation

Money laundering is the process of taking the proceeds of criminal activity and making them appear legal. Money laundering can facilitate crimes such as fraud, drug trafficking and terrorism; it adversely impacts the global economy, and it is illegal. Applicable laws and our Policies prohibit everyone working for and with IDV Group from engaging in or otherwise becoming involved in any activity which may give rise to money laundering or the appearance of money laundering. We are responsible for complying with applicable anti-money laundering laws and related Policies.

## We Respect Economic Sanctions, Embargoes and International Trade Laws

As a global player, IDV Group’s business activities involve international trade that is subject to various laws and regulations. We are committed to ensuring business activities are performed in compliance with applicable economic sanctions, embargoes and international trade laws which are complex, often fact-specific, and can change quickly depending on, among other things, world events.

## **We Compete Fairly**

IDV Group recognises the critical importance of an open and competitive marketplace and is committed to fully complying with all applicable competition and antitrust legislation. We do not engage in business practices – such as the establishment of cartels, price fixing, market divisions, limitations with respect to production or sales, tying arrangements, exchange of commercial information, business views, etc. – which may violate applicable antitrust or competition laws. Within the framework of fair competition, we must not obtain or use our competitors' confidential information, or knowingly infringe any third party's intellectual property rights.

While we keep ourselves informed about market trends and opportunities when defining commercial strategies, we always put integrity first in our business conduct. The same principles drive us in the reciprocal relationship we have with our suppliers and customers where we all ensure and require full respect of fair competition and applicable rules.

## **We Do Business with and through Reputable Third Parties**

IDV Group conducts an appropriate background check of available information (including financial information) before establishing any business relationship with a third party, to ensure that the person or entity is reputable, qualified and involved in a legitimate business.

In some areas of our business, we engage third parties, such as consultants and agents, to act on our behalf and/or in our interest. Our agreements with these third parties require them to follow the same high ethical standards of conduct we practice ourselves. Legal violations by third parties can damage IDV Group's reputation, create legal risk for the Company, and even result in the levying of penalties against the Company. Because third parties represent us and how we do business, we use a risk-based approach in the initial vetting and in the ongoing, periodic due diligence on all third parties. In addition, third parties are required to provide timely and accurate information to the Company as part of this vetting and due diligence process, and to update any of their information that becomes outdated or inaccurate.

# 03 PEOPLE



IDV Group is home to unique people who are motivated, engaged and highly professional.

Recognising and welcoming the diverse contributions of everyone makes our workplace more inclusive and our work practices more innovative and comprehensive.

We see this as an enabler to maintaining competitiveness, creating long-term value for stakeholders and ensuring customer satisfaction.

The following principles, in compliance with the United Nations Declaration of Human Rights and the relevant International Labour Organization conventions, confirm the importance of respect for the individual, ensure equal treatment and exclude any form of discrimination. We support the protection of fundamental human rights.

### **We Do Not Use Child or Forced Labour, Human Trafficking or any form of Slavery**

IDV Group does not employ child labour; namely, it does not employ people younger than the permissible age for working established in the legislation of the place in which the work is carried out and, in any case, younger than fifteen, unless an exception is expressly provided by international conventions and by local legislation. The Company is also committed to not establishing or maintaining working relationships with third parties that employ child labour.

The Company does not tolerate the use of forced or mandatory labour, slavery, involuntary or coerced labour, human trafficking or sex trafficking.

### **We Respect Freedom of Association**

Employees are free to choose to join (or not join) a trade union in accordance with local law and the rules of the various trade union organisations. IDV Group recognises and respects the right of employees to be represented by trade unions or other representatives established in accordance with locally applicable legislation and practice, including the right to collective bargaining. When engaging in negotiations with such representatives, the Company seeks a constructive approach and relationship.

### **We Treat Others with Respect and Do Not Discriminate**

IDV Group does not accept any manner of discrimination against employees on the basis of individual differences, including but not limited to age, ethnicity, gender, gender identity, sexual orientation, physical or mental ability, religion and socio-economic status. The Company recruits and hires people on the basis of their experience, knowledge and skills and is committed to providing equal opportunities to all employees in both their job and their career advancement.

### **We Foster an Inclusive Working Environment**

IDV Group takes any steps necessary to maintain an inclusive and engaging working environment in which the dignity of each individual is respected and where we can contribute our unique strengths. Our culture is based on behaviours that promote equity and make everyone feel welcome, included and valued with the opportunity to fulfil our individual potential.

In particular, all employees and stakeholders are asked to follow a set of principles and requirements that enhance diversity, equity and inclusion throughout our organisation:

- Ensure everyone can access and benefit from the resources, opportunities and physical spaces available
- Model inclusive behaviour and language, avoiding behaviour intended to or that might create an intimidating or offensive climate among colleagues
- Refrain from working while under the influence of alcohol or drugs; respect the law and Company requirements to avoid “passive smoke” effect on those not smoking.

### **We Do Not Tolerate Intimidation or Harassment**

IDV Group prohibits and does not tolerate any type of harassment. By way of example, racial or sexual harassment, harassment related to other personal characteristics which has the purpose or the effect of creating a hostile work environment, violating the dignity of the person who is the victim of such harassment, or demanding any kind of sexual favour in exchange for a workplace advantage (e.g., a raise or to avoid being fired) is totally unacceptable to the Company, whether it takes place inside or outside the workplace.

### **We Use Company Assets and Resources in a Responsible Manner**

Everyone working for and with IDV Group is required to use Company assets and resources they have access to or in their care in an efficient manner and in a way that is appropriate to protect their value. We use these assets and resources solely to achieve the business goals and objectives of IDV Group and only for the purposes and in the manner intended.

In addition, we are responsible for protecting these assets and resources against loss, theft, unauthorised use, damage or destruction. Any use of these assets and resources that might be contrary to the interests of our Company, or that is inconsistent with the purposes and the manner in which they were intended to be used, is prohibited. We are required to follow IDV Group's Policies and Guidelines regarding information technology, security and privacy.

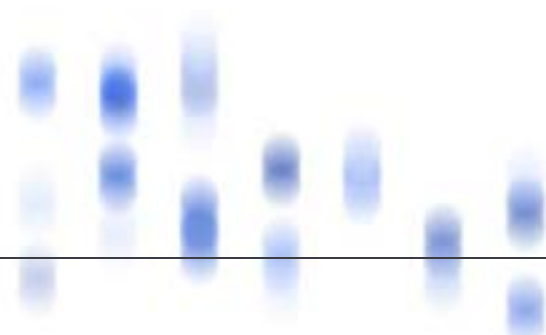
### **We Protect Our Reputation**

IDV Group's reputation is something we take very good care of and which can be damaged or destroyed quickly by a careless act. Our corporate image, our culture and our brands' long history are assets to be cherished and vigilantly protected by all of us. Living the spirit of our Purpose and Values and abiding by our Code at all times will help us to protect our reputation.

### **We Recognise and Respect Personal Privacy**

In IDV Group's ordinary business operations, personal data may be collected through permissible means. In collecting this personal data, we commit to safeguarding the right of each individual (employees, prospective employees, end customers and individual employees of business partners such as dealers and suppliers) to control when, how and to what extent their personal data is collected, maintained and processed by our Company. Everyone working for and with IDV Group is held to this same commitment.

We comply with privacy laws and our Data Privacy Policy. Also, we ensure a robust level of security in the selection and use of our information technology systems designed to collect, maintain and process personal data.



# 04 ENERGY, ENVIRONMENT, HEALTH & SAFETY



IDV Group believes firmly in creating and maintaining workplaces that are safe for everyone where processes incorporate environmental protections and the products and services we design, test and develop respect the health and safety of ourselves and others.

Sustainable work practices and life cycle thinking are at the core of our operations. We measure and continuously improve the way we do business in order to advance a more sustainable society.

## **We Protect the Health and Safety of Others and Ourselves**

IDV Group recognises health and safety in the workplace as a fundamental right of employees and a key element of IDV Group's sustainability efforts. All our choices respect the health and safety of our employees in the workplace. We have adopted and continue to improve an Occupational Health and Safety Policy which implements preventive measures, both at the individual and collective level, to minimise potential health and safety risks in the workplace.

We are also committed to ensuring industry leading working conditions, in accordance with principles of hygiene, industrial ergonomics and individual organisational and operational processes. IDV Group believes in and actively promotes a culture of accident prevention and risk awareness among workers, particularly through the provision of training and information. We take ownership and hold ourselves personally responsible to take the preventive measures established by IDV Group for the protection of health and safety which are communicated through specific directions, instructions, information and training. Everyone working for and with IDV Group is responsible for proper management of safety and should not expose him/herself or other workers to dangers which could cause health and safety issues for themselves or others.



## **We Implement Environmental Protections in Our Processes**

Environmental protection is an important consideration in IDV Group's overall approach to business, the creation of long-term value, and sustainability. We are committed to continuously improving the environmental performance of our operations and complying with all applicable environmental protection laws. This includes the development and extension of an effective, certified Environmental Management System (EMS) based on the fundamental principles of reducing environmental impacts and optimising the use of resources. We actively implement these principles through, among others, the dissemination of relevant information and regular training.

## **We Produce Safe and Environmentally Friendly Products**

IDV Group designs, produces and sells products of the highest standard, in terms of environmental and safety performance, and in full compliance with all applicable laws. Moreover, we develop and implement innovative technical solutions to minimise the environmental impact of our products and maximise safety. We also encourage the safe and eco-friendly use of our products, providing customers and dealers with information regarding the use, maintenance and disposal of our vehicles and other products.

# 05 COMMUNITY AND SOCIETY



IDV Group is committed to conducting and enhancing relationships with all stakeholders with loyalty, fairness, transparency and due respect for our core Values.

Respect for others is at the foundation of our relationships and our business practices ensure products and services that meet the needs of customers and contribute to a more sustainable society.

By going beyond the obvious and engaging with likeminded organisations, IDV Group makes a difference in the communities where we operate and society in general.

## **We Aim to Deliver the Highest Value to Our Customers**

IDV Group goes beyond to meet the expectations of our customers. Our goal is to exceed customer expectations and continuously improve the quality of our products and services, while making it easy to do business with us.

We work towards this objective by developing and maintaining profitable and lasting relationships with customers and by offering safety, service, quality and value supported by continuous innovation. All of our business relationships are treated fairly and without discrimination. We do not use our bargaining position to any customer's disadvantage.

## **We Objectively Select Our Suppliers**

IDV Group considers suppliers and service providers partners and relationships are based on three key aspects: resilience, efficiency and sustainability.

Our supply chain and our suppliers play a fundamental role in ensuring IDV Group's overall competitiveness. To achieve the highest level of quality and customer satisfaction, we evaluate and ultimately select suppliers through the use of appropriate, objective methods, on the basis of, among others, the quality, innovation, costs and services offered, as well as their social and environmental performance and the principles outlined in the Code. We expect to establish and maintain stable, transparent, mutually beneficial and cooperative business relations with our suppliers including encouraging open communication and an ongoing dialogue with the Company.

Because our suppliers represent us and how we do business, the Company uses a risk-based approach to conduct initial vetting as well as ongoing periodic due diligence on third-party suppliers. In addition, suppliers are required to provide timely and accurate information to the Company as part of this vetting and diligence process and to update any information that becomes outdated or inaccurate.

Moreover, all Company suppliers must abide by the ethical standards set forth in our Supplier Code of Conduct. The Supplier Code of Conduct applies to all persons and entities who sell goods or services of any type to IDV Group or any of its subsidiaries.

## **We Maintain Transparent Relations with Public Institutions**

IDV Group promotes and supports active dialogue and cooperation with international, national and local authorities and institutions.

Relations with public institutions are managed only by duly designated departments and authorised individuals. All such relations are transparent and conducted in accordance with our Values and in compliance with applicable laws. All relations with institutional stakeholders are conducted only where permitted by applicable law, in strict compliance with such laws and in full observance of the Code and of any applicable Company Policies.

We aim to contribute positively to the future development of policies, regulations and standards in the industries in which we operate. We also contribute to advancing a more sustainable society and to collaborating with public institutions, universities and other organisations in researching and developing innovative and sustainable solutions and related technologies.

The Group fully co-operates with regulatory and governmental bodies within the context of their legitimate activity inspections. Whenever a public institution is a customer or supplier of any IDV Group company, the latter shall act in strict compliance with applicable laws which govern the acquisition from, or the sale to, that public institution of goods and/or services.

## **We Participate in Public Matters in an Appropriate Manner**

IDV Group's relationships with trade unions, work councils, political parties and their representatives and candidates are conducted with the highest level of transparency and fairness and in strict compliance with applicable laws. Contributions of money, goods, services or other benefits are prohibited unless required or expressly permitted by law and, in the latter case, authorised by the appropriate representatives of the relevant IDV Group company. Any contribution made or activity performed by employees of the Company are intended only as a personal and voluntary contribution.

## **We Are Active Members in the Communities in Which We Operate**

IDV Group is aware that its decisions can have significant direct and indirect impacts on the local communities in which we operate. Accordingly, we take all reasonable steps to inform those communities of relevant actions and projects and promote an open dialogue to ensure their legitimate expectations are taken into consideration. Moreover, we contribute to the social, economic and institutional development of local communities through specific programmes. We act in a socially responsible manner, respecting the cultures and traditions of each country in which our Company operates and operating with integrity and good faith in order to earn the trust of the community.

All Company initiatives in favour of local communities are run and carried out in accordance with the Group's Code of Conduct, the Community Investment Policy, local regulations and the Company's Environmental, Social and Governance (ESG) strategy.

In supporting the communities in which we operate, we build valuable partnerships based on transparency, fairness and impartiality.

## **We Are Fair, Honest and Open in Our Communications**

IDV Group recognises that communication and external relations influence the development of our Company, both directly and indirectly. It is therefore necessary for these activities to be organised with clear, uniform criteria, which take into consideration the requirements of the various business lines and the economic and social role of our Company as a whole, as well as applicable legal requirements. Communications and disclosures to financial markets and supervisory authorities are supplied in an accurate, complete, fair, clear, timely manner and always in compliance with applicable laws. These communications are only made by those officers and employees with the specific responsibility for media communications and in strict compliance with the Code and the applicable Company Policies.

Social media is an important channel of communication. Information, once disclosed, cannot be recovered and may have significant and unintended consequences. Our Code and related Policies apply to all communications we make through social media that relate to, or may impact, IDV Group or any of its employees. Revealing confidential, non-public information through social media, about the Company, co-workers, competitors, customers or those acting on our behalf through social media, is a violation of our Code, related Policies and possibly applicable law.

# 06 INTERNAL CONTROL AND RISK MANAGEMENT SYSTEM



We promote and maintain an Internal Control and Risk Management System based on best practices to continuously guarantee that the risks that could compromise sustainable long-term value creation are promptly identified and properly managed.

The Internal Control and Risk Management System includes a set of policies, procedures and processes established by the Company to provide reasonable assurance that all operations are carried out effectively, efficiently and ethically, to safeguard the Company's assets, to ensure accurate financial and non-financial reporting and to comply with any applicable laws and regulations.

Controls are carried out by the employees who manage and coordinate operational activities (e.g., purchases, logistics, production, sales) and are governed by the principles of Separation of Duties and Delegation of Authority. Guidelines and monitoring activities are governed by specific areas and corporate functions such as Finance, Human Resources and ICT, Legal and Compliance and Enterprise Risk Management (ERM). The Internal Audit function carries out an additional level of control, operating independently with the aim of reviewing the adequateness and effectiveness of our Internal Control and Risk Management System to ensure that the overall set of controls works effectively and the risks are mitigated to an acceptable level for the organisation.

### **We Have Adopted Processes for Our Financial Reports, Accounting and Tax Records**

IDV Group is committed to the maximum level of transparency consistent with best business practices to ensure that all transactions and business records are:

- Duly authorised, verifiable and legitimate
- Timely, properly and accurately recorded, accounted for and duly documented in accordance with the relevant accounting principles and best practices

The Group recognises that disclosure controls and procedures and internal control over financial reporting are of prime importance for the management and success of our Company. As a result, the IDV Group Board of Directors and senior management have adopted management processes, procedures and Policies to ensure that assigned employees obtain the required training and experience for building and maintaining efficient and effective disclosure controls and internal control over the financial reporting system.

We consider accuracy and transparency in the disclosure of, and accounting for, each single transaction to be of vital importance for our success.

Our Company, therefore, demands accurate, timely and detailed reporting from all of its employees with regard to all financial and other business transactions. True and accurate records of all financial and other business transactions should be kept with proper supporting documentation.

The irregular keeping of accounting books is a violation of the Code and is considered illegal in almost all jurisdictions. It is, therefore, forbidden to behave in such a way or to be responsible for omissions that might lead to inaccurate or incomplete information, including:

- The recording of false transactions;
- The inaccurate reporting of operations or the recording of operations that are not adequately documented;
- The failure to record commitments, including guarantees or buy-back obligations that might generate liabilities or obligations for IDV Group companies.

Additionally, IDV Group is committed to ensuring timely compliance with all applicable tax laws in all the jurisdictions where the Group operates, including through the design and implementation of a Tax Control Framework, as part of the whole Internal Control system.

This is done to identify, evaluate and mitigate tax risk which is understood as the risk of operating in violation of tax regulations or principles. By linking up the Tax Control Framework with the internal control over financial reporting, IDV Group ensures that tax affairs are managed in a way that is consistent with its own low tax risk appetite. IDV Group promotes a co-operative and transparent relationship with the Tax Authorities.

### **We Handle “Inside Information” Appropriately and Lawfully**

All employees are required to comply with applicable “insider trading” legislation. In particular, everyone working for and with IDV Group must never make use of, or disclose to unauthorised third parties, information not in the public domain and obtained as a result of their position in IDV Group or because of the fact that he/she enjoys a business relationship with IDV Group, in order to trade or otherwise transact, directly or indirectly, in the shares of the Company, or other companies, or to obtain a personal advantage or favour third parties. We are all required to comply with Company Policies regarding regular and any special “blackout” periods when trading in Company shares.

### **We Safeguard Our Confidential Information** IDV

Group considers its proprietary information and its know-how, trade secrets, copyrights and other forms of intellectual property to be assets of utmost importance and value. It is mandatory for everyone working for and with IDV Group to safeguard these valuable resources. We are strictly forbidden from sharing, disclosing or using any confidential information pertaining to the Company for personal benefit or to the advantage of any third party, unless compelled by law or explicitly authorised by an IDV Group company.

These confidentiality obligations remain in effect even after the termination of the employment relationship. Employees are required to utilise appropriate measures to safeguard confidential information, for example by utilizing secure storage, implementing password protection, and employing encryption methods when applicable.

In addition, IDV Group companies may receive confidential information from third parties. As part of our commitment to maintaining the highest level of confidentiality, it is our responsibility to safeguard and protect all third-party information. This responsibility is typically established through the implementation of formal agreements, such as confidentiality or non-disclosure agreements, with the respective third party.



# 07 A CULTURE OF COMPLIANCE AND ETHICS



A 'speak-up' culture is an essential part of a healthy workplace. We want everyone to feel safe sharing ideas and concerns, reporting misconduct and informing the Company about potential ethics violations.

IDV Group calls for good behaviour at all levels which implies remaining informed about the Policies and regulations contained in the Code of Conduct and taking ownership of our actions.

## We Encourage Speaking Up

We understand that speaking up may be difficult but when a concern is not raised and addressed appropriately, it can adversely impact our reputation, employee health and safety, our brands, our customers, communities and shareholders. The sooner a concern is brought to the Company's attention, the sooner it can be investigated and corrective action can be taken. Any employee that in good faith has reasonable grounds to suspect the violation of a law, the Code of Conduct or a Policy, or has knowledge of other improper activities at IDV Group, they are required to promptly report the situation without fear of retaliation.

Reports can be made using the Company's Compliance Helpline at <https://www.idvgroup.com/compliance-helpline/>, also on an anonymous basis where allowed by law.

Alternatively, the matter can be reported to a manager, a Human Resources representative or a member of the Legal and Compliance function.

All reports will be investigated by trained staff in a prompt, thorough and confidential manner, in compliance with all applicable laws.

Any form of retaliation against anyone who has in good faith reported possible violations of an applicable law, the Code or a Company Policy, or who has requested an explanation of Code application procedures, will be considered a violation of the Code.

Ascertained Code violations may result in disciplinary measures, among other consequences (including legal proceedings), and in the most serious cases in the termination of any fiduciary, business, employment or other relationship with IDV Group, with the contractual and statutory consequences set forth in any applicable labour legislation.

## We Foster Continuous Learning

IDV Group makes the Code of Conduct available to all employees and to all people subject to the Code. The Code can be accessed and downloaded from IDV Group's website at [www.idvgroup.com](http://www.idvgroup.com) and from the Company Intranet. Printed copies found on the bulletin boards at all our sites contain a QR Code that can be scanned to download the document. It is also possible to consult the Code through your local Human Resources representative.

IDV Group has an extensive education programme designed to reinforce the Company culture and Values while fostering a continuous learning environment. Among the available courses are those dedicated to raising awareness on the Code of Conduct, related Policies and legal requirements. It is the duty of all employees to complete mandatory courses, and it is the duty of all managers to reinforce and ensure such completion. Other on-line courses as well as in-person educational opportunities are available by contacting a Human Resources or Legal and Compliance representative.

The Code of Conduct cannot cover every situation or answer every question that may arise. The Code and the Company's other Policies are meant to be guides. Any questions or concerns can be discussed with a manager, a Human Resources representative, a member of the Company's Internal Audit function, or a member of the Legal and Compliance function. Guidance can also be found at the Company's [Compliance Helpline](#) ↘ by utilising the *Ask a Question* section.

**The Code and any subsequent update is approved by IDV Group Board of Directors. Exceptions or waivers to the Code can be authorised only by the IDV board of Directors for extraordinary and justified reasons. Any such exception or waiver shall be disclosed as per applicable rules.**

**INTEGRITY**  
ALWAYS,  
EVERYWHERE

