

## AIR GLOBAL PLC

### CODE OF BUSINESS CONDUCT AND ETHICS

#### I. INTRODUCTION

##### A. Purpose

This Code of Business Conduct and Ethics (the “*Code*”) contains, among other things, general guidelines for conducting the business of AIR Global PLC and its direct and indirect subsidiaries (collectively, the “*Company*,” “*our*” or “*we*”) consistent with the highest standards of business ethics. To the extent this Code requires a higher standard than required by commercial practice or applicable laws, rules or regulations, the Company is committed to adhering to these higher standards.

This Code applies to all of our directors, officers and other employees. We refer to all officers and other employees covered by this Code as “Company employees” or simply “employees,” unless otherwise stated or the context otherwise requires. In this Code, we refer to our principal executive officer, principal financial officer, principal accounting officer and controller, or persons performing similar functions, as our “*principal financial officers*.”

##### B. Seeking Help and Information

This Code is not intended to be a comprehensive rulebook and cannot address every situation you may face. If you have any questions, feel uncomfortable about a situation or have any doubts about whether it is consistent with the Company’s ethical standards, seek help. We encourage you to contact your line manager for help first. If your line manager cannot answer your question or if you do not feel comfortable contacting your line manager, contact any of the following: the Company’s Group Director, Security; Head of Corporate Affairs, PR and Sustainability; Senior Manager, Global Security; Company Secretary; or Chief Legal and Corporate Affairs Officer, or their designees (each, a “*Group Designated Officer*”) or the appropriate human resources contact.

We have also established reporting channels as described below.

##### C. Reporting Violations of the Code

All employees and directors have a duty to report any known or suspected violation of this Code, including violations of the laws, rules, regulations or policies that apply to the Company or other relevant legislation in the country where an employee is located.

If you know of or suspect a violation of this Code or of any laws, rules, regulations or policies applicable to the Company, immediately report the conduct to your line manager, a Group Designated Officer or the appropriate human resources personnel. A Group Designated Officer will work with you and your line manager or other appropriate persons to investigate your concern. If you do not feel comfortable reporting the conduct to your line manager or you do not receive a satisfactory response, you may contact a Group Designated Officer directly. You may also report known or suspected violations of the Code or of laws, rules, regulations or policies that apply to

the Company through the Ethics Hotline that is available 24 hours a day, 7 days a week.

The Ethics Hotline is available by telephone at +1-800-236-6815 or the Internet at <https://www.whistleblowerservices.com/AIIR>. The intake information may be received by a third-party contractor specifically engaged to provide the hotline services or an internal person specifically designated to receive reported information. For concerns specifically regarding accounting, internal accounting controls, fraud, or auditing matters relating to the Company, please refer to the Company's Policies and Procedures for Complaints Regarding Accounting, Internal Accounting Controls, Fraud or Auditing Matters.

To the extent permitted by local law, you may remain anonymous and will not be required to reveal your identity when reporting through the Ethics Hotline, although providing your identity may assist the Company in investigating your concern. All reports of known or suspected violations of the law or this Code will be handled sensitively and with discretion. Your line manager, the Group Designated Officer, the Company and any others assisting in the investigation will protect your confidentiality to the extent possible, consistent with applicable laws and the Company's need to investigate your concern. Nothing in this Code prevents you from communicating directly with relevant government authorities about potential violations of law.

It is Company policy that any employee or director who violates this Code will be subject to appropriate discipline, which may include, for an employee, termination of employment or, for a director, a request that such director resign from the Board of Directors of the Company (the "**Board of Directors**"). This determination will be based upon the facts and circumstances of each particular situation. Employees and directors who violate the law or this Code may expose themselves to substantial civil damages, criminal fines, and prison terms. The Company may also face substantial fines and penalties and may incur damage to its reputation and standing in the community. Your conduct as a representative of the Company, if it does not comply with the law or with this Code, can result in serious consequences for both you and the Company.

#### D. Policy Against Retaliation

The Company prohibits retaliation against an employee or director who, in good faith, seeks help, reports known or suspected violations or assists in the investigation of reports made under this Code. Any reprisal or retaliation against an employee or director because the employee or director, in good faith, sought help or filed a report will be subject to disciplinary action, including potential termination of service.

#### E. Waivers of the Code

Any waiver of this Code for our directors, executive officers, or other principal financial officers may be made only by our Board of Directors or a duly authorized committee of the Board and will be disclosed to the public as required by law or the rules of the stock exchange where the Company's securities are listed, when applicable. Waivers of this Code for other employees may be made only by our Chief Executive Officer or a Group Designated Officer and will be reported to our Board of Directors and/or Audit and Risk Committee, as necessary or advisable.

## II. CONFLICTS OF INTEREST

### A. Identifying Potential Conflicts of Interest

Employees, officers and directors must act in the best interests of the Company. You must refrain from engaging in any activity or having a personal interest that presents a “conflict of interest” and should seek to avoid even the appearance of a conflict of interest. A conflict of interest occurs when your personal interest interferes with the interests of the Company. A conflict of interest can arise whenever you, as an employee, officer or director, take action or have an interest that prevents you from performing your Company duties and responsibilities honestly, objectively and effectively.

Identifying potential conflicts of interest may not always be clear-cut. The following situations might reasonably be expected to give rise to a conflict of interest and should be identified to, and addressed by, a Group Designated Officer or the Board of Directors or a committee thereof as soon as you become aware of the circumstances:

- Outside Employment. Your being employed by, serving as a director of, or providing any services to a company the individual knows or suspects is a material customer, supplier or competitor of the Company (other than services to be provided as part of an employee’s job responsibilities for the Company).
- Improper Personal Benefits. Your obtaining any material (as to the individual) personal benefits or favors because of the individual’s position with the Company. Please see “Gifts and Entertainment” below for additional guidelines in this area.
- Financial Interests. Your having a “material interest” (ownership or otherwise) in any company that you know or suspect is a material customer, supplier or competitor of the Company and using your position to influence a transaction with such company. Whether you have a “material interest” will be determined by a Group Designated Officer, as applicable, in light of all of the circumstances, including consideration of your relationship to the customer, supplier or competitor, your relationship to the specific transaction, and the importance of your interest.
- Loans or Other Financial Transactions. Your obtaining loans or guarantees of personal obligations from, or entering into any other personal financial transaction with, any company that you know or suspect is a material customer, supplier or competitor of the Company. This guideline does not prohibit arms-length transactions with banks, brokerage firms or other financial institutions.
- Service on Boards and Committees. Your serving on a board of directors or trustees or on a committee of any entity (whether profit or not-for-profit) whose interests might reasonably be expected to conflict with those of the Company.
- Actions of Family Members. The actions of family members outside the workplace may also give rise to the conflicts of interest described above because they may influence an employee’s or director’s objectivity in making decisions on behalf of

the Company. For purposes of this Code, “family members” include your spouse or life-partner, brothers, sisters, parents, in-laws and children whether such relationships are by blood or adoption.

For purposes of this Code, a company is a “material” customer if the customer has made payments to the Company in the past year in excess of \$200,000 or 5% of the Company’s gross revenues, whichever is greater. A company is a “material” supplier if the supplier has received payments from the Company in the past year in excess of \$200,000 or 5% of the supplier’s gross revenues, whichever is greater. If you are uncertain whether a particular company is a material customer or supplier, please contact a Group Designated Officer for assistance.

#### **B. Disclosure of Conflicts of Interest**

The Company requires that employees and directors disclose any situation that reasonably would be expected to give rise to a conflict of interest. If you suspect you have a situation that could give rise to a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it in writing to your line manager or a Group Designated Officer, or if you are a director, executive officer, or other principal financial officer, to the Audit and Risk Committee. A Group Designated Officer or the Audit and Risk Committee, as applicable, will work with you to determine whether you have a conflict of interest and, if so, how best to address it. Transactions that could reasonably give rise to a conflict of interest involving an executive officer, or principal financial officer must be approved by the Audit and Risk Committee, and any such approval will not be considered a waiver of this Code. Any conflict of interest involving a director will be considered in accordance with the Company’s Amended and Restated Memorandum and Articles of Association and Jersey law.

### **III. CORPORATE OPPORTUNITIES**

As an employee or director of the Company, you have an obligation to advance the Company’s interests when the opportunity to do so arises. If you discover or are presented with a business opportunity through the use of corporate property or information or because of your position with the Company, you should first present the business opportunity to the Company before pursuing the opportunity in your individual capacity. No employee or director may use corporate property, information, or the individual’s position with the Company for personal gain while employed by us or, for a director, while serving on our Board of Directors.

You should disclose to your line manager the terms and conditions of each business opportunity covered by this Code that you wish to pursue. Your line manager will contact a Group Designated Officer and the appropriate management personnel to determine whether the Company wishes to pursue the business opportunity. If the Company waives its right to pursue the business opportunity, you may pursue the business opportunity on the same terms and conditions as originally proposed and consistent with the other ethical guidelines set forth in this Code. Directors of the Company must be mindful of their fiduciary duties as it relates to corporate opportunities at all times.

### **IV. CONFIDENTIAL INFORMATION**

Employees and directors have access to a variety of confidential information regarding the

Company. Confidential information includes all non-public information that might be of use to competitors, or, if disclosed, harmful to the Company or its collaborators, customers or suppliers. Employees and directors have a duty to safeguard all confidential information of the Company or third parties with which the Company conducts business, except when disclosure is authorized or legally mandated, and disclosures of confidential information should be made in accordance with the Company's Guidelines for Corporate Disclosure and applicable law. Unauthorized disclosure of any confidential information is prohibited. Additionally, employees and directors should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to the Company or another company, is not communicated within the Company except to employees and directors who have a need to know such information to perform their responsibilities for the Company. An employee's and director's obligation to protect confidential information continues after he or she leaves the Company. Unauthorized disclosure of confidential information could cause competitive harm to the Company or its collaborators, customers, or suppliers and could result in legal liability to you and the Company.

Any questions or concerns regarding whether disclosure of Company information is legally mandated should be promptly referred to a Group Designated Officer.

## **V. COMPETITION AND FAIR DEALING**

All employees should endeavor to deal fairly with fellow employees and with the Company's collaborators, licensors, customers, suppliers, and competitors. Employees should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. Employees should maintain and protect any intellectual property licensed from licensors with the same care as they employ with regard to Company-developed intellectual property. Employees should also handle the nonpublic information of our collaborators, licensors, suppliers, and customers responsibly and in accordance with our agreements with them, including information regarding their technology and product pipelines.

## **VI. GIFTS AND ENTERTAINMENT**

The giving and receiving of gifts is a common business practice designed to build relationships and understanding among business partners, and the Company permits appropriate gifts and entertainment. Gifts and entertainment, however, should not compromise, or appear to compromise, your ability to make objective and fair business decisions. Nor should such expenses be used as a bribe or improper quid pro quo related to our business. In addition, it is important to note that the giving and receiving of gifts are subject to a variety of laws, rules, and regulations applicable to the Company's operations. These include, without limitation, laws covering the marketing of products, bribery, and kickbacks. You are expected to understand and comply with the provisions of this Code, the Gifts and Entertainment Procedure, and all laws, rules, and regulations that apply to your job position.

It is your responsibility to use good judgment in this area. As a general rule, you may give or receive gifts or entertainment to or from collaborators, customers, or suppliers only if the gift or entertainment is intended to build or maintain a business relationship or offer normal courtesy, is compliant with all applicable laws, is not lavish or extravagant, is infrequent, and is given and

accepted in an open and transparent way. You should never give gifts or entertainment where they may be viewed as an inducement to or reward for any particular business decision.

The Gifts and Entertainment Procedure sets out the approval process for gifts and entertainment. All gifts and entertainment expenses of any value should be properly recorded in the Company's records.

You should make every effort to refuse or return a gift that is beyond the permissible guidelines set out in this Code and the Gifts and Entertainment Procedure. If it would be inappropriate to refuse a gift or you are unable to return a gift, you should promptly report the gift to your line manager. Your line manager will bring the gift to the attention of a Group Designated Officer, who may require you to donate the gift to an appropriate community organization. If you have any questions about whether it is permissible to accept a gift or something else of value, contact your line manager or a Group Designated Officer for additional guidance.

Gifts and entertainment may not be offered or exchanged under any circumstances to or with any employees of the government of Lebanon, the U.S. government or state or local governments.

Since the Company conducts business in various countries around the world, you must be particularly careful that gifts and entertainment are not construed as bribes, kickbacks or other improper payments. Please review the Company's Gifts and Entertainment Procedure for a more detailed discussion of our policies regarding giving or receiving gifts and entertainment. For a more detailed discussion of special considerations applicable to dealing with government officials, see "Interactions with Governments" section of this Code. Please contact a Group Designated Officer for any questions regarding giving or receiving gifts.

## **VII. COMPANY RECORDS**

Accurate and reliable records are crucial to our business. Our records are the basis of our earnings statements, financial reports, regulatory submissions and many other aspects of our business and guide our business decision-making and strategic planning. Company records include financial records, personnel records, records relating to our technology and product development, collaborations, manufacturing and regulatory submissions, suppliers, licensors, customers and all other records maintained in the ordinary course of our business.

All Company records must be complete, accurate and reliable in all material respects. Each employee and director must follow any formal document retention policy of the Company with respect to Company records within such employee's or director's control. Please contact your line manager or a Group Designated Officer to obtain a copy of any such policy or with any questions concerning any such policy.

## **VIII. PROTECTION AND USE OF COMPANY ASSETS**

Employees and directors should protect the Company's assets and ensure their efficient use for legitimate business purposes only and not for any personal benefit or the personal benefit of anyone else. Theft, carelessness, and waste have a direct impact on the Company's financial performance. The use of Company funds or assets, whether or not for personal gain, for any

unlawful or improper purpose is prohibited.

Employees and directors should be aware that Company property includes all data and communications transmitted to or received by, or contained in, the Company's electronic or telephonic systems. Company property also includes all written communications, including but not limited to conversations or transmissions by email, the internet or instant messaging. Employees, directors and other users of this property should have no expectation of privacy with respect to these communications and data. To the extent permitted by law, the Company has the ability, and reserves the right, to monitor and review all electronic and telephonic communication using the Company's electronic or telephonic systems. These communications may also be subject to disclosure to law enforcement or government officials.

## **IX. ACCURACY OF FINANCIAL REPORTS AND OTHER PUBLIC COMMUNICATIONS**

As a public company we are subject to various securities laws, regulations, and reporting obligations. Both applicable law and our policies require the disclosure of accurate and complete information regarding the Company's business, financial condition, and results of operations. Inaccurate, incomplete or untimely reporting will not be tolerated and can severely damage the Company and result in legal liability.

The Company's principal financial officers and other employees working in the finance department have a special responsibility to provide that all of our financial disclosures are full, fair, accurate, timely and understandable. These employees must understand and strictly comply with generally accepted accounting principles and all standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts.

## **X. COMPLIANCE WITH LAWS AND REGULATIONS**

Each employee and director has an obligation to comply with all laws, rules, and regulations applicable to the Company's operations. These include, without limitation, laws covering interactions with the government, political contributions, bribery and kickbacks, the development, testing, manufacture, marketing and sale of our products, copyrights, trademarks and trade secrets, information privacy, insider trading, illegal political contributions, antitrust, foreign corrupt practices, offering or receiving gratuities, environmental hazards, employment discrimination or harassment, occupational health and safety, false or misleading financial information, or misuse of corporate assets. You are expected to understand and comply with all laws, rules, and regulations that apply to your job position. If any doubt exists about whether a course of action is lawful, you should seek advice from your line manager or a Group Designated Officer.

### **A. Interactions with Governments**

The Company may conduct business with governments of countries around the world, including the U.S. government, state and local governments. The Company is committed to conducting its business with all governments and their representatives with the highest standards of business ethics and in compliance with all applicable laws and regulations, including the special requirements that apply to communications with governmental bodies that may have regulatory authority over our products, services and operations, such as government contracts and

government transactions.

If your job responsibilities include interacting with any government agency, you are expected to understand and comply with the special laws, rules and regulations that apply to your job position as well as with any applicable standard operating procedures that the Company has implemented. If any doubt exists about whether a course of action is lawful, you should seek advice immediately from your line manager or a Group Designated Officer.

In addition to the above, you must obtain written approval from a Group Designated Officer for any meetings with legislators or for any lobbying activities. Work activities covered by this policy include meetings with legislators or members of their staffs or with executive branch officials on behalf of the Company. Preparation, research and other background activities that are done in support of lobbying communication are also covered by this policy even if the communication ultimately is not made. If any doubt exists about whether a given work activity would be considered covered by this provision, you should seek advice immediately from your line manager or a Group Designated Officer.

For additional information regarding the Company's policies on interactions with governments, please contact a Group Designated Officer.

**B. Political Contributions and Volunteer Activities**

As a Company we do not engage in political activity, including lobbying or campaign contributions, using Company funds, facilities, or in-kind gifts. Exceptions to this rule must be approved in advance by a Group Designated Officer, and contributions must be made in accordance with applicable law. Employees and directors must also comply with any other Company policies related to political activity that may apply. The Company encourages its employees and directors to participate in the political process as individuals and on their own time. The Company will not reimburse you for personal political contributions. When you participate in non-Company political affairs, you should be careful to make it clear that your views and actions are your own, and not made on behalf of the Company. Please contact a Group Designated Officer if you have any questions about this policy.

**C. Compliance with Antitrust Laws**

Antitrust laws of the United States and other countries are designed to protect consumers and competitors against unfair business practices and to promote and preserve competition. Our policy is to compete vigorously and ethically while complying with all antitrust, monopoly, competition or cartel laws in all countries, states or localities in which the Company conducts business. Violations of antitrust laws may result in severe penalties against the Company and its employees, including potentially substantial fines and criminal sanctions.

The following are examples that constitute violations of applicable antitrust laws and regulations, and must not be engaged in under any circumstances: agreements with competitors to fix prices or any other terms and conditions of sale; agreements with competitors to boycott specified suppliers or customers; agreements with competitors to allocate products, territories or markets, or to limit the production or sale of products or product lines; agreements with customers to fix resale prices; and any behavior that could be construed as an attempt to monopolize.

You are expected to maintain basic familiarity with the antitrust principles applicable to your activities, and you should consult a Group Designated Officer with any questions you may have concerning compliance with these laws.

#### 1. Meetings with Competitors

You should exercise caution in meetings with competitors. Any meeting with a competitor may give rise to the appearance of impropriety. As a result, if you are required to meet with a competitor for any reason, you should obtain the prior written approval of an executive officer of the Company. You should try to meet with competitors in a closely monitored, controlled environment for a limited period of time. You should create and circulate agendas in advance of any such meetings, and the contents of your meeting should be fully documented. In no event should you disclose or receive confidential information during these meetings. Additionally, you should refrain from any communications regarding product or service offerings, supplier terms and conditions, collaborations and development projects, prices, costs, market share, allocation of sales territories, bids for a particular contract or collaboration, distribution methods or channels, marketing strategies, future development plans or product roadmaps and any other subjects relating to or affecting the production or sale of products and services to existing or prospective customers. If any of the foregoing topics are raised during your meeting, you should affirmatively end the discussion, and you should state your reasons for doing so.

#### 2. Professional Organizations and Trade Associations

You should be cautious when attending meetings of professional organizations and trade associations at which competitors are present. Attending meetings of professional organizations and trade associations is both legal and proper, if such meetings have a legitimate business purpose in the interest of the Company and are conducted in an open fashion, adhering to a proper agenda. Any questions regarding the appropriateness of such meetings should be referred to a Group Designated Officer. At such meetings, you should not discuss the restricted topics listed above, the Company's pricing policies or other competitive terms, plans for new or expanded products, services or facilities or any other proprietary, competitively sensitive business information. You are required to notify your line manager or a Group Designated Officer prior to attending any meeting of a professional organization or trade association.

#### D. Compliance with Insider Trading Laws

Consistent with the Company's Insider Trading Compliance Policy, employees and directors are prohibited from trading in the stock or other securities of the Company while in possession of material nonpublic information about the Company. In addition, employees and directors are prohibited from recommending, "tipping" or suggesting that anyone else buy or sell the Company's stock or other securities on the basis of material non-public information. Employees and directors who obtain material non-public information about another company in the course of their duties are prohibited from trading in the stock or securities of the other company while in possession of such information or "tipping" others to trade on the basis of such information. Violation of insider trading laws can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including, termination of service. You are required to read carefully and observe our Insider Trading Compliance Policy, as amended from

time to time. Please contact a Group Designated Officer for a copy of the Insider Trading Compliance Policy or with any questions you may have about insider trading laws.

E. Anti-Corruption Compliance, the U.S. Foreign Corrupt Practices Act and the UK Bribery Act

The Company is committed to complying with the U.S. Foreign Corrupt Practices Act of 1977 (the “*FCPA*”), the UK Bribery Act 2010 (“*UKBA*”) and other applicable anti-corruption laws. The FCPA and other applicable anti-corruption laws generally prohibit the Company and its employees, directors, officers, and agents from offering, giving, or promising money or any other item of value, directly or indirectly, to win or retain business or to influence any act or decision of any government official, political party, candidate for political office, or official of a public international organization. The Company prohibits employees, directors, officers, contractors who devote all or substantially all of their time to the Company and agents acting on behalf of the Company from giving or receiving bribes, kickbacks, or other inducements to foreign officials. Indirect payments include any transfer of money or other item of value to another individual or organization where the person making the transfer knows or has reason to know that some or all of that transfer is for the benefit of an individual to whom direct payments are prohibited. Violation of the FCPA and other applicable anti-corruption laws is a crime that can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including, termination or cessation of service.

The use of agents or other third-party intermediaries for the payment of bribes, kickbacks or other inducements is expressly prohibited. To minimize the bribery and corruption risk associated with the use of third parties to act on the Company’s behalf, you must comply with the provisions of the Third-Party Anti-Bribery and Corruption Procedure before engaging any new third party.

The UKBA also prohibits: (i) offering, giving or promising money or any other item of value to any other person (including in the private sector) to induce or reward the improper performance of that person’s duties; and (ii) requesting, agreeing to receive or accepting money or any other item of value in exchange for the recipient performing their own duties improperly. The Company therefore prohibits employees, directors, officers, contractors who devote all or substantially all of their time to the Company and agents acting on behalf of the Company from engaging in any such conduct that may violate the UKBA.

F. Trade Controls

Company employees and agents must know and comply with all applicable trade and economic sanctions and export controls (collectively, “*Trade Controls*”), including U.S. laws and regulations that govern international operations (including those administered and enforced by the U.S. Treasury Department’s Office of Foreign Assets Control and the U.S. Commerce Department’s Bureau of Industry and Security), EU, EU member states, United Nations, and UK sanctions, as well as, the local laws of countries where the Company operates, when they do not conflict with U.S. laws.

The United States and many other countries have laws that restrict or otherwise require

licensing for the export, re-export, or transfer of certain goods and services to other countries or to certain parties. If you are involved with importing or exporting, you need to be aware of the applicable governmental regulations and requirements, including those required by the Customs-Trade Partnership Against Terrorism (C-TPAT) and the Export Administration Regulations (EAR). Certain items may require classification and proper authorization prior to export; this includes items manufactured in the United States, items sourced from the United States, or items manufactured abroad with more than a *de minimis* amount of U.S.-origin content. In addition to OFAC sanctions lists, BIS maintains its own lists of restricted persons, including the Denied Persons List and the Entity List, and any person is generally restricted from exporting or re-exporting a U.S.-controlled item to a person on one of these lists. Contact the Chief Supply Chain Officer before engaging in any export or re-export of items that may be subject to U.S. export controls. A failure to comply can result in fines, penalties, imprisonment and/or a loss of import or export privileges. U.S. laws and regulations also impose various economic and trade sanctions or embargoes against other countries, governments, groups, or persons, and prohibit cooperation with certain foreign boycotts. The Company does not participate in prohibited boycotts.

The scope of these licensing requirements, economic and trade sanctions and trade embargoes may vary from country to country. They may range from specific prohibitions on trade of a given item to a total prohibition of all commercial transactions and dealings with certain countries/territories (“**Sanctioned Areas**”), which currently include Cuba, Iran, North Korea, the Crimea region of Ukraine, and the so-called Donetsk People’s Republic and Luhansk People’s Republic, or with designated entities and individuals that appear on certain restricted party lists, including but not limited to the Specially Designated Nationals and Blocked Persons List (“**Sanctioned Persons**”). It is important to note that the Company may not facilitate or encourage a non-U.S. company to perform a transaction that it could not perform itself pursuant to U.S., UK, EU, EU member state, or United Nations sanctions laws. The Company prohibits any transactions or dealings with Sanctioned Areas or Sanctioned Persons, absent prior compliance clearance from the Chief Supply Chain Officer.

Employees involved in export transactions or international operations must familiarize themselves with the list of countries against which the United States maintains comprehensive sanctions and the rules relating to exporting to or transacting with or involving such countries, either directly or indirectly through foreign subsidiaries or other third parties. Employees must regularly screen new and existing counterparties against applicable sanctions lists and be vigilant for red flags that may indicate potential sanctions evasion, including those relating to counter-terrorism requirements, when engaging in international trade. Due to the complexities of Trade Controls laws, contact a Group Designated Officer before exporting or importing goods or services, or engaging in transactions with countries or persons that may be affected by economic or trade sanctions. If requested to participate in or cooperate with a foreign boycott that the United States does not support (e.g., the boycott of Israel sponsored by the Arab League), you may not agree to or comply with such request. Immediately report this request to a Group Designated Officer or the Chief Supply Chain Officer. For additional guidance, please refer to the Company’s Trade Controls Policy.

## **XI. ENVIRONMENT, HEALTH AND SAFETY**

The Company is committed to providing a safe and healthy working environment for its

employees and to avoiding adverse impact and injury to the environment and the communities in which it does business. Company employees must comply with all applicable environmental, health and safety laws, regulations and Company standards. It is your responsibility to understand and comply with the laws, regulations, and policies relevant to your job. Failure to comply with environmental, health and safety laws and regulations can result in civil and criminal liability against you and the Company, as well as disciplinary action by the Company, up to and including termination of employment. You should contact a Group Designated Officer if you have any questions about the laws, regulations, and policies that apply to you.

A. Environment

All Company employees should strive to conserve resources and reduce waste and emissions through recycling and other energy conservation measures. You have a responsibility to promptly report any known or suspected violations of environmental laws or any events that may result in a discharge or emission of hazardous materials.

B. Health and Safety

The Company is committed not only to complying with all relevant health and safety laws, but also to conducting business in a manner that protects the safety of its employees. All employees are required to comply with all applicable health and safety laws, regulations, and policies relevant to their positions. If you have a concern about unsafe conditions or tasks that present a risk of injury to you, please report these concerns immediately to your line manager or a Group Designated Officer.

C. Employment Practices

The Company pursues fair employment practices in every aspect of its business. The following is only intended to be a summary of certain of our employment policies and procedures. Copies of the Company's detailed policies are available upon request. Company employees must comply with all applicable labor and employment laws, including anti-discrimination laws and laws related to freedom of association and privacy. It is your responsibility to understand and comply with the laws, regulations, and policies relevant to your job. Failure to comply with labor and employment laws can result in civil and criminal liability against you and the Company, as well as disciplinary action by the Company, up to and including termination of employment. You should contact a Group Designated Officer if you have any questions about the laws, regulations, and policies that apply to you.

D. Harassment and Discrimination

The Company is committed to providing equal opportunity and fair treatment to all individuals on the basis of merit, without discrimination because of race, color, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status or other characteristic protected by law. The Company also prohibits harassment based on these characteristics in any form, whether physical or verbal and whether committed by supervisors, non-supervisory personnel or non-employees. Harassment may include, but is not limited to, offensive sexual flirtations, unwanted sexual advances or propositions, verbal abuse, sexually or racially degrading words, or the display in the workplace of sexually suggestive or racially

degrading objects or pictures.

If you have any complaints about discrimination or harassment, report such conduct through the reporting channels described in section I.C of this Code. All complaints will be treated with sensitivity and discretion. The Company will protect your confidentiality to the extent possible, consistent with law and the Company's need to investigate your concern. Where our investigation uncovers harassment or discrimination, we will take prompt corrective action, which may include disciplinary action by the Company, up to and including, termination of employment. The Company strictly prohibits retaliation against an employee who, in good faith, files a complaint.

Any member of management who has reason to believe that an employee has been the victim of harassment or discrimination or who receives a report of alleged harassment or discrimination is required to report it to the appropriate human resources personnel immediately.

E. Alcohol and Drugs

The Company is committed to maintaining a drug-free workplace. All Company employees must comply strictly with Company policies regarding the abuse of alcohol and the possession, sale, and use of illegal drugs (for the purpose of this Code, "*illegal drugs*" includes marijuana). Drinking alcoholic beverages is prohibited while on duty or on the premises of the Company, except at specified Company-sanctioned events or as otherwise authorized by management. Possessing, using, selling, or offering illegal drugs and other controlled substances is prohibited under all circumstances while on duty or on the premises of the Company. Likewise, you are prohibited from reporting for work or driving a Company vehicle or any vehicle on Company business, while under the influence of alcohol or any illegal drug or controlled substance.

F. Violence Prevention

The safety and security of Company employees is vitally important. The Company will not tolerate violence or threats of violence in, or related to, the workplace. If you experience, witness or otherwise become aware of a violent or potentially violent situation that occurs on the Company's property or affects the Company's business you must immediately report the situation to your line manager or the relevant human resources personnel.

G. Personal Conduct and Social Media

Company employees should take care when presenting themselves in public settings, as well as online and in web-based forums or networking sites. Each Company employee is encouraged to conduct himself or herself in a responsible, respectful, and honest manner at all times. The Company understands that employees may wish to create and maintain a personal presence online using various forms of social media. However, in so doing employees should, if posting about any topic relating to the Company or the Company's industry, include a disclaimer that the views expressed therein reflect the employee's personal opinion and do not necessarily reflect the views of the Company. Company employees should be aware that even after a posting is deleted, certain technology may still make that content available to readers.

Company employees are prohibited from using or disclosing confidential, proprietary,

sensitive, or trade secret information of the Company, its partners, vendors, consultants, or other third parties with which the Company does business. Harassment of others will also not be tolerated. A Company employee may not provide any content to Company social media sites that may be construed as political lobbying or solicitation of contributions, or use the sites to link to any sites sponsored by or endorsing political candidates or parties, or to discuss political campaigns, political issues, or positions on any legislation or law.

## **XII. CONCLUSION**

This Code contains general guidelines for conducting the business of the Company consistent with the highest standards of business ethics. If you have any questions about these guidelines, please contact your line manager or a Group Designated Officer or the appropriate human resources personnel. The Company expects all of its employees and directors to adhere to these standards.

This Code, as applied to the Company's principal financial officers, shall be our "*code of ethics*" within the meaning of Section 406 of the Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder.

This Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing Company policy. The Company reserves the right to amend, supplement or discontinue this Code and the matters addressed herein, without prior notice, at any time.

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*Effective Date: May 12, 2026*