



=exact

Exact Code of Conduct

Legal & Compliance

Contents

Introduction	2
Our commitments	3
+ To our people	
+ To our customers, partners and resellers	
Ethics and Compliance policies	4
+ Anti-bribery and anti-corruption	
+ Conflicts of interest	
+ Competition law	
+ Privacy	
Responsible business - Making a difference	5
Ethical business conduct	5
Reporting violations	6

Code of conduct	
Author: General Counsel	Management Board adoption: October 2
Version 2024	External Policy

Introduction

This Code of Conduct of Exact sets guidance for Exact's business decisions and provides principles of ethical business behaviour, in line with our company values: Keep Raising the Bar, Welcome Everyone, Always be Learning, Work Hard Play Hard, Act Responsibly and Take Ownership. With "Exact", we mean Exact Group B.V. including its subsidiaries.

The Code of Conduct contains obvious and universal standards and expected behaviours that we expect from all our people: Exact employees, contractors, agents, representatives and other associated persons of Exact when acting on behalf of Exact. Breaches of the Code of Conduct may involve severe consequences, including disciplinary actions such as dismissal.

Our Code of Conduct is updated every year.



Exact Code of Conduct

Our Commitments

To our people

Our employees are key to our success as an organisation. We aim to offer a challenging, inclusive and inspiring working environment where they feel welcome, safe and are encouraged to develop themselves, both professionally and personally. By being a part of our organisation, one dedicates itself to treating others with kindness and respect.

Within Exact every employee has an equal opportunity for personal recognition and career development, regardless of personal preferences, background or beliefs. The same applies to the recruitment of new employees. No form of discrimination or harassment will be tolerated.

To our customers and business partners

At Exact, we commit to being a reliable partner for our customers and business partners as they pursue their businesses. We keep ourselves to the standards outlined in our Code of Conduct as well as underlying ethics and compliance policies to ensure we provide not only the best service, but operate in an ethical, appropriate and legal manner. Every person working for Exact therefore commits oneself to carry out its responsibilities with professional integrity, having due regard for the interests of Exact as well as the interests of our customers and business partners, in compliance with our ethics and compliance policies.

Ethics & Compliance policies

Exact is committed to compliance with all applicable laws and regulations regarding the topics below. For each of these topics, we have an applicable policy where one will find how to recognise red flags and protect oneself and our company from unethical practices.



Anti-bribery and anti-corruption

Bribery can include the offering, promising, giving or receiving of payments or other advantages from or to any person to influence a business outcome, like obtaining or retaining business or services. Bribery and corruption can be direct or indirect through third parties like agents, resellers and partners.



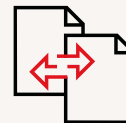
Privacy

As part of its business operations, Exact processes a lot of personal data. This includes data about our customers, our suppliers and employees. We attach great importance to privacy and the careful processing of personal data according to privacy legislation, from the moment of collecting personal data until the moment the processing ends.



Conflicts of interest

A conflict of interest can jeopardize one's reputation and that of Exact. It occurs when personal interests compromise one's motivation to take business decisions or could be perceived by others to influence one's motivation to take business decisions.



Competition law

Competition law prohibits conduct that harms our competition and consumers. It ensures that business is conducted based on merit and open competition. We must act independently of our competitors. We must not exchange commercially sensitive information with our competitors nor make agreements on any aspect of pricing in the market, commercial terms, strategy and market or customer allocation.

Responsible business Making a Difference

Exact is committed to making a difference, meeting our responsibility with respect to our environmental, social and governance initiatives.

We are strongly committed to a responsible business model and way of working. We do business with respect for each other, the environment and the communities we serve. We have an obligation towards our customers, ourselves and society as a whole to do good and to make a difference. We actively take care of our planet and engage with our local communities.

Ethical business conduct

We ensure the highest level of business conduct, by adhering to universal human rights principles including, among others, non-discrimination and non-harassment, forced labour, child protection, but also financial integrity and financial crime. We respect human rights as defined by international guiding principles on business and human rights, and we recognise our responsibility to respect all internationally recognised human rights across our own activities and our business relationships.

Our commitment to respect human rights is in line with these principles and provides guidance to our employees, customers and business partners on appropriate behaviour relating to labour and human rights issues:

- + We do not tolerate any form of discrimination or harassment.
- + We do not tolerate any form of forced labour, restrictions on workers' freedom of movement, withholding of wages or identity documents, physical or sexual violence, threats and intimidation, or fraudulent debt from which workers cannot escape.
- + We do not tolerate the hiring of child labour under any circumstances.
- + We do not tolerate any acts that knowingly support financial crime, including money laundering.

We strive to continuously improve our ability to identify potential or actual business integrity impacts and to take appropriate action to prevent or mitigate those business integrity impacts once identified. We also expect our business partners to remain vigilant of unusual and suspicious activities which may indicate unethical business practices. Driven by our value to Act Responsibly, we strive to be an ethical business. We expect our business partners to share these standards.

We are prudent and fair about how we select and engage our business partners. All our business partners are expected to comply with applicable laws and regulations. We expect our business partners to act with the highest level of business, professional and legal integrity as well. We screen our business partners to verify that they meet adhere to our standards concerning financial crime and financial integrity. This may mean that we choose not to do business with certain business partners or with business partners located in countries where we deem the risk of non-compliance with our standards and ethics too high.

Reporting violations – we need your help

Failure to comply with a Code of Conduct, underlying ethics and compliance policies or applicable laws and regulations, can have a serious impact on individuals, severely damage our business and expose us to (criminal) charges and fines.

Exact encourages you to speak-up and report any reportable conduct. If you experience, suspect or witness any matters of concern, we encourage you to speak up. You can speak up by reporting through our whistleblower channel on <https://www.exact.ethicspoint.com>, offering the option to report anonymously. If you do speak up, Exact does not tolerate any form of threat, retaliation or other action against you.