

Kinly Code of Conduct

Our policy that we live and work by



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Version Control

| Version number | Date | Author | Approved by: | Confidentiality: |
|----------------|------------|------------|----------------------|------------------|
| Version 1 | 29-09-2021 | Legal & HR | Compliance Committee | Public |
| Version 2 | 29-04-2024 | CSR | Compliance Committee | Public |

A message from our Management Board

“At Kinly, we think working together is the most exciting thing in the world.

Our vision is to engage people in a world of possibilities. Technology promises endless possibilities to help us with that, but technology can also be confusing for a lot of people. This is why our brand promise is:

Working together. Everywhere

Our role is to provide a seamless and reliable experience that enables people to work together, in different spaces and places.”

Kinly’s solutions and services include video conferencing, audio visual integration, unified communications and collaboration. The company today serves corporate and public customers in over 120 countries from established office locations throughout EMEA, the USA and APAC.

We recognize our responsibility to our customers, shareholders, suppliers, employees, and society at large. We aim to conduct our business in a caring and accountable manner to achieve sustainable growth, taking responsibility for the social, environmental and economic impacts of our activities, whilst fulfilling moral and legal obligations.

We are a dedicated team, all working towards a common goal. To help that happen, we created a set of shared values to form a solid foundation for our business. We do this to inform, to motivate, but most of all to inspire. We want to build a company that truly reflects our core values as a living, changing and growing company.

We are:



Passionate innovators

We think working together is the most exciting thing in the world.

We work closely with the world’s leading technology providers, build and innovate our own awards winning solutions on top of their technology.

For us, being close to our clients as always been the best source of innovation, understanding what you do, and how you can do it better, to:

Improve your workflow.



Reliable Professionals

Our goal is to earn the position as your trusted advisor.

We employ some of the best talent and expertise in the industry, and are among the highest certified industry professionals globally.

For us, credibility and trust is built over time by doing the right thing, as promised, always:

Also when nobody is watching.



In it Together

To work efficiently, we need better ways of coming together.

We built that.
We use that.
We provide that.

For us, it doesn’t stop with technology. On your journey to work smarter, in different spaces and places, you can rely on Kinly people being helpful:

We will be there with you, every step of the way.

Introduction

This Code of Conduct (the “Code”) covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles for all employees of the Kinly group (“Kinly”) to follow. This Code is based on the ten principles of the UN Global Compact and the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work.

Compliance with all applicable laws is the foundation on which Kinly's ethical standards are built, and all employees must respect and comply with the applicable laws, rules, and regulations. Where there is a discrepancy between the expectations in this Code and local regulations, employees must comply with local law. The basic principles discussed in this Code are also subject to any Kinly policies covering the same topics.

All Kinly employees must read, understand, and apply the Code in their work and seek to avoid even the appearance of improper behavior. Kinly also expects its agents, representatives, and contractors to read, understand and apply the Code in their work for Kinly. For the purpose of the Code, they fall within the definition of employee.

Responsibility of Employees and Managers

Complying with and upholding these commitments is essential to our continued success. If Kinly employees have any question about the Code or how to handle a particular situation they are encouraged to turn to their manager, People team, or legal department.

Employees are responsible for understanding the legal and policy requirements that apply to their jobs, and reporting any suspected violations of the law, this Code, or any Kinly policy. Managers are expected to show leadership in following the Code and to create a culture where employees feel confident to speak up.

Responsibility of Suppliers and Sub-Contractors

All Suppliers and Sub-Contractors to Kinly will conduct their dealings in an ethical manner and in accordance with Kinly’s Supplier Code of Conduct. This can be found on our website.

Labour and human rights

Working practices

Kinly is committed to protecting human rights and reducing negative social impacts from employment, including tackling modern slavery and human trafficking. This includes:

- Complying with all applicable child labour laws and employ only workers who meet the applicable minimum legal age requirement.
- Prohibiting the use of forced and compulsory labour, prison labour, or any other form of modern slavery. Employment must always be voluntary.
- Prohibiting the trafficking of persons.
- Setting working hours, wages and overtime pay in compliance with all applicable laws, including abiding by any national minimum legal wage.
- Upholding the freedom of association and the effective recognition of the right to collective bargaining.
- Ensuring that all third-party employment agencies we use are compliant with the provisions of this Code and the law.
- Providing opportunities for two-way communication between employees and management.

Diversity, Discrimination & Harassment

At Kinly, we appreciate that all people are unique and are to be respected for their individual talents. For this reason, we strive to attract a diverse workforce and to create an inclusive work environment which allows everyone to contribute. By embracing diversity, we open Kinly to new ways of thinking, new skills and new opportunities. We are committed to:

- Treating all employees with dignity and respect.
- Enforcing a zero-tolerance approach to any form of harassment, discrimination or other behaviour that may be perceived as threatening or degrading. This includes – but is not limited to –

discrimination on the basis of gender, religion, national or ethnic origin, cultural background, social affiliation, functional disability, sexual orientation, marital status, age or political conviction and all other protected classes where regionally applicable.

- Fair and respectful treatment of all employees or other business associates with whom they interact. Employees will base personnel-related decisions solely on relevant qualifications such as education, experience, results and other professional criteria.
- Providing a suitable environment for people with disabilities. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions of their job.

Health & Safety

Kinly strives to provide each employee, contractor, customer and visitor with a safe and healthy work environment environment that is free from workplace injury and illness. This will only be achieved through the participation, co-operation and commitment of everyone in the workplace. Violence and threatening behavior are not accepted.

Each employee is responsible for maintaining a safe and healthy workplace for everyone by following environmental, safety, and health rules and procedures. Employees must also report accidents, injuries and unsafe equipment, practices or conditions. Employees will follow instructions, and use safety and personal protective equipment as instructed and when applicable.

Environment

Kinly is committed to leading the industry in minimizing the impact of our activities on the environment. We are committed to conduct our business in a way that supports environmental sustainability and we set ourselves challenging standards in areas such as energy consumption, waste management and reduction of harmful carbon emissions. We are focused on:

- Reducing our carbon emissions. Kinly have committed to the Science Based Targets initiative and have goals to be net-zero carbon by 2050.
- Understanding and mitigating the environmental risks to our operations.
- Sourcing and promoting a product range that minimizes the environmental impact of both production and distribution.
- Reducing emissions to air, ground and water, to limit pollution and prevent damage to biodiversity.
- Meeting or exceeding all the environmental legislation that relates to Kinly.

Governance

Competition Law

Competition law protects fair competition. We ensure that all business dealings fully comply with these laws, wherever business is conducted. Kinly expects its employees to comply with competition law. This means that Kinly employees are, amongst other things, prohibited from:

- Being involved in any agreements, arrangements or practices that have as their object or effect to prevent, restrict or distort competition.
- Discussing pricing or other competitive information with competitors, fixing prices with competitors or entering into any other arrangements with competitors that might restrict free competition.

Employees involved in a private or public tender process must always comply with applicable tender regulations, and provide correct, transparent and non-discriminatory data.

Fair Dealing, Anti-bribery & Anti-Corruption

Kinly seeks to outperform our competition fairly and honestly, and we comply with all anti-trust and fair competition laws in all countries we operate. Each employee should make every endeavour to respect the rights of, and deal fairly with, Kinly's customers, suppliers, competitors, and employees. No employee should take unfair advantage of anyone through manipulation, extortion, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice.

All dealings with public officials or other third party must be carried out with integrity and in compliance with applicable laws, rules and regulations, and bribery is strictly prohibited. No Kinly employee will offer

or provide, directly or indirectly, any unlawful payment or item of value to a public official or other third party for the purpose of unduly influencing official action or a decision.

Business entertainment and gifts in a commercial setting are only accepted as proper and legal working relationships, not to gain unfair advantage with customers or other third parties. No gift or entertainment should ever be offered, given, provided, or accepted by any Kinly employee or family member of an employee, or agent unless it:

- Is not a cash gift.
- Is consistent with customary business practices.
- Is reasonable in value.
- Cannot be construed as a bribe or payoff.
- Does not violate any laws, regulations or applicable policies of the other party's organization.

Conflicts of Interest

A conflict of interest exists when a person's private interest interferes in any way, or can appear to interfere, with the interests of Kinly. They can arise when an employee takes actions or has interests that may make it difficult to perform their Kinly work objectively and effectively. Conflicts of interest may also arise when an employee or a member of their family receives improper personal benefits because of their position in Kinly. Conflicts of interest are prohibited at Kinly, and employees must:

- Avoid any direct or indirect business connection with customers, suppliers, or competitors that conflicts with the interests of Kinly.
- Inform and receive consent from their manager before undertaking an investment in a company that competes with Kinly or does business with Kinly.

Employees are prohibited from taking opportunities that are discovered using corporate property, information or position for themselves without the consent of Kinly. No employee may use corporate property, information or position for personal gain and no employee may compete with Kinly directly or indirectly. Employees owe a duty to Kinly to advance Kinly's interests when the opportunity to do so arises.

Anti-money laundering, tax evasion & Financial Reporting

Kinly does not tolerate any business transaction or activity that would directly or indirectly support criminal acts or violate anti-money laundering or terrorism financing laws. Kinly has a zero-tolerance policy for corporate tax evasion and the facilitation of tax evasion.

As a private company, it's important that Kinly's filings with the government are accurate and timely. Kinly expects employees to take this responsibility very seriously and provide prompt and accurate answers to inquiries related to Kinly's public disclosure requirements.

Kinly's policy is to comply with all financial reporting and accounting regulations applicable to Kinly.

Information security

Confidentiality

Employees must maintain the confidentiality of proprietary information entrusted to them by Kinly or its customers or suppliers, except when disclosure is authorized in writing or required by laws or regulations. Proprietary information includes all non-public information that might be of use to competitors or harmful to Kinly or its customers or suppliers if disclosed. It includes information that suppliers and customers have entrusted to us. The obligation to preserve proprietary information continues even after employment ends.

Privacy

Kinly will process personal data in accordance with applicable data protection laws and only for limited, explicit, and legitimate purposes. We will not use personal data for any purpose that is incompatible with the purpose for which it was initially collected unless we receive prior consent for further use.

Protection & Proper use of Kinly Assets

All employees should protect Kinly's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on Kinly's profitability. All Kinly assets are to be used for legitimate Kinly purposes.

The obligation of employees to protect Kinly's assets includes Kinly's proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information, and any unpublished financial data and reports. Unauthorized use or distribution of this information is a violation of Kinly policy. It could also be illegal and result in civil or criminal penalties.

To maintain Kinly's valuable reputation, compliance with our quality processes and safety requirements is essential. All inspection and testing documents must be handled in accordance with all applicable specifications and requirements.

Compliance procedures

Employees are encouraged to talk to managers, HR, the legal department, or other appropriate personnel about observed behaviour that they believe may be illegal or a violation of this Code or any Kinly policy, or when in doubt about the best course of action in a situation. It is the policy of Kinly not to allow retaliation for reports made in good faith by employees of misconduct by others. Employees are expected to cooperate in internal investigations of misconduct.

Where an investigation finds violations to this Code, Kinly will take prompt and consistent action. Failure to adhere to this Code by any employee may result in disciplinary action, including dismissal, under the applicable employment laws. Furthermore, violations of this Code may also be violations of the law and may result in civil or criminal penalties for employees, managers and/or Kinly.

Any concerns of breaches to the Code, misconduct, acts, or behaviour that is not in accordance with the Code should be reported to Kinly's compliance committee (trust@kinly.com) or anonymously via the SpeakUp Communication tool: [SpeakUp Policy \(kinly.com\)](#).

Taking time to think

In some situations, it is not easy to know right from wrong. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. An employee's prompt action to report any suspected misconduct can help prevent or limit any damage to Kinly and its reputation.

If you have a concern regarding unethical conduct or suspect a possible violation of the Code, any company policy or procedure, or the law, you should report it immediately. These are the steps to keep in mind:

- a. Make sure you have all the facts. To reach the right solutions, we must be as fully informed as possible.
- b. Ask yourself: what specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- c. Discuss the problem with your manager. This is the basic guidance for all situations. In many cases, your manager will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is your manager's responsibility to help solve problems.
- d. Seek help from another Kinly resource in a case where it may not be appropriate to discuss an issue with your manager or local management, contact the Managing Director, HR or the Legal Department.
- e. You can also raise a concern directly with the Compliance Committee.
- f. Always ask first, act later: If you are unsure of what to do in any situation, seek guidance before you act.

For more information:

Kinly now operates in over 20 locations throughout Europe, USA and APAC, serving clients in over 120 countries with over 1,200 talented and passionate employees.

To connect with us at one of our global offices, visit kinly.com/contact

