quantexa

# Our Duty to Ethical Integrity

January 2026

OUR CODE OF CONDUCT



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**Appendix: Associated Documentation (Link to policies)**



# Forward From the CEO

As we continue to grow rapidly across geographies, industries, customers, and partners, our responsibility grows with it. With greater scale comes greater visibility and scrutiny, and that makes it more important than ever that we are clear about how we operate. Our Code of Conduct at Quantexa exists to ensure that how we win matters just as much as what we achieve. This is not about rules for rules' sake. It is about protecting our people, our customers, and the company we are building together.

Culture is not an abstract idea or a set of words on a page. It is shaped by the decisions we make every day, especially when situations are complex, pressured, or ambiguous. The Code of Conduct sets a shared baseline for behavior, regardless of role, region, or seniority. It reflects who we are at our best: acting with integrity, treating others with respect, and making ethical decisions even when no one is watching.

The Code of Conduct applies to every one of us, including me and the leadership team. It is not something owned by Legal or HR; it belongs to all of us. Every Quantexan is expected to understand the Code, apply it in day-to-day decisions, and speak up if something does not feel right. Our standards only matter if we each take responsibility for upholding them.

I ask every employee to take the time to re-familiarize yourself with the Code and use it as a guide when navigating uncertainty, entering new markets, responding to customer pressure, or managing rapid change. If you are unsure how to proceed, ask questions early. Seeking guidance is a sign of strength, not weakness.

Failing to uphold the Code exposes us to a great deal of risk. It can erode trust with customers, partners, and regulators. It can damage our reputation as a responsible and ethical leader in AI and data. It can undermine the safe and inclusive culture we expect for our people. Short term wins that compromise our values ultimately weaken long term success.

When we operate consistently under the Code, the impact is powerful. We earn deeper trust with customers and partners. We empower teams to act with confidence and clarity. We build a company that can scale sustainably and responsibly. This is how we create a generational company that people are proud to work for and proud to represent.

I am personally committed to upholding our Code of Conduct and holding myself accountable to it. I expect the same commitment from every leader and every Quantexan. Together, we will continue to build Quantexa the right way.

Thank you for taking this seriously, and for playing your part in protecting the culture that makes Quantexa exceptional.



**Vishal Marria,**
**Founder and Chief Executive Officer**

# Introduction

Quantexa endeavors to conduct its affairs with integrity and openness and to the highest ethical standards. To that end, we have developed a set of governance principles designed to ensure that:

- Decision-making processes are transparent.
- Potential conflicts of interest are identified.
- Possible malpractice is reported and investigated openly and objectively.

These principles are underpinned by policies implemented across Quantexa to ensure a consistent governance environment:



### How To Read This Document

This Code of Conduct sets out the guiding principles by which Quantexa operates and how it expects all contracted parties to conduct themselves. These guiding principles are underpinned by our policies and procedures, which govern how Quantexa operates its business. They must be read and adopted in conjunction with this Code of Conduct.

Our policies, standards, guidelines, and procedures can be found on Q-net and should be duly understood and adhered to.

### Scope

This Code of Conduct applies to colleagues, suppliers, partners, contractors, and sub-contractors, including all those delivering a service to or using Quantexa's software to provide a service to a Quantexa end-client. This Code of Conduct applies whether Quantexa or the third party is the primary contractor and/or supplier to that end-client.

All parties must comply with all applicable local and international laws and regulations and are expected to comply with this Code. To the extent any applicable law or regulation is more restrictive than this Code of Conduct, the law or regulation then takes precedence.

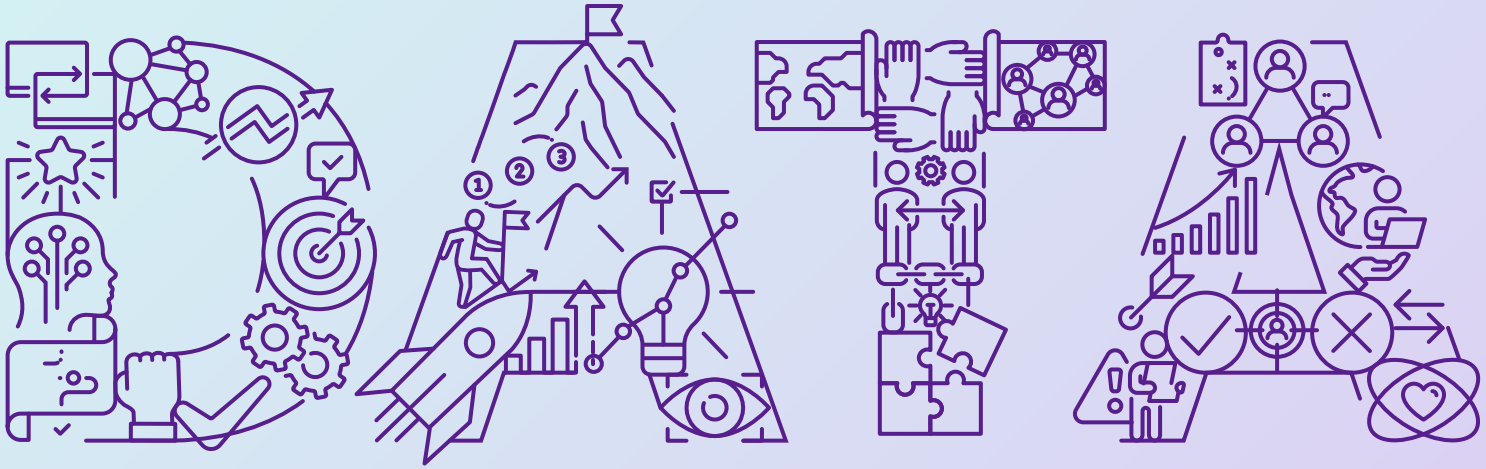
### Purpose

The Quantexa Code of Conduct aims to define the minimum standards of integrity and business conduct expected of all Parties working with or for Quantexa.

SECTION 1

# Our Culture

# Our Values



**Determination**
Get stuff done

**Ambition**
Drive for better

**Teamwork**
Share success

**Accountability**
Do the right thing

At Quantexa, shared values are at the heart of everything we do—and those values inspire us to do our best work, together. We aim to be leaders in innovation while simultaneously manifesting the integrity, discretion and care that befit an organization dealing with sensitive data and decisions. Our unwavering commitment to ethics, equity, and inclusivity is inextricable from our mission to tackle the most pressing information challenges faced by industry and government today.

# Expectations

## Expectations of you

Quantexa is committed to cultivating a culture of ethics across the company, wherein colleagues act with integrity and professionalism.

Colleagues are expected to comply with all applicable local, national, and international laws and regulations.

They assiduously avoid any unethical behavior, including fraud, dishonesty, and conflicts of interest. They maintain a high standard of professionalism in all workplace interactions, including communication and demeanor, and uphold the company's image and reputation through exemplary conduct.

Quantexa colleagues consistently exude professionalism in communication, appearance, and behavior, all of which are integral to creating a positive and respectful workplace.

## Expectations of your manager

Quantexa managers maintain the highest standard of judgment and integrity, ensuring that their words and actions demonstrate a consummate commitment to ethical behavior.

They serve as neutral parties when colleagues bring grievances, elevating these concerns or taking other appropriate action when necessary, and ultimately fostering a trusted and safe environment for everyone.

Managers maintain a welcoming and inclusive atmosphere, keeping their doors open when colleagues have questions, concerns, or need to talk.

They take seriously the issues raised by colleagues, acting both as a resource, offering guidance and advice, and as a conduit, connecting colleagues to further support and help when needed.

Managers are also responsible for ensuring that colleagues who report to them, directly or indirectly, comply with policy and, where appropriate, complete any certification or training required of them and their team.

# Principles and Raising Concerns

## Acting with Principle

- ✓ Act when aware of misconduct
- ✓ Cooperate with investigations
- ✓ Never retaliate

## How to Raise a Concern (Speak-up Policy)

Colleagues and those engaged with Quantexa should promptly report in good faith any (suspected) breach or irregularity in any law, regulation, business principle, or Quantexa policy.

Quantexa is committed to ensuring compliance with Whistleblowing laws in jurisdictions in which we operate and protecting colleagues who call out specific types of wrongdoing, including cases where:

- ✓ A criminal offense is taking place, such as fraud.
- ✓ Health and safety are in danger.
- ✓ There is risk or actual damage to the environment.
- ✓ There has been or will be a miscarriage of justice.
- ✓ The company is breaking the law.
- ✓ Someone is covering up wrongdoing.



# Principles and Raising Concerns

## Grievance and Investigation

- Anyone wanting to raise a concern over misconduct or unethical behavior (including discrimination or harassment) must raise a formal grievance.
- Quantexa will review grievances and will conduct investigations (if appropriate) thoroughly, fairly, with discretion, and in a timely manner, regardless of the people involved.
- Read our grievance policy* for further information.
- Quantexa prohibits retaliation against anyone taking part in the grievance procedure.

## Disciplinary Action

- Abiding by the standards outlined in this Code and related policies is a condition of continued employment with Quantexa. Violations of laws, regulations, rules, or breaches of policy, standards, procedures, or this Code may result in disciplinary action up to and including termination of employment or other relationship with Quantexa.
- Our disciplinary policy* outlines our current disciplinary procedure.



**Policies are available via the Resources Section*

# Harassment and Complaints

Harassment of any colleague by management, supervisors, co-workers, or non-colleagues who are in the workplace is prohibited. We will take any and all steps necessary to prevent and eliminate unlawful harassment.

While it is not possible to list every possible circumstance that may constitute sexual harassment, the following are examples of conduct that, if unwelcome, may constitute sexual harassment depending on the totality of the circumstances, including the severity of the conduct and its pervasiveness:

- Unwanted sexual advances, whether they involve physical touching or not.
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life, comments about an individual's body, comments about an individual's sexual activity, deficiencies, or prowess.
- Displaying sexually suggestive objects, pictures, or cartoons.
- Unwelcome leering, whistling, brushing up against the body, sexual gestures, or suggestive or insulting comments.
- Inquiries into one's sexual experiences or discussion of one's sexual activities.



SECTION 2

# Our Company

# Promoting a Safe Quantexa

Quantexa is committed to complying with all applicable local and international laws and regulations. To the extent any applicable law or regulation is more restrictive than this Code of Conduct, the law or regulation then takes precedence. The following principles exist to ensure adherence to legal, regulatory, and compliance requirements and that the company conducts its affairs with integrity and openness to the highest ethical standards. These principles ensure that:

**Decision-making processes are transparent.**

**Any potential conflicts of interest are identified.**

**Possible malpractice can be reported and investigated openly and objectively.**

## Creating a Safe Space

All Quantexa colleagues and affiliates must work to promote an environment that is healthy, safe, and secure for everyone, complying with both internal and external regulations. Selling, possession or use of illegal drugs on the premises or working while intoxicated are both strictly prohibited. If you become aware of a situation in which others may be at risk, it is incumbent upon you to report it to a manager as soon as possible.

## Violence-Free Environment

Physical, verbal, and sexual threats, abuse, harassment, or intimidation are expressly prohibited and are grounds for repercussions up to and including summary dismissal. Immediately contact your manager or the People Team if you perceive any threats to safety or security. Quantexa maintains a zero-tolerance policy for violence or other types of aggressive conduct in the workplace.



# Respecting Others

Quantexa is committed to the simple idea that everyone—inside and outside of the company—is deserving of dignity, fairness, and respect. We strive not only to elevate traditionally underrepresented voices, but also to create an environment free of harassment, intimidation, hostility, or disrespect. We promote an inclusive workplace, inside and outside of our offices, with zero tolerance for unwanted sexual comments or advances, requests for sexual favors, displays of media or materials of a sexual nature, or any other verbal or physical contact of a sexual nature.



## Diversity & Inclusion

Quantexa believes that inclusive business creates long-term value for our clients and is an important part of how we embed social responsibility into everything we do. Our diversity—of race, gender, nationality, ethnicity, religion, ability, generation, sexual orientation, military status—is not just an indispensable way of being but a source of strength, allowing for outside-the-box thought and novel ideas.

Quantexa is committed to a both operating a globally responsible business and manifesting a socially responsible workplace culture. We strive for continuous improvement in these areas, regularly implementing initiatives and programs to drive a more inclusive business environment within Quantexa and our affiliate organizations.

## Elimination of Discrimination

Quantexa recognizes that we live in a society where discrimination is still a pervasive problem, leading to systemic disadvantages for many different social groups. Quantexa believes all persons should have equal rights, complete recognition of human dignity, and parity in opportunities to be educated, work, receive services, and participate in society. To that end, we are committed to promoting equal opportunities within the Quantexa group and affiliates. To express this commitment, we develop, promote, and rigorously maintain policies conducive to fairness and equality in the workplace.

There is no discrimination in pay, hiring, compensation, access to training, promotion, or termination of employment or retirement on the grounds of race, nationality, religion, age, disability, marital status, sexual orientation, union membership, or political affiliation.

# Enterprise Risk Management



At Quantexa, we promote a culture of measured risk-taking to advance our strategic objectives. Our risk appetite recognizes the necessity for proportional risk-taking in achieving goals amid uncertainty, while striving to minimize risk exposure wherever feasible.

Quantexa's day-to-day work entails inherent risks that require diligent management and oversight. Our approach involves identifying, analyzing, and evaluating these risks to determine whether they necessitate any non-standard management or mitigation in line with Quantexa's risk criteria and guidelines.

We maintain open communication with key stakeholders and risk stewards within Quantexa throughout this risk management process. This ensures continuous monitoring and review of both the risks identified and the controls implemented to mitigate them, thereby preventing the need for further risk treatment.

Oversight of these efforts rests with the Quantexa Finance, Audit, and Risk Committee, which adheres to established procedures. Effective risk management is integral to Quantexa's sustained growth across diverse geographic regions and industry sectors. To oversee this, Quantexa has also instituted a Finance, Audit, and Risk Committee as a sub-committee of the Board. This committee is comprised of Board members with robust expertise in risk management, tasked with monitoring and managing all identified risks.

Additionally, our Risk & Ethics Committee, composed of senior leadership and advisors, reviews proposed direct-to-customer and alliance deals. These assessments encompass business, geographic, ethical, and financial considerations to determine overall risk exposure. Based on these evaluations, the committee decides whether to proceed with the deal and outlines any necessary mitigations to safeguard the company's interests.

# Information Security Management

Quantexa's Information Security Management System (ISMS) was developed to provide assurance to our clients and other stakeholders that the confidentiality, integrity, and availability of their information is securely managed and maintained. Policies and standards are in place to support this Information Security framework and are annually reviewed for effectiveness and alignment to the organization's requirements. Information Security policies play a major role within the organization, setting the level of adherence to ensure the following commitments:

**01** Information is protected against unauthorized access.

**02** Confidentiality of information and data is achieved.

**03** Integrity of information is maintained.

**04** Regulatory and legislative requirements are met.

**05** Compliance with client terms and requirements is achieved.

**06** Business continuity plans are produced, maintained, and tested.

**07** Mandatory Information Security training is completed by all staff.

**08** Breaches of information security are reported to the Information Security team.

Our company's policies and procedures cover the management and security of the internal systems used by us as well as operations and systems supporting services provided to clients. Individual business units may implement additional policies and procedures to supplement our company policies, addressing specific regulatory or business requirements applicable to those services.

Information security policies and procedures outline the roles and responsibilities of our colleagues, allowing us to take disciplinary action for policy violations, up to and including termination of employment or contract. We also prioritize the protection and management of personal information, implementing policies, programs, and procedures to safeguard both company and client personal information against loss or misuse, ensuring compliance with applicable data privacy laws.

# Information Security

Quantexa considers its information and systems as critical assets, requiring strong protection from internal and external security risks. These risks could threaten the confidentiality, integrity, and availability of both Quantexa's and its clients' data.

Quantexa is committed to implementing effective security controls across information, technical, personnel, and physical domains, in line with legal, regulatory, contractual, and ethical standards. The Board, Senior Management, Head of Information Security, and the Information Security Steering Group (ISSG) ensure adherence to these policies.

As an Independent Software Vendor (ISV), Quantexa designs its software to meet global security standards, integrating security by design, governance, risk management, and compliance throughout the development process. Secure environments protect the integrity of products, with best practices applied to Quantexa's cloud infrastructure, including data encryption, network security, access control, and system monitoring.

Information security is central to Quantexa's culture. Regular training ensures staff remain aware of expectations and evolving threats.

At Quantexa, the employment contract is a binding agreement that outlines an individual's security roles and responsibilities within the organization. New colleagues must sign the terms and conditions of employment before commencing their duties or accessing any organizational data, and they must also formalize their acceptance of the organization's security policies.

**All colleagues at Quantexa are expected to adhere to the following key requirements:**

1. Familiarize themselves with the Information Security Policy*.
2. Read and understand the Security Behavior Policy*.
3. Complete all issued Cyber Awareness Training promptly and without fail.
4. Report all actual or suspected information security incidents by contacting a member of the Quantexa Information Security Team at security@quantexa.com.

Finally, Quantexa values its compliance with ISO/IEC 27001 by regularly reviewing, updating, and making its policies and standards available to all relevant stakeholders.

This ongoing commitment highlights Quantexa's dedication to maintaining a robust and comprehensive security framework. By adhering to these global standards, Quantexa not only strengthens its own security posture but also provides confidence to clients and partners that their data is managed and protected according to best practices.

Furthermore, Quantexa actively fosters a secure environment across all aspects of its operations, continually refining processes to address evolving threats and regulatory demands. This proactive approach ensures that the organisation remains resilient in the face of emerging security challenges, safeguarding both its internal assets and those of its clients.

**Policies are available via the Resources Section*

# Intellectual Property

Quantexa protects and respects the intellectual property rights of its group entities and of others. We never knowingly use the intellectual property of a third party without permission or legal right to do so.

Intellectual property rights include copyrights, patents, trademarks and trade secrets. We are each responsible for protecting Quantexa's intellectual property rights. This includes maintaining the confidentiality of Quantexa's trade secrets and proprietary information in accordance with Quantexa's IP Policy - Quantexa's Security Behaviour Policy*.



**Policies are available via the Resources Section*

# Responsible Marketing Communication

## Promoting our Brand, Platform and Solutions with Truthfulness

Everyone in Quantexa is responsible for communicating appropriately and with self-awareness so as not to offend others. It is important to remember your duties of confidentiality whenever you make an online post, as well as the potential for your post to be used by others and misquoted, thereby creating a reputational issue for Quantexa.

## Speaking on Behalf of Quantexa

Marketing and Communications principles govern the creation and disbursement of communications and content to ensure consistency with the brand and strategic plan. These include corporate communications, external presence, investor relations and communication of incidents and unforeseen events.

## Speaking to Media and Industry Analysts

Quantexa prides itself in its reputation. We are well known for providing high-quality professional services and have strong ties with our customers, whose respect we have earned over time.

Should any staff member be involved in an incident or event that attracts media attention, they are reminded that the head of Corporate Marketing will appoint an approved spokesperson authorized to communicate with the media.



# Using Social Media

Quantexa's social media policy provides social do's and don'ts for responsible social media use by colleagues. It aims to protect the company's reputation, ensure compliance with legal and regulatory requirements, and promote positive and effective communication.

Our policy applies to all colleagues, contractors, and affiliates who engage in social media activities on behalf of the company or in a personal capacity where their activities may impact the company. It covers all social media platforms, including but not limited to Facebook, X, LinkedIn, Instagram, and YouTube.

## Social Do's and Don'ts

- Only official logos and branding elements should be used.
- Do not modify or alter the company's branding without permission.
- Engage with followers and respond to comments in a professional and timely manner.
- Avoid engaging in arguments or disputes online. Redirect negative conversations to private channels when necessary.
- Colleagues are encouraged to use social media responsibly, ensuring that their personal activities do not conflict with their roles and responsibilities within the company.
- Colleagues are advised NOT to post controversial content on their professional social channels.
- Only the Social Media Manager and Marketing Communications Manager are authorized to create and manage social media accounts on behalf of the company.
- Content shared on corporate social media accounts must be approved by the Marketing Communications Team.

#Quantexa #DecisionIntelligence #DataWithoutDoubt #FinancialCrime

## Content Standards

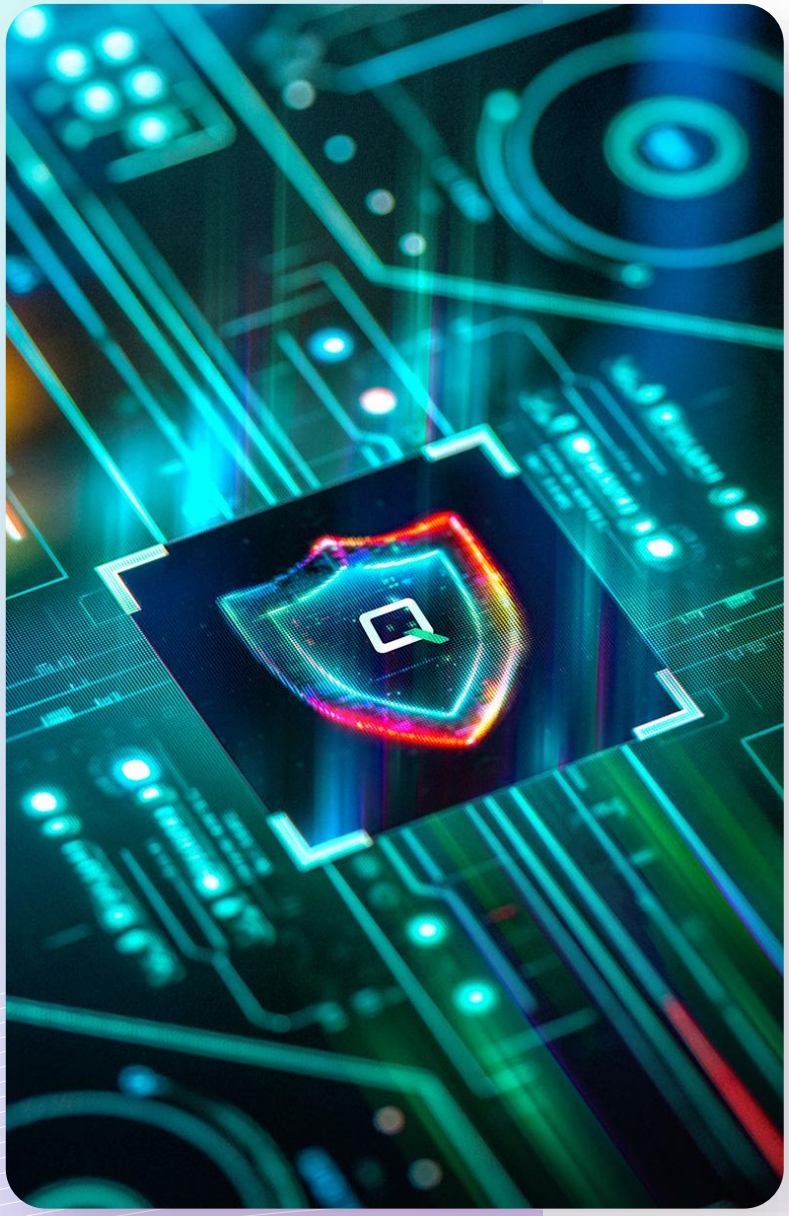
- Accuracy: Ensure all content shared is accurate, truthful, and not misleading. Verify information before posting.
- Relevance: Share content relevant to the company's mission, values, and industry.
- Confidentiality: Do not disclose proprietary or confidential information about the company, clients, or partners.
- Respect: Be respectful and considerate of others, avoiding offensive, discriminatory, or inappropriate language.
- Compliance: Ensure all content complies with applicable laws, regulations, and company policies.

## Monitoring and Enforcement

- The company reserves the right to monitor social media activities related to its brand.
- Violations of this policy may result in disciplinary action, up to and including termination of employment.

SECTION 3

# Our Commitments



# Data Privacy

At Quantexa, we have an inviolable responsibility for our people and our data, both of which we manage with diligence and care. We stake our reputation on our ability and commitment to protecting the dignity, privacy, and integrity of the individuals with whom we work, as well as the information with which they entrust us.

Quantexa respects the rights of privacy of individuals in respect of their personal data.

We adhere to the applicable laws relating to the processing of personal data in the territories where we operate, including but not limited to those set out in the GDPR. Quantexa will:

- Process personal data lawfully in accordance with applicable laws and regulations.
- Provide guidance and training on data privacy and protection.
- Carefully assess and implement appropriate data protection.
- Ensure colleagues understand and follow the Quantexa Data Protection & Privacy Policy.
- Always report any concerns or suspected breaches of personal data.

For further information, please see the Quantexa Data Protection & Privacy Policy*.

If you have any questions or concerns, raise them immediately with your line manager or the Quantexa General Counsel.

**Policies are available via the Resources Section*

# Responsible Workplace

**Quantexa is committed to creating an environment wherein we protect human rights and elevate human dignity in every aspect of our work. We see it as a critical responsibility of our organization to contribute to the creation of a just, safe, and equitable society.**

As a socially responsible business, our colleagues, local community, and customers have a right to expect:

- All colleagues of Quantexa are to be treated with full consideration of their basic human rights.
- Quantexa must act ethically above and beyond basic legal requirements.
- Quantexa to be committed to implementing the principles of the Ethical Trading Initiative Base Code.

## Working conditions are safe and hygienic:

- Adequate steps will be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- Staff will receive health & safety information.
- Staff have access to toilet facilities and drinking water.
- Quantexa has a published Health & Safety Policy*.

- **Policies are available via the Resources Section*

## Ethical and Transparent Pay:

- Staff pay rates are equal to or above the national legal minimum standards.
- Staff are given information about their employment conditions with respect to wages.
- No deductions are made from wages as a disciplinary measure, and payslips detailing lawful deductions are provided for each pay period.
- Staff are given understandable written terms and conditions of employment that detail the employment relationship and the respective obligations of the colleague and employer.

## Equal Opportunities:

In providing services and employing staff, Quantexa is committed to promoting equal opportunities for everyone. Throughout its activities, Quantexa will treat all people equally, irrespective of which of the following categories they belong to:

- Seeking or using our services.
- Applying for a job or already employed by us.
- Trainee workers and students on work experience or placements.
- Volunteer workers.

Opportunities for personal and career development are equally available to all colleagues.

# Fair Labor

## Freedom of Association & Collective Bargaining

Staff, without distinction, have the rights applicable at law to join or form trade unions of their choosing and to bargain collectively.

## Fair Labor Standards

Working hours are not excessive: Staff are not forced to work more than 48 hours per week; a voluntary opt-out agreement is available for those who wish to work more than 48 hours per week.

## Against Forced & Child Labor

Employment is freely chosen:

- No forced, bonded, or involuntary labor is ever used.
- Staff are not required to lodge deposits or identity papers with us.
- Staff are free to leave Quantexa after reasonable notice.

## Child Labor Will Never Be Used:

- There will be no recruitment of child labor.
- Children or persons under 16 are not employed at any time, day or night.
- Young persons under 18 will not be employed at night or in hazardous conditions.



# Anti-human Trafficking

## Anti-Human Trafficking

Quantexa is committed to a work environment that is free from human trafficking and slavery, which includes forced labor and unlawful child labor. Quantexa will not tolerate or condone human trafficking or slavery in any part of our global organization.

Quantexa colleagues, subsidiaries, contractors, subcontractors, vendors, suppliers, partners, and others through whom Quantexa conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery, which our organization categorically prohibits.

Quantexa colleagues, contractors, subcontractors, vendors, suppliers, partners, and others through whom Quantexa conducts business must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons.
- Procuring commercial sex acts.
- Using forced labor in the performance of any work.
- Destroying, concealing, confiscating, or otherwise denying a colleague's access to the colleague's identity or immigration documents, such as passports or driver's licenses, regardless of issuing authority.
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment.
- If required by law or contract, failing to provide or arrange housing that meets the host country's housing and safety standards.

## Ethical Recruitment

Quantexa will not use misleading or fraudulent practices during the recruitment of colleagues or offering of employment/contract positions, such as:

- Failing to disclose, in a format and language understood by the colleague or applicant, basic information.
- Making material misrepresentations during the recruitment of colleagues regarding:
    - The key terms and conditions of employment.
    - Wages and fringe benefits.
    - Location of work.
    - Living conditions, housing, and associated costs (if provided by the employer or agent).
    - Any significant cost to be charged to the colleague or applicant.
    - Hazardous nature of the work.
- Using recruiters that do not comply with local labor laws of the country where the recruiting occurs.
- Charging applicants recruitment fees.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.

# Health & Safety

These principles ensure the smooth operation of Quantexa's facilities and buildings and the health and safety of those who use them. The company also accepts its responsibilities and obligations to others affected by its activities.

## Health & Safety

Quantexa's strong health and safety record can only be achieved and maintained through the cooperation and support of everyone in Quantexa's facilities.

All those who work in Quantexa's facilities, whether colleagues, partners, contractors, or other third parties, must fully participate in managing health and safety in Quantexa. All colleagues have duties as follows:

- Take reasonable care for their own and other people's health and safety.
- Work safely, following any information and training provided.
- Fully cooperate with Quantexa in all health and safety requirements.
- Promptly report any concerns to Quantexa through the correct channels.
- Report hazards and other health and safety issues or problems.
- Report accidents, near misses, and ill-health that may be work-related.
- Report health issues (both physical and mental), illnesses, disabilities, or other health problems that could affect or be affected by their work.

## Equipment

Quantexa is required by law under the Provision and Use of Work Equipment Regulations (PUWER) to ensure that all work equipment provided for use is suitable for the intended use; safe for use; maintained in a safe condition, and, in certain circumstances, inspected to ensure this remains the case; used only by people who have received adequate information, instruction, and training; and has suitable safety measures such as protective devices, markings, and warnings.

Equipment must be suitable for the work it is provided to do (both for the operation concerned and for the conditions under which it will be used). Maintenance equipment must be maintained in safe working order and good repair.

If there is any risk to health or safety, measures must be taken (to the extent possible) so that work equipment can be maintained while it is shut down. If this is not reasonably possible, precautions to prevent risks to the health or safety of those carrying out maintenance work must be taken. In this context, maintenance includes cleaning and repair.

SECTION 4

# Our Relationships

# Conflict of Interest

A conflict of Interest arises when an individual's personal interests, such as a financial or other interest, or those of someone with whom an individual has a close relationship with actually influence, or may be perceived to influence, the objective exercise of an individual's professional duties and responsibilities.

In cases of a conflict of interest, judgment can be distorted, and decisions taken may be more in favor of an individual's own interests than those of Quantexa.

## Quantexa will:

- Always look to ensure that we avoid creating potential or perceived conflicts of interests.
- Be aware of the circumstances in which an actual or potential conflict of interest or perception of such a conflict may arise, and take care to avoid them.
- Identify and report any actual or potential conflicts of interest we face or observe.
- Ensure colleagues understand and follow the Conflicts of Interest Policy & Procedures.

For further information please see the Quantexa Conflicts of Interest Policy*.

If you have any questions or concerns, raise them immediately with your line manager or the Quantexa General Counsel.

**Policies are available via the Resources Section*

# Anti-Bribery & Corruption

Quantexa is committed to conducting business in an ethical and honest manner, and to implementing and enforcing systems that ensure bribery is prevented. Quantexa has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships, wherever in the world we operate.

A bribe includes any direct or indirect payment, benefit, gift or other thing of value, offered, given, requested or received with the purpose of improperly influencing a decision or outcome, or gaining any business advantage. Even the suggestion of corruption may damage the reputation of the Company and affect our ability to do business.

We will never offer, give or receive any gift, hospitality or payment that is intended to be or may be construed as a bribe.

We will also be careful when working with third parties to ensure they are not acting unduly on our behalf and will adhere to standards that we expect.

## Quantexa will:

- Never tolerate any form of bribery or corruption.
- Never offer, give, request, or receive bribes or other inducements, either directly or through a third party.
- Provide training to our colleagues to understand and comply with our standards.
- Carefully assess and implement appropriate measures to assess undertake third parties we engage.
- Ensure colleagues understand and follow the Quantexa Anti-Bribery and Corruption Policy & Procedures.
- Always report any concerns or suspected bribery or corruption.

For further information please see the Quantexa Anti-Bribery & Corruption Policy*.

If you have any questions or concerns, raise them immediately with your line manager or the Quantexa General Counsel.

**Policies are available via the Resources Section*

# Fraud Prevention

Quantexa regards any act of fraud as extremely serious and has taken measures to identify and investigate any suspected instances should they occur. Quantexa is committed to preventing, detecting, and reporting fraud and to cooperating with other organizations to reduce opportunities for fraud.

“Fraud” describes activities such as theft, deception, bribery, forgery, corruption, false accounting, and conspiracy to commit these offenses. Fraud may be defined as deception to obtain an advantage, avoid an obligation, or cause loss to another party. Various global laws and regulations cover many offenses referred to as fraud, including criminal offenses.

**Quantexa has zero tolerance for fraud and seeks to manage fraud risk by:**

- Defining, setting, and maintaining policy and control procedures to identify and deter fraud.
- Investigating incidences of actual, attempted, or suspected fraud.
- Encouraging staff to be vigilant and raising fraud awareness at all levels within the company.
- Ensuring key controls are complied with.
- Providing staff with effective confidential reporting mechanisms (see Whistleblowing Support).
- Acting against individuals and organizations perpetrating fraud against the company.
- Seeking recovery of any asset fraudulently obtained.
- Cooperating with police and other appropriate authorities to investigate fraudulent activity.
- Prosecution of those suspected of fraud.

# Insider Information

Quantexa is committed to adhering to applicable laws with respect to the disclosure and handling of material nonpublic information.

When engaging with customers, Quantexa colleagues may be privy to information in listed companies that could have a material effect on the value of securities.

Information is material if it would likely to be considered important by an investor who is deciding whether to buy or sell the security. Both positive and negative information may be considered material.
It is illegal to sell or buy the stock of a company whilst privy to such material information that has not yet been publicly announced, or to give anyone, including friends and family, tips on when to buy or sell securities when aware of material nonpublic information concerning that security.
Engagement in such conflict can result in severe penalties for both the individual involved and Quantexa.

## Examples of potential material information include:

Financial results, key management changes, information about new products or significant features, timing of significant product announcements or new product introductions, news of a pending or proposed acquisition or other corporate transaction, significant changes in sources or availability of supplies, changes in dividend policy, significant product defects or modifications, actual or threatened significant litigation or investigations, award or cancellation of a major contract or strategic partnership, and significant cybersecurity, or other data protection or privacy incidents.

If you have any concerns, please contact the Quantexa Legal Function.

# Enforcing Sanctions

Sanctions are laws or regulations which prohibit or restrict dealings with a country, entity or individual person including imports, exports, financial transactions and travel.

We comply with all laws and regulations applicable to sanctions, in the countries in which we operate.

## Quantexa will:

- Not participate in transactions or engage in conduct in breach of applicable sanctions or transactions designed or intended to evade or facilitate such a breach.
- Not conduct business that would violate any applicable trade controls or anti-boycott laws.
- Not conduct business in, or involving any, embargoed territory or sanctioned targets.
- Ensure colleagues and contractors are aware of the risk of sanctions and the Quantexa Sanctions Policy.
- Promptly raise any concerns as set out below.

For further information please see the Quantexa Sanctions Policy*.

If you have any questions or concerns, raise them immediately with your line manager or the Quantexa General Counsel.

**Policies are available via the Resources Section*

# Trade Controls

Quantexa is committed to complying with all applicable trade laws and regulations in the countries in which we operate and do business in. Compliance with applicable trade laws protects Quantexa's ability to conduct international business.

If an engagement involves the provision of products, technologies or services across international borders it is important to consult the Quantexa Sanctions Policy before providing or facilitating products and technologies or providing services across international borders. If you have any concerns, please contact the Quantexa Legal Function.

# Government & the Public Sector

**Quantexa abides by the laws, rules and regulations that govern:**

- the acquisition of goods and services by government entities; and
- the performance of government contracts.

We recognise that when dealing with government customers, our activities must comply with their specific rules and regulations.

Quantexa has specific engagement guidance for employees and partners working with governments or state-owned entities which should be clearly read and understood prior to any such engagements.

# Environmental, Social, and Governance (ESG)

**Environmental, Social, and Governance (ESG)**

At Quantexa, we recognize the pivotal role that ESG principles play in shaping a brighter, more equitable, more sustainable future for all.

To that end, we support and assess performance across an array of environmental, social, and governance metrics. These metrics cover the range of ESG factors against which stakeholders can assess company performance concerning environmental, social, and governance requirements.



### Environment

Quantexa believes that a responsible approach to its operations and global footprint, as well as to our colleagues, suppliers, local communities, the environment, and society is essential to our success. Quantexa believes that responsible ownership and business success go hand in hand, and as such, Quantexa has embedded consideration for Environmental, Social, and Governance (ESG) factors throughout all departments and functions.



### Social

We are fundamentally committed to building a long-term, sustainable business that will grow, provide employment, and generate economic benefit in an environmentally and socially responsible manner. Responsible investment and responsible ownership require proper analysis, judgment, and risk mitigation. Quantexa aims to invest within the organization and take a responsible approach toward the environment, society, and corporate governance.



### Governance

Quantexa is committed to making the world safer and more secure with software developed to combat crime through better KYC money laundering and fraud prevention. In the digital era, this commitment applies to our work on the internet and in the physical world. Furthermore, we pursue our business objectives while protecting the interests of the parties involved in Quantexa's growth, merger, and acquisition processes.

# ESG Practices and Guidelines

As we aspire to achieve a more bright, equitable, and sustainable future for all, we set out the following practices and guidelines which our colleagues and stakeholders are expected to follow:

Commit to reducing its emissions to achieve Net Zero emissions by 2050.

Perform an annual review and publish a "Responsibility Report" which will include:

- Environmental: Carbon reduction strategy and systemic environmental initiatives.
- Social: Diversity & Inclusion metrics with progress.
- Governance: Anti-Bribery & Corruption and Corporate Social Responsibility metrics with progress.

Commit to investing in the training and awareness of all staff on managing environmental, social, and governance risks.

Implement and adhere to various policies and procedures to reduce greenhouse gas emissions, energy use, water use, waste generation, consumption of finite natural resources, and pollution of land, air, and water.

Create a diverse, equitable and inclusive work environment where everyone feels valued and respected.

Positively impact our constituent communities by providing opportunities for education and employment, as well as other areas of support.

Generate social value by providing resources and positive engagement within constituent communities, enabling them to thrive.

Meet and exceed the requirements of the Modern Slavery Act (MSA) and ensure that all partners and affiliates within our supply chain are also in compliance.

Continually improve our commitment to ESG and refine our own best practices, which we share with affiliates and partners through on-going education opportunities.

# Resources

## Global Policy Center

Please note the Global Policy Center is only available internally for Quantexa colleagues.

## Quantexa Trust & Policy Center

The Quantexa Trust & Policy Center is available for partners, customers and external individuals and organisations.

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