

Code version	Date of revision and publication	Name of person responsible for revisions
V1.0	27 th June 2025	Sarah Batterbury, General Counsel
V2.0	8 September 2026	Sarah Batterbury, General Counsel

Global Code of Conduct Policy

At Unily, we are committed to fostering a secure, inclusive, and high-performing workplace. Our culture is built on integrity, transparency, and respect for one another. We strive for excellence in all aspects of our work, continually seeking to improve and innovate. By embracing these standards, we uphold Unily's values, promote ethical business practices, and continuously strive for improvement to create exceptional experiences for our employees, customers, and partners.

1. About this Code of Conduct

1.1 The purpose of this code of conduct (Code) is to:

- (a) Explain Unily's core values and expectations of our workforce.
- (b) Provide information and guidance in relation to how we should conduct ourselves when carrying out Unily's business. We expect our workforce to adhere to our core principles.

2. Who this Code applies to

- 2.1 This Code applies to all persons working for us or any group company, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns and individual temporary or fixed term contractors, wherever they may be located. We also expect our clients, partners, and vendors to engage with our teams respectfully and professionally.
- 2.2 This Code does not form part of any contract of employment or contract to provide services and we may amend it at any time.

3. Responsibility for this Code

- 3.1 The Legal Team and People Team have overall responsibility for the Code and ensuring that all those under our control comply with it.
- 3.2 The General Counsel has primary and day-to-day responsibility for implementing this Code, monitoring its use and effectiveness, and dealing with any queries about it.
- 3.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this Code.

4. Unily's core principles

4.1 Integrity and ethical behaviour:

- (a) Act with honesty, transparency, and professionalism in all interactions.
- (b) Avoid conflicts of interest, collusion, or anticompetitive behaviour.
- (c) Maintain compliance with global and local regulatory and legal requirements.
- (d) Protect company, employee, and customer information, and do not disclose sensitive or proprietary data to third parties without authorisation.
- (e) We take responsibility for our actions and their impact on others, aiming to rectify any issues promptly.

4.2 Respect and inclusion

- (a) Foster an inclusive workplace where all staff feel valued.
- (b) Treat colleagues, clients, and partners with respect, embracing diverse perspectives.
- (c) Uphold a zero-tolerance stance on discrimination, harassment, or bullying.

4.3 Collaboration and open communication

- (a) Support principles of transparency, openness, and fairness in decision-making.
- (b) Foster teamwork and constructive feedback while maintaining professionalism.
- (c) Resolve disputes respectfully and follow established resolution processes.
- (d) We believe in open communication, ensuring that our actions and decisions are clear and understandable.

5. Unily's expectations

5.1 Professional conduct:

- (a) **Honesty and Fairness:** We expect all employees to be truthful in their communication and actions. Misrepresentation, fraud, and deceit are strictly prohibited. Fairness should guide our interactions with customers, colleagues, and competitors.
- (b) **Confidentiality:** Protecting the confidentiality of sensitive information is paramount. Employees must not disclose proprietary, confidential, or personal data without proper authorisation. This includes adhering to data protection laws and company policies in this area.

- (c) **Conflict of Interest:** Employees must avoid situations where personal interests could conflict with those of the company. Any potential conflicts should be immediately disclosed to your line manager.
- (d) **Compliance with Laws:** Our company is committed to complying with all applicable laws and regulations, including (but not limited to) those relating to employment, health and safety, data protection, intellectual property, and criminal law. Employees and contractors are expected to understand the laws and requirements relevant to their role and to comply with them at all times.

5.2 Workplace environment:

- (a) **Harassment and Discrimination:** We are committed to providing a work environment free from harassment and discrimination. Any form of bullying, harassment, or discriminatory behaviour based on protected characteristics (race, gender, age, disability, sexual orientation, or any other protected characteristic) or non-protected traits (appearance, social status, personal style, political views, etc.) where such treatment creates a hostile work environment is unacceptable.
- (b) **Health and Safety:** The health and safety of our employees is a top priority. We adhere to all health and safety regulations and strive to provide a safe and supportive workplace. Employees are encouraged to report any hazards or unsafe conditions to their line manager.
- (c) **Diversity and Inclusion:** We value diversity and inclusion, recognising the strength that comes from varied perspectives and backgrounds. Our company promotes equal opportunities and seeks to create an inclusive culture where everyone can thrive.

5.3 Conduct Towards Customers and Partners:

- (a) **Quality and Excellence:** We are committed to delivering products and services of outstanding quality. Our employees should strive for excellence in their work, ensuring that customers receive the best possible solutions and services and that we respond to customer requests promptly and thoroughly.
- (b) **Honest Communication:** Transparency and honesty are key in our interactions with customers and partners. We provide accurate information and do not make false promises. Misleading or deceptive practices are strictly forbidden.
- (c) **Confidentiality:** As with internal practices, maintaining the confidentiality of customer and partner information is essential.

We adhere to confidentiality agreements and ensure that sensitive data is protected.

5.4 Ethical Business Practices:

- (a) **Anti-Bribery and Corruption:** Our company has a zero-tolerance policy towards bribery and corruption. Employees must not offer, give, solicit, or accept any form of bribe or corrupt payment. We adhere to anti-bribery laws and regulations.
- (b) **Fair Competition:** We believe in competing fairly and ethically. Employees should avoid engaging in practices that distort competition, such as price-fixing, bid-rigging, or market allocation.
- (c) **Sustainability:** Our company is committed to sustainable business practices. We strive to minimise our environmental impact and promote sustainability in our operations. Employees are encouraged to contribute to these efforts.
- (d) **Unlawful Conduct.** Our company is committed to preventing unlawful conduct across its business. Employees and senior managers must not engage in, facilitate, conceal or ignore any activity that may constitute a criminal offence in connection with Unily's business or their role at Unily, including fraud, bribery, tax evasion, sanctions breaches, data misuse, competition law breaches or other misconduct, including criminal misconduct. Senior managers must ensure that decisions made within their area of responsibility are lawful, properly authorised and consistent with Unily's policies and controls. All individuals are expected to follow applicable procedures, complete required training, keep accurate records and promptly report any suspected misconduct. Nothing in this Code prohibits or restricts you from reporting possible violations of law to any governmental agency or regulator, or from participating in any such investigation, without notice to or approval from Unily.

Contractors are expected to observe equivalent standards.

6. Reporting Misconduct

- 6.1 Employees and contractors are expected to report any suspected misconduct or unethical behaviour. Reports can be made to managers, the People Team or through our whistleblowing platform ([Whispli](#)) in line with our [Whistleblowing Policy](#). All reports will be taken seriously and investigated promptly. Retaliation against individuals who report concerns in good faith, or failure to adhere to this Code may lead to disciplinary action, up to and including dismissal and/or legal proceedings (where relevant).



7. Your responsibilities

- 7.1 You must ensure that you read, understand and comply with this Code. Disciplinary action, up to and including termination and/or legal proceedings, may result from any failure to comply with this Code. Unily is committed to enforcing these guidelines consistently and fairly.

8. Questions

- 8.1 Any questions you have about this Code should be directed to the legal team: Legal@unily.com or the people team: peopleteam@unily.com