

Board Group

Business Partners

Code of Conduct

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1. INTRODUCTION TO BOARD BUSINESS PARTNER CODE OF CONDUCT

Board Group ("**Board**") expects its Business Partners, when conducting business, to operate in full compliance with all applicable laws and regulations, and to adhere to the principles outlined in this Business Partners Code of Conduct (the "**Code**").

This code applies to all Board Business Partners, including but not limited to our distributors, resellers and other Business Partners (each a "**Business Partner**").

It is important for Board that Business Partners embrace and continually improve on Board's values. For Board Supplier the "Supplier Code of Conduct" available on Board's website applies.

This document has been approved by a resolution of the Board of Directors on February 11, 2025. Any amendments or updates are subject to the approval of the Company's Board of Directors.

2. BOARD VALUE AND EXPECTATION

Board's values are the foundation of our success and reflect our continued commitment to ethical and responsible business practices. Our values include:

- **Honesty and Respect:** these are the underlying principles of every activity undertaken by Board, its initiatives, reports, and it is an essential element of management. Everyone that collaborate with Board must respect the duties of honesty and diligence imparted by Board, avoiding wrongdoing at all costs, not merely when it is apparent, but also when it is expressed through unlawful deeds or unfair advantages arising from situations of conflict of interest.
- **Integrity:** promotes respect, honesty and trust as the basis of every partnership.
- **Confidentiality and data protection:** Board is committed to treating personal data and company information, particularly if confidential and/or privileged, which is gathered and managed within the sphere of its activities, in accordance with the applicable laws.

Board expects and requires its Business Partners to act professionally and ethically at all times in carrying out their services and contractual obligations to Board or on Board's behalf to a Board customer or any other third party.

As a Business Partner, you represent and agree to the following standards.

3. OUR STANDARDS

3.1 Compliance with applicable international, national, and local laws

Board recognizes that local customs, traditions, and practices may differ, but expect as a minimum that its Business Partner comply with local, national and international applicable laws, including (but not limited to) all anti-corruption, economic sanctions and related restrictions, competition, environmental, health and safety, data protection, and labor laws and to monitor compliance with applicable laws.

3.2 Human Rights

The Business Partner must respect internationally recognized human rights in dealing with their stakeholders at large (i.e. employees, clients, shareholders, and communities).

Business Partners will provide a safe and healthy work environment, fully compliant with all employment, health and safety laws and regulations.

The Business Partner commits to prevent, mitigate or remedy adverse human rights impacts with the Business Partner causes or contributes to, directly or indirectly.

3.3 Modern Slavery, Forced and Child labor

The Business Partner does not use, directly or indirectly, any work or services which have been obtained from a person under any form of modern slavery, including forced, bonded, child or compulsory labor and human trafficking.

3.4 Freedom of association, collective bargaining and political involvement

The Business Partner's employees are free to join associations and unions and express political views and engage in political activities outside of working hours without discrimination, harassment or retaliation.

3.5 Equality, Diversity and inclusion

Business Partner will not discriminate in hiring, compensation, access to training, promotion, and termination of employment or retirement on grounds of social, cultural, ethnic or national origins, religious or other beliefs, caste, gender, marital status, pregnancy status, sexual orientation, disability, age, and trade union membership.

Business Partners should promote diversity and inclusion.

3.6 Respect for employees and dignity

Business Partner will treat employees with respect and dignity and will not use physical or verbal abuse or other harassment and any threats or other forms of intimidation are prohibited.

Business Partners will conduct themselves in a professional manner at all times, helping Board to create an inclusive, productive, respectful and professional environment, free from any forms of discrimination or harassment.

Business Partners will not use any form of language which may be considered discriminatory, intimidating, harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate.

3.7 Event Behavior

In any event sponsored or hosted by Board or during which Business Partners may interact with any Board employees, subcontractors or customers, regardless of location, Business Partners must behave in a professional manner including responsible alcohol use and continued adherence to this Code.

3.8 Confidential and proprietary information

Business Partner and their contractors and employees will maintain confidentiality with regard to all Board confidential and business sensitive information (usually under a Non-Disclosure Agreement) they have access to, in accordance with applicable laws or applicable contractual engagement. Any taking, downloading or other prohibited use of Board confidential or proprietary information may be considered a misappropriation of Board trade secrets.

This includes, but is not limited to, source code, product development plans, marketing and sales plans, competitive analysis, non-public pricing, potential contracts or acquisitions, business and financial plans or forecasts, internal business processes and practices and prospects, and customer and employee information.

3.9 Data Protection and Privacy

Business Partner will protect personal data and comply with all data protection laws and regulations. Business Partner will secure Board data against unauthorized access or use.

3.10 Anti-Corruption Guidelines

Board takes a “zero tolerance” approach to bribery and other forms of corruption, and is committed to acting professionally, fairly, with integrity and in compliance with all applicable anti-bribery and corruption laws wherever it operates. Board will not take adverse action against anyone who reports, in good faith, an actual or potential violation of anti-bribery and corruption laws.

3.10.1 Compliance with laws and regulations

Board requires to all Business Partners to comply with all applicable anti-bribery and corruption laws, including, but not limited to the US Foreign Corrupt Practices Act, the UK Bribery Act and other similar anti-corruption laws around the world (“Applicable Laws”). These laws prohibit the giving or receiving of bribes both to and from any person including Public Officials.

“Bribes” or “bribery” in this Code of Conduct refers to the act of directly or indirectly offering, promising, giving, or receiving money or other advantage with the intent that the money or other advantage will either induce or reward a person to perform their role improperly, or for any other corrupt or improper purpose. Other than money, bribes may also include gifts, hospitality,

discounts, charitable donations, free products or services, or any other financial advantage or benefit.

References to "Public Officials" in this Code of Conduct include individuals who perform duties on behalf of government entities, employees of government agencies state-owned or state-controlled enterprises or international organizations, members or candidates of political parties, members of royal families, and other personnel who perform public services according to law. When engaging with Public Officials, Board Business Partners must be mindful of adhering to applicable laws, the honesty and integrity requirements for Public Officials, and this Code of Conduct.

These applicable laws also require commercial organizations to be pro-active in preventing bribery by their employees or any other person acting on their behalf. Amongst other steps, this includes the need to undertake a risk assessment and introduce policies and procedures which often include specific financial controls and the need to maintain a gift and hospitality register. Any person or commercial organization who either commit bribery or fail to prevent this taking place face the possibility of both criminal and civil sanctions.

Where Business Partners suspect or become aware of bribery taking place, either as a result of the actions of its own employees or persons acting on their behalf, or the actions of Board employees and other persons acting on its behalf, this shall be reported to Board immediately as explained in the "paragraph 3.18 Concerns".

3.10.2 Bribery and Facilitation Payments

All forms of bribery and corruption (including "kickbacks" and facilitation or "grease" payments) are strictly prohibited.

Examples of what would be regarded as bribery would include, but not be limited to, the following:

- ❖ Giving, promising, offering, or authorizing the payment of bribes to Public Officials, counterparty stakeholders, or stakeholders, directly or indirectly, with the intention of inducing or rewarding those individuals to perform their role improperly in order to help Board obtain or retain a business advantage.
- ❖ Business Partners shall not make facilitation or "grease" payments on behalf of Board to secure or expedite any routine tasks by Public Officials.
- ❖ Aiding, abetting, assisting, or conspiring with a Board employee or any other person acting on Boards behalf to commit bribery.
- ❖ Business Partners are forbidden from bribing Board employees, agents, or any other person acting on Boards behalf by any means.

Business Partners are also forbidden from accepting bribes from any Board employees, agents, or any other person acting on Boards behalf.

3.10.3 Books & Records

Business Partners shall keep accurate and up to date books, records and accounts.

Where requested, Business Partners shall provide Board with details regarding the steps it has taken to prevent bribery and corruption within its own organization.

3.11 Economic Sanctions

Economic sanctions are financial, trade, and travel-related restrictions and embargoes targeting individuals, companies, and countries. Sanctions may be imposed by governments (e.g., the United States, European Union member states) as well as international organizations (such as the United Nations) and are generally designed to (i) penalize past conduct; or (ii) compel the targeted individual, entity, or country to change its current conduct. As a general matter, Board will not engage in any transaction with or relating to Cuba, Iran, North Korea, Syria, and the Crimea, Russia, or the so-called “Donetsk People’s Republic,” or the so-called “Luhansk People’s Republic” regions of Ukraine (each, a “Sanctioned Country”). Board will also not engage in any transaction with or relating to any person that is the subject or target of economic sanctions. If you become aware of any signs that a Sanctioned Country or sanctioned person is directly or indirectly involved in any potential opportunity or transaction, you should immediately report this to your supervisor or to codeofethics@board.com. Board will not take adverse action against anyone who reports, in good faith, an actual or potential violation of economic sanctions.

3.12 Unfair business practices

Antitrust and competition laws are designed to protect consumers and competitors against unfair business practices. The Business Partner undertakes to comply with all applicable antitrust and competition laws and regulations and, in particular, Business Partner must not:

- fix prices, bid, allocate customers or markets;
- exchange sensitive information with competitors on strategies, customers, markets, current, recent or future prices and similar;
- structure or orchestrate bids to direct business to a certain competitor;
- engage in bid-rigging, bid rotation or other collusion.

3.13 Conflict of interest

Board requires its Business Partners’ to be free from any conflicts of interest. A conflict of interest describes any circumstance that could cast doubt on your ability to act with total objectivity with regard to Board’s interests. Conflict of interest situations may arise in many ways.

If a family member, or the family member of one of Business Partner’s owners, officers, directors, employees or agents, are related to a current Board employee or a third party acting on Board’s behalf, Business Partners are required to immediately disclose this relationship to Board in writing prior to engaging in business with Board.

For purposes of this paragraph, a family member includes a parent, spouse, sibling, son, daughter, mother-in-law or father-in-law, or brother/sister-in-law.

If you feel that you have an actual or potential conflict with Board or any of its employees, you must disclose such conflict to Board management.

3.14 Environmental Sustainability

Board Business Partner recognizes that environmental sustainability is an important factor for long-term business success. The Business Partner guarantees that it systematically works to address any environmental problems and to use resources and conduct its business in an environmentally responsible manner.

The Business Partner aims to have the lowest possible negative impact on the climate and the environment.

The Business Partner shall implement business controls to detect and prevent unlawful conduct by their employees and counterparties. These business controls should be adequately resourced and be periodically reviewed and updated to take into account the current risk environment.

3.15 Training

Board Business Partners will ensure that they have an adequate training program that achieves the appropriate levels of knowledge and skills to maintain compliance with applicable laws, regulations and standards.

3.16 Information, Request and Assistance

Board Business Partners will provide reasonable assistance to Board in connection with any investigation of a violation of this Code or applicable law and regulations.

Board Business Partners will permit Board reasonable access to all records and other applicable documentation concerning Partners' compliance with this Partner Code of Conduct and applicable law and regulations.

3.17 Survey

Board may conduct periodic surveys to assess its supply base, support compliance requirements, understand the community and environmental impact of the diversity of our business partners and your overall compliance with the principles set out in this document. Employees will be informed of the publication of such surveys and will be given a reasonable period of time to provide their responses. Failure to respond to the survey will constitute a violation of the Standards of this Code.

3.18 Information Request and assessment

Board, as part of its procurement review activities, may conduct audits and reviews of its Business Partners against its requirements.

Board expects reasonable assistance in these exercises and in connection with any investigation of a breach of this Code of Conduct for Business Partners or of any applicable laws and regulations.

Board may request reasonable access to all relevant applicable information and documentation relating to the Business Partners' compliance with this Code of Conduct and applicable laws and regulations.

In addition, Board may request an audit if concerns of non-compliance have been raised or if it wishes to better understand your compliance.

3.19 Concerns

You agree to immediately report to Board any concerns or suspect you may have regarding a violation of this Code or any unethical or illegal business practice by any Board employee or Business Partner by emailing codeofethics@board.com.

For matters related to the handling, security or use of personal information, please contact privacy@board.com.

Any reported violation will be kept confidential to the maximum extent allowed under applicable laws.

Business Partners are expected, consistent with applicable laws and contractual obligations, to provide reasonable assistance to any investigation by Board of a violation of this Code or applicable laws.

4. TERMINATION

Failure to follow this Code can result in termination of your business relationship with Board.