

kubrick

# Code of Conduct - Guiding us to make the right decisions



# Our Core Values



Our core values are the foundation guiding our behaviours. We hold not only ourselves but also our clients, third party suppliers, associates and our practices to account based on the values that drive our business forward and create a safe environment for our staff.



## **Innovation over complacency**

We take pride in being market disruptors, not followers. We're curious, always open to new ideas, and never shy away from making mistakes; each mistake leads to a lesson learnt, which takes you one step closer to a better solution.

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## **Adaptability over inflexibility**

The technology landscape is always changing and so are the needs of our clients. We are agile in our working, ways of thinking, and approach to the future of data and technology.

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## **Collaboration over isolation**

We believe in working together rather than in isolation and acting with humility over arrogance. Every person at Kubrick can create something great, but together we can build something incredible

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## **Evidence over bias**

We know better evidence leads to better insight. We champion data and technology-driven decision-making and always examine processes with a critical eye to uncover and eliminate the biases which prevent businesses and people from unleashing their potential.

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## **Diversity over homogeneity**

We respect the differences in others and understand the importance of diverse thoughts, experiences, backgrounds and perspectives when formulating new ideas and creating solutions. We believe in creating equal opportunities for all and pushing against barriers that have existed for too long.

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# A note from HR Director: Linda MacDonald



Kubrick continues to remain at the forefront of creating and retaining a high quality, diverse workforce addressing the acute global technology skills shortage and enabling companies to successfully implement their digital and data transformation agendas.

At Kubrick, we aim to create a culture that allows all our employees to bring their whole selves to work in order to thrive and perform well. Our leaders are committed to ensuring equal opportunities for all employees as well as working to promote inclusion through external partnerships and using our voice to be advocates of change.

One reason I'm so proud to work for Kubrick is because of our amazing people. We hire great people that help us innovate and drive our business forward. Who strive to be better and make Kubrick a fantastic place to work

That's our purpose, and it's why we come to work every day. But just as important as what we do is how we do it. It's not always easy, and sometimes it involves taking tough decisions. They might be about who to work with, when to report something that seems out of the ordinary, or how to be respectful of differences.

Our Code of Conduct is our guide to those decisions. It's founded on our values and it helps us deliver on our purpose, and it defines the standards expected of everyone who works for Kubrick. Our Code is very important for all of us, but like any document, it's only effective if we are familiar with it, understand it, follow it, and most importantly, apply it using good judgement. And as our Code says, if you ever see something that could be unsafe, unethical or harmful, please speak up.

I promise your concern will be taken very seriously, and Kubrick will not tolerate retaliation of any kind.

I stand by our Code of Conduct and expect you to do so too

**Linda Macdonald**  
HR Director



# Our code, Our responsibility

Our Code is a public statement that Kubrick is committed to doing the right thing. It serves as a valuable resource to help employees and others make informed, ethical decisions.

Our Code includes references to relevant Policies, Procedures and Practices and other helpful tools and resources. Because no code of conduct can cover every possible situation Kubrick relies on you to use good judgement and to speak up when you have questions or concerns.

Whenever there is a conflict or a difference between an applicable legal requirement and our Code, you must apply the strictest standard. Do not follow customs that violate our Code.

Our Code applies to all Kubrick employees, officers, and members of the Board as well as all persons working with us including agency workers, volunteers and interns. Business partners, including third parties, can have a direct impact on our reputation through their behaviour. For this reason, we want to work with business partners that share our commitment to safety and ethics and compliance. We expect and encourage all our contractors and their employees to act in a way that is consistent with our Code. We will take appropriate measures where we believe they have not met our expectations or their contractual obligations.

Our reputation is crucial to our success, and Kubrick employees are expected to perform with honesty, professionalism and integrity at all times in the course of their work.

The Code does not form part of any contract of employment or contract to provide services and Kubrick may amend it at any time.



# How we deliver is as important as what we deliver

## Executive Leadership Team

- Overall responsibility for ensuring the Code complies with our legal and ethical obligations, and that all those under our control comply with it.
- Primary responsibility for implementing this Code, monitoring its use and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure they are effective in managing ethics and conduct on behalf of Kubrick.

## Employee responsibilities:

- Read and be familiar with the information in our Code.
- Certify annually that you have acted in accordance with our Code.
- Act in a manner that is safe, ethical, and consistent with applicable laws and regulations, Kubrick Requirements, values and our Health and Safety goals.
- Raise questions and concerns if you become aware of possible violations of laws, regulations, our Code or Requirements.
- Co-operate fully when responding to an investigation or audit

## Additional responsibilities of Managers

Be a positive role model and support your team members by:

- Creating an environment that is respectful and inclusive.
- ensuring those reporting to them understand and comply with this Code and are given adequate and regular training on it and the issues covered by it.
- Encouraging them to speak up.
- Listening and responding to concerns when they are raised.
- Doing your part to make sure that no one experiences retaliation for speaking up or co-operating in an investigation.
- Help your team members understand the principles and expectations of our Code, Requirements and applicable laws.
- Be consistent when enforcing our requirements and holding people accountable for their behaviour at work.

You are invited to comment on this Code and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to a member of the HR team.

# Speak up and protect our Organisation

## When should you speak up?

Each of us has a responsibility to speak up if we see something unsafe, unethical or potentially harmful. If you have a question, need help or want to raise a concern you have several options. Please refer to the 'How you can speak up' decision tree on the opposite page for these options.

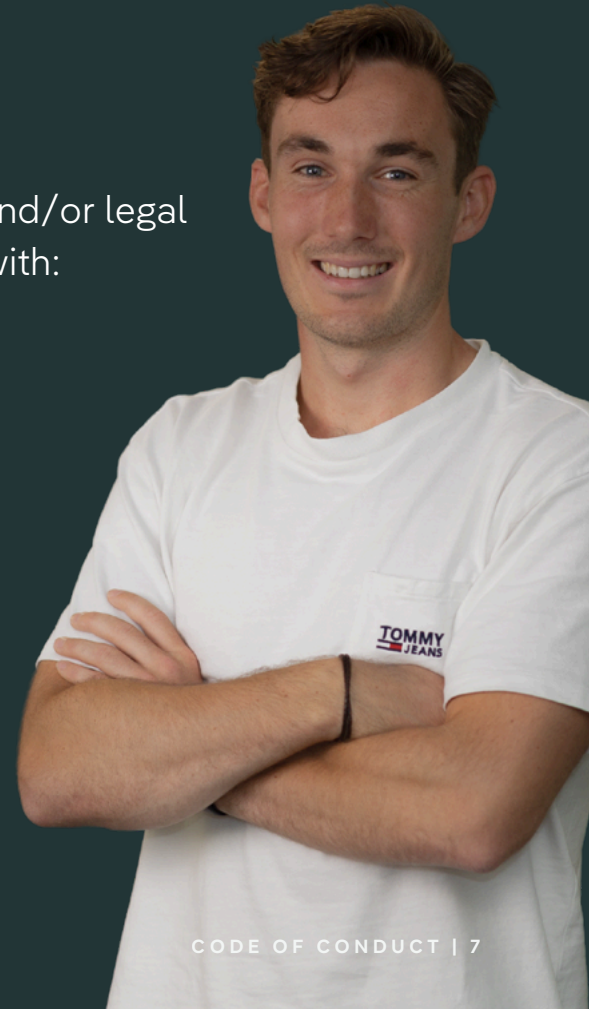
## Zero tolerance on retaliation

Kubrick does not tolerate retaliation. We consider acts of retaliation to be misconduct. Retaliation can take many forms, for example: threats, intimidation, exclusion, humiliation, and raising issues maliciously or in bad faith. If you think that you or someone you know has experienced retaliation, contact any of the Speak Up resources listed in the Code.

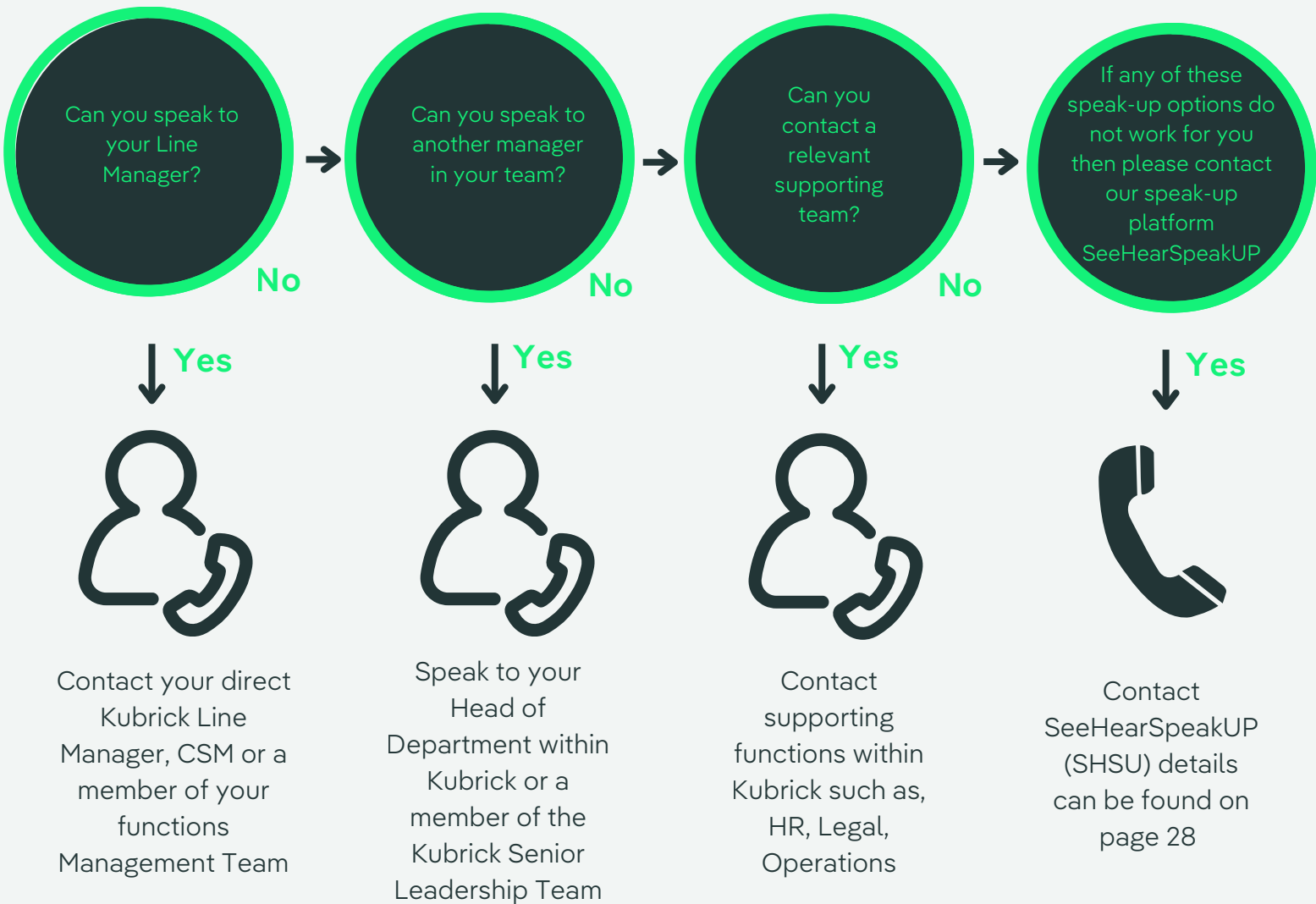
## Consequences of failure to Comply

Disciplinary action, up to and including termination and/or legal proceedings, may result from any failure to comply with:

1. The Code
2. Applicable laws, rules or regulations
3. Any other Kubrick policy



# How can you speak up



# 01

# Innovation over complacency

We have a responsibility to take care of our assets and resources and to be honest and transparent about our operations and performance.

Covered in this section are;

- 1.1 Human rights
- 1.2 Bribery and corruption
- 1.3 Public communications
- 1.4 Political activity
- 1.5 Records management
- 1.6 Protecting our assets
- 1.7 Insider dealing
- 1.8 Modern Slavery and Human Trafficking



**“We take pride in being market disruptors, not followers. We’re curious, always open to new ideas, and never shy away from making mistakes; each mistake leads to a lesson learnt, which takes you one step closer to a better solution”**

## 1.1 Human Rights:

- We seek to conduct our business in a manner that respects the human rights and dignity of people.
- Each of us can play a role in the elimination of human rights abuses such as child labour, human trafficking and forced labour.
- Report any human rights abuse in our operations or in those of our business partners.

## 1.2 Bribery and Corruption:

- We do not tolerate bribery and corruption in any of its forms in our business.
- We comply with anti-bribery and corruption laws and regulations and support efforts to eliminate bribery and corruption in our workplace.
- We work to make sure that our business partners share our commitment.
- Do not offer or accept bribes, kickbacks or any other kind of improper payment including facilitation payments.
- Keep accurate books and records so that payments are honestly described and company funds are not used for unlawful purposes.
- Know who you are doing business with by following our counterparty due diligence procedures.

## 1.3 Public communications and protecting Kubrick's reputation:

- It is essential that our public communications are clear, accurate, consistent and responsible.
- Remember that your social posts and comments are not anonymous and can negatively impact Kubrick's reputation.
- Only authorized persons can talk to the media or make public statements on behalf of Kubrick.
- External presentations can be an excellent way to share our expertise with others, but make sure you have the required approvals before accepting any invitation and obtain the necessary approvals on content.

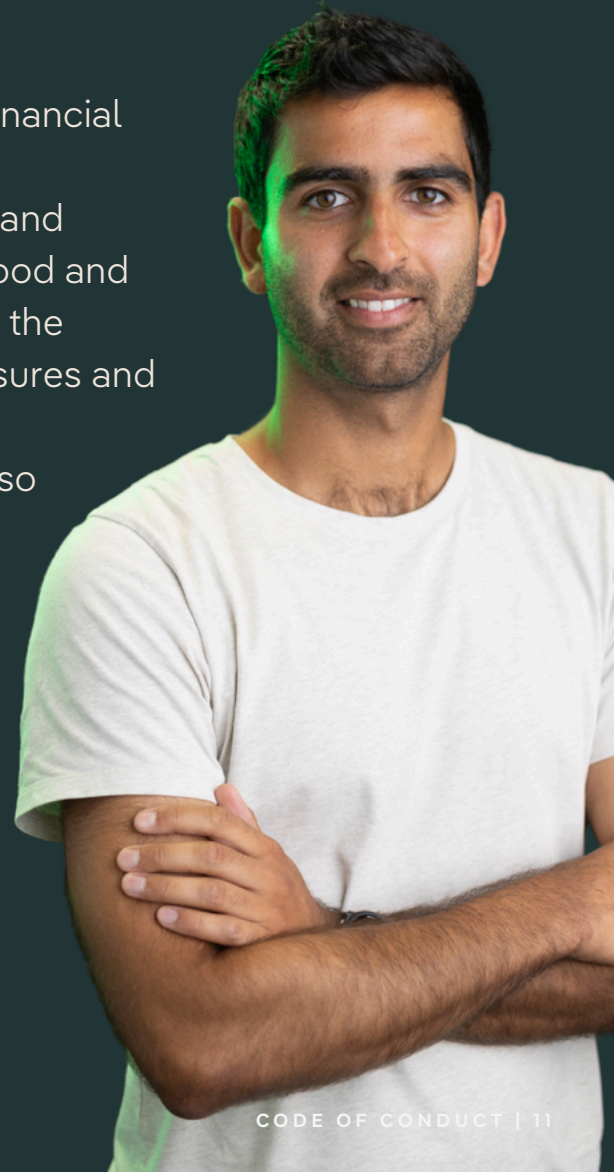


## 1.4 Political activity:

- Our stance on political activity In accordance with applicable laws, Kubrick exercises its right and responsibility to make its position known on relevant issues.
- As an individual, you have the right to personally participate in the political process, including making personal political contributions.
- However, you need to make it clear that your personal views and actions are not those of Kubrick.
- Do not use company funds or resources to support any political candidate or party.
- Obtain approval before engaging in any lobbying activities.
- Personal political activities can sometimes create a conflict with Kubrick. Talk to your line manager if you or a close relative are planning to accept or seek a public office, or if any other political activity might have an impact on Kubrick or on your job.

## 1.5 Records management:

- All of us contribute to the process of recording financial and non-financial information.
- While protecting our interests, we must be open and honest about our business and performance – good and bad. Business partners, government officials and the public rely on our accurate and complete disclosures and business records.
- Such information is also essential within Kubrick so that we can make good decisions.
- Ensure all transactions are properly authorized, recorded and reported, as required.
- Follow applicable laws and Kubrick requirements when creating, maintaining, retaining or destroying documents including those in electronic formats.
- Make sure you have the necessary approvals when you respond to a request for information from a government or regulatory agency.



## 1.6 Protecting our assets:

- We are all responsible for protecting Kubrick's assets.
- Company assets include facilities, property and equipment, computers and IT systems, information, corporate opportunities and funds.
- Be conscientious and act appropriately to ensure company assets are not damaged, misused, or lost.
- Make sure your user IDs and passwords are secure.
- Computer equipment, phones, email and internet access are provided for business purposes and monitored regularly to help Kubrick defend against cyber-attacks and malicious activity. Limited personal use will usually be acceptable.
- When handling confidential and secret information be especially careful by encrypting it when required and sharing it only with authorized parties.
- Do not share Kubrick information in public forums or on social media.
- Be vigilant against cyber-attacks and scams such as phishing and report immediately any incidents, including potential or actual losses of Kubrick information or assets.
- Guard our intellectual property and respect the intellectual property rights of others.

## 1.7 Insider dealing:

- Do not engage in insider dealing
- Never buy or sell any Kubrick securities if you have inside information.
- Never spread false information to manipulate the price of listed securities.
- Trading indirectly when in possession of inside information, for example through family members or others, or providing 'tips' is also prohibited.
- Follow the same principles in relation to inside information in respect of other listed companies.
- Remember these rules continue to apply when you are no longer a Kubrick employee. If in doubt, check with Kubrick's Legal team

## 1.8 Modern Slavery and Human Trafficking:

- Kubrick has adopted procedures, such as an approval matrix and a purchasing procurement questionnaire, to assess suppliers before engaging with a particular product or service.
- We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.
- We take a zero-tolerance approach to any cases of modern slavery or human trafficking identified in our supply chain or our business. Our whistleblowing policy contains guidance on how to raise any questions or concerns that our people may have.



We work together with governments and communities to contribute to sustainable growth, create jobs and invest in people.

Covered in this section are;

- 2.1 Community Engagement
- 2.2 Intellectual property
- 2.3 Record and Maintain our Information
- 2.4 Data Protection



**“The technology landscape is always changing and so are the needs of our clients. We are agile in our working, ways of thinking, and approach to the future of data and technology”**

## 2.1 Intellectual Property:

- Intellectual property laws protect Kubrick's valuable assets—our employees, trademarks, regulatory data, copyrights, trade secrets, domain names and related rights.
- Safeguard and protect Kubrick's intellectual property rights.
- Kubrick is committed to respecting the intellectual property rights of third parties, including clients. Kubrick expects that all its employees take the intellectual property rights of third parties into due consideration in their daily work.
- When our IP is not protected, we risk losing the rights to our property and the competitive advantages it offers. If you are unclear or unsure on what would be considered either Kubrick's or our clients IP then please speak to your Head of Department or CSM.
- We are committed to vigorously protecting these assets and, when appropriate, taking legal action to enforce our IP rights.
- It is our policy to not knowingly infringe upon the IP rights of others.
- Unauthorized copying, trade secret misappropriation and unauthorized disclosure of confidential information of third parties are illegal activities and, if shown, would have serious consequences to Kubrick.
- You are required to report to management, Human Resources, a member of management or the Legal or Compliance departments any suggestions or accusations, informal or formal, made by third parties that Kubrick has committed any acts of IP infringement as discussed above.
- Kubrick recognizes the importance of information security and has established policies and procedures to help protect our, and our clients, information resources and/or systems. We must all help keep our information resources and information systems safe by following our information security policies and procedures.



## 2.2 Community Engagement:

- Engage with communities and respect their rights and dignity:
- We want to be a trusted neighbour in the communities where we operate and live.
- Maintaining an open, ethical stance and respecting diversity, local cultures and customs make a positive difference.
- We encourage participation in the local community.
- Notify your line manager in advance of speaking with representatives of community organizations or non-governmental organizations (NGOs).

## 2.3 Record and Maintain our Information:

- We all contribute to the process of recording information. While protecting our interests and confidentiality, we must be open and honest about our business and performance – good and bad.
- Follow applicable laws and Kubrick requirements when creating, maintaining, retaining or destroying documents, including electronic ones.
- Ensure all transactions are properly authorized, recorded and reported, as required. Records should be fair and accurate.
- Make sure you have the necessary internal approvals when you respond to a request for information from a government or regulatory agency on Kubrick's behalf.

## 2.4 Data Protection:

The Data Protection Policy is an overarching policy that sets out what personal data is and how Kubrick processes it. The main sections of the policy are: Organisational structure; Processing personal data; Data protection impact assessments; Documentation and record keeping; Information provided to, and the rights of, data subjects; Confidentiality and information security; Storage and retention of personal data; Sharing personal data with third parties; Transferring personal data outside the UK and EEA Personal data breaches

### 2.4.1 Personal data:

Kubrick is committed to high standards of information security. In particular we treat confidentiality, cyber-security and the protection of personal data extremely seriously.

This is part of our legal obligations but also part of the values that support the reputation and valuation of our business. As data management consultants, Kubrick must promote high standards, especially when providing services to regulated organisations in the public, pharmaceutical or financial sector.

To reflect these values, you must read, understand and comply with our information security and data protection related policies, which you can find on MyKubrick. To see how these policies interact, please refer to the policy architecture, also published on MyKubrick.

We are committed to safety, protecting the environment and respecting the communities in which we operate.

Covered in this section are;

- 3.1 Health and Safety
- 3.2 Ethical Use of Digital Technology
- 3.3 Contract Authorisation
- 3.4 Anti-Competitive information
- 3.5 Operational Excellence
- 3.6 Upholding our Brand



**“We believe in working together rather than in isolation and acting with humility over arrogance. Every person at Kubrick can create something great, but together we can build something incredible.”**

### 3.1 Health and Safety:

- Nothing is more important to us than the health, safety and security of our workforce and the communities in which we operate and behaving responsibly towards our shared environment. We must be vigilant, disciplined, and always looking out for one another. Threats, intimidation and violence will not be tolerated. Each of us is a role model for safety
- Do not undertake work that you are not qualified to perform.
- Play your part in protecting the environment – make it a personal priority.
- Be sure that your performance is not impaired, for example by a lack of sleep, alcohol, or any drugs – including prescription or over the counter medication.
- Speak up if you observe an unsafe or unhealthy working environment. Listen to others who speak up.
- Expect and encourage contractors and others with whom we work to comply with applicable HSSE requirements.
- Report any accident, injury, illness, or unsafe condition immediately. Never assume that someone else has reported or will report a risk or concern.
- Know the emergency procedures that apply where you work.

### 3.2 Ethical use of digital technology:

- We care about any unintended consequences when developing or using digital technologies and the potential risks they may pose throughout their lifecycle.
- Take account of any relevant policies or guidance considering the ethical implications of any digital technologies you develop or use.
- If in doubt about the ethical use of digital technologies, please speak with your Line Manager or use one of our speak-up channels.
- Use artificial intelligence and automated tools responsibly, ensuring compliance with all applicable laws and maintaining ethical standards including data privacy, accuracy verification, and appropriate human oversight of AI-generated content.



### 3.3 Working with Third Parties:

- Kubrick employees are expected to execute Company agreements in an ethical and conscientious manner
- Contracts should always be executed in accordance with our contractual obligations.
- We will always obtain proper approvals before deviating from a contract or other agreement.
- All purchasing decisions must be made based on the best value received by Kubrick.
- Employees should take care that personal or family relationships not influence or appear to influence objective business decisions.
- Obtaining competitive bids, verifying quality and service claims on a regular basis and confirming the financial and legal condition of the supplier are all important steps in good purchasing decisions.
- Agreements should be written, and clearly set forth the services or products to be provided, the basis for earning payment, and the applicable rate or fee.
- The amount must not be excessive in light of industry practice and must be commensurate with the services provided. Kubrick will respect the confidential information of our suppliers

### 3.4 Anti-Competitive conduct:

- We comply with competition and antitrust laws. These are laws that protect consumers by prohibiting anti-competitive behaviour.
- Do not engage in any form of agreement or understanding with competitors to fix prices, rig bids, allocate customers or restrict supply.
- Understand who is an actual or potential competitor (e.g. these may include a Non-Operated Joint Venture) and the restrictions on exchanging competitively sensitive information.



### 3.5 Operational Excellence:

We have a number of expectations in support of Kubrick's Operational Excellence expectations that aim to protect Kubrick's financial position.

If your role requires it then it is your responsibility to adhere to these processes in the required timeframe

#### Timesheets:

- If your role requires you to submit timesheets then you must do so in the required timeframe. Failure to submit timesheets on time could negatively impact Kubrick's financial position and if you repeatedly fail to meet this requirement then more formal action may be taken

#### Compliance Training:

- Adherence to completing all mandatory Kubrick and Client issued compliance training is imperative to make sure that we are operating, safely, legally and compliantly both within our organization and within our client's requirements.

#### Policies and Procedures:

- All Kubrick's policies and procedures are available to everyone on Workplace. It is your responsibility as a Kubrick employee to familiarize yourself with these policies and seek guidance and clarification where necessary to make sure that you act to uphold the standards Kubrick expects from its employees. If based at a client you must also familiarise yourself with their policies to make sure you also adhere to their ways of working and behavioural standards.

#### Communication Channels:

- If you are based at a client site it is important that you monitor your Kubrick channels including but not limited to, outlook, workplace and teams. These channels are often used by Kubrick to reach our employee network and not monitoring these channels regularly could mean you miss important company updates or legal and compliance requirements.

### 3.6 Upholding our Brand

We expect all Kubrick employees, whether on client site, or representing Kubrick at an external event, including workplace socials to uphold our values at all times. By doing so we ensure workplace success, a strong reputation and a high level of work ethic and excellence.

It is important that if you are on-site at one of our clients you;

- Go into the office as much as your team and manager do.
- Turn your camera on and participate in meetings.
- Introduce yourself to new stakeholders and make yourself known.
- Be respectful of others around you - in the office or in virtual teams.
- Always consider your audience: emails and messages should be written in a professional format and use correct punctuation.
- Only use your client's laptop and email for client work.
- Never send any client data or sensitive information to a personal laptop or email address.
- Only use a secure, password-protected Wifi network.
- Establish positive working relationships with colleagues but keep it professional.
- You must not do or say anything at a work-related social event that risks breaching confidential business information.
- Be mindful of your reputation and the reputation of Kubrick. Do not say anything at social events that could cause offense to others.

Our people are key to Kubrick's success. When we respect and value one another we succeed individually and as a company. We all have a role in maintaining a corporate culture based on respect and fairness

Covered in this section are;

- 4.1 Diversity and Inclusion
- 4.2 Equal Opportunities
- 4.3 Harassment
- 4.4 Workplace Relationships
- 4.5 Workplace Violence
- 4.6 Drugs and Alcohol



**“We respect the differences in others and understand the importance of diverse thoughts, experiences, backgrounds and perspectives when formulating new ideas and creating solutions. We believe in creating equal opportunities for all and pushing against barriers that have existed for too long.”**

#### 4.1 Diversity and inclusion build teamwork and success:

- We value the unique contribution that each person brings to Kubrick.
- We accomplish more when people from diverse backgrounds and with different talents and ideas work together in an environment where everyone can contribute
- Treat everyone with respect
- Encourage and listen to those who speak up
- Be respectful of cultural differences

#### 4.2 We expect those we work with to act in a way that is consistent with our sense of fairness and equal opportunity:

- Base your work-related decisions on merit – not on race, colour, national origin, religion, gender, age, sexual orientation, gender identity, marital status, disability, or any other characteristic protected by applicable laws
- Offensive messages, derogatory remarks and inappropriate jokes are never acceptable

#### 4.3 Provide a workplace that is free from harassment and intimidation We do not tolerate any form of abuse or harassment.

- This includes actions that can reasonably be considered as offensive, intimidating or discriminatory, as well as any form of sexual harassment.
- Remember that harassment does not have to occur in the workplace or involve a Kubrick employee to violate our Code or the law.
- Help create a work environment free of all forms of harassment.
- Inappropriate comments of a sexual nature or any other sexually offensive behaviour will not be tolerated.



## 4.4 Workplace Relationships:

- We recognise that individuals who work together may form close personal relationships. Personal relationships at work are a normal part of life and you are entitled to a private life. At the same time, we are committed to promoting a working environment based on dignity, trust and respect.
- It is important for us to ensure that staff behave in an appropriate, professional and responsible manner at work and that any personal relationship does not compromise this.
- You must ensure that any personal relationship at work does not have an adverse effect on your work or the work of others, give rise to a conflict of interest, or provide any other workplace advantage.
- Intimate behaviour during work time, such as holding hands, kissing, other close physical contact and discussions of a sexual nature is not permitted. For the avoidance of doubt, this applies during any period that you are working, whether that is at the workplace, at a work event including those not directly organised by Kubrick, at any other remote location, or if you are visiting a clients' premises.
- You must ensure that any confidential information that you have access to is protected at all times.
- If you enter into a personal relationship with a colleague working in the same department, an individual that you supervise or is your supervisor, a manager or someone you manage, or with any individual which may give rise to a conflict of interest, you must declare your relationship to your line manager and a member of the HR team. Failure to do this could result in you being in breach of this policy and may lead to disciplinary action.
- Any position in HQ would be deemed to be a supervisory role in relation to consultants and must therefore be declared.

## 4.5 Workplace Violence:

- Kubrick is committed to preventing workplace violence and to maintaining a safe work environment.
- Kubrick has policies in place to address intimidation, harassment or other threats of or actual violence that may occur onsite or offsite.

### **Workplace violence is defined as including, but not limited to:**

- Physical violence or acts of aggression toward or by another person
- Physical violence or acts of aggression toward Kubrick property or personal property on Kubrick premises
- Threats of violence or acts of aggression, whether direct, indirect (veiled) or conditional
- Behavior that acts to intimidate or to instill fear in others
- Menacing gestures
- Bringing, or threatening to bring, weapons to the workplace
- Stalking
- Hostile, aggressive, injurious and/or destructive actions undertaken for the purpose of domination or intimidation

## 4.6 Drugs and Alcohol:

- Kubrick requires you to work free from the influence of any substance, including drugs and alcohol, which may prevent you from conducting work activities safely and effectively.
- Working under the influence of any substance disregards our commitment to a safe working environment, jeopardize our business relationships and negatively impact customers and even our communities.
- Kubrick Consulting Inc reserves the right to have any employees tested, where local law and policies allow, if there is reasonable suspicion that someone is under the influence of drugs or alcohol.
- If you are using prescription or non-prescription drugs that may impair alertness or judgment, or witness an employee who may be impaired and, therefore, possibly jeopardizing the safety of others or Kubrick's business interests, unless prohibited by local laws, you should report it immediately.

We work with our business partners in an honest, respectful and responsible way. We are a company on which others can rely.

Kubrick gains its competitive advantages through strong performance rather than through unethical or illegal business practices.

Covered in this section are;

- 5.1 Supplier and business partners
- 5.2 Gifts and entertainment
- 5.3 Competition and anti trust
- 5.4 Conflicts of interest
- 5.5 International trade
- 5.6 Anti-money laundering
- 5.7 Environmental



**“We know better evidence leads to better insight. We champion data and technology-driven decision-making and always examine processes with a critical eye to uncover and eliminate the biases which prevent businesses and people from unleashing their potential”**

### 5.1 We aim to build and maintain strong relationships with suppliers and business partners:

- Our suppliers and business partners are essential to our ability to do business and meet our stakeholders' expectations.
- That is why we choose carefully and use an objective selection process.
- We seek to work with others who share our commitments to safety and ethics and compliance.
- Communicate clearly our relevant expectations to our suppliers and business partners, agreeing on contractual obligations where applicable.
- Take the appropriate measures if they do not meet those expectations or obligations.
- Report any indications that a supplier or business partner is not complying with applicable laws or their contractual obligations.

### 5.2 Appropriately exchange gifts and entertainment:

- We do not accept or provide gifts or entertainment in return for any business, services or confidential information, or if the intent is to bias a decision.
- If there is a conflict between Kubrick's gifts and entertainment requirements and applicable external gifts and entertainment requirements, follow the strictest requirement.
- Some gifts and entertainment are never acceptable as they may be illegal or could damage our reputation; for example, anything that could be seen as a bribe or that is indecent or improper.
- Obtain Legal approval before paying travel expenses for government officials or agreeing to pay a per diem in connection with their travel.

### 5.3 Avoid anti-competitive conduct:

- Competition and antitrust laws are complex and often fact specific.
- For this reason if you have any questions consult Legal.
- Do not engage in the following activities: Any form of agreement or understanding with competitors to fix prices, rig bids, allocate customers and/or restrict supply.

#### 5.4 Be proactive and manage conflicts of interest:

- A conflict of interest may occur when your interests or activities affect your ability to make objective decisions
- Be aware of the many different ways in which conflicts of interest can occur.
- Proactively establish if you should record a potential conflict on our conflict of interest register by contacting a member of the legal team or HR.

For example:

- Outside jobs, and affiliations with competitors, customers or suppliers.
- Working with close relatives, especially those who are government officials.
- Having an intimate relationship with another employee who can influence decisions such as salary, performance rating or promotion.
- Serving as a board member of another organization.
- Investments, including those of close relatives, which might influence or appear to influence your judgement.
- Disclose situations to your line manager that might create a conflict or even the appearance of a conflict. Once disclosed, we then have the opportunity to better address the situation.

#### 5.5 Respect international trade laws:

- We abide by the trade laws of all countries in which we operate including economic sanctions, import and export laws.
- Trade sanctions, including financial sanctions, are complex. If you are involved in transactions, such as business dealings with a sanctioned country, entity, or person, you must ensure compliance with applicable trade laws.
- Products intended for import or export, including equipment, software, and technology, must be classified in advance, and all required labelling, documentation, licenses and approvals completed.
- If you have any questions speak to your line manager who will contact Legal.



## 5.6 Preventing money laundering:

- Money laundering is the process of hiding illegal funds or making them look as though they are legitimate.
- It also covers the use of legitimate funds to support crime or terrorism.
- Never become involved in money laundering.
- Know who you are doing business with by following our counterparty due diligence procedures.
- Raise concerns where you see them.

## 5.7 Environmental:

- As a global company with diverse operations, managing our environmental impact is complex yet imperative to ensure a sustainable environment for years to come.
- We are committed to reducing our impact through programs that encourage energy-efficient technologies, decreased use of natural resources and overall reduction of harmful effects from our products and processes.
- Employees are trained on applicable areas of environmental compliance in terms of laws, regulations and facility-specific requirements.
- Employees are expected to comply with these requirements to ensure all Kubrick's business is conducted in a way that is protective of the environment
- We aim to continuously ensure knowledge and consciousness about sustainability within our organisation. We commit to development of sustainability objectives and KPIs to continuously improve our sustainability for our operations.

## 5.8 Fraud protection:

- Fraud laws are complex and carry serious criminal penalties for both individuals and the organisation.
- Under the Economic Crime and Corporate Transparency Act 2023, our organisation can be held criminally liable for fraud committed by employees or associated persons. For this reason, if you have any questions about potential fraud risks, contact Legal immediately.

# 05 How to Speak Up

One of your options for speaking up is our whistleblowing platform SeeHearSpeakUp.

SeeHearSpeakUp, Kubrick's global helpline, is a confidential way to get answers to your questions and to raise concerns. It is administered by an independent company, is available every day of the week at any time, day or night, and can accommodate calls in more than 30 languages. You can contact SeeHearSpeakUp anonymously from most locations. Any report you make will be kept confidential to the fullest extent possible consistent with law and good business practices

You can reach SeeHearSpeakUp through the following:

- 0800 0562539 in the UK
- 1855 290 6405 in the US
- Email: [report@seehearspeakup.co.uk](mailto:report@seehearspeakup.co.uk)
- You will find a full list of local numbers at: [www.seehearspeakup.co.uk](http://www.seehearspeakup.co.uk)
- You can also submit a report through the website

 SeeHearSpeakUp

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