

NPAW CODE OF CONDUCT & ANTIBRIBERY AND CORRUPTION POLICY

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NPAW CODE OF CONDUCT & ANTIBRIBERY AND CORRUPTION POLICY

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NPAW CODE OF CONDUCT

1. Introduction

At NPAW, we strive for excellence, creating, producing, and bringing the most accurate, high quality, and innovative business intelligence tools to the most important online video providers worldwide. We do business in an ethical manner, with proper responsibility, and with a commitment to respecting the needs and rights of the individual, society and the environment.

NPAW's reputation is, without any doubt, one of its most valuable assets; that's why our stakeholders expect us to do the right thing. Definitely, on this matter, we all have a responsibility to protect the reputation of NPAW, the company that represents every one of us.

Our main values –Innovation, Reliability, Agility, Vibrancy, Diversity and Dynamism – define a clear guidance for our way of doing things and for how we behave while we do business. Together, we're building cutting-edge technology that leads a fast-growing industry.

We strongly believe in a culture of mutual trust that encourages the free exchange of views across our company. That's because we consider that having a liberal working environment is critical to our success.

Additionally, NPAW is convinced that there's no better way to keep a successful and sustainable basis for our business and our culture than making it with unquestionable integrity. We commit to avoiding any breach of integrity which could result in a loss of our capacity or license to operate, making us unable to provide the services we create for a better media technology.

The NPAW Code of Conduct expresses NPAW's expectations while providing this practical guidance, references to and examples of further useful information, and sets forth the basic standards for a responsible and ethical business conduct that must be followed by all directors, officers, and employees of NPAW ("NPAW Personnel" or "we"). That means that Employees of NicePeopleAtWork S.L., including its affiliates, subsidiaries and branches, are expected to act lawfully, honestly, ethically and in the best interests of the company when performing duties on behalf of NPAW.

This code is subject to change and may be amended, supplemented or superseded by one or more separate policies.



If any part of this code conflicts with local laws or regulations, only the sections of this code permitted by applicable laws and regulations will apply. Any policies that are specifically applicable to your jurisdiction will take precedence to the extent they conflict with this code.

If you are in doubt about what the NPAW correct business behavior is, do not hesitate to seek advice and help from your direct or indirect manager or the Legal or Human Resources department.

Please take the time to carefully read our NPAW Group Code of Conduct and put it to practice in all your daily business activities.

2. Compliance Committee

NPAW has designated a Compliance Committee in order to ensure the compliance with this Code of Conduct, as well as the policies and protocols that stem from this Code. This Committee is conformed by the following members:

- Chief Financial Officer.
- Head of Legal.
- Head of People.

3. Conflicts of Interest

NPAW Personnel is expected to use their judgment to act, avoiding any undue influence, at all times and in all ways, in the best interest of NPAW when performing their job duties. As such, NPAW Personnel should attempt to avoid current or apparent situations containing any kind of conflict of interest. A conflict of interest exists when your personal interests interfere with the best interests of NPAW and / or create conflicting loyalties.

To protect NPAW, do not unduly use your position in the company for personal benefit, avoid taking part in activities with close associates and relatives that could cause a conflict of interest or even appear to take part in it.

The best rule for any situation that appears to present a conflict of interest is to “abstain and disclose.” If it is not possible to avoid participating in the event or activity creating the conflict, (1) promptly disclose the potential conflict to your direct or indirect manager and/or HR or the Legal Department and (2) avoid participating in decisions that might raise



the appearance of a conflict until you receive appropriate guidance as many conflicts of interest or potential ones can be resolved in an acceptable way for both the individual and the company. They will all consider the facts and circumstances of the situation and decide whether a corrective or mitigating action is appropriate to resolve the situation.

4. Discrimination & Harassment

NPAW is committed to an equal and fair treatment of all employees, that's why we do not tolerate any form of harassment, discrimination or mistreatment in the workplace or in a work-related situation (including individual contributors, managers and contingent workers) guests, clients, or agency partners. We will not accept any offense to our people, nor abuse, intimidation or humiliation (sexual, psychological, physical, verbal or any other form of harassment).

Our goal is to make sure that no behavior of our employees discriminates against sex, race, color, nationality, ethnic or national origin, ancestry, citizenship, religion (or belief, where applicable), age, physical or mental disability, medical condition, sexual orientation, gender identity or expression, veteran status, marital status, genetic information or characteristics (or those of a family member) or any other category protected under applicable laws.

It's important to declare that these principles apply to all aspects of the employment relationship, such as hiring, assignments, compensation, promotion, discipline and termination.

If you suspect harassment, discrimination or retaliation has occurred, we strongly encourage you to immediately report the incident through the Whistleblowing Channel enabled within NPAW. Similarly, managers who learn of any such incident should immediately report it through the referred channel.

The Protocol against Sexual and Workplace Harassment implemented within NPAW establishes the guidelines for all NPAW Personnel regarding any form of harassment, discrimination or mistreatment in the workplace.

5. Personnel's Rights

NPAW considers the well-being and health of its employees as important elements for its success and will actively work to eliminate health risks and create a safe working environment.

Therefore, NPAW Personnel must comply with all safety and health regulations, as well as existing measures to prevent risks. Any incident or opportunity for improvement related to safety or health issues must be reported to the Compliance Committee, the Head of Human Resources or through the Whistleblowing Channel.

NPAW acknowledges the rights of employees to establish or join unions in accordance with Spanish laws and principles. NPAW Personnel have the recognized right to unionize, freedom of association, and collective bargaining.

NPAW considers individuals as a key business factor, advocates for and promotes compliance with human and labor rights and commits to the implementation of regulations and best practices regarding employment conditions, health, and safety in the workplace.

6. Communications

The term “NPAW electronic communication tools” covers the company’s own hardware such as computers, mobile phones, telephones and handhelds, but also it covers our social media and collaboration tools like our corporate e-mail and other similar internet systems that could be implemented.

To have access to NPAW’s electronic communication tools means that they must be used with due care while ensuring that they are not lost, damaged or otherwise misplaced. In addition, NPAW employees must comply with NPAW IT security standards, which are established in the entity’s ICT Resources Policy. For instance, they are not allowed to install any software that could suppose a risk or be dangerous for the general IT security standards or simply not comply with it. In the event of theft or other loss of an NPAW electronic communication tool, immediately inform the local service desk in the company.

NPAW’s electronic communication tools are to be used in principle and primarily for NPAW’s business purposes. As a general rule, NPAW employees are allowed to use them (in exceptional cases) for personal use (this means every use which is not for NPAW’s business purposes). This permission may be revoked at any time. Private Internet use must be strictly limited in duration and must not interfere with an employee’s duties.

Data Privacy in connection with the use of the NPAW electronic communication tools is not unreservedly guaranteed; it may be rescinded in some way if the situation requires it.

That’s why you should take care to ensure that all business records and communications

(including email, texts, NPAW Messages and instant messages) are clear and accurate. Your business communications may be shared or become public through litigation, government investigation or other similar situations. Potential risks from inaccurate or misleading statements could include any claim of false advertising, misrepresentation, breach of contract, securities fraud, unfair disclosure or / and any antitrust violations.

NPAW recognises the benefits of social media (e.g. blogs, micro blogs, wikis, communities, social networking sites), but expects that employees make use of these platforms, whether they are operated by NPAW or not, in a responsible way. Please, in order to properly proceed with it, consult with the Marketing & Communications Department and your Manager before making any formal statements or providing any information about NPAW, our products or our business and fellow NPAW Personnel to journalists, bloggers and industry analysts through any public forum (such as a trade show or conference).

In this regard, you may not give an endorsement or other statement on behalf of NPAW or personal endorsement that identifies your affiliation with NPAW, except when approved by the Management Team. In addition, you may not discuss NPAW's business, including financial condition, business or financial performance, products or business prospects with financial analysts or actual or potential investors without the prior approval of the Management Team. All requests for a representative of NPAW to participate in a financial conference (including speaking on a panel or attending a dinner or any event that targets the financial community) must be referred to the Management Team for review and management. If any such analysts or investors contact you, please refer such inquiries to the Management Team.

7. False advertising

NPAW's Personnel must ensure that advertising serves as a particularly useful tool in the economic process, ensuring respect for advertising ethics and the rights of advertising recipients, excluding the defense of professional interests, and avoiding advertising false characteristics of its products and/or services.

8. Financial Integrity and Responsibility

NPAW Personnel are expected to act responsibly and exercise sound judgment with respect to matters involving company finances. We want to avoid overspending or unnecessary costs with the objective of having a more productive and optimized company composed of loyal, trusted employees.

There are two types of employee expenses in the company:

- Expenses already covered by employees owners of a corporate credit card.
- Expenses that are paid by our employees and that are reimbursable.

NPAW may reimburse all reasonable business expenses, after internal approval, in part or in full - depending on the case. This means that if you spend money, enter into contracts, or maintain financial records on behalf of NPAW, you must keep accurate and complete records as required, comply with NPAW's system of internal controls and ensure compliance with all applicable legal and regulatory requirements.

To expect that the NPAW Personnel act with responsibility also means that when you submit an expense for reimbursement or spend money on NPAW's behalf, you should make sure that the cost is reasonable, directly related to business expenses and supported by the appropriate documentation. Always record the business purpose and comply with other submission requirements.

9. Confidential Information

As NPAW employees, we have access to confidential information related to our business in many ways, but confidential information includes much more, it also refers without limitation to proprietary data, trade secrets and know-how such as software and product designs, product plans, inventions, processes, designs, engineering, customer lists, employee data (other than your own), financial information, budgets, pricing, business plans or other business information.

NPAW's confidential business information is a valuable asset that everyone must protect. NPAW Personnel are required to use confidential information of NPAW only for business purposes and must always keep such information in strict confidence. In this regard, NPAW personnel must take all the necessary steps to ensure that the information is protected and stored in a safe location, whatever its format, respecting the safety regulations issued by the Security Committee. The dissemination of said information must be expressly authorized by the Management team.

This responsibility extends to confidential information exchanged outside NPAW or through third parties that we have received under non-disclosure agreements or others. If we share confidential information with a third party, any exchange of such information is subject to the signing of a confidentiality agreement (Mutual Non-Disclosure Agreement).

Additionally, you are not to bring with you to NPAW or use or disclose to any person associated with NPAW, any confidential or proprietary information belonging to any former employer or other person or entity to which you owe an obligation of confidentiality under any agreement or otherwise. NPAW does not need and will not use such information and so, they will assist you in any way possible to preserve and protect the confidentiality of

proprietary information belonging to third parties.

For help with Confidentiality, how to establish a Mutual Non-Disclosure Agreement, questions about provisions of a Mutual Non-Disclosure Agreement already in place or if you have questions about whether certain information can be disclosed, please get in contact with the Legal Department or the Management Team. NPAW personnel should also refrain from sharing confidential information internally beyond those persons who legitimately need to know it for purposes of their job. And please, always keep in mind that improper use or disclosure of confidential business information could seriously damage NPAW's reputation.

We also have to be aware that in a competitive environment like ours, third parties could strive to get access to confidential information related to our business. These competitive intelligence activities by third parties are part of our industry too. We must be extremely careful on how we handle confidential information in public places, such as airplanes, trains, trams, restaurants and bars.

Secrecy obligations are part of the employment contract and will continue to be in force after the end of employment.

Note that this code is not intended to restrict an employee's legal right to discuss the terms and conditions of his/her employment.

NPAW's Confidentiality Policy establishes the guidelines for all NPAW Personnel regarding the treatment of confidential information and secrecy obligations.

10. Protection of User Data and Personal Data

NPAW operates around the globe, using various electronic systems to process, share and exchange information in the relationships it maintains with Customers. The ever-increasing complexity of cooperation in such a different way of doing business nowadays, especially in our industry, entails the exchange of personal data, but all of this processing of personal data (e.g. data of employees, business partners, customers and suppliers) must be in compliance with all the applicable data privacy laws as well as to the entirety of NPAW's corporate policies elaborated for this purpose.

This, linked to the trend of increasing also the use of modern telecommunications and electronic collaboration platforms and tools inside the company, makes NPAW committed to the respect of Data.

Privacy, in all of its matters and to the fact of developing some corporate principles in this



regard, which must be consistently applied when the company processes personal data.

In this regard, the dissemination, disclosure, or transfer of images or audiovisual recordings of employees or other individuals associated with NPAW, captured in private spaces or beyond the view of third parties, is strictly prohibited without the consent or authorization of the affected person.

Depending on your role at NPAW, you may have access to information systems or tools that enable you to view certain information relating to people (including users, your coworkers, as well as registered and non-registered individuals), which would otherwise not be visible to you. These tools are important and necessary to enable you to perform your work effectively. However, it is of the utmost importance that all NPAW Personnel treat this data access with extreme caution and sensitivity, and only access to it to the extent it is necessary in order to do your job. This data is confidential and subject to the privacy protections in many jurisdictions. NPAW's brand and the trust users put in us depend on your responsible use of tools that allow you to view user information that would otherwise not be visible to you.

Please read the Data Protection and Information Security Policy, available on the NPAW's Site, which regulates your use of and access to data.

11. Protection of Use of NPAW Assets

NPAW provides its Personnel with a wide range of valuable assets to help you perform your work on behalf of the Company at the highest possible level. NPAW's corporate assets are to be used mainly for legitimate business purposes and only by authorized NPAW personnel or their designees, that's why all the provided assets must be used with a sufficient grade of diligence, they should be well maintained and not subject to unreasonable use.

That means preventing them from any loss, damage, misuse, theft or sabotage. Most of all, you should use your own judgment in using company assets for personal matters because while we recognize that personal use occurs, this should not be excessive and it should not in any way interfere with the performance of your business duties.

"NPAW's corporate assets" cover not only the tangible corporate things like the computer equipment, mobile devices, communications platforms and equipment, software, office and electronic equipment and facilities but the intangible assets too like our brand, ideas, know-how, trademarks, ideas, technology, confidential or proprietary information and /or

information systems, and the most important thing, our reputation.

Please, try not to pursue any personal benefits while using NPAW's corporate assets. Remember that to the extent permitted under applicable laws, NPAW reserves the right to monitor and inspect how its assets are being used by their Personnel.

12. Intellectual and Industrial Property

Intellectual and industrial property rights are an invaluable asset and, as such, must be protected and respected both internally and externally. This category includes, but is not limited to, copyright, reproduction, trade secrets, rights to knowledge, trademarks, patents, industrial designs and the transmission or reproduction of these. Employees commit to:

- Never associating NPAW's brand with offensive, defamatory, or degrading content.
- Intellectual or industrial property resulting from the work of employees during their tenure at NPAW, using the organization's resources and as part of their duties, shall belong to NPAW.
- Using protected assets only if NPAW has been granted usage rights, paid for usage licenses, or if they are classified as freely usable.
- Prohibiting employees from copying, publishing, reproducing, storing, or making protected assets available to third parties if NPAW has not been granted usage rights, paid for usage licenses, or if they are not classified as freely usable.
- Not contributing to or participating in any file-sharing networks of protected files.
- When granted usage rights for protected assets, ensuring their proper handling in a diligent and transparent manner, and providing accurate attribution to sources and authors when required.

Please read the Intellectual Property Policy, available on the NPAW's Site, which regulates all assets protected under intellectual property rights.

13. Compliance with laws and regulations

NPAW is esteemed as a company with distinct strengths. While this reputation is the product of several the work of these last years, improper actions or the carelessness of just one of our employees ignoring this good and mandatory practice, could seriously damage our image and our reputation. The way each employee conducts the company's business



could affect NPAW's public image making the company lose money and reputation.

We must prevent this. NPAW Personnel is expected to act within the bounds of all applicable laws, rules and regulations of the countries where it operates and does business. We know that the application of these and other possible laws can be complex and fact-dependent. If you have any questions about the applicability or interpretation of any law, rule or regulation, you should contact the Legal Department or the Compliance Committee.

To do so, NPAW will require all employees to be guided in their activities by reasoned principles, particularly those set forth in this Code of Conduct.

14. Reporting Violations

All NPAW Personnel are required to immediately report any suspected violation of the Code of Conduct, any other policy or protocol implemented in NPAW, as well as any administrative infraction, crime or violation of the European Union Law, through the Whistleblowing Channel enabled within NPAW and regulated by the Whistleblowing Channel Protocol.

Below is the link to access the Whistleblowing Channel enabled for filing complaints and communications:

<http://centinela.lefevre.es/public/concept/1572431?access=%2bRIth1y8KWIwiQMU5qXpbdgWIWrh2e4OJ3eGwgFtWU%3d>

In cases in which an individual reports a suspected violation of policy or law in good faith and is not engaged in the questionable conduct, NPAW will keep its discussions and actions confidential to the greatest extent possible and in compliance with applicable laws and regulations governing privacy. NPAW will not retaliate against anyone who makes a good-faith report of a potential violation. NPAW will investigate any report of a violation and you must cooperate fully with any investigation, but you should not investigate independently, as alleged violations may involve complex legal issues, and you may risk compromising the integrity of a formal investigation.

Conduct that violates the law or company policies is grounds for prompt disciplinary or remedial action. In addition, your failure to report a known violation of law or company policy by someone else may result in disciplinary action up to termination of employment.



15. No Retaliation

It is against NPAW's Whistleblowing Channel Protocol (and may be unlawful) for any NPAW personnel to retaliate against any person for reporting what he or she believed in good faith to be a violation of this code, assisting other NPAW personnel to report a violation of this code or participating in any investigation pursuant to this code.

16. Amendment and Waivers

Any amendment or waiver of any provision of this code must be approved by NPAW's Board of Directors and promptly disclosed as may be required pursuant to applicable laws and regulations.

ANTI-BRIBERY AND CORRUPTION POLICY

1. Explanatory Statement

This anti-bribery policy exists to set out the responsibilities of NPAW or any of its affiliates or subsidiaries (hereinafter "NPAW") and those who work for us in regard to observing and upholding our zero-tolerance position on bribery and corruption.

It also exists to act as a source of information and guidance for those working for NPAW. It helps them recognise and deal with bribery and corruption issues as well as to understand their responsibilities.

2. Policy Statement

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

NPAW will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of Spain, in regard to our actions both at home and abroad.

NPAW recognises that bribery and corruption are punishable. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

3. Scope of Application and Interpretation

This anti-bribery policy applies to all employees (whether temporary, fixed-term or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors or any other person or persons

associated with us (including third parties) or any of our subsidiaries or their employees, no matter where they are located (within or outside Spain). The policy also applies to Officers, Trustees, Board and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organization our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers and government and public bodies – this includes their advisors, representatives and officials, politicians and public parties.

Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

4. Definition of Bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting or soliciting something of value or of an advantage to induce or influence an action or decision.

A bribe refers to any inducement, reward or object/item of value offered to another individual in order to gain commercial, contractual, regulatory or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe, and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above) or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes to any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's compliance manager.

5. General Prohibitions and Acceptable Invitations

This section of the policy refers to 4 areas:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions

Gifts and hospitality

NPAW's gifts and hospitality policy accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

1. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage or as an explicit or implicit exchange for favors or benefits.
2. It is not made with the suggestion that a return favor is expected.
3. It is in compliance with local law.
4. It is given in the name of the company, not in an individual's name.
5. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
6. It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
7. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
8. It is given/received openly, not secretly.
9. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
10. It is not above a certain excessive value, as predetermined by the company's Compliance Committee (usually in excess of €100).
11. It is not offered to, or accepted from, a government official or representative or politician or political party.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offense), the gift may be accepted so long as it is previously declared to the Compliance Committee, who will assess the circumstances.

NPAW recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As good practice, gifts given and received should always be disclosed to the Compliance Committee. Gifts from suppliers should always be disclosed. In this regard, when disclosing the giving or reception of a gift, NPAW's Personnel should inform the Compliance Committee about the following aspects:

- Name of the person giving the gift.
- Name of the person receiving the gift.
- Content and approximate value of the gift.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Compliance Committee should be sought.

Facilitation Payments and Kickbacks

NPAW does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

NPAW does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favor or advantage.

Political Contributions

NPAW will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions

NPAW accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the Compliance Committee.

When making a donation, NPAW's Personnel must duly register all the documentation concerning this operation -i.e., the donation certification-, and the destiny given to the donation should be monitored.

6. Employee Responsibilities

As an employee of NPAW, you must ensure that you read, understand, and comply with the

information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must report this situation through NPAW's Whistleblowing Channel.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. NPAW has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

7. Consultation and reporting

This section of the policy covers 3 areas:

- a) How to raise a concern.
- b) What to do if you are a victim of bribery or corruption.
- c) Protection

How to raise a concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to NPAW, you are encouraged to raise your concerns as early as possible. If you're uncertain about whether a certain action or behavior can be considered bribery or corruption, you should speak to the Compliance Committee or report your doubt through the Whistleblowing Channel.

NPAW will familiarize all employees with its Whistleblowing Channel Protocol so employees can share their concerns swiftly.

What to do if you are a victim of bribery or corruption

You must tell the Compliance Committee as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of

another corrupt activity.

Protection

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, NPAW understands that you may feel worried about potential repercussions. NPAW guarantees no retaliation for concerns raised in good faith under this policy, even if investigation finds that allegations were not substantiated or the behaviour was not unlawful.

If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform the Compliance Committee immediately.

8. Training and Communication

Cooperation of directors, employees and executives: compliance with this Policy is mandatory for all directors, executives, and employees of NPAW, who must provide full and honest cooperation as may be required from them in this regard.

Training: depending on their responsibilities, NPAW may request the attendance of directors, executives, and employees to training related to this Policy.

NPAW's anti-bribery and corruption policy and zero-tolerance attitude will be communicated to suppliers, contractors, business partners, and third-parties at the outset of business relations, and as appropriate thereafter.

9. Record keeping

NPAW will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

10. Monitoring and reviewing

NPAW's Head of Legal will review the implementation of this policy on a regular basis. They will assess its suitability, adequacy, and effectiveness.



Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Compliance Committee.

This policy does not form part of an employee's contract of employment and may amend it at any time to improve its effectiveness at combating bribery and corruption.



Declaration

Code of Conduct and Anti-Bribery and Corruption Policy

This is to acknowledge that I have received, read, and understand NPAW's Code of Conducts ("Code") and Anti-Bribery and Corruption Policy (the "Policy"). I understand that I am required to comply with the policies, practices, and standards established in the Code and Policy and I commit to conduct myself in accordance with them. I confirm that in the past twelve months I have not violated, nor am I aware of any violation of what is set forth in the Code and Policy within my scope of responsibility, except for any suspected instances of noncompliance already reported to the Compliance Committee.

Signature: _____

Date: _____