



Code of Conduct

The aim of this document is to describe the behaviors we expect from each Everlam employee while conducting their work in line with Everlam's core values.

Safety

- Everlam prioritizes the health and safety of our employees, business partners, visitors, and communities where we operate. We implement and enforce safety rules and procedures to help prevent accidents.
- Every employee must follow these safety rules and procedures and promptly notify management of any non-compliance with these requirements.
- We must lead by example, demonstrate a commitment to health and safety in our daily actions, and actively promote a workplace where everyone can work safely.
- No process should be operated without assurance of safety. When we take care of each other, we can reduce future injuries and save lives.

Diversity and respect

- We never discriminate against anyone based on race, ethnicity, religion, nationality, color, marital status, gender, gender identity, sexual orientation, disability, age, or any other legally protected group. Treat others with respect and never engage in behavior that could be perceived as harassing, hostile or disrespectful.
- Physical or verbal harassment, sexual harassment, and physical violence of any kind (whether by supervisors, fellow employees, or third parties) harm a positive work environment and are strictly prohibited. These actions are also prohibited outside of work and on social media. Everlam believes in the rights of all workers. We follow all applicable laws concerning human and civil rights and require that all employees treat their colleagues with dignity and respect.
- Everlam has zero tolerance for any human rights violations such as forced/child labor.
- All Everlam employees as well as former ones are entitled to have his/her privacy respected.

Contact with suppliers and customers

- Everlam does not encourage giving or receiving gifts, certainly not with a value above 100 EUR. To prevent conflicts or when in doubt please consult with the Everlam management.
- Any action which could be considered as a bribe or kickback is prohibited. Never should an Everlam employee accept, offer, or provide payments or other benefits that might be perceived as improper or illegal.



- All company payments to outside parties should be appropriate in value and justified (properly documented), so they cannot be misunderstood as being illegal or improper.
- The privacy of Everlam customers, suppliers or other third parties must be protected and cannot be disclosed to those who are not authorized to receive it.
- Any conflict of interest must be disclosed immediately to Everlam management. Both conflicts of interest involving family members or other personal relationships and personal political contributions & activities must be avoided. Company funds and assets cannot be used for personal political activities.
- The Everlam employee should know the local rules regarding export and import of products and services. Everlam respects the Antiboycott regulations and international restrictive measures on trade with potentially sensitive countries.
- We expect our business partners especially suppliers to share similar principles in the area of environment, labor and human rights and expect them to sign “Everlam Supplier Code of Conduct”

Company funds and assets

- Always obtain, use, protect, share, or dispose of company property with the Everlam shareholders’ interest in mind. The assets include but are not limited to computer and communication systems, non-public information, intellectual property (trademarks, copyrights, patents, etc.), NDA’s, records and expense requests.
- Company funds can only be used for authorized purposes. Never seek reimbursement for non-business expenses or duplicate reimbursement. All expense reports should be properly approved. Employees are expected to spend the company’s funds as carefully as they would their own.
- An employee leaving Everlam must return all company assets, not take copies of Everlam information when departing and not disclose non-public information to others even after leaving the company. Proper transition to a successor is part of the expectation. Failure to comply with this obligation may result in civil and criminal penalties.

Competition practices

- Antitrust laws are in place to protect and maintain a fair, open, and honest marketplace— consistent with our beliefs at Everlam. It is our responsibility to understand how antitrust laws apply to our job and always follow them.
- Employees must avoid even the appearance of conspiring or making an agreement with a competitor. It is illegal to enter into formal or informal agreements with competitors that may prevent, restrict, or distort trade. These agreements include, but are not limited to, arrangements to fix prices, rig bids, or divide or allocate markets, territories, or customers.



- Stop the conversation if a competitor tries to discuss any of these topics. Then, immediately report the incident to your supervisor or Legal Department. Remember that a simple discussion or exchange of information with a competitor— even one with no clear agreement—could lead to a violation of Antitrust laws.
- Any meeting with competitors must be for a legitimate purpose, have an agenda and meeting minutes and be approved in advance by management.
- Gathering information about an Everlam competitor can only be done in a proper way and never by theft or misrepresentation.

Environment

- Environmental protection is an essential part of our business by assessing and improving our operations and processes, using renewable energy where possible, recycling where possible, and reducing waste.
- We set ambitious goals to shrink our environmental footprint and address sustainability challenges.
- We always take special care to manage chemicals and hazardous materials properly.
- We follow all applicable laws, rules, and regulations related to environmental health and safety.

General employee responsibilities

As an Everlam employee your actions must reflect the responsible business practices our company stands for. To ensure this each employee:

- Must demonstrate the Everlam core values in his or her everyday actions.
- Must become familiar with all Everlam procedures and company policies.
- Must comply with the laws, regulations and company policies in the businesses and countries the employee works in.
- Must never ask or allow a 3rd party, such as an agent, representative, supplier, or toll manufacturer to perform an action not permitted to an Everlam employee.
- Must raise questions and concerns about the business practices with management when ethics/compliance issue exists.
- Cooperate and provide complete and accurate information related to investigations of misconduct.