



Unblu Code of Conduct

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Luc Haldimann CEO

luc.haldimann@unblu.com

www.unblu.com

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1 Introduction

1.1 Scope

This policy sets out Unblu's arrangements for Business Code of Conduct

1.2 Revision History

Revision	Date	Record of Changes	Approved By
1.0	12.9.2019	First Version	Luc Haldimann CEO
1.1	04.02.2022	Revised Document clarification on Breaches and other minor changes	Luc Haldimann CEO
1.2	18.01.2023	Changed classification to PUBLIC	Martin Danell

1.3 Control of hardcopy versions

The digital version of this document is the most recent version. It is the responsibility of the individual to ensure that any printed version is the most recent version. The printed version of this manual is uncontrolled, and cannot be relied upon, except when

formally issued by the ISMS Manager and provided with a document reference number and revision in the fields below:

Document Ref.		Rev .		Uncontrolled Copy	X	Controlled Copy	
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1.4 Terms and Definitions

- “staff” and “users” means all of those who work under our control, including employees, contractors, interns, etc.
- “we” and “our” refer to Unblu
- “Covered Person” refers to any director, officer or employee of Unblu and Unblu’s global affiliates.

1.5 Responsibilities

The CEO is responsible for all aspects of the implementation and management of this policy unless noted otherwise.

2 Unblu Global Code of Business Conduct and Ethics

Unblu is committed to conducting business in accordance with the highest ethical and legal standards. Failing to do so puts Unblu’s name, reputation for integrity, and

business at risk. While Unblu strives to achieve market leadership and business success, achieving results through unethical or illegal business practices is not tolerated.

This Code of Business Conduct and Ethics is intended to provide guidance and perspective for business ethics and practices. Unblu's Board of Directors and management team appreciate the support and cooperation of every employee as we all do our part to conduct business in accordance with the highest ethical and legal standards.

The Code applies to all directors, officers, and employees of Unblu and Unblu's global affiliates (each a "Covered Person") and it is Unblu's policy not to grant any waivers to the provisions of this Code unless approved by the Board of Directors of Unblu Inc. Unblu recognizes that questions may arise when the Code applies to conduct that is legal and acceptable under the circumstances. If there are any questions on the applicability of the Code, we should contact the resources identified by Unblu for these purposes.

Each Covered Person is required to adhere to this Code of Business Conduct and Ethics. Any failure to observe this Code may result in disciplinary action, up to and including termination of employment. The Chief Executive Officer of Unblu Inc. is accountable for compliance with this Code of Business Conduct and Ethics.

This Code of Conduct provides for reporting and consultation with persons designated by Unblu for these purposes; Unblu provides a list of these designated persons to all directors, officers, and employees.

2.1 Diligence and Behavior:

Covered Persons must act in good faith, responsibly, with due care, competence, and diligence. Covered Persons must act in a manner that does not adversely reflect upon Unblu

2.2 Dealing with Conflicts of Interest:

Covered Persons must act in an honest and ethical manner, particularly with respect to the honest and ethical handling of actual or apparent conflicts of interest between their personal interests and Unblu's interests. Conflicts of interest arise when employees take actions or have interests that may make it difficult to perform their company work objectively and effectively. To avoid conflicts of interest, all of our business decisions must be based on the best interests of Unblu. If we encounter situations that are or may even appear to be, conflicts of interest, we should discuss it with our manager or other available resources designated by Unblu for this purpose. Where there is a doubt, it is best to raise the issue. Conflicts of interest include, but are not limited to: the ownership by a Covered Person, or to the Covered Person's knowledge, by a member of the Covered Person's family, of significant financial interest in any outside enterprise which does or seeks to do business with or is a competitor of Unblu; serving as a director, officer, partner, consultant of, or in a managerial or decision-making position with, or employment in a technical capacity by, any outside enterprise which does or seeking to do business with or is a competitor of Unblu; and acting as a broker, finder, go-between or otherwise for the benefit of a third party in transactions involving or potentially involving Unblu or its interests. In general, a "significant" financial interest is a direct or indirect aggregate interest of the Covered Person and their family members of more than: 5% of any

class of the outstanding securities of any entity; 5% of the total assets or gross income of the applicable Covered Person; or any other arrangements or circumstances, including family or other personal relationships, which might discourage the Covered Person from acting in the best interests of Unblu.

2.3 Fair Dealing and Competition:

Our customers trust us to meet their needs in a meticulously accurate, professional manner. We uphold that trust and build on it every day, with each customer transaction. We treat all of our customers with the greatest respect, recognizing that the smallest details of a customer transaction can be of the utmost importance to their lives and livelihood. We will not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. Our sales and marketing information will accurately and honestly present the quality of our goods and services. Antitrust and fair competition laws and regulations are designed to preserve free and open competition and to promote fair business practices between companies. The antitrust laws of the United States and other countries where Unblu operates are a critical part of the business environment. Fair competition laws can be extremely complex and vary considerably from country to country, so if we encounter any issue that may have antitrust implications, Covered Persons should consult with the persons designated by Unblu for these purposes.

2.4 Confidentiality and data privacy:

Unblu is committed to maintaining the highest standards for the protection of the legitimate data privacy interests of its directors, officers, employees, customers, and business partners. As part of that commitment, Unblu has adopted a data privacy policy. Covered Persons must comply with the data privacy policy. Covered Persons

must respect the confidentiality of information acquired in the course of their work for Unblu (including, but not limited to, information about customers, suppliers, business partners, and competitors) except when authorized by their manager or otherwise legally obligated to disclose it. Covered Persons should disclose Confidential Information to other Unblu personnel only on a “need to know” basis. Covered Persons must not use confidential information acquired in the course of their work for personal advantage. This includes, but is not limited to, taking advantage of such information by trading or providing information for others to trade in securities. Covered Persons shall not engage in any unauthorized or inappropriate use, misappropriation or disclosure of any confidential information (in any form), intellectual property or computer systems belonging to Unblu or any of Unblu’s customers, suppliers, business partners or others, including, without limitation, any intellectual property protected under any U.S. or other laws relating to copyrights, patents or trade secrets.

2.5 Compliance with Laws:

Covered Persons must comply with all applicable laws, rules and regulations of Federal, state, local and foreign governments and agencies, and all applicable stock exchange listing requirements, insider trading laws, antitrust and competition laws, anti-bribery and anti-corruption laws (including the U.S. Foreign Corrupt Practices Act), equal opportunity and related laws, and environmental, health and safety laws.

2.6 Recordkeeping, reporting, and communications:

We keep honest and complete records. These records are the basis for managing the company’s business and for fulfilling our obligations to stakeholders, employees, customers, suppliers, and regulatory authorities. We conform to our internal controls,

to securities and reporting regulations, and to approved accounting practices. Our financial records are accurate, timely, and do not exclude, disguise, or mislead. Where estimates and accruals are necessary for company reports and records, we will support them with good, honest judgment and appropriate documentation.

All documents and records shall be clear, concise, accurate, and appropriate, and will avoid exaggeration and derogatory remarks of people and companies. It is wrong to make false claims on any company records, including expense reports and timesheets, to understate or overstate known assets or liabilities, or to delay or accelerate the recognition of income or expenses. When we end our employment with Unblu, all company records that we have in our possession must be immediately returned to the company.

Our documents are to be kept and destroyed according to our document retention policy and our data privacy policy. However, when there is a pending or possible audit, government investigation, claim or litigation, we may be responsible for retaining all documents (including e-mails) related to the investigation, despite any normal document destruction schedule. If you have questions or concerns, please seek guidance from the persons designated by Unblu for these purposes.

Covered Persons shall not engage in any inappropriate, illegal, or unethical recording, reporting, or disclosing of Unblu's business and financial transactions and results, including, without limitation, any deviation from generally accepted accounting principles and any matter regarding accounting, internal control or auditing. Covered Persons shall not fabricate, falsify or forge all or any part of any Company document, contract, or record.

2.7 Care of Company Property:

Covered Persons must act responsibly with respect to all Company assets and resources entrusted to them.

2.8 Gifts:

Gifts, favors, and entertainment may be given to others on behalf of Unblu and/or at Company expense only if they are consistent with customary business practices, are not excessive in value and cannot be construed as a bribe or pay-off, are not in contravention of applicable law or ethical standards, and would not be embarrassing to Unblu if publicly disclosed. Accounting records and supporting documentation reflecting such gifts, favors, and entertainment must be accurately stated and described.

Covered Persons shall neither seek nor accept for themselves or others any gifts, favors, entertainment or other items of value without a legitimate business purpose, nor seek or accept loans (other than conventional loans at market rates from lending institutions) from any person or business organization that does or seeks to do business with, or is a competitor of, Unblu. In the application of this policy: Covered Persons may accept for themselves and members of their families common courtesies usually associated with customary business practices; an especially strict standard is expected with respect to gifts, services, discounts, entertainment or considerations of any kind from suppliers; and it is never permissible to accept a gift in cash or cash equivalents (e.g., stocks or other forms of marketable securities) of any amount.

2.9 Anti-corruption/bribery:

Unblu is a global organization and complies with all applicable anti-corruption and anti-bribery laws. These laws make it illegal to provide or offer something of value to government officials in order to improperly influence their acts or decisions. If we are asked to make any improper payments, including facilitating payments (small payments given in exchange for performing routine governmental functions), Covered Persons should contact the persons designated by Unblu for these purposes immediately. We never accept, provide, or offer kickbacks, bribes, or gratuities. Covered Persons shall not make any contributions of Company funds, property, or services to any political party or committee, domestic or foreign, or to any candidate for or holder of any office of any government--national, state, local or foreign. This policy does not preclude: the operation of a political action committee under applicable laws; and Company contributions, where lawful, to support or oppose public referenda or similar ballot issues of interest to Unblu, if approved in advance by the Chief Executive Officer. No direct or indirect pressure in any form is to be directed by Covered Persons toward Company employees to make any political contribution or participate in the support of a political party or the political candidacy of any individual. However, this policy shall not affect the right of Covered Persons to make personal political contributions to and/or be active on behalf of the parties, committees, and candidates of their choice as long as the donation is derived exclusively from that Covered Person's personal funds or time.

3 Circulation of this Code

Management shall circulate this Code of Business Conduct and Ethics to all Covered Persons during each fiscal year and request disclosure of any new or continuing

conflicts of interest, potential conflicts of interest, or violations of this Code of Business Conduct and Ethics.

4 Breaches of policy

Obligation of Reporting Violations: Covered Persons must report any evidence of a material violation of this Code of Business Conduct and Ethics of which they become aware. Reports may be filed through the persons designated by Unblu for these purposes.

Unblu will take all necessary measures to remedy any breach of this policy including the use of our disciplinary or contractual processes where appropriate.