

# SABIO GROUP CODE OF CONDUCT

Sabio Group Policy

June 2024

PUBLIC  
PO V2.0 – Sabio Group Code of Conduct



# CONTENTS PAGE

Page 3.	BEING A RESPONSIBLE BUSINESS
Page 4.	POLICY SCOPE AND AWARENESS & TRAINING
Page 5.	RESPONSIBLE DECISION-MAKING STEPS
Page 6.	REPORTING SERIOUS CONCERNS / WHISTLEBLOWING
Page 7.	REPORTING SERIOUS CONCERNS / WHISTLEBLOWING PROCEDURE
Page 8.	NO RETALIATION
Page 9.	PRINCIPLE 1 - OUR VALUES
Page 10.	PRINCIPLE 2 - HEALTH, SAFETY & WELLBEING
Page 11.	PRINCIPLE 3 - DIVERSITY, INCLUSION AND BELONGING
Page 12.	PRINCIPLE 4 - OPEN COMMUNICATION
Page 13.	PRINCIPLE 5 - PROFESSIONAL CONDUCT & CAPABILITY
Page 14.	PRINCIPLE 6 - ANTI-SLAVERY
Page 15.	PRINCIPLE 7 - ENVIRONMENT
Page 16.	PRINCIPLE 8 - SOCIAL RESPONSIBILITY
Page 17.	PRINCIPLE 9 - BRIBERY, GIFTS AND HOSPITALITY
Page 18.	PRINCIPLE 10 - CONFLICT OF INTEREST
Page 19.	PRINCIPLE 11 - RECORDING OF TIME, COSTS AND FINANCIALS
Page 20.	PRINCIPLE 12 - CONFIDENTIALITY & INTELLECTUAL PROPERTY
Page 21.	PRINCIPLE 13 - IT ACCEPTABLE USE
Page 22.	PRINCIPLE 14 - INTERNET AND SOCIAL MEDIA
Page 23.	PRINCIPLE 15 - INFORMATION SECURITY AND DATA PROTECTION
Page 24.	PRINCIPLE 16 - BUSINESS CONTINUITY
Page 25.	PRINCIPLE 17 - SUPPLIER SELECTION
Page 26.	PRINCIPLE 18 - PRICING, FEES & PAYMENT

PUBLIC

PO V2.0 – Sabio Group Code of Conduct



# BEING A RESPONSIBLE BUSINESS

**The success of Sabio Group depends upon us all behaving in a responsible way.**

Being responsible means:

- Being a great employer
- Minimising our environmental impacts
- Making a positive contribution to our community
- Doing what is legally required in each country we operate
- Working in an ethical way

**In short, we need to ‘do the right thing’.**

When we work in this way we demonstrate to our colleagues, clients, suppliers and investors that we can be trusted which enables us to build strong and sustainable relationships. Whilst this document will not capture every possible scenario, it makes it clear:

- What our principles are,
- Where to find more information,
- Who can provide further advice; and
- How to escalate serious concerns about our business practices.

I would like to ask everyone to familiarise yourself with our Sabio Code of Conduct Policy and help us ensure we achieve the high standards required by our clients, investors and each other.

**Andy Roberts**  
CEO

PUBLIC  
PO V2.0 – Sabio Group Code of Conduct



# POLICY SCOPE

The scope of this policy, including our Principles apply to all Sabio Group employees, temporary workers and contractors. It serves as a guideline for expected behavior towards customers, colleagues, managers, external stakeholders, and the organisation.

We recognise that we must conduct our business based on the rules and regulations established in the countries where we operate. In the event of a conflict between local law and these principles we will always opt for the highest demanding rule.

Our principles are the starting point. We encourage sharing of best practice across the group to help us continuously improve our approach and positive impact on society.

Everyone must stay alert to the importance of preventing and eliminating wrongdoing, illegal or unethical conduct at work and report anything of that nature that they become aware of.

Failure to comply may result in disciplinary action, including dismissal.

Sabio Group may also take legal action in cases of corruption, theft, embezzlement, or other unlawful behavior.

# AWARENESS AND TRAINING

The intranet hosts a copy of this document and links to further resources, guidance and training to support responsible decision making.

All new starters will receive access to an electronic copy of this policy document when they join and will be asked to confirm their agreement with this policy and the principles.

PUBLIC  
PO V2.0 – Sabio Group Code of Conduct



# RESPONSIBLE DECISION-MAKING STEPS

Our principles and policies may not cover every situation, therefore if you are faced with a situation that you are not familiar with, please follow these steps:



## CHECK THE FACTS

- Do you have all the facts?
- Have you separated assumptions and opinions?
- Do you need any more facts?



## UNDERSTAND THE RULES

- What do our policies say?
- Do you know what the local laws and regulations are?
- What did we do in the past?



## APPLY THE PRINCIPLES

- What do our principles say?
- How would you feel if this decision appeared in newspaper?
- Are you doing the right thing?



## SEEK ADVICE

- Have you spoken with your line manager?
- Have you engaged with the People, Legal or IT department?
- Have you sought alternative perspectives?



## RAISE CONCERNS

- If you feel able to do so, speak directly with the individual involved.
- Escalate to your line manager.
- If you have a serious concern, please formally report this. (see next section)

# REPORTING SERIOUS CONCERNS / WHISTLEBLOWING POLICY



Any fraud, misconduct, or wrongdoing by Sabio Group employees must be reported and properly dealt with. At Sabio, we take all reports of wrongdoing seriously. If you become aware of any actions that concern you, we encourage you to report them without fear of retaliation. If you have a complaint and you are not sure that it is covered by the whistleblowing policy, please speak to a member of The People Team for guidance. It may be that your complaint is a grievance and can be addressed under an alternative process.

Whistleblowing, a term used in some countries, is a law that protects employees who raise legitimate concerns about specific matters. These are called qualifying disclosures. A qualifying disclosure is one made in the public interest by a person who has a reasonable belief that one of the below acts has been or is likely to be committed:

- **Breach of the Code of Conduct policy**
- **A criminal offence**
- **A miscarriage of justice**
- **An act creating risk to health and safety**
- **An act causing damage to the environment**
- **Any act of conduct that could be considered as discriminatory**
- **Any act of harassment**
- **Any concerns of Information security breaches**
- **The company is breaking the law**
- **Someone is covering up wrongdoing such as corruption and bribery**
- **A breach of any other legal obligation; or**
- **Concealment of any of the above.**

# WHISTLEBLOWING PROCESS



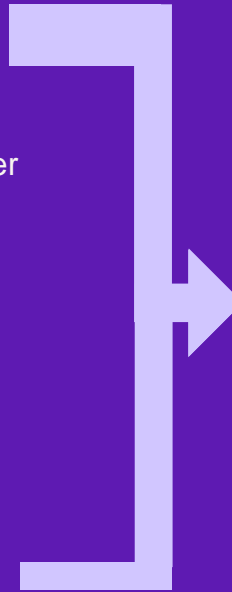
## Speak with your Line Manager

Or your line manager's manager if the issues concern them.



## Line Manager seeks guidance

From the Chief People Officer in the first instance. If not appropriate an alternative Chief Officer within the business.



## Email

[whistle@Sabiogroup.com](mailto:whistle@Sabiogroup.com)

If you don't feel you can approach your manager or their manager.



## Confidentiality

The reporter's identity will be treated with the strictest confidence and will not be disclosed without your consent unless legally required to do so.

## Investigation

An independent investigator will be assigned, and an investigation will be carried out.

- The investigation may find that the complaint is a grievance rather than a whistleblowing complaint and may be redirected to an alternative process.



## Feedback

On conclusion of any investigation, you will be told the outcome of the investigation and what the board has done or proposes to do. If no action is to be taken, the reason for this will be explained to you directly.

- If in conclusion you reasonably believe that the appropriate action has not been taken, depending on your country's laws, you may still have a right to report the matter to the proper authority.
- Whistleblowing legislation sets out the bodies to which **qualifying disclosures** may be made.
- Please contact The People Team for more information.

# REPORTING SERIOUS CONCERNS / WHISTLEBLOWING



## NO RETALIATION

You are encouraged to raise concerns following the steps set out on the previous pages and in our Sabio Whistleblowing Policy. Retaliation will not be tolerated for raising a concern about our business practices. Retaliation can include being dismissed, demoted, intimidated, harassed, excluded or treated poorly as a result of raising a legitimate concern.

If you are not sure whether to raise a concern, we encourage you to discuss the issue with your Line Manager, Legal Team or People Partner.

### **Where to find out more:**

Whistleblowing Policy | Speak to your Line Manager or People Partner



# PRINCIPLE 1

## OUR VALUES

Know the Sabio Values, apply them and promote them

### HOW WE BEHAVE

#### TAKE OWNERSHIP

Assuming responsibility for the small things – and the big ones. Our people take accountability for their roles, actions and behaviours. They manage expectations well and see things through to completion.

*I act like an owner*

#### BE THERE

We work in a fast-paced, complex environment, often working remotely. Our commitment is to be present and mindful of interactions with others. We support each other through our willingness to help in the understanding that we win together.

*I'm there for my team*

#### CAMARADERIE

Our people work together towards shared goals, enjoy each other's company and have fun along the way. We recognise that diversity of talents, opinions and perspectives make teams stronger.

*We work, have fun and win together*

### HOW WE WIN

#### FOLLOW THE DATA

Data forms the building blocks of our decisions. It tells us whether we're succeeding or failing, where we can and should do more - or less. Whether it's NPS or analytics, data on diversity or sustainability, we find it, we follow it and act on it.

*I'll do the research; I am informed*

#### OWN AN OPINION

Our business relies on expertise, research and hard work because no two customers are the same. Opinions are our currency. We form them through knowledge and data, debate them, decide and commit, then act on them to generate value.

*I come prepared to share my point of view*

#### STAY AHEAD

The world changes quickly. We spend time analysing the market, mastering our craft and the technologies we work with. We perpetually look for ways to automate, optimize, flex and improve keeping our customers at the forefront of digital CX.

*We keep moving forward*

### WHAT WE BELIEVE

#### NO LIMITS

Our people are our business. There are no boundaries to greatness for us as individuals and as a team. We put people at the centre of everything we do and give everyone the opportunity to grow, learn and develop, to scale great heights.

*It's up to me how far I go*

#### CONTINUOUS LEARNING

Fulfilment comes from enjoying the work we do and having a path for progression. We believe in providing every opportunity for our people to continuously learn and develop throughout their whole career.

*I'm thirsty for knowledge*

#### BUILD SOCIAL VALUE

Our aim is to minimise our impact on the environment and support our customers in doing the same for the long-term future of the planet. We believe that the world must work for everyone, support diverse needs and views and deliver social justice and equality.

*We have commitments to society & the planet*

#### Who to speak to:

Intranet (Our values)| Speak to your Line Manager or People Partner



# PRINCIPLE 2

## HEALTH, SAFETY & WELLBEING

Look after your own health, safety and wellbeing, and encourage others to do the same



### MENTAL WELLBEING

The well-being of our colleagues is important to us and can be affected by various factors both at work and in your personal life. To support you, Sabio has trained Mental Health First Aiders globally. They are available as points of contact if you, or someone you are concerned about is experiencing a mental health issue or emotional distress. They can give you initial support and signpost you to appropriate help if needed.

Additionally, we offer access to a free telephone helpline service called the Employee Assistance Programme (EAP). This confidential service provides practical and emotional support, including help with emotional and physical well-being and legal advice.

### OFFICE SAFETY

Please familiarise yourself with the global health and safety policy. If you work in or visit the office, make sure you know the fire procedures and exit routes. Understand common office risks and hazards (e.g., slips and trips, safe lifting), and know how to access first aid.

### DRIVING

Ensure your car maintenance is up to date and follow local road rules. Avoid using mobile phones when driving. Do not drive under the influence of drugs or alcohol.

#### Where to find out more:

Health & Safety Policy | MetaCompliance: Health & Safety Training | Mental Health First Aiders | EAP | Speak to your Line Manager or People Partner | Emergency Evacuation Plans |

### PHYSICAL WELLBEING

Many of our roles require us to sit at a desk for long periods of time. Finding ways to get moving and keep active not only improves your physical health but can also have a positive impact on your mental wellbeing too.

### USING LAPTOPS & PCS (Display Screen Equipment)

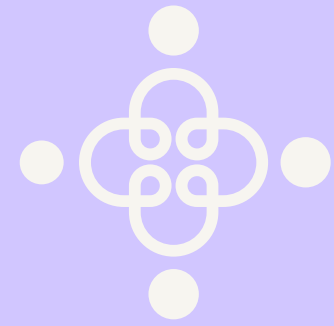
You can prevent many aches, pains, and long-term musculoskeletal issues by ensuring your desk is set up correctly. Additionally, remember to have your eyes tested regularly. Sabio has launched mandatory Display Screen Equipment (DSE) training that provides employees with useful health and safety information. This training also allows you to request additional equipment if needed to ensure you have a proper workstation setup.

### REPORTING

We need to know if you have had an accident or if there has been a near miss. We want to check you are ok and look at what we can do to avoid the accident happening in the future. We also ask that you help us to identify any safety concerns and improvements.

# PRINCIPLE 3

## DIVERSITY, INCLUSION & BELONGING



Make others feel valued, included and able to be their authentic selves at work

At Sabio Group, we are committed to fostering a workplace where everyone is treated with equal respect and fairness. Embracing diversity in perspectives, cultures, and backgrounds is integral to our inclusive culture. We believe that a diverse workforce not only enriches our environment but also enhances our collective experience.

To ensure our commitment to diversity and inclusion is upheld, we have implemented several initiatives. These include non-biased recruitment processes and ongoing education for our colleagues.

Encouraging constructive challenges from different viewpoints is fundamental to our success - We promote active listening and value diverse opinions, creating an environment where individuals feel empowered to express themselves. Sabio Group affirms its pledge to provide equal opportunities to all current and prospective employees, regardless of age, disability, sex, sexual orientation, pregnancy and maternity, race or ethnicity, religion or belief, gender identity, or marriage and civil partnership. We reject discrimination based on any factor and are committed to fostering a culture of meritocracy, openness, fairness, and transparency.

We recognise that perceptions of comfort in the workplace may vary among individuals. What one person considers humor may be perceived as inappropriate by another. We encourage mindfulness of diverse perspectives and urge addressing any concerns directly with the individual involved.

At Sabio, we maintain a zero-tolerance policy towards discrimination, victimization, harassment, or bullying in any form.

Your feedback is crucial to us. We encourage all employees to participate in focus groups and internal communities. Quarterly, we conduct anonymous surveys to gather your input and continuously improve Sabio as a workplace.

One of our aims is to annually provide unconscious bias training to >90% of the organisation, ensuring continuous awareness and education.

### Where to find out more:

Intranet Page | Equality, Diversity & Inclusion Policy | Unconscious Bias Training | Have your Say | Online Learning | Speak to your Line Manager or People Partner

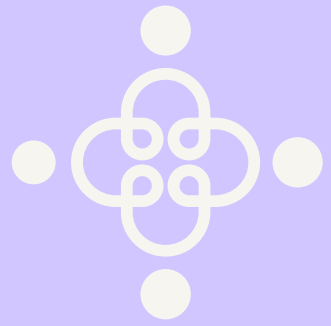
PUBLIC  
PO V2.0 – Sabio Group Code of Conduct



# PRINCIPLE 4

## OPEN COMMUNICATION

We believe in honest and open communication



At Sabio Group, we understand that open communication and active engagement are essential for a thriving workplace. We are committed to creating an environment where everyone feels heard and valued. Social dialogue is a cornerstone of our company culture, and we have implemented several initiatives to ensure that your voice is integral to our decision-making process.

Through various platforms and forums, we encourage you to share your thoughts, concerns, and feedback. Whether it's through our quarterly 'Have Your Say' surveys, the Sabio Life Forum, or our workers councils in Spain and France, we aim to foster a culture of transparency, collaboration, and continuous improvement. Your input helps us shape our policies, improve our practices, and enhance our overall work environment.

- **Quarterly 'Have Your Say' Surveys:** These anonymous feedback surveys allow you to share your thoughts, which feed into our group, local, and team action plans. Results and actions are communicated back to you during company-wide meetings and team gatherings.

### Where to find out more:

Intranet Page | Equality, Diversity & Inclusion Policy | Have your Say |  
Speak to your Line Manager or People Partner

- **Sabio Life Forum:** This forum consists of recognised company ambassadors from different parts of the business, regions, and acquisitions. They meet monthly to discuss what's working and what isn't. Our ambassadors also act as our charity committee and help identify employee engagement activities.
- **Workers Councils:** In Spain and France, we have workers councils that represent employee interests. These councils comprise internally elected employee representatives who have the right to be active in the council without fear of retaliation. Sabio is committed to working with elected employee representatives to negotiate in good faith and reach mutually beneficial agreements.
- **Freedom of Association:** All Sabio colleagues have the freedom to associate and engage with any of the mentioned open communication groups without fear of retaliation, including the right to form and join trade unions for the protection of interests.

## PRINCIPLE 5

# PROFESSIONAL CONDUCT & CAPABILITY

High standards of behaviour, integrity and respect in all interactions, and taking pride in your work



At Sabio, we expect each of you to uphold the highest standards of professional conduct at all times. This means treating each other with respect, courtesy, integrity, and consideration, while also valuing diverse perspectives. Your work should be performed diligently, competently, and productively, aligning closely with the requirements of your role.

It is crucial that you always act with integrity, honesty, and fairness, maintaining and upholding the highest standards of behavior. We expect you to adhere strictly to Sabio's policies, practices, and procedures. If you have any uncertainties about these guidelines, please seek guidance promptly.

Working under the influence of alcohol or illegal drugs is strictly prohibited at Sabio.

If you witness any instances of poor conduct in the workplace, such as harassment, discrimination, or unethical behavior, we urge you to report them immediately to your line manager or through our whistleblowing procedure, included in this policy. Please remember that all reports are treated with the utmost confidentiality, thoroughly investigated, and protected from any form of retaliation. Your commitment to maintaining a respectful and ethical work environment is crucial to our collective success at Sabio.

### Where to find out more:

Equality, Diversity & Inclusion Policy | Dignity at Work Policy | PDP Page on Wise | Speak to your Line Manager or People Partner

In addition to regular one-on-one meetings with your line manager, you will participate in quarterly Performance Development Plan (PDP) reviews. These sessions are dedicated to discussing your performance objectives and professional development goals.

These sessions ensure your goals align with the organisation's objectives, fostering focused discussions on performance and career growth. They offer valuable feedback and access to resources needed to enhance your skills and adapt to organisational priorities, promoting both personal advancement and contributing to company success.

If your role requires professional credentials, please ensure that they are kept up to date.

If for any reason you cannot perform your role to the requirements expected, you should discuss this with your line manager.

PUBLIC  
PO V2.0 – Sabio Group Code of Conduct



# PRINCIPLE 6

## ANTI SLAVERY

Have a zero-tolerance approach to slavery and human trafficking



Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

We are committed to acting ethically and with integrity in our business dealings and relationships and are committed to preventing modern slavery in our own business and to helping prevent modern slavery in our supply chains. We are committed to acting ethically and with integrity in all our business dealings and relationships. We are dedicated to preventing modern slavery within our own operations and helping to prevent it within our supply chains.

Here's several ways we ensure this commitment:

- Strictly prohibit the use of forced, bonded, or compulsory labor, human trafficking, and all forms of modern slavery.
- Ensure compliance with all relevant legislation and regulations, including the Modern Slavery Act.

- Implement robust due diligence procedures for all new suppliers and partners, ensuring their adherence to our standards and values.
- We provide annual training on identifying and preventing modern slavery in our business and supply chain. Participation is mandatory.
- Encourage and protect whistleblowers who raise genuine concerns regarding modern slavery, ensuring they can do so without fear of retaliation.
- Regularly review and update our policies and practices to ensure they remain effective in combating modern slavery and human trafficking.

Our commitment to eradicating modern slavery is a fundamental part of our ethical business practices and reflects our dedication to upholding human rights and promoting social responsibility throughout our organisation and its supply chains.

### Where to find out more:

Anti-Slavery Policy | Anti-Slavery Statement | MetaCompliance: Modern Slavery Compliance Training | Speak to the Legal Team or People Partner

PUBLIC  
PO V2.0 – Sabio Group Code of Conduct



# PRINCIPLE 7

## QUALITY AND ENVIRONMENTAL

Help us to reduce our environmental impact



Our strategy is to build an organisation where everyone can make a positive contribution to the planet and work in a sustainable environment to deliver economic growth for all our stakeholders.

We want our colleagues to feel proud of their workplace, proud of us living up to our commitments to society and to feel they're achieving great things. We believe that to provide a workplace that people are proud to work in, we must think about our broader place in society and the impact we have on our environment.

### Where to find out more:

Quality and Environment Policy | Speak to the Sustainability Steering Committee | Speak to the Legal Team or People Partner

# PRINCIPLE 8

## SOCIAL RESPONSIBILITY

Give back to society and the local community



At Sabio, we want our people to feel excited about their workplace, to get a buzz from working at Sabio, and to feel they're achieving great things. Sabio believes that to deliver this, we must think about our broader place in society and a purpose that goes beyond the day job.

We recognise the importance of sustainability and its role in supporting our local communities. We are committed to making a positive impact through our charitable initiatives that support sustainability and our social responsibility. We firmly believe that supporting charitable causes not only benefits the community but also cultivates a sense of purpose and fulfilment among our colleagues – which is why we have developed a Charity Donation Policy.

Sabio affiliates itself with charities at both a group and local level. Typically, charitable support activities are discussed in our Sabio Life forum and publicised across the group so those that wish to get involved can. Key support themes include:

- Mental health
- Environmental and conservation
- Support to international emergencies

To further support our employees' involvement in charitable activities, Sabio provides two days of paid leave per year for volunteer work within the community or charitable institutions, once probation is passed. The types of volunteer activities Sabio supports include:

- Community care work
- Environmental work and conservation projects
- Fundraising for community projects or charities

### Where to find out more:

Volunteering Policy | Charity Policy | Sabio Life  
Speak to your Line Manager or People Partner

PUBLIC  
PO V2.0 – Sabio Group Code of Conduct

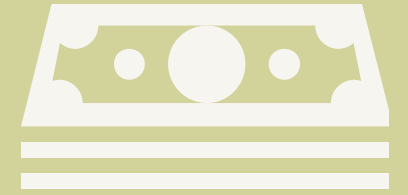




# PRINCIPLE 9

## BRIBERY, GIFTS AND HOSPITALITY

Don't accept or offer a bribe



Bribery is offering, promising, giving, or accepting any financial or other advantage, to induce the recipient or any other person to act improperly or to reward them for acting improperly.

An advantage includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract, or anything else of value.

- You must not bribe or attempt to bribe anyone.
- You must not accept or allow another person to accept a bribe.
- If you are offered gifts or hospitality from a supplier, customer, or anyone else doing company with us you should take advice from your manager.
- You may need to refuse the gift and document the receipt of the gift in our gifts and hospitality register.
- You are not allowed to give gifts or hospitality without the appropriate permission. If approved, it must be recorded in our gifts and hospitality register.

### Where to find out more:

Global Anti Bribery Policy | Gifts & Hospitality Policy | Speak to your Line Manager, Legal Team or People Partner

PUBLIC

PO V2.0 – Sabio Group Code of Conduct



# PRINCIPLE 10

## CONFLICT OF INTEREST

Let us know of any conflicts of interest



There may be times during your employment with Sabio when a conflict of interest arises, potentially harming your or Sabio's reputation. These conflicts can compromise your ability to exercise independent judgment or fulfill the demands of your role. Examples include:

- Being in a close relationship with a colleague (friend/partner)
- Outside activities that begin to interfere with work time

If such a conflict arises, you must inform your manager and local People Partner. They will discuss this with you and agree on appropriate next steps.

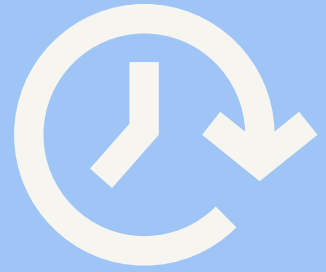
### **Where to find out more:**

Speak to your Line Manager and People Partner

# PRINCIPLE 11

## RECORDING OF TIME, COSTS AND FINANCIALS

Record time, costs and financials accurately



It's essential for our credibility and reputation that we honestly and accurately record and report financial and nonfinancial information.

Accurate and timely recording helps us to ensure that we:

- Can more accurately estimate the time and cost to deliver future work.
- Bill our customers accurately.
- Can plan future resource requirements.
- Meet our financial reporting obligations.

To support this, we use applications that give our teams a complete, customer-centric view and allow us to align our sales, services, and finance teams around a single customer record.

When claiming your expenses be mindful that they are reasonable and comply with the travel and expenses policy. Consider how would you spend it if it were your own money.

### Where to find out more:

Group Travel & Expenses Policy | FinancialForce | Sales Force  
Speak to your Line Manager, Finance or People Partner

# PRINCIPLE 12

## CONFIDENTIALITY & INTELLECTUAL PROPERTY

Respect confidentiality & intellectual property



Sabio takes the protection of its confidential information and intellectual property very seriously. You will find yourself in possession of confidential and sensitive information as part of your role. For example:

- Details of customers.
- Product and services information including price lists and contract terms.
- Technical information, code, and algorithms.
- Employee information.

### Where to find out more:

Your contract of employment | Speak to your Line Manager, Legal Team, or People Partner

You must not discuss any company sensitive or confidential matter whatsoever with any outside organisation including the media.

You must also take care to protect respect internal confidentiality. Ensure confidential and sensitive information must be kept secure by:

- Using appropriate access restrictions and passwords.
- Locking screens when not in use.
- Minimising the use of hard copy documents and ensuring they are stored securely.
- Appropriately classifying confidential documentation.
- Using caution when using mobile phones or laptops in possible visibility of others – e.g., on public transport or in public areas.

Sabio retains ownership of all intellectual property you create unless agreed otherwise in advance with our clients. In return, we must also respect the rights vested in our clients' intellectual property.

# PRINCIPLE 13

## IT ACCEPTABLE USE

Look after your IT equipment



Inappropriate use of our computer equipment and systems exposes Sabio to risks including virus attacks, compromise of network systems and services, and legal issues.

Our Global IT Acceptable Use Policy provides you with the rules of what is and is not acceptable use of our systems. Please ensure that you have read this policy and if in any doubt, please seek guidance.

Please ensure you look after the equipment given to you to minimise wear and tear, accidental damage, or theft.

If you plan to take or access Sabio devices when abroad depending on the duration and country, you may need to notify the Information Security team. The policy provides further details on this.

Sabio monitors internet and email access where there are valid reasons to do so.

Deliberate damage and excessive or unauthorised use equipment of or software are classed as disciplinary matters and may be dealt with formally by the People Team if necessary.

### Where to find out more:

Global IT Acceptable Use Policy | IT Intranet Page | Speak to your Line Manager, Technical Services, Information Security Team or People Partner

# PRINCIPLE 14

## INTERNET & SOCIAL MEDIA

Be careful what you post on social media



Limited personal use of the internet and social media is permitted if it does not impact on your performance. Do not view or download illegal, pornographic, sexist, racist, extremist, offensive or any other material which may cause embarrassment to Sabio.

When you use social media (e.g., Facebook, Twitter, WhatsApp, LinkedIn, Instagram, TikTok) whether for personal use or authorised work purposes, we expect you to act responsibly and professionally.

Be mindful that your association with the company may be known to anyone at any time and this could reflect positively or negatively on the company. You must not damage the company, its interests, or its reputation whether directly or indirectly, in any way.

### Where to find out more:

Global IT Acceptable Use Policy | IT Intranet Page  
Speak to your Line Manager, Marketing Team or People Partner

- You must be mindful about anything that you post or share on the internet or social media.
- Do not share confidential information where you are not authorised.
- Do not breach copyright or other intellectual property rights.
- Do not breach any of the company's policies.
- Do not breach and laws or other applicable rules set out by regulatory bodies.
- Do not make any abusive, obscene, discriminatory, disparaging, defamatory or harassing comments.
- Be aware that any communication could be relied upon in court to the detriment of you or the company.

Certain individuals are authorised the company to use social media on behalf of the company. They must use it in line with the guidance from the Marketing team.

# PRINCIPLE 15

## INFORMATION SECURITY & DATA PROTECTION

Keep our systems and data secure



It is critical that you know what to do to keep our data secure. More than ever organisations are under increased risks of various types of cyber-attacks. You can help mitigate these attacks by:

- Being aware of dubious emails. If you are unsure do not click on links or attachments. Instead send it to: [Security@sabiogroup.com](mailto:Security@sabiogroup.com)
- Creating strong passwords for all accounts and equipment.
- Be on alert for people attempting to lure you into providing them with company information that could be used fraudulently
- Any request to work outside of your employment contract location needs to be going via your senior manager and People so that we can ascertain various risks (employment law, financial as in corporation tax liabilities and security).

We gather and use certain information about individuals as part of our work. We also have access to information on behalf of our customers and suppliers. It is important that you know how to handle it in line with the General Data Protection Regulations (GDPR). Please ensure you have completed your GDPR training where you will learn more about data protection and below you will find links to Sabio supporting data protection policies.

### Where to find out more:

Information Security Sabio Sharepoint | Speak to your Line Manager, Information Security Team or People Partner

PUBLIC  
PO V2.0 – Sabio Group Code of Conduct



# PRINCIPLE 16

## BUSINESS CONTINUITY

We have robust plans in place to ensure business continuity in the event of an incident or emergency



In the event of a major incident or emergency, it's important that we mitigate the impact to the business, our employees, customers, and investors and get everything back to normal as soon as practically possible.

As part of our business continuity planning approach, we document potential issues that the business has identified as being of a realistic and potential danger and identify the key action that will be taken in the event of an incident.

Business continuity responsibilities are assigned to key individuals across the organisation who will play a role in supporting these types of incidents.

Regular internal testing takes place to ensure that plans are robust and that those part of business continuity teams are clear what is expected of them. Lessons learnt from these exercises are then used to improve the business continuity planning documentation.

In the event of an emergency, we may need to contact you, therefore it is important that you ensure that your work and personal contact as well as your emergency contact details are kept up to date on Wise (our internal HR platform).

### Where to find out more:

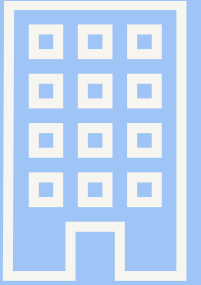
Business Continuity Plans | Speak to Information Security Team or People Partner



# PRINCIPLE 17

## SUPPLIER SELECTION

We make sure our suppliers are responsible businesses



Sabio has a stringent vetting process ensuring that whoever we work with is not only competent to deliver the service expected, but that they operate within the relevant expectations, laws, and legislation applicable.

We ensure that any supplier working on our behalf is treated as an extension of our organisation, with mirrored service level agreements and contractual obligations.

**Where to find out more:**  
Speak with the Legal Team or Finance

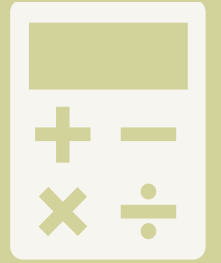
We prioritise sustainability in our procurement practices and office operations. This is done in the following ways:

- **Sustainable Procurement:** We prioritise purchasing sustainable materials, working closely with suppliers committed to environmental responsibility.
- **Waste Management:** Across all offices, we implement waste and recycling programs to minimise our environmental impact.
- **IT Procurement:** Our IT procurement strategy integrates environmental considerations, focusing on energy-efficient hardware and responsible disposal practices. Additionally, through our 'Laptop Resell for Charity' initiative, we enable colleagues to acquire unused technology for personal use while making charitable donations in return. This effort is aligned with our commitment to the circular economy, aiming to reduce waste, carbon emissions, and energy leakage

# PRINCIPLE 18

## PRICING FEES AND PAYMENT

Our pricing approach



Our prices and fees are always competitive for the high-quality tailored service that we provide.

As such, we do not generally offer arbitrary discounts; a price reduction is only enabled by reducing the level or extent of solutions and services to be delivered. That said, we always try to propose solutions that accommodate our clients' available budgets and timescales.

Wherever possible we agree on our fees and basis of charges clearly in writing in advance, so that we and our clients can plan reliably for what lies ahead, how it is to be achieved, and with financial justification.

We aim to be as flexible as possible in the way that our solutions and services are charged.

Some clients prefer fixed project costs; others are happier with a time and materials basis, and we try to work with payment plans that will be best for the client.

We will not accept or give hidden discounts or incentives – neither on an individual basis nor on behalf of the organisation.

**Where to find out more:**

Speak with Legal Team or Finance

# GOVERNANCE, VERSION CONTROL AND CHANGE HISTORY

This policy document is reviewed annually to ensure that it remains up to date.

PUBLIC  
PO V2.0 – Sabio Group Code of Conduct



sabiogroup.com

 @sabiogroup

 info@sabiogroup.com