



Code of Business Conduct

XLMedia Plc ("**XLMedia**" or the "**Company**") and its subsidiaries (together, the "**Group**", "**we**" or "**us**") are dedicated to conducting our business consistent with the highest standards of business ethics and has adopted this Code of Business Conduct (the "**Code**"). We have an obligation to our employees, shareholders, customers, suppliers, community representatives and other business contacts to be honest, fair and forthright in all of our business activities. The Code applies to employees, directors, officers and other staff of all Group companies as well as to how we interact with our independent contractors, consultants, suppliers, merchants, developers and all others with whom we do business ("**you**").

Employees of the Group in particular are faced every day with a number of business decisions. Each of us must therefore take personal responsibility to uphold the Group's high standards of business ethics in each and every one of these situations. It is not possible for our Code to address every situation that you may face. If you use your good business judgment and experience, your business decisions are not likely to raise ethical issues. When you are faced with an ethical issue, we hope that this Code will serve as a guide to help you make the right choice.

We encourage you to take this opportunity to review this Code and the policies referred to herein and to discuss any questions you may have with your supervisor directly. We rely on you to uphold our core values and conduct our business honestly, fairly and with integrity.

Sincerely,

Ory Weihs, Chief Executive Officer

A handwritten signature in black ink, appearing to read 'O. Weihs', written in a cursive style.

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1. INTRODUCTION

Purpose

This Code contains general guidelines for conducting the business of the Group consistent with the highest standards of business ethics. To the extent this Code requires a higher standard than required by commercial practice or applicable laws, rules or regulations, you should adhere to these higher standards. If a local law conflicts with the Code, you should follow the law, but please advise the Compliance Officer of the conflict. If you find, however, that a local business practice conflicts with the Code, you should follow the Code. If you are not sure what to do, seek help (see Seeking Help and Information paragraph below).

We refer to all persons covered by this Code as "Group Employees" or simply "Employees." We also refer to our Chief Executive Officer ("CEO") and our Chief Financial Officer ("CFO") as our "Principal Officers". It is your responsibility to read, understand and comply with the Code, to check the Code when you're not sure of what to do, and to report any violations or suspected violations of the Code when you come across them. The Code does not form part of any employment contract and confers no rights relating to employment.

We may change the Code as necessary from time to time and you are welcome to give the board of directors your feedback at any time.

Seeking Help and Information

This Code is not intended to be a comprehensive rulebook and cannot address every situation that you may face. If you feel uncomfortable about a situation or have any doubts about whether it is consistent with the Group's ethical standards, seek help. We encourage you to contact your supervisor for help first. If your supervisor cannot answer your question or if you do not feel comfortable contacting your supervisor, contact your department head, the Compliance Officer, or the CFO.

Reporting Violations of the Code

All Employees have a duty to report any known or suspected violation of this Code, including any violation of the laws, rules, regulations or policies that apply to the Group. If you know of or suspect a violation of this Code, immediately report the conduct to your supervisor. Your supervisor will work to investigate your concern. If you do not feel comfortable reporting the conduct to your supervisor or you do not get a satisfactory response, you may contact a Principal Officer directly. All reports of known or suspected violations of the law or this Code will be handled sensitively and with discretion. Your supervisor, the Principal Officers and the Group will protect your confidentiality to the extent possible, consistent with law and the Group's need to investigate your concern. ***You may also contact the Group Compliance Officer and the Company's Compliance Hotline at 00 44 207 079 8866*** (att. Richard Rosenberg) should you wish to report a violation of the Code.

Any Employee who violates this Code may be subject to disciplinary action, which may include termination of employment and in some cases legal action. This determination will be based upon the facts and circumstances of each particular situation. An Employee accused of violating this

Code will be given an opportunity to present his or her version of the events at issue prior to any determination of appropriate discipline. Employees who violate the law or this Code may expose themselves to civil damages, criminal fines and prison terms. The Group may also face substantial fines and penalties and many incur damage to its reputation and standing in the community. Your conduct as a representative of the Group, if it does not comply with the law or with this Code, can result in serious consequences for both you and the Group.

Policy Against Retaliation

The Group prohibits retaliation against an Employee who, in good faith, seeks help or reports known or suspected violations. Any reprisal or retaliation against an Employee because the Employee, in good faith, sought help or filed a report will be subject to disciplinary action, including potential termination of employment. Please refer to the Group's Whistleblowing Policy available on the Intranet.

Waivers of the Code

Waivers of this Code for Employees may be made only by an executive officer of the Group. Any waiver of this Code for our directors or the Principal Officers may be made only by our Board of Directors of XLMedia or the appropriate committee of our Board of Directors and will be disclosed to the public as required by law or the rules of the Alternative Investment Market (AIM), operated by the London Stock Exchange.

Additional Responsibilities of Managers

If you are managing people, we expect you to serve as a role model for ethical and responsible behavior. We also expect you to ensure that our team members are aware of their responsibilities under the Code and other Group policies and procedures and receive adequate guidance to enable them to perform their jobs the right way. We expect you to continuously review conduct, practices, and expenditures in your respective areas of responsibility to ensure that your team always acts in a compliant and ethical manner. You should maintain an environment of openness and trust where your team members feel secure and comfortable in asking questions and raising concerns and we expect you to raise swiftly and effectively all issues of non-compliance, including escalating issues to higher executives in the Group and consulting with appropriate departments, such as Human Resources or Legal.

2. OUR PRINCIPLES

- 1. Conduct business with integrity**
- 2. Treat people fairly**
- 3. Protect and uphold the reputation of the Group**

IMPLEMENTING OUR PRINCIPLES

1. Conduct Business with Integrity

Anti-Bribery and Corruption Policy

The Group conducts all business in an honest and ethical manner and complies with anti-bribery and corruption laws around the world. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. We do not act in any way which might reflect adversely upon the integrity and goodwill of the Group. We expect to win and retain business based on the quality of our business solutions, services and people and not on the basis of engaging in corrupt practices.

We must all comply with applicable laws and the Group's Anti-Bribery and Corruption Policy available on the Intranet.

Other Laws Governing our Business

The Group's business is subject to various international Gambling and advertising regulations. Employees with significant responsibilities in our international business units have an additional responsibility to understand and comply with such applicable laws. These Employees are expected to have a working knowledge of the laws and regulations applicable to their job positions. Questions and requests for assistance should be directed to a Principal Officer or the Compliance Officer.

Avoiding Conflicts of Interest

The Group counts on you to make fair, objective decisions based on good business practices and not let personal interests, associations or investments interfere – or appear to interfere – with the Group's interests. In order to act in the Group's best interests, you should avoid a conflict of interest situation or a situation which might appear as a conflict between a person's duty to the Group and their personal interest.

The Group expects you to be open and honest about your actions on and off the job and inform your manager about any outside activities or relationships (with customers, suppliers, competitors, friends or family) that could influence your job responsibilities or the decisions you make at your job.

The Group respects your right to conduct activities and pursue interests outside of work. But a "conflict of interest" may arise whenever those activities or interests begin to interfere with your job responsibilities or affect the way you make decisions as a Group Employee. A conflict of interest may arise when you have a financial interest in a competitor, customer, supplier or vendor of the Group, when you take on a second job, when you hire or work with family or friends at the Group or when you take advantage of a business opportunity that rightfully belongs to the Group. It can also arise when you serve on the board of another company.

You must inform your manager and the HR department about:

- Any other employment you plan to undertake or board memberships (and refer to your employment agreement in relation to any such other employment);
- Close relationships with people in your reporting chain;
- Close relationships with people going through a recruitment process, if you have any influence over the decisions to recruit or award a contract; and
- Close relationships with people who work for competitors, major customers, suppliers or other business partners.

You should disclose any potential conflict of interest and should refer to the “Avoiding conflicts of interest” section of the Anti-Bribery and Corruption Policy.

Gifts and Hospitality

The giving and receiving of reasonable and proportionate gifts and hospitality is a common business practice. However, giving or receiving significant gifts or significant benefits (including hospitality, discounts and other benefits) can be considered bribery and is prohibited.

As a general rule, gifts and hospitality should never compromise, or appear to compromise, your ability to make objective and fair business decisions.

You may give or receive gifts or entertainment to or from customers or suppliers only if the gift or entertainment would not be viewed as an inducement to or reward for any particular business decision. For example, you should not give or receive gifts or hospitality during a tender process or when signing a new deal. It is your responsibility to use good judgment in this area.

We expect you to:

- Avoid giving or accepting anything of inappropriate value
- Avoid giving or accepting any gifts or hospitality during a tender process
- Think about the context of the gift or hospitality: imagine how it might look to someone outside the Group
- Never give or accept any cash or cash equivalents
- Never accept gifts from competitors or public officials
- Never ask for gifts or hospitality
- Seek approval and record gifts and hospitality where required
- Discuss any concerns with your manager or with the HR Department
- Know and understand the Gifts and Hospitality section of the Group’s Anti Bribery and Corruption Policy

All gifts and hospitality expenses should be properly accounted for on expense reports and other relevant forms available in our Anti Bribery and Corruption Policy.

If you conduct business in other countries, including Israel, you must be particularly careful that gifts and hospitality are not construed as bribes, kickbacks or other improper payments. See the Group’s Anti-Bribery and Corruption Policy for a more detailed discussion of our policies regarding giving or receiving gifts related to business transactions in other countries.

Political and Charitable Donations and Sponsorship

The Group encourages charitable work and sponsorship undertaken by Employees but affirms that personal relationships with external contacts should remain and be seen to remain on a professional footing.

Any charitable or political sponsorship sought from or offered by the Group itself must be pre-approved by a board member.

All charitable or political donations made by the Group or on its behalf (if any) must also be pre-approved by a board member.

Employees should refer to the “Political and Charitable Donations and Sponsorship” section of our Anti-Bribery and Corruption Policy.

Company Records

Accurate and reliable records are crucial to our business. Our records are the basis of our earnings statements, financial reports and other disclosures to the public and guide our business decision-making and strategic planning. Records include booking information, payroll, timecards, travel and expense reports, e-mails, accounting and financial data, measurement and performance records, electronic data files and all other records maintained in the ordinary course of our business.

All Group records must be complete, accurate and reliable in all material respects. Undisclosed or unrecorded funds, payments or receipts are inconsistent with our business practices and are prohibited. You are responsible for understanding and complying with our record keeping policy. Ask your supervisor if you have any questions.

Accuracy of Financial Reports and Money Laundering

As a public company we are subject to various securities laws, regulations and reporting obligations. The law and our policies require the disclosure of accurate and complete information regarding the Group's business, financial condition, and results of operations. Inaccurate, incomplete or untimely reporting will not be tolerated and can severely damage the Group and result in legal liability.

The Group's Principal Officers and Employees working in the Finance Department have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate, timely and understandable. These Employees must understand and strictly comply with generally accepted accounting principles and all standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts.

We must always remain alert to the possibility that criminals may try to use our business to move funds raised from criminal activity into legitimate financial systems. This is commonly known as money laundering and there are severe penalties for companies and individuals involved in money laundering or other financial crimes.

What is expected of you:

- If you are involved in recording income or costs, ensure you are aware of our accounting policies and how they apply to your role;
- Only submit financial information that is accurate and relates to the correct financial reporting period;
- Maintain appropriate records, including invoices and receipts, to support all financial information;
- Be aware of, and follow, our travel and expense policies and ensure that members of your team do the same;
- Work closely with the finance team and seek guidance if you are unclear about how to record income or expenditure;
- Co-operate with our internal and external auditors, providing them with the information and documents they need to audit our accounts; and
- Report to your supervisor if you have reason to believe that inaccurate or falsified records are being kept by other Employees or they are misappropriating funds.

Compliance with Laws and Regulations

Each Employee has an obligation to comply with all laws, rules and regulations applicable to the Group. These include, without limitation, laws covering bribery and kickbacks, copyrights, trademarks and trade secrets, information privacy, insider trading, illegal political contributions, antitrust prohibitions, foreign corrupt practices, offering or receiving gratuities, environmental hazards, employment discrimination or harassment, occupational health and safety, false or misleading financial information or misuse of corporate assets. You are expected to understand and comply with all laws, rules and regulations that apply to your job position. If any doubt exists about whether a course of action is lawful, you should seek advice from the Compliance Officer or a Principal Officer.

Insider Dealing

Our Employees must individually comply with all applicable securities laws, in particular in respect of “inside information”. Insider dealing means using information which is not generally available to the public, but which you have access to as a result of your job or business relationships, to either purchase or sell shares or securities or tip others to do so.

The trading of securities or the manipulation of share prices based on information you may have as result of working for the Group is strictly prohibited.

It is against the law and against Group policy to use inside information for your own benefit, or on behalf of others. It is also an offence to share inside information with any other person if they might use it to make a trading decision.

The Group’s Share Dealing Code is available on the intranet and should be followed at all times.

We expect you to:

- Not buy, sell or otherwise deal in XLMedia securities if you have inside information.

- Not sell or otherwise deal in any securities of any company if you have inside information.
- Not pass inside information to third parties. This is not only a breach of confidentiality but you may also be committing an offence.
- Not engage in market abuse by spreading false information or engaging in other activities designed to manipulate the price of a company's securities.

Insider trading results in severe penalties in most countries with participants facing either a heavy fine, a prison sentence or both. Please discuss any concerns or queries you have with the CFO or Compliance Officer.

Competition and Fair Dealing

All Employees should endeavour to deal fairly with fellow Employees and with the Group's customers, suppliers and competitors. Employees should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

Relationships with Customers

Our business success depends upon our ability to foster lasting customer relationships. The Group is committed to dealing with customers fairly, honestly and with integrity. Specifically, you should keep the following guidelines in mind when dealing with customers:

- Information we supply to customers should be accurate and complete to the best of our knowledge. Employees should not deliberately misrepresent information to customers.
- Employees should not refuse to sell, service or maintain products the Group is offering simply because a customer is buying services or products from another supplier.
- Customer entertainment should not exceed the limits of reasonable and customary business practice. Employees should not provide entertainment or other benefits that could be viewed as an inducement to or a reward for customer purchase decisions. Please see "Gifts and Hospitality" section above for additional guidelines in this area.

Relationships with Suppliers

The Group deals fairly and honestly with its suppliers. This means that our relationships with suppliers are based on price, quality, service and reputation, among other factors. Employees dealing with suppliers should carefully guard their objectivity. Specifically, no Employee should accept or solicit any personal benefit from a supplier or potential supplier that might compromise their objective assessment of the supplier's offering and prices. Employees can give or accept promotional items of nominal value or moderately scaled entertainment within the limits of responsible and customary business practice. Please see "Gifts and Hospitality" above and the relevant section of the Anti-Bribery and Corruption Policy for additional guidelines in this area.

Relationships with Competitors

The Group is committed to free and open competition in the marketplace. Employees should avoid actions that would be contrary to laws governing competitive practices in the marketplace,

including antitrust laws. Such actions include misappropriation and/or misuse of a competitor's confidential information or making false statements about the competitor's business and business practices. For a further discussion of appropriate and inappropriate business conduct with competitors, see "Compliance with Antitrust Laws" below.

Interactions with the Government

The Group is committed to conducting any business with governments and their representatives with the highest standards of business ethics and in compliance with all applicable laws and regulations, including the special requirements that apply to government contracts and government transactions. In your interactions with the government, you should:

- Be forthright and candid at all times. No Employee should intentionally misstate or omit any material information from any written or oral communication with the government.
- You should not offer or exchange any gifts, gratuities or favours with, or pay for meals, entertainment, travel or other similar expenses for, government employees.

If your job responsibilities include interacting with the government, you are expected to understand and comply with the special laws, rules and regulations that apply to your job position. If any doubt exists about whether a course of action is lawful, you should seek advice immediately from your supervisor and a Principal Officer. You must also abide by the "Business dealings and contacts" section of the Anti-Bribery and Corruption Policy.

Compliance with Antitrust Laws

Antitrust laws are designed to protect consumers and competitors against unfair business practices and to promote and preserve competition. Our policy is to compete vigorously and ethically while complying with all antitrust, monopoly, competition or cartel laws in all countries, states or localities in which the Group conducts business.

In general, antitrust laws forbid agreements or actions "in restraint of trade." All Employees should be familiar with the general principles of the antitrust laws in any jurisdiction in which the Group does business. The following is a summary of actions that are violations of applicable antitrust laws:

- Price Fixing. The Group may not agree with its competitors to raise, lower or stabilize prices or any element of price, including discounts and credit terms.
- Limitation of Supply. The Group may not agree with its competitors to limit its production or restrict the supply of its services.
- Allocation of Business. The Group may not agree with its competitors to divide or allocate markets, territories or customers.
- Monopolies. The Group may not engage in any behaviour that can be construed as an attempt to monopolize.
- Boycott. The Group may not agree with its competitors to refuse to sell or purchase products from third parties. In addition, the Group may not prevent a customer from purchasing or using non-Group products or services.

- Tying. The Group may not require a customer to purchase a product that it does not want as a condition to the sale of a different product that the customer does wish to purchase.

Any meeting with a competitor may give rise to the appearance of impropriety and may also be illegal under anti-trust laws. As a result, you should take extra care as to the matters which you may discuss with competitors.

Professional Organizations and Trade Associations

Employees should be cautious when attending meetings of professional organizations and trade associations at which competitors are present. Attending meetings of professional organizations and trade associations is both legal and proper, if such meetings have a legitimate business purpose. At such meetings, you should not discuss any proprietary, confidential or competitively sensitive information such as pricing policies or other competitive terms, plans for new services or any other sensitive information.

Seeking Help

Violations of antitrust laws carry severe consequences and may expose the Group and Employees to substantial civil damages, criminal fines and, in the case of individuals, prison terms. Whenever any doubt exists as to the legality of a particular action or arrangement, it is your responsibility to contact the Compliance Officer or a Principal Officer promptly for assistance, approval and review.

Public Communications

Public Communications Generally

The Group places a high value on its credibility and reputation in the community. What is written or said about the Group in the news media and investment community directly impacts our reputation, positively or negatively.

You should not speak on behalf of the Group unless you're authorized to do so. If you are contacted by a member of the media, financial analysts, stockholders, government entities or law enforcement for information about the Group or in any matter that relates to the Group, please refer them to the Group CEO or the Group CFO, who will work with the appropriate personnel to evaluate and coordinate a response to the request.

We must always be aware that we are all representatives of XLMedia and that whatever we do and say in public represents the Group.

Disclosure Policy

The Group is under an obligation to inform the public as soon as possible of all inside information that directly concerns the Group. The directors must carefully and continuously monitor whether an announcement obligation has arisen and the Group must ensure that any information it does announce is not false or misleading in any material respect and does not

omit any material fact. The Group maintains procedures, systems and controls to make timely and accurate disclosures.

The Group's Disclosure Policy available on the intranet should be followed at all times.

Social Media Policy

Using social networks and online communities offers great benefits to us as individuals and as a business to communicate what we're doing, whether to colleagues, customers or others. The Group respects and encourages any Employee to maintain a non-Group-related blog, forum or web page or to participate in social networking, Twitter or similar sites. However, to protect the Group's interests and to empower all of our Employees to be good ambassadors for our brand, Employees must be familiar with and adhere to our Social Media rules available in the Social Media section of the Computer Usage Policy available on the intranet.

We expect you to:

- Make no statements that could have a negative impact on the Group's reputation or brand;
- Make no personal comments that could be interpreted, even mistakenly, as a comment or endorsement made by the Group; and
- Keep confidential and proprietary information of the Group strictly confidential.

All rules regarding confidential, non-public and proprietary business information and insider trading apply in full to blogs, web pages, social networking, Twitter and similar sites. Any information that cannot be disclosed through a conversation, a note or an e-mail also cannot be disclosed in a blog, web page, social networking, Twitter or similar site. Group-related information or data or comments or opinions about the Group should not be expressed on any of these social networks.

The Group's Social Media Policy is available on the intranet and should be followed at all times.

Employees with any questions should review the guidelines above and the Group's Social Media Policy and consult with the Compliance Officer or Human Resources. **When in doubt, don't post.** Failure to follow these rules or the Social Media Policy may result in disciplinary action which may include termination of employment.

2. Treat People Fairly

Health and Safety

We aim to provide a safe workplace for all Employees and visitors. The health and safety of Employees is a priority and as a minimum, we comply with all applicable health and safety laws, regulations and standards. We take appropriate action to prevent occupational illnesses and work-related accidents and to provide a safe and healthy workplace. We count on you to follow all health and safety rules and notify your supervisor immediately of an accident or injury you may experience on the job.

You may not use, possess, purchase, manufacture, sell or distribute illegal drugs or controlled substances while on Group property or when working on Group business.

Threats or violence of any kind (including physical violence, intimidation, harassment or coercion) are not tolerated.

We expect everyone to behave in a safe and responsible manner at all times.

We expect you to:

- Create a welcoming and inclusive work environment and encourage those who you work with to do so by treating everyone as you would like to be treated;
- Don't engage in behaviour that would be considered by anyone in the team as creating a hostile or intimidating work environment, including making inappropriate jokes or comments;
- Don't spread malicious rumours or gossip that might be considered derogatory, defamatory, harassing, pornographic or otherwise offensive;
- Intervene quickly if you see someone behaving unsafely; and
- Consider how your decisions and actions will affect the health and safety of others.

Employees' wellbeing

Our Employees are at the heart of our business and we recognise that our Employees are key to the delivery of our goals. We aim to attract, retain, and motivate the best people and take our responsibilities for staff welfare, training and development seriously, including having training and controls in place that promote good conduct.

Human Rights

The Group respects human rights and commits to avoid causing or contributing to adverse human rights impacts.

The Group endorses and upholds the UN's Guiding Principles on Business and Human Rights, in particular, guiding principles 11 to 24.

Modern Slavery

All forms of slavery are unacceptable and we are committed to implementing and enforcing effective systems and controls to ensure such practices are not taking place in our operations and

in our supply chain. We expect the same high standards from all of our counterparts as we stand against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

For more information please see our Modern Slavery Policy available on the intranet.

Equal Opportunities and Diversity

We are committed to providing equal employment opportunities to all qualified candidates and we do not discriminate on the grounds of race, colour, sex, religion or belief, national origin, gender, gender identity, sexual orientation, marital status, age, disability, veteran status or any other status that is protected by law.

We promote and value diversity and strive for an inclusive and welcoming working environment, where everyone feels respected and valued.

We will not tolerate any form of discrimination. We base relationships with and between Employees on respect for individuals and their human rights.

Our commitment to a diverse workforce is reflected in all our employment practices, including decisions about recruiting and hiring, working conditions, appraisals, compensation and benefits, training, promotions and demotions, transfers, layoffs and terminations, and disciplinary actions.

Whistleblowing Policy

All Employees are encouraged to raise any queries if they are concerned that:

- a criminal offence has been committed, is being committed, or is likely to be committed;
- a person has failed, is failing, or is likely to fail to comply with their legal obligations;
- a miscarriage of justice has occurred, is occurring, or is likely to occur;
- the health and safety of any individual has been, is being, or is likely to be endangered; or
- any of the above are being, or are likely to be, deliberately concealed.

Employees should refer to the Whistleblowing Policy available on the intranet.

3. Protect and uphold the reputation and assets of the Group

Risk

We constantly assess risks and uncertainties facing the Group and our business to ensure that we have the capability to identify and manage new risk types and uncertainties. The CFO carries out these assessments and advises the board regularly of the findings and suggested solutions.

If you become aware of any risks or uncertainties facing the business or our people, please contact the CFO.

Environment

We recognise that our offices and operations may have an impact on the environment. We strive to make a positive effect on the aspects which we can influence and to reduce any potential adverse impacts. We also acknowledge and promote the importance of green energy, recycling and limiting carbon emissions.

Environmental initiatives include our commitment to recycling and identifying opportunities to donate equipment or assets no longer used in our offices to charitable causes.

Community

In order to protect and promote the Group we need to actively protect and promote our communities and environment, locally and globally.

We encourage Employees to give back to the community by introducing to them opportunities for voluntary work. We will continue to champion local projects which promote engagement between our teams and in turn engagement with the communities in which our teams work and live.

Confidentiality, Data Protection and Information Security

Confidentiality

We all have a duty to protect the Group's proprietary and confidential information. Proprietary information is any information the Group owns. It includes things like the Group's list of customers, sales and marketing plans, products it develops, personnel information, earnings or financial data and many other types of information. Confidential information also includes information you may be exposed to as part of your job, whether about the Group or its customers, suppliers or other third parties. It can be verbal, written or electronic information.

Disclosing proprietary and confidential information can seriously damage our company and put current and future business opportunities at risk. It can also expose you and the Group to legal penalties.

The information we use (whether written or spoken, digital or physical) needs to be protected so that we can ensure its confidentiality, integrity and availability.

You are expected to:

- Always use strong passwords (please refer to our Computer Use Policy for further information);
- Not be tricked into parting with important information like passwords or PINs;
- Keep information organised, identifiable and accessible;
- Be aware of and respect any requirements about retaining or deleting information;
- Not disclose information unless it is appropriate and safe to do so;
- Not use personal email accounts for work matters;
- Manage sensitive data with care, keeping it protected and dispose of it securely; and
- Speak up immediately if you suspect that information security has been breached.

Please follow our Computer Usage Policy available on the Intranet.
For any questions on confidential information, contact your supervisor or the Compliance Officer.

Data Protection

We take the protection of customers', employees' and others' personal data very seriously and have implemented strict data protection, information security and privacy policies in accordance with applicable laws, rules and regulations, including data protection laws. This includes appointing a Data Protection Officer (DPO) as per the General Data Protection Regulation (GDPR).

Business Continuity

We recognise that the availability of our services is critical to our customers and have processes in place designed to ensure that our business and operations can continue to function even in a range of disaster scenarios.

3. CONCLUSION

This Code contains general guidelines for conducting the business of the Group consistent with the highest standards of business ethics. If you have any questions about these guidelines, please contact your supervisor or a Principal Officer, or you may call the Compliance Hotline at 00 44 207 079 8866 (att. Richard Rosenberg).

This Code, as applied to the Group's Principal Officers, shall be our "code of ethics" within the meaning of Companies (Audit, Investigations and Community Enterprise) Act of 2004 and the rules promulgated thereunder.

This Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing Group policy. We reserve the right to amend, supplement or discontinue this Code and the matters addressed herein, without prior notice, at any time.

Policy last updated: May 2019