



XXL Code of Conduct

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XXL Code of Conduct

1. Understanding the Code and How it applies

XXL considers good, sustainable corporate governance to be a prerequisite for long-term value creation and trustworthiness and for access to capital. XXL ensures legal and healthy business practices, reliable financial reporting, and compliance with legislation and regulations. Reporting and communication with all stakeholders shall be based on applicable legislation, openness, and transparency.

XXL's Vision is to be THE PREFERRED SPORTS & OUTDOOR DESTINATION IN EUROPE. To realize our vision, we need always to serve the best interest of XXL, act in accordance with all applicable laws and regulations and the highest integrity standards. We are committed to constantly work to earn the trust of our shareholders, customers, employees, and other stakeholders. This requires the collective effort of all anyone employed by and acting on behalf of XXL Group. As a market leader, we acknowledge our far-reaching responsibilities as a corporate citizen towards the communities in which we operate and the society at large.

To reaffirm our commitment to lawful and ethical business conduct, XXL has adopted a Code of Conduct (hereinafter the Code). The Code is based on our four Core Values CUSTOMER-FIRST, KNOWLEDGEABLE, PASSIONATE, CARING. The Code provides the framework for what XXL considers to be responsible business conduct and defines the requirements that apply to all individuals working for XXL or having any kind of professional relationship with XXL.

The Code applies to board members¹, the XXL Group CEO and members of the XXL Senior Management Team, XXL managers and employees including trainees and temporary staff, in-house working consultants, in-house working staff from temporary agencies and similar assignments, in all entities wholly owned or controlled by XXL (hereinafter XXL Group).

The Code also applies to our business partners supplying, e.g., suppliers, sub-suppliers, vendors, consultants, landlords, agents, service providers and organizations (hereinafter Business Partner), or others acting on behalf of XXL. XXL Business Partners are encouraged and required to adhere to principles that are consistent with applicable laws and the Code.

The Code should be considered as a guiding instrument. It does not provide an exhaustive overview of what is responsible conduct. The ultimate responsibility to act in accordance with law and ethical norms always remains with the individual. Any changes to or waivers of the Code may only be made by the XXL ASA Board of Directors. Employees or managers failing to comply with the Code may face disciplinary action, and in the most severe cases, termination of employment in accordance with local applicable legislation.

The Code and its supplementing documents are available on our intranet, XXL Workplace.

1.1 **Our Commitment to Compliance and Integrity**

Your Responsibility: Comply with public laws and XXL policies, regulations, and requirements.

XXL actively promotes compliance with all laws, rules, and regulations in each jurisdiction in which we do business. Board members, employees, and managers and anyone working for or acting on behalf of XXL Group shall always respect and comply with applicable local laws and regulations.

Anyone working for or acting on the Company's behalf has a personal responsibility for complying with all the requirements stated in applicable laws and the Code. We shall not act or encourage others to act contrary to the Code. This requirement applies even when violation of a principle may appear to be in the interest of XXL.

¹Reference to "board members" should be understood as members of the Board of Directors of XXL ASA and members of the internal Company boards.

Any employee or manager who is in doubt whether a particular activity is in accordance with the principles of the Code should, insofar as is practicable, consult in advance, primarily with their immediate superior.

XXL believes in discussions about responsible conduct in an improvement-oriented and informal manner. Nevertheless, violations of the requirements set out in the Code by any XXL employee or manager may lead to disciplinary action and in serious cases to dismissal or even criminal prosecution.

1.2 Best Interest of XXL

Your Responsibility: Be loyal to and serve the best interests of XXL.

Loyalty means working to promote the best interests of XXL in any meaning of the word. And, within the framework of public law and regulations and our Company policies, giving XXL's interests priority over private or other interests. We should always use our best judgement to enhance XXL's value creation, protect the Company's interests and contribute to its continuous improvement.

1.3 Act with Integrity

Your Responsibility: Behave with personal integrity.

Personal integrity means "always doing the right thing", even when nobody is watching or when being tempted to act differently. XXL insists on honesty, integrity and fairness and is strongly committed to upholding and promoting the highest ethical business standards in all aspects of our business and when interacting with any stakeholder. Employees and managers must always be ethical and lawful in all business dealings or when involved in other activities related to their employment with XXL. This includes selling or buying XXL products, or representing XXL in any capacity, whether within or outside of normal working hours.

1.4 Corporate Citizenship and Environment

Your Responsibility: Act socially responsible and contribute to reducing adverse environmental impact.

The Code provides the fundamental principles for how we make responsible business decisions that both create value for the company and our shareholders, protect the environment as well as contribute to the greater good of the society. As a market leader, XXL has far reaching responsibilities towards the communities in which we operate. We recognize the importance of having an open communication with those that are affected by our operations, whether they are employees, customers, shareholders, the public and their representatives.

We are committed to our goal of protecting the environment and minimizing the impact of our business on the environment with methods that are socially responsible and sustainable. As a retailer dependent on a healthy nature, we have a strong moral commitment to use resources and energy in a responsible way and to reduce the pollution and waste generated by our business. We believe that physical and outdoor activities must be available for everyone. Regardless of age, gender, skin color, geography or financial position, everyone should be able to participate — on their own terms. Our obligation to society is firmly embedded in our Purpose: All Sports United. Sports Unite All.

We are committed to guide and support our suppliers and manufacturers worldwide to reduce their environmental impact in forms of emissions and material consumption.

2. Our Ethics & Compliance Framework

2.1 Supplementing Policies and Guidelines

To facilitate the understanding and application of the Code, an *XXL Code of Conduct In Brief*-version has been provided for internal use in all relevant XXL languages. Furthermore, we have provided an *XXL Anti-Corruption Guide*, also available in all relevant XXL languages, as a practical tool aiming to raise everyone's awareness of some key corruption risks and dilemmas they may face, and what to do.

XXL Compliance Governance and Procedures document explains the different roles and responsibilities regarding the implementation and application of the Code: the XXL ASA Board of directors, the XXL Group CEO, the Senior Management Team, XXL managers, XXL HR staff, the XXL Ethics & Compliance Officer (ECO), and the local legal XXL entities' Ethics & Compliance Associates (ECA).

The Compliance Governance and Procedures document also covers our procedures for handling of reported concerns, and monitoring compliance.

2.2 Training Program

All XXL employees, managers, and board members are required to familiarize themselves with the contents of the Code. To help you understand and comply with the principles and requirements stated in the Code and the supplementing documents, and how to identify and deal with any ethical challenges that you or your colleagues may face, XXL has developed a Company-tailored, e-learning based training program. All XXL board members, managers, employees and contracted staff are required to complete the training program as part of their orientation program or introductory period and will be required to repeat the training as decided by the ECO.

2.3 Declaration of Compliance

You are required to confirm that you have read and understood the contents of the Code and the supplementing documents and that you will comply with its policies, principles and intention, by signing the XXL Declaration of Compliance Form. The Form is an integral part of the training program. The Declaration of Compliance is standard appendix to our contracts with Business Partners, who are required to confirm compliance with XXL Supplier Code of Conduct by signing the Declaration when signing new or extended contracts with XXL.

3. Speaking up and Reporting Violations

3.1 Speak up Culture

Your Responsibility: Seek advice, ask questions, express your ideas and opinions.

XXL is committed to the highest possible standards of transparency, honesty and accountability in everything we do. We are focusing on building a speak up culture of trust where employees feel safe and comfortable to ask questions or raise concerns. No one raising their voice to express or share their thoughts and opinions in good faith, will be retaliated or sanctioned.

3.2 Whistleblowing

Your Responsibility: Raise concerns and report breaches of the law or the Code.

You are urged to report breaches, detected or reasonably suspected, of any applicable laws, the Code, or any Company rules or guidelines (whistleblowing). Sometimes it takes courage to speak up about such issues. However, we encourage you to do so and promise that any concern you raise in good faith, will be taken seriously and handled with the strictest confidentiality. You have *a duty to notify XXL* of conditions that may pose danger to life or health, or any type of harassment or discrimination.

Observations of conduct which is illegal or represents a breach of the principles or intentions of the Code or its supplementing guidelines, or anything that appears to contravene the Code or Company rules and guidelines, or infringement of ethical norms that are broadly accepted in the society, must be reported immediately, verbally or in writing (recommended), to:

- your immediate superior/personnel responsible manager (for stores: the Store Manager, for warehouses: the Warehouse Manager), or a higher ranked XXL-leader;
- your local ECA); or – as a last resort
- the Chairman of the XXL ASA Board of Directors

However, if you have reasons not to approach any of the above, you may report

- in writing by e-mail to the XXL Group ECO at compliance.officer@xxl.no
- verbally or in writing (recommended) through XXL ASA's whistle-blower channel at www.xxlasa.com (external receiver)

You may report on a confidential, or even anonymous basis. All persons authorized to receive reports, or information about such report, shall keep the information strictly confidential to protect the employees concerned, both the reporter and the employee(s) of concern. Any report concerning illegal activities or breach

of the Code shall be taken seriously and be appropriately and responsibly investigated. If you do not want to notify yourself, you may also notify through safety representatives, employee representatives, or lawyer.

You may also report externally as stated in your local country's whistleblowing legislation. However, you are strongly advised to report internally before you consider reporting externally. If you want to notify the media, you are obliged to report internally first. External notifications will be handled in accordance with the laws and rule that apply for these authorities.

Irrespective of how you chose to report internally, the ECO will consider and determine if and how the notification should be handled. If there is reason to look further into your report, the ECO will conduct an internal investigation in accordance with the procedure stated in XXL's Compliance Governance and Procedures. Anonymous reports will also be handled in accordance with this procedure to the extent possible.

A notification should include a specific description of the alleged censurable condition, including What has happened, Where it happened, When it happened, The scope of the matter, and the Name of "witnesses" or documentation that can support your notification. *See XXL Compliance Governance and Procedures for further information.*

3.3 Zero Tolerance for Retaliation

Your Responsibility: Not accept sanctions or participate in any retaliation of whistleblowers.

XXL will not accept any retaliation or sanction against anyone who, in good faith, reports a violation (or suspected violation) of applicable law or the policies and principles in the Code, even if the concern turns out to be groundless. XXL encourages a speak up culture. However, anyone who recklessly, frivolously, or vexatiously report or knowingly submit a false report as determined by XXL for harming another individual, may be subject to disciplinary actions. Anyone that feels that a report has in any way been used against them, should report this to their immediate superior or through any of the other reporting channels mentioned above.

4. We Care

4.1 Our Employees

Your Responsibility: Participate in building a respectful and cooperative working environment.

The relationship between XXL and our employees, and between employees, must be built on mutual trust, respect, and dignity. We strongly believe in the connection between the competence of our employees and the results we achieve. To attract and retain skilled people, we must be an attractive employer that offers good working conditions, fair wages, and appropriate training. As a market leader, we also have a responsibility to continue the development of the entire industry. By co-operating with trade organizations, unions, public authorities, and law enforcement, we help develop the entire market with the goal of ensuring active involvement, open dialogue, and cooperation with workers' representatives regarding labor standards and psychosocial topics related to the working environment.

4.2 Fundamental Human Rights and Labor Rights

Your Responsibility: Your work conduct complies with XXL's commitments to human and labor rights.

XXL supports and respects the fundamental human rights and labor rights proclaimed in international human and labor rights conventions. We are committed to implementing and enforcing effective systems to minimize risks of human and labor rights violations in our own operations and our supply chain. Everyone working in or for XXL has the right to freedom of thought, conscience, religion, opinion and expression, freedom of peaceful assembly and association. XXL will never employ, contract or use child labor (as defined by the ILO Convention No. 138) or any form of forced labor and will not tolerate working conditions or treatment that is in conflict with international laws and practices. We have a zero-tolerance approach towards modern slavery and human trafficking.

We are committed to the protection of labor against any kind of harm and exploitation and providing a safe and healthy working environment for all labor involved in our operations. We are taking all necessary steps to prevent accidents and occupational diseases, mitigate hazards, establish controls, and monitor performance. XXL is a drug and alcohol-free workplace. We will not tolerate anyone being under the influence of drugs or alcohol while at work for XXL. Employees must be conscious about work-related events where alcohol is served and show moderation.

XXL respects the rights of all employees to form and join trade unions of their choice and to bargain collectively in accordance with local laws and principles. XXL will not interfere, nor sanction anyone as a result of such activities.

We recognize the importance of fair wages. Workers' wages and benefits shall at least equal the legal or industry minimum standards. XXL shall comply with applicable working time regulations reflected in national legislation or industry standards and are committed to comply with internationally proclaimed employment standards and the demands of family and life outside work.

We respect the privacy rights of each individual that we interact with both internally and externally. All personal data will be treated in compliance with applicable legislation and the General Data Protection Regulation (GDPR).

4.3 Equal Opportunities

Your Responsibility: Understand the value of diversity and do not discriminate in any way.

XXL is committed to an inclusive work culture and appreciates and recognizes that each person is unique, valuable and should be respected for their individual abilities. XXL embraces a diverse and inclusive culture where everyone should feel valued and respected. XXL shall provide equal employment opportunity and treat all employees fairly. XXL employees shall use work-related decisions on merit, qualifications and other professional criteria as basis for employee-related decisions, regarding for instance recruitment, training, compensation and promotion.

XXL promotes a productive work environment and does not tolerate disrespectful behavior. Discrimination in hiring, compensation, training, promotion, termination, or retirement based on ethnic and national origin, religion, sex, or other distinguishing characteristics is never acceptable.

4.4 Health, Safety and Security

Your Responsibility: Act to contribute to healthy, safe and secure working environment.

XXL complies with all applicable national and local laws and regulations on occupational health, safety and security. XXL is committed to the goal of doing no harm to people on our job sites. This means prevention of all accidents and incidents related to people, environment and assets. Risks vary from location to location and every employee needs to understand the local risks and help prevent and mitigate them.

4.5 Anti-Harassment and Intimidation

Your Responsibility: Treat everyone with fairness respect, and dignity.

XXL strictly prohibits any form of harassment, including sexual harassment, in the workplace or anywhere else where XXL employees perform their work. XXL will take prompt and appropriate action to prevent and, where necessary, discipline behavior that violates this policy.

Sexual harassment consists of unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when:

- submission to such conduct is made a term or condition of employment;
- submission to or rejection of such conduct is used as a basis for employment decisions; or
- such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, offensive or hostile work environment.

Forms of sexual harassment can include, but are not limited to, the following:

- verbal harassment, such as unwelcome comments, jokes, or slurs of a sexual nature;
- physical harassment, such as unnecessary or offensive touching, or impeding or blocking movement; or
- visual harassment, such as derogatory or offensive posters, cards, cartoons, graffiti, drawings, or gestures.

Other forms of harassment based on other characteristics are also strictly prohibited. Under this policy, harassment is verbal or physical conduct that degrades or shows hostility or hatred toward an individual because of his or her race, color, national origin, citizenship, religion, sexual orientation, marital status, age, mental or physical handicap or disability, veteran status or any other characteristic protected by law, which:

- has the purpose or effect of creating an intimidating, hostile, or offensive work environment;
- has the purpose or effect of unreasonably interfering with an individual's work performance; or
- otherwise adversely affects an individual's employment.

Harassing conduct includes, but is not limited to, the following: epithets, slurs, negative stereotyping, threatening, intimidating or hostile acts and written or graphic material that ridicules or shows hostility or aversion to an individual or group and that is posted on Company premises or circulated in the workplace.

5. Acting with Integrity

See the XXL Anti-corruption Guide for further information.

5.1 Anti-corruption and Bribery

Your Responsibility: Refrain from corruption and bribery in all forms.

XXL recognizes that corruption and anti-competitive measures distort markets and hamper economic and social progress. It is therefore essential for XXL to avoid such practices. We support efforts by international and national authorities to establish and enforce high ethical standards for all businesses.

You shall not engage in any form of corruption or bribery including paying facilitation payments. This requirement is based on anti-corruption legislation and regulations that apply to all XXL's activities world-wide. Individuals involved in acts of corruption or bribery may be exposed to civil and criminal liability. Corrupt activities are punished severely by the court, and individuals who are found guilty of violating the law may become liable to imprisonment. If a challenging situation arises in connection with your work for XXL, you should seek immediate advice from your immediate superior regarding how to handle the issue in a legal manner. Such discussions are an important part of the Company's efforts to prevent corruption and bribery.

5.2 Gifts and Hospitality

Your Responsibility: Do not accept or offer gifts or hospitality of value.

Offering and accepting personal courtesy gifts may be allowed provided they have a minimal economic value, are infrequent and clearly appropriate under the circumstances. Gifts include items such as cash or cash equivalents including entertainment, gift cards, product discounts, and non-business activities. It is not allowed to give or receive cash or gifts which are given in return for a favor. Gifts or hospitality shall not be accepted at the time of contract negotiations, bidding or award. Gifts shall not be given in a context or a manner that might give reason to suspect that the recipient will keep such gift or benefit hidden from their immediate superior. For example, gifts should be addressed to the recipient's working address at the relevant legal or public entity. If you are offered, or have received gifts or favors, you shall, without delay, notify your immediate superior, who will determine whether the gift needs to be returned.

Events for customers or business partners shall always have a specific and relevant business purpose. Invitations from business partners or others to attend such events can only be accepted if they are reasonable and appropriate with respect to both value and frequency. Transportation and accommodation must be paid by XXL.

5.3 Business Information

Your Responsibility: Treat XXL information with due care and non-public information confidentially.

We are committed to protecting confidential information and will not misuse information belonging to ourselves or our business partners. By confidential information we generally mean information, which is not, or should not be, known to the public, which may include financial information, business plans, technical information, information about customers and other types of information that are not known to the public or to competitors.

You have a duty to protect confidential information that you have access to and confidential relationships between the Company and its customers, suppliers, shareholders, and others that you have insight into.

Confidential information obtained during your employment at XXL must not be used for personal gain. Moreover, confidential information should never be disclosed to or discussed with non-XXL employees, including family members and friends, and should only be provided to or discussed with other employees for valid business reasons. If you leave XXL, you are still obliged to maintain the confidentiality of this information.

5.4 Privacy Rights and Data Protection

Your Responsibility: Collecting, processing, and safeguarding of personal data shall be lawful.

XXL is committed to complying with applicable laws on all humans' right to privacy and the GDPR provisions on personal data retention. We respect our employees' right to privacy and protect employees' and business partners' personal data.

Our employees, customers and business partners must be able to trust that XXL will only collect, store, and use their personal information for defined business purposes. We do not disclose our customers' personal information, appropriately safeguards our customers' information. See *XXL Privacy Statement for further information*.

5.5 Conflict of Interest

Your Responsibility: Be loyal to XXL by avoiding any conflict of interest.

A conflict of interest arises when there is a risk that any person or their relatives, friends, etc., obtains a benefit of any kind at the expense of XXL. You must always base your business decisions on objective reasons and criteria, putting XXL's best interests first and without unjustified influence from third parties. You must avoid conflict of interest between your private activities and personal considerations or relationships. You shall not seek to obtain advantages for yourself or others that are improper or may harm XXL's interests.

You must provide complete and immediate disclosure of any business or work interest that you may have at the time you are hired by XXL or during employment, which creates, or may create, a potential risk of conflict of interest. You may, not, e.g.:

- work in any capacity such as employee, consultant, contractor, etc., in any company that is considered an XXL competitor;
- hold duties, positions or jobs with a scope and workload that may affect your ability and capacity to satisfactorily perform your job at XXL without the prior written permission from your immediate superior;
- operate, undertake, or invest in enterprises that engage in the same or similar businesses as XXL under your own or other's name including family members, friends, proxies, partnerships, or other representative as a member of management bodies without XXL's prior written consent;
- perform non-XXL work during your working hours;
- accept money or benefits of any kind for any information, advice or services employees may provide to a supplier or any other business partners or public officials in connection with its business with XXL;
- offer/accept reimbursements, gifts, or benefits to/from a third party which are inconsistent with accepted business practices or would be unlawful or unethical; or
- demand/accept or offer/give, directly or indirectly, any kind of bribe or kickback.

If you are in doubt or have any questions whether the business or activity you engage in or plan to engage in constitutes a conflict of interest, you should consult your immediate superior, the ECO or your local ECA. If you become aware of a potential and unacceptable conflict of interest you shall, without delay, notify your immediate superior.

5.6 Business Partners

Your Responsibility: Ensure that XXL business partners comply with applicable laws and the Code.

The success of XXL depends on the relationship and cooperation with our business partners: suppliers, vendors, consultants, landlords, agents, service providers, intermediaries, and others. XXL may be held responsible for their actions. Hence, we require our business partners to comply with all applicable laws and regulations, respect internationally proclaimed human and labor rights, adopt environmentally responsible business practices, and conduct their business with integrity and comply with the principles and intention of the Code. Failure to comply with our standards may result in termination of the business relationship.

To ensure alignment throughout our supply chain we have adopted an XXL Supplier Code of Conduct (hereinafter Supplier Code). The Supplier Code applies to all XXL suppliers and states the behaviors and practices we expect our suppliers, their subcontractors, and affiliates to demonstrate. A breach of the Supplier Code of will be considered a breach of the business agreement with XXL and may lead to the termination of the business relationship with the Company. Where the requirements of applicable laws and the XXL Supplier Code differ or are in conflict, the supplier shall comply with the higher standard.

The XXL Supplier Integrity Due Diligence Survey is an integral part of the Company's supplier selection process. The Company will systematically map suppliers' adherence to the Company' requirements and expectations, review improvement initiatives and progress, and assess the level of compliance through Integrity Due Diligence Surveys and open dialogue. *See XXL Supplier Code of Conduct for further information.*

5.7 Fair Competition

Your Responsibility: Comply with competition and marketing legislation.

XXL gains business and builds long-term customer relationships by providing the widest assortment of branded goods at the lowest prices as well as by demonstrating honesty, integrity, and care in all our interactions. We shall comply with applicable competition legislation. Honest competition must be based on integrity, product quality, price, and customer service. We treat our competitors with respect and great sportsmanship. XXL does not accept soliciting or acceptance of bribes in any form.

Our marketing and advertising materials and other representations we make to current or prospective customers must be accurate, truthful and in compliance with applicable laws. Employees who are involved in marketing, sales, purchasing or logistics activities shall ensure that they are familiar with applicable laws and internal rules and guidelines related to fair competition, marketing, and sales.

5.8 Reliable Records

Your Responsibility: Information you record and communicate must be accurate, complete and reliable.

XXL records shall be prepared in accordance with applicable laws, regulations and relevant accounting standards. This includes both financial and non-financial information such as social and environmental data and operations reports. No false, misleading or artificial entries may be made in XXL's books and records. All transactions must be fully and completely documented and recorded in our accounting records and material prepared in accordance with the highest standards of care.

5.9 Insider Trading

Your Responsibility: Refrain from insider trading.

Employees and board members shall not trade, nor give advice to others about trading, in the securities of XXL or other listed companies based on non-public information acquired in work for XXL which, if publicly known, may influence the price of the securities.

If an employee or a board member is in doubt concerning how to apply or interpret XXL's requirements or public laws on insider trading, XXL's CFO or Investor Relations should be consulted. *See the XXL Insider Trading Policy for further information.*

5.10 Anti-Money Laundering

Your Responsibility: Do not in any way become involved in money laundering.

Money laundering is defined as arrangements implemented to make money which is acquired through criminal activities look as though it has been lawfully earned. Money laundering is prohibited by law and will not be tolerated by XXL. Should an employee observe activities which may indicate that money laundering is, or has been, taking place in connection with Company activities, the employee shall without delay report his or her concern to XXL.

The same rules apply to arrangements with the Intent to speculate in non-detection of illegal or disloyal avoidance of taxes, customs, or other duties.

5.11 Public Officials

Your Responsibility: Avoid improper influence or advantage if engaging with public officials.

Public officials include any person employed by or acting in an official capacity for or on behalf of a government, or any department, agency or government owned entity, any person elected to political office, candidates for political offices, members of royal families, political party officers, employees or any person acting in official capacity on behalf of a political party and family members of any of the above.

To avoid any suspicion or appearance that XXL attempts to improperly influence public authorities, diligence is warranted when dealing with public officials. If engaging with public officials, do so in a transparent and straightforward manner and exercise the utmost integrity at all times.

5.12 Trade Compliance

Your Responsibility: Comply with applicable trade compliance regulations.

XXL shall comply with all applicable national and international trade compliance regulations. Trade compliance includes regulations governing the import, export and domestic trading of goods, technology, software and services as well as international sanctions and restrictive trade practices.

5.13 Safeguarding of Assets, Information and Technology Resources

Your Responsibility: Safeguard XXL's property; do not misuse our assets and technology resources.

XXL assets are dedicated to achieving our business objectives. They must be secured by adequate protective measures. This applies to tangible assets, e.g., products and equipment, and intangible assets, e.g., intellectual property and confidential information. If you become aware of theft, waste, or misuse of our assets confidential information you must report through any of the available reporting channels.

Our technology resources, including phones, computers, Internet and e-mail resources and the like, are provided to XXL employees and managers for business use. Information produced and stored on XXL's IT systems is regarded as the property of the Company. You are responsible for exercising good judgment regarding the reasonableness of personal use. When in doubt, you should consult your immediate superior. If you engage in social networking including all types of postings on Internet, such as blogs, Twitter, Facebook, TikTok, YouTube and similar media, you should be mindful that your postings, even if done outside work, could have an adverse effect on XXL's business. You are expected to respect the principles of the Code and must not post any derogatory, offensive, or inappropriate comments concerning XXL and/or our employees, customers, suppliers, other business partners or competitors. Furthermore, you should not write about, post pictures or videos of, or otherwise refer to any XXL employee, customer, supplier, other business partner without the consent of the relevant person.

Without prior notice, the Company reserves the right to block internet use, and will do so for legitimate business purposes. Inappropriate use of the internet is strictly prohibited. Inspections may be conducted by XXL in accordance with the local applicable law and internal policies and principle.

You must not claim or imply authorization to speak as an XXL representative or use XXL's logos, trademarks, copyrights, or other intellectual property rights in any manner.

5.14 Political Contributions, Sponsoring and Donations

Your Responsibility: Get the CEO's approval before making significant contributions.

XXL will not sponsor political groups or organizations. Before making any contributions the risk of a conflict-of-interest situation must be contemplated. If you are in conflict due to private interests, you shall withdraw from any discussions and decision-making processes.

6. External References

UN Convention on Human Rights: www.un.org

ILO Declaration on Fundamental Principles and Rights at Work: www.ilo.org

OECD Guidelines for Multinational Enterprises: www.oecd.org