



XXL Code of Conduct

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1. Understanding and Living Our Code of Conduct

1.1 Our Commitment

XXL's Code of Conduct affirms our commitment to lawful and ethical business conduct wherever we operate. Our Code creates the foundation that supports our efforts to do the right things and to always act with integrity. The Code provides the framework for what XXL considers as responsible business conduct and defines the requirements that apply to everyone working for XXL or acting on our behalf.

Our Code does not provide an exhaustive overview of what is legal and responsible conduct. It provides a framework that guides us in how to conduct our business and ourselves in a responsible and respectful manner. However, the ultimate responsibility to act accordingly always remains with each of us.

Working for or acting on behalf of XXL means that you must always be loyal to and work to promote the best interests of the Company. Contributing to XXL's value creation and continuous improvement, as well as protecting its best interests should always be your priority.

XXL believes in an improvement-oriented approach to conducting responsible business conduct. Nevertheless, violations of the applicable legislation or the Code may lead to corrective action in accordance with applicable legislation.

You 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.

1.2 How our Code applies

The Code applies to members of the XXL Board of Directors¹ and all XXL managers and employees, temporary and contracted staff as well as all others who act on behalf of or represent XXL, in all entities wholly owned or controlled by XXL.

Any changes or waivers to our Code may only be made by the XXL ASA Board of Directors (the Board). This version of our Code supersedes all prior versions and has been approved by the Board. The Code is available in local XXL languages and is published on www.xxlasa.com, the webpages of our local XXL entities, and on our internal communication channel.

1.3 Making Ethical Choices and Decisions

Making sound choices and decisions or finding sustainable solutions is not always easy. If in doubt, ask yourself the following questions:

- Is my action legal?
- Is my action consistent with XXL's Code of Conduct and other Company policies?
- Is my action justifiable to my colleagues, family, and friends?
- Is my action in XXL's best interest, including with regard to its reputation?
- Is my action OK if made public?

If you are not sure, you should seek guidance before making any decision. You are never authorized to act illegally or unethically even when doing so may seem to be in XXL's best interest or you are directed to do so by your superiors.

1.4 Corporate Citizenship and Protecting the Environment

The Code provides the fundamental principles for how XXL managers and employees make responsible business decisions that both create value for the Company and our shareholders, protect the environment as well as

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

contribute to the greater good of society. As a market leader, XXL has far-reaching responsibilities towards the communities in which we operate. We recognize the importance of having open communication with those that are affected by our operations, whether they are XXL shareholders, customers, employees, employees working in our value chain or for our business partners, everyone living in communities that are affected by our business or the public in general.

We are committed to sustainable and responsible business practices aimed at protecting the environment and minimizing any adverse impact of our business with methods that are socially responsible and sustainable. We incorporate environmental, social, and corporate governance considerations and standards into our business strategies and decision-making processes, operations, and corporate culture. As an enterprise 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 should be available to everyone regardless of age, gender, skin color, geography, or financial position and on their own terms. Our obligation to society is firmly embedded in our mission: Sports unite all.

We acknowledge that the way we conduct our business has a significant impact across our value chain. Hence, we have taken an integrated approach to sustainability across all aspects of our business activities. Our requirements and expectations for our worldwide business partners regarding responsible business conduct are clearly stated in our *Supplier Code of Conduct* (SCoC). We are committed to guiding and supporting our business partners to reduce their adverse impact on the environment and society.

1.5 Supplementing Policies and Guidelines

To facilitate the understanding and application of the Code, we have provided supplementing policies and guidelines. The Code and its supplementing documents are referred to as *XXL Ethics & Compliance Governance Framework* (the Framework) and are available on XXL's internal communication channel.

In order to raise everyone's awareness of key risks and dilemmas regarding corruption, and what to do if faced with potential corruption attempts or suspicion, we have provided an *XXL Anti-Corruption Guide*.

XXL Compliance Governance and Procedures explains the roles and responsibilities of certain XXL-roles and jobs that are engaged in the implementation of the the Framework. The Compliance Governance and Procedures document also includes our procedures and routines for how reported concerns and complaints should be handled, and our Monitoring Compliance procedures.

XXL Whistleblowing Policy (XXL WP) reiterates everyone's right to report any concerns or complaints regarding experienced, observed or reasonably suspected violation of applicable legislation, our Code, or breaches of ethical norms that are commonly endorsed in society, and how reports are handled.

1.6 Compliance Training Program

We actively arrange for you to familiarize yourself with the contents of the Code and its supplementing policies and guidelines. To support compliance with the policies and rules stated in this Framework and to clarify how to identify and deal with any legal or ethical challenges, we have developed an XXL-tailored, job-customized e-learning training program. Everyone that the Code applies to is required to complete their Code of Conduct Training Program as part of their orientation program or introductory period and will be required to repeat the training as decided by XXL's Ethics & Compliance Officer (ECO).

1.7 Declaration of Compliance

The Signing of the Declaration of Compliance Form completes your Code of Conduct Training Program. By signing the Declaration, you certify that you have read and understood the contents of the Code and its supplementing Guidelines, that you will comply with its policies, standards, and intention, and that you accept that XXL expects you to report any detected or seriously suspected violation of the law or our Code through any of the reporting options provided.

2. Seeking Guidance, Speaking up, and Reporting Violations

2.1 Speak-up Culture

Seek advice, share ideas, and opinions, raise concerns and report potential violations.

If you are in doubt about how to act or behave in accordance with the law or our Code you should consult primarily with your immediate superior or your local Ethics & Compliance Associate (ECA).

XXL is focused on building a speak-up culture of trust where anyone can feel safe and comfortable asking questions or raising concerns. No one raising their voice to express or share their thoughts, opinions or concerns in good faith will be retaliated or sanctioned. “Good faith” means that you sincerely believe that a legitimate issue may exist.

2.2 Whistleblowing

Raise concerns and report potential violations of the law or the Code in a responsible manner.

We all have a key role to play in speaking up about experienced, observed, or reasonably suspected breaches of any applicable law, the Code, or ethical norms that are commonly endorsed in society (“whistleblowing”). Sometimes it takes courage to speak up about such issues. However, XXL promises that any concern raised in good faith will be taken seriously and handled with the strictest confidentiality. If you experience, observe, or reasonably suspect the existence of an XXL-related issue that may pose danger to life or health, or any type of harassment or discrimination, *you are urged to promptly notify XXL* through any of the reporting channels listed below.

You may report any concern or complaint yourself or through your employee representatives, safety delegates, or another representative. You may report to:

- your immediate superior (for stores: the Store Manager, for Warehouses: the Warehouse Manager), or a higher ranked XXL-leader;
- your local Ethics & Compliance Associate (ECA);
- XXL’s external Ethics & Compliance Officer (ECO) at compliance.officer@xxl.no, or through XXL’s Whistleblowing Channel available at www.xxlasa.com and all local XXL Companies’ webpages; or – as a last resort - to
- the Chair of the XXL ASA Board of Directors

You may report orally or in writing. You may identify yourself (recommended) or report anonymously. All reports, including anonymous reports, will be treated with the strictest confidentiality and appropriately and professionally investigated by our external compliance management service provider (XXL’s external ECO) in accordance with the Procedure stated in XXL’s Compliance Governance and Procedures.

Reporting externally must take place in accordance with your local country’s legislation regarding reporting externally. You are strongly advised to report internally before considering reporting externally.

See XXL Whistleblowing Policy and XXL Compliance Governance and Procedures for further information.

2.3 Zero Tolerance for Retaliation

Do not accept or participate in sanctioning or retaliation of whistleblowers.

Retaliation or sanctions against anyone who, in good faith, reports an experienced, observed or reasonably suspected violation of applicable law or this Code, even if the concern turns out to be groundless, is unlawful and will not be accepted by XXL. This rule also applies to any XXL employee representative or safety delegate that supports the reporter, any of the reporter’s colleagues whether related to the reporter or not, or any enterprise that the reporter owns or is otherwise involved in. If you feel that reporting a complaint, concern or potential violation has in any way been used against you, you should immediately report this.

3. Our Workplaces, Human Rights and Labor Rights

3.1 Our Employees

Participate in building a respectful and cooperative working environment.

We strongly believe that the relationship between XXL and our employees, and in between our employees, must be built on mutual trust, respect, and dignity in a supportive and collaborating working environment. We strive to ensure everyone feels included, engaged, and enabled to perform at their best in line with our guiding principles: We bring great energy; We play to win, together; We make every customer a fan.

We are committed to being an attractive employer that attracts and retains skilled people, offers good working conditions, fair wages, and appropriate competence development opportunities.

As a market leader, we also have a responsibility to continue the development of the entire industry. By co-operating with trade organizations, our employees' representatives, or union representatives with the goal of ensuring active involvement and an open dialogue, we help develop the entire industry with regard to labor standards.

3.2 Fundamental Human Rights and Labor Rights

Uphold and promote human rights and labor rights.

We support and respect the fundamental human rights and labor rights proclaimed in international human and labor rights conventions. We are committed to implementing and enforcing effective systems and measures to minimize risks of violating human rights and labor rights in our own operations, in our supply chain and in the enterprises of our other business partners.

Everyone working for or representing XXL has the right to freedom of thought, conscience, religion, opinion and expression, and freedom of peaceful assembly and association.

XXL shall not employ children (as defined by the ILO Convention No. 138) or enter into contracts that entail use of child labor in own operations or in the operations of our suppliers and other business partners.

We are opposed to all forms of modern slavery, human trafficking or forced or compulsory labor. Workers shall be free to leave after reasonable notice. No deposits (monetary or otherwise) shall be collected, directly or indirectly, from workers, including migrant labor and employees provided by agencies, recruiters, or brokers, or retained by XXL during the agreed work period.

We shall comply with working time regulations in applicable legislation or industry standards and are committed to complying with internationally recognized working life standards and family life and life outside work requirements. Our employees' working hours, including overtime, shall not exceed the maximum stipulated in applicable laws and regulations. We shall respect our employees' right to family and leisure time, and our employees shall be entitled to annual leave, sick leave, and parental leave in accordance with applicable legislation.

We respect all employees' right to form and join trade unions of their own choosing and to bargain collectively in accordance with applicable laws and principles. We will not interfere with or sanction anyone as a result of such activities. We recognize the importance of fair wages. Our employees' wages and benefits shall at least be equal to the legal or industry-specific minimum standards, or the standards set in any applicable collective agreement.

We shall comply with applicable working time regulations as set in national legislation or industry standards and are committed to complying 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 the General Data Protection Regulation (GDPR).

3.3 Equal Opportunities

Value diversity and do not discriminate in any way.

We are committed to creating an inclusive work culture and appreciate and recognize that each person is unique, valuable and should be respected for their individual abilities. We embrace a diverse and inclusive culture where everyone should feel valued and respected. We will provide equal employment opportunities and treat all employees fairly. Employment-related decisions regarding recruitment, training, compensation, promotion, etc., will be based on level of qualifications, skills, merit, and other professional criteria.

We promote a productive work environment and do not tolerate disrespectful behavior. Discrimination in regards to, e.g., hiring, compensation, training, promotion, termination, or retirement based on ethnic and national origin, religion, sex, or other distinguishing characteristics is never acceptable.

3.4 Health, Safety, Security, and Working Environment

Contribute to a healthy, safe, and secure working environment.

We are committed to providing a safe and healthy working environment for all individuals involved in our operations in accordance with applicable legislation. We shall take all necessary steps to prevent accidents and occupational ill-health, mitigate hazards, establish controls, and monitor performance. We do not tolerate any violence or threat of violence at our workplaces and are committed to seeing to that no people shall be harmed while at work for XXL. This means that we focus on preventing accidents, close call incidents, and work-related ill-health in our workplaces. We regularly conduct risk assessments, we properly record accidents, close call incidents, and work-related illness, establish action plans and conduct follow-up activities. Risks vary from location to location and every employee needs to understand the local risks and help prevent and mitigate them.

3.5 Anti-Harassment and Anti-Intimidation

Treat everyone with fairness, respect, and dignity.

We do not tolerate any form of harassment, including sexual harassment, or bullying in the workplace or anywhere else where our employees perform their work. We will take prompt and appropriate action in accordance with applicable legislation to prevent and, where necessary, correct behavior that violates this policy.

Under this policy, harassment means any verbal or physical conduct that degrades or shows hostility or hatred toward an individual because of their race, color, national origin, citizenship, religion, sexual orientation, marital status, age, mental or physical functional reduction, veteran status or any other characteristic protected by law, which lead to an intimidating, hostile, or offensive work environment, have a negative effect on an individual's work performance or otherwise adversely affect an individual's employment. Harassing conduct includes but is not limited to 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 or circulated in the workplace.

Sexual harassment includes but is not limited to unwelcome sexual advances, requests for sexual favors, unwelcome comments, jokes, or slurs of a sexual nature, offensive touching, impeding, or blocking movement, derogatory or offensive videos, texts, e-mails, posters, cards, cartoons, graffiti, drawings, or gestures. and other unwelcome verbal or physical conduct of a sexual nature.

4. Our Business Conduct

4.1 Anti-corruption and Anti-Bribery

Refrain from corruption and bribery in all forms.

We recognize that corruption and anti-competitive measures distort markets and hamper economic and social progress. Hence, it is essential to avoid such practices. We conduct our business in accordance with all applicable laws and regulations relating to fighting corruption and bribery, and support efforts by international and national authorities and organizations to establish and enforce high ethical standards for all businesses.

When conducting your work for XXL you shall not engage in any form of corruption or bribery including paying facilitation payments, offer, accept, request, or receive bribes or other improper advantages, whether directly or indirectly, whether for yourself or others. Improper advantages can be in the form of cash, cash equivalents, gifts, entertainment, favors, business or employment opportunities, or anything else of value. If a challenging situation arises in connection with your work for XXL, you should immediately seek advice from your immediate superior or XXL's ECO.

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

See XXL Anti-Corruption Guide for further information.

4.2 Working with Business Partners

Ensure that our business partners are committed to complying with the laws and the Code.

Our success depends on the relationship and cooperation with our business partners: suppliers, vendors, consultants, landlords, agents, service providers, intermediaries, and others. However, we may be held

responsible for their unlawful or unethical actions when serving XXL. Hence, we shall ensure that our business partners confirm their commitment to comply with all applicable laws and regulations, and the principles and intentions of XXL Supplier Code of Conduct (SCoC) by signing the SCoC Declaration of Compliance. We will systematically map suppliers' adherence to the Company' requirements and expectations, follow up discussed improvement initiatives and progress, and assess their compliance through our Integrity Due Diligence Survey and an open, personal dialogue.

See XXL Supplier Code of Conduct for further information.

4.3 Gifts and Hospitality

Do not accept or offer gifts or hospitality of value.

Our relationship with our business partners can be built and strengthened through legitimate networking and social interaction. The exchange of gifts and hospitality is a traditional way to express gratitude and build relationships. However, there is a fine line between offering or accepting a gift and hospitality as a business courtesy and attempts that intend to or may be perceived as an attempt to influence business decisions or create a conflict-of-interest situation. You should not offer or accept gifts or hospitality that might influence your ability to make objective decisions in the best interest of XXL or that are given in return for a favor. You must always use prudent judgment and carefully consider XXL's guidelines for giving or receiving gifts and hospitality in business setting. If in doubt what to do, you must consult your immediate superior or XXL's ECO.

Gifts or hospitality must never be accepted at the time of contract negotiations or signing. You must not offer gifts and hospitality, favors or benefits of any kind to public officials in exchange for information, advice or services related to XXL's business.

Gifts can be accepted or offered if they are modest in value, e.g., flowers, chocolates, a moderate bottle of wine, and similar, provided that they are infrequent in time, and clearly appropriate under the circumstances.

If you have been offered or have received gifts, you shall, without delay, notify your immediate superior, who will determine whether the gift may be received or needs to be returned.

Events 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 and are consistent with accepted good business practice. Transportation and accommodation shall always be paid for by XXL.

4.4 Sponsoring, Charitable Donations, and Political Contributions,

Get the CEO's approval before making significant social donations.

Community investments like charitable donations or sponsorships may prompt allegations of bribery. You should base any such contribution on a business case that benefits both XXL and society. They should be given in an open and transparent manner, based on objective criteria, and be properly recorded, documented, and reported. Before making significant contributions, you need to get the XXL CEO's approval. If you are or may be seen as being in a potential conflict of interest, you shall withdraw from any discussions and decision-making processes. If in doubt, you must consult your immediate superior or XXL's ECO.

Financial or other contributions to political parties or organizations, officials thereof or candidates for public office shall never be made on behalf of XXL.

4.5 Fair Competition

Comply with competition and marketing legislation and fair-trade principles.

We support the principle of free enterprise and believe in free, fair, ethical, and open competition in compliance with applicable laws. We are committed to complying with all applicable antitrust and competitions laws and to dealing with our competitors based on honesty, integrity, and fairness. We look to gain competitive advantages through our product offering, price, and customer service. We do not enter into anti-competitive agreements with competitors, including price-fixing, market allocation or segmentation, and do not share commercially sensitive information with competitors. We collect competitive information only from legitimate sources and treat our competitors with respect and sportsmanship.

Our marketing and advertising materials and other representations that we make to current or prospective customers should be accurate, truthful and in compliance with applicable laws.

4.6 Privacy Rights and Data Protection

Collecting, processing, and safeguarding personal data must be lawful.

We respect anyone's right to privacy and observe the regulations for processing and protection of personal data. We safeguard and protect employees', customers' and business partners' personal data made available to us. We collect, store, and use personal information only for defined business purposes and do not illegally disclose any personal information. If you suspect a data breach involving personal data, you need to promptly report this primarily to your immediate superior or XXL's ECO.

4.7 Reliable Records

Information you record and share 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 materials shall be prepared in accordance with the highest standards of care.

4.8 Trade Compliance

Comply with all trade compliance regulations.

Trade restrictions, e.g., sanctions, embargoes, and trade controls, include regulations governing the import, export and domestic trading of goods, technology, software, and services as well as international sanctions and restrictive trade practices. We are committed to complying with all national and international trade regulations including United Nations sanctions and sanctions under the laws of the European Union, the United States, and the United Kingdom. XXL shall not engage with business partners that are the target of any economic sanctions or export control. We regularly conduct risk assessments of our agents, suppliers in our value chain and other relevant business partners to identify potential risk exposure.

4.9 Anti-Money Laundering

Do not in any way become involved in money laundering.

Money laundering is illegal and punishable in most countries. XXL is adamantly opposed to all forms of money laundering. We are committed to taking reasonable steps to prevent and detect any illegal payments and prevent XXL from being used by others to launder money or to finance terrorism. If you observe activities which may indicate that money laundering is, or has been, taking place in connection with our operations, you should without delay report this to your immediate superior or XXL's Ethics & Compliance Officer. 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. Our Personal Conduct

5.1 Personal Integrity

Always do the right thing.

You must always behave with personal integrity, meaning that you must always do the right thing even when nobody is watching or when being tempted to act differently. You must always base your work performance on honesty, integrity, and fairness and clearly demonstrate your strong commitment to upholding and promoting the highest ethical standards. This also applies when representing XXL in any capacity or participating in XXL-related professional or social events, whether within or outside of normal working hours.

You may not be under the influence of drugs or alcohol while at work for XXL. If you represent XXL or participate in XXL-related social job events where alcohol is served, you must show moderation and act responsibly. You should refrain from using, or encouraging others to use, intoxicating substances in a manner that might have a negative impact on XXL's or any of our business partners' reputation.

Unless authorized or approved by your superior leader, you must not claim or imply authorization to speak as an XXL representative or use XXL's name, logos, trademarks, copyrights, or other intellectual property rights in any manner.

If you engage in social media including all types of postings on the internet, such as blogs, X, Facebook, TikTok, YouTube, Instagram, Snapchat, or similar, you should be mindful that your activities, even if done outside work, could have an adverse effect on XXL's business or employees.

XXL strictly prohibits the purchase of sexual services when on assignment or on a business trip, irrespective of whether permitted by local law, locally customary, or not. You must not visit any establishment or participate in any activity, including podcasts, TV shows, and similar, in a manner that could put XXL in an unfavorable light.

5.2 Conflict of Interest

Be loyal to XXL by avoiding any conflict of interest.

Business decisions must always be based on objective reasons and criteria, putting XXL's best interests first and without unjustified influence from third parties. You must not seek to obtain improper advantages for yourself or others that may harm XXL's interests. You shall not take part in, or seek to influence, any decision which could give rise to an actual or perceived conflict of interest. A conflict of interest arises if or whenever you or your relatives, friends, etc., have a personal interest that may interfere with your ability to make an objective decision and act in the best interest of XXL.

If you are planning to engage in any business interest or take on any additional employment, posts, directorships, online business activities, etc., you must immediately, in advance, and on your own initiative fully disclose your intentions to your immediate superior. Your immediate superior will consider and discuss with you to find out if your potential non-XXL professional activities may harm XXL's best interests, e.g., regarding business competition, confidentiality, work performance, operational conditions, etc. Refusing to consent to your requests must be based on just cause.

This means that, unless otherwise stated in applicable legislation or collective agreement, you may:

- not take on work or be engaged in any capacity as employee, consultant, contractor, director, etc., in any company that is considered by XXL as a competitor;
- not, without the prior written permission of your immediate superior, have jobs, act as a contractor, consultant, director, etc., with a scope and workload that may affect your ability and capacity necessary to satisfactorily perform your job at XXL;
- not 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 representatives as a member of management bodies without XXL's prior written consent; or
- not perform non-XXL work during working hours;

5.3 Safeguarding of Company Assets, and Information Security

Use and safeguard XXL's property with care and ensure that information is secured.

XXL assets are dedicated to achieving our business objectives. You must use and safeguard them through adequate protective measures. This applies to tangible assets, e.g., physical facilities and equipment, computer systems, PCs, mobile devices, files and documents, inventory, and supplies, as well as intangible assets, e.g., intellectual property, trademarks, copyrights, trade secrets, know-how, confidential information, brand recognition, reputation, and goodwill. If you become aware of theft, waste, or misuse of XXL's assets you have a duty to inform your immediate superior or XXL's ECO.

Our technological resources, including phones, computers, the 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, except information related to employees' representatives' or safety deputies' activities, is regarded as the property of the Company. You should exercise responsible judgment regarding personal use of our technological resources.

You must not under any circumstances and on any technological platform 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. If in doubt, you should consult your immediate superior or XXL's ECO.

Inappropriate use of the internet, e.g., visiting websites of unlawful, racist, pornographic, discriminating or otherwise derogatory nature, is strictly prohibited. If detected, XXL will, without prior notice, block the use of internet for legitimate business purposes. Inspections may be conducted by XXL in accordance with applicable legislation and/or collective agreement and XXL policies.

Securing information relies on both technical system protection as well as all end users complying with some basic security rules. You must:

- protect your digital identity by ensuring passwords are unique and protected. Your identity is personal and shall only be used for business purposes;
- protect XXL's data by using XXL approved software and services. Follow the issued guidelines for information management;
- protect the security of XXL's network by only connecting through trusted networks;
- protect your end user device by not sharing it with others and by not leaving it unattended without locking screen.

5.4 Confidentiality

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

We are committed to protecting trade secrets or other confidential information. You must not misuse any trade secret or other confidential information in your possession, including information you may receive from our business partners. Confidential information in general mean information, which is not, or should not be, known to the public or people not concerned, which may include financial information, business plans, technical information, information concerning individuals, commercial conditions, and customers or information protected by law.

If you have access to confidential information or confidential business relationships you have a duty to protect such information or relationships.

You must not use information obtained during your employment at XXL and where it can be reasonably assumed that XXL wants to keep the information confidential for personal gain. Moreover, you shall only make confidential information available to or discuss it with other employees for valid business reasons. You must never disclose or discuss confidential information with non-XXL employees, including family members and friends, and. Your duty of confidentiality continues after your employment with XXL has ended.

5.5 Insider Trading

Refrain from insider trading.

You must not trade, nor give advice to others about trading, in XXL's or other listed companies' securities based on non-public information acquired in work for XXL which, if officially known, may influence the price of the securities. If you are in doubt concerning how to apply or interpret XXL's requirements or applicable legislation on insider trading, you should consult XXL's CFO or Investor Relations Officer.

See the XXL Insider Trading Policy for further information.