

Code of conduct

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TABLE OF CONTENT	PAGE
Who are we?	3
What do we stand for?	4
Our code of conduct	5
Environment	6
Ethics	7
Social Ethics and Human Rights	11
Form of Acknowledgement	13



“We want to become the most sustainable video technology vendor and to further drive our positive contribution to society and I am certain that our core values Aspiration, Courage, and Trust fully align with this ambition”.

Michael Lantz
Chief Executive Officer

A handwritten signature in black ink, consisting of stylized, flowing letters that appear to read 'Michael Lantz'.

WHO ARE WE?

At Accedo, we strive to reduce the complexity of an ever-evolving video ecosystem, and empower the next generation of video-centric experiences. We have a clear vision for the industry's role in influencing society responsibly and are proud to be forging this path alongside other leading partners in the sector.

Our mission statement sets not only the direction for Accedo's innovation roadmap, but it also defines the scale of our impact on the industry and the world. We want to become the most sustainable video technology vendor and to further drive our positive contribution to society and I am certain that our core values Aspiration, Courage, and Trust fully align with this ambition. As a global company with offices around the world, we thrive on diversity and are continuously working on enabling a global framework for local entities to leverage and adapt locally, while staying true to Accedo's global culture and strategy. This framework defines our ways of working, from human resources processes to global delivery, as well as our internal policies. In all ways, we seek to act in a fair and honest way towards each other and all our stakeholders, to limit our environmental impact, and to ensure a safe place for everyone at Accedo to work in.

This is of course something we need to improve continuously and we need the support of everyone in the Accedo team to make this program a success.

As part of this global framework, we created the Code of Conduct, to summarize our commitment to the Accedo way of working and to what we stand for as a company. Please read, understand and follow this Code – and always speak up if you have any concerns.

Thank you for your efforts and contribution!

WHAT DO WE STAND FOR?

Our core values, Aspiration, Courage and Trust, are meant to represent who we want to be in this ecosystem. These are the cornerstones of our identity. They unite us as employees and are our guiding principles in everyday actions, behaviors and decisions.

Aspiration

We dream big while enabling our customers' long-term success, learning and innovating along the way.

We are driven by growth, our willingness to learn, and by remaining innovative in the way we work.

We actively share our knowledge and work together to grow both as individuals and as a company.

Courage

Our employees feel empowered to take action and are not afraid to push clients to think outside the box.

We dare to voice our opinions and suggest improvements, always valuing the greater good of the company.

We have the courage to always advise customers on the best approach for their business.

Trust

We rely on each other's commitment and expertise, and use constructive feedback as a vehicle for growth.

We are completely honest and transparent in the way we work, and offer our customers 100% commitment.

We trust each other to give and receive feedback and use constructive criticism as a vehicle for growth.



OUR CODE OF CONDUCT IS BASED ON OUR VALUES

Our code of conduct's sole purpose is to ensure that the way we work is done in a legal, ethical and respectful manner.

It gives us guidance on how to operate, whilst providing clear visibility to all Accedo's partners, customers and suppliers on the way we expect them to collaborate with us.

As a global company with offices around the world, it is our policy to observe and apply all local rules, laws and regulations. It is also the personal responsibility of each Accedo staff to adhere to these standards, with the addition of the policies and guidelines described in the Code of Conduct - encompassing Environment, Ethics, Labour & Human Rights and Sustainable Procurement. Indeed, our responsibility does not end within the border of Accedo, as we also

expect our suppliers to follow the same standards and principles within our Code of Conduct.

This Code of Conduct is the foundation of our work, and are to be respected by all of Accedo's staff (see form of acknowledgement), to ensure that we are doing our very best - both at an individual and group level - to work in accordance with our values, policies and customer's expectations.

Any employee unsure whether their conduct or the conduct of others is in line with this code should reach out to their manager or the People & Culture team. This code applies to all Accedo's staff, whether they are permanent or temporarily employed. This code is subject to modifications and may be amended should it be necessary, as policies and regulations can evolve over time.



ENVIRONMENT

Accedo is a global company with 15 offices and over 600 employees. While being distributed, we are all keen to act behind the same policies.

Public Transport & Company Cars

Accedo actively encourages use of public transport, bicycles or other environmentally friendly means of transport. To this end, Accedo does not subsidize or provide any company cars anywhere in the world. Offices are placed in locations where public transport (if reasonably available in the office location) can be used for work commute.

Recycling

All offices shall have a recycling process. At a minimum, the following items shall be recycled:

- Computers, TVs and other electronic or IT equipment
- Paper, cardboard or any other similar products
- Any hazardous material, as applicable (paint, cleaning equipment etc)
- The office admin in each office shall be responsible for executing the recycling process.

Energy Consumption

Being a software company, Accedo's main use of energy is to power offices and hardware used by employees (TVs, computers, connected devices) - primarily related to office work. The amount of energy consumed in the office follows normal standards for each market, with the following additional constraints:

In the nature of Accedo's business we produce software for Smart TVs and other big screen devices. Such devices consume more energy than normal office equipment and should be turned off or put in standby after office hours.

All computers should have power save mode enabled, guaranteeing that the computer goes into standby mode if not used.

No production servers shall be hosted in any office. Energy efficient data centers should always be used - Amazon Web Services being the reference cloud provider.

Travel

Travelling can be needed in the context of our business, and the following guidelines are applied:

- Flights can only be used if corresponding train, bus or car travel takes longer than 3 hours.
- We should strive to minimize travel by choosing project attendees from the closest office.
- Internal meetings which require flight travel should be kept to a minimum. Each larger office shall have at least one video conferencing system to allow for efficient digital meetings.

Cloud Services vs. In-house Hosting

Accedo strives to use Cloud services, as usage of data centers has low climate impact compared to in-house hosting when considering resource utilization and energy efficiency. It has been researched that Cloud services can use up to 40% less energy than in-house hosting, and such data centers are also able to re-use the heat output as energy, making them more sustainable.

Accedo has chosen Amazon Web Service as our main vendor of cloud services. In order to use other Cloud Service suppliers or vendors, the vendor must utilize at least 40% of renewable energy. The Cloud vendor should also have energy recycling in place for at least 40% of the data centers used.

Accedo is committed to review hosting partners on an ongoing basis to ensure constant optimisation, which allows us to leverage the right amount of resources needed for our products.

ETHICS

We thrive on doing business with ethics. Our commitment to doing what is right is deeply embedded in our DNA for the benefits of our employees and customers.

Conflicts of Interest

A conflict of interest in the workplace can take many forms, but generally occurs when personal, social, or financial interests are put before the best interests of the company. Conflicts can even arise when Accedo earns a profit from a transaction, for instance when a member of Accedo's staff or its representatives have a personal, social, or financial interest in the transaction. Actual conflicts must be avoided, but even the appearance of a conflict can be harmful and must therefore be avoided.

Family and other close personal relationships

Conflicts of interest may arise when family or friends are involved. For instance, a conflict of interest can occur if Accedo offers to sell our products or services at a lower price than usual to a family member, a close friend, or a company in which a family member or friend has an ownership interest. At a minimum, these situations raise serious appearances of conflicts, even when intentions are good.

No business activity related to Accedo should be taken with an employee's family member or close friend before disclosing this to Accedo's management. Such business activity will always require written confirmation from the CEO or CFO before proceeding. For the avoidance of doubt, this includes all situations when a family member has ownership interest in a supplier, customer, or business intermediary/partner of Accedo, or when Accedo is contemplating awarding business to a family member or a business owned by a family member.

In addition, employees should not supervise a family member, be under the supervision of, or be in a position to influence the salary or conditions of employment, or the expense report, of a family member.

Insider trading

When working for Accedo, its staff and representatives get access to confidential information about our customers, partners, market trends and new technologies. Accedo's staff and its representatives should avoid any personal investment decisions in companies, public or private, that are influenced by any insider knowledge. Insider trading is forbidden by law, and Accedo will, by law, report any suspicion of insider trading to the proper authorities in each relevant jurisdiction.

Personal relationships with suppliers

Accedo buys many goods and services from others. The selection process for services or goods should be based solely upon quality, delivery, price, service, and need. Additionally, we must take care to ensure that we engage in business with suppliers that carry on their businesses legally and with integrity. Employees involved in the selection or purchase of goods and services from suppliers should avoid situations that could interfere, or appear to

interfere, with their ability to make independent decisions regarding purchases on behalf of Accedo.

Not only would accepting excessive gifts or entertainment from a supplier create the appearance of a conflict of interest, but it could also constitute accepting a bribe, which is prohibited by international law.

Bribery and Corruption

Anti-corruption

Accedo works with customers and partners all over the world and occasionally also with public officials in the territories we are active in. Accedo is following the guidelines of the International Chamber of Commerce regarding anti-bribery and corruption.

Accedo strictly prohibits the following practices (“Corrupt Practices” or “Corruption”) at all times and in any form, in relation with a public official at the international, national or local level, a political party, party official or candidate to political office, and a director, officer or employee of any company or organization, whether these practices are engaged in directly or indirectly, including through third parties:

Bribery is the offering, promising, giving, authorizing or accepting of any undue pecuniary or other advantage to, by or for any of the persons listed above or for anyone else in order to obtain or retain a business or other improper advantage, e.g. in connection with public or private procurement contract awards, regulatory permits, taxation, customs, judicial and legislative proceedings.

Bribing often includes:

- Kicking back a portion of a contract payment to government or party officials or to employees of the other contracting Party, their close relatives, friends or business partners or
- Using intermediaries such as agents, subcontractors, consultants or other third parties, to channel payments to government or party officials, or to employees of the other contracting Party, their relatives, friends or business partners.

Extortion or Solicitation is the demanding of a bribe, whether or not coupled with a threat if the demand is refused. Accedo will oppose any attempt of Extortion or Solicitation and is encouraged to report such attempts through available formal or informal reporting mechanisms, unless such reporting is deemed to be counterproductive under the circumstances.

Trading in Influence is the offering or Solicitation of an undue advantage in order to exert an improper, real, or supposed influence with a view of obtaining from a public official an undue advantage for the original instigator of the act or for any other person.

Laundering the proceeds of the Corrupt Practices mentioned above is the concealing or disguising the illicit origin, source, location, disposition, movement or ownership of property, knowing that such property is the proceeds of crime.

Whistle-blowing

It is the responsibility of all employees to immediately report any suspected corruption directly to the CEO, CFO and VP of People & Culture. If either CEO, CFO or VP of People & Culture are suspected of corrupt practices, the board of the company shall be alerted. To report any suspected corruption we use a whistle blowing tool (link found on our Confluence page).

Sub-contractors and vendors

If a sub-contractor or a vendor of Accedo engages in corrupt or other unethical practices, with Accedo staff or other entities, Accedo's CEO, CFO and VP of People & Culture shall be notified and they shall immediately notify the sub-contractor/vendor's top management. If the practice is not actively discouraged and immediately stopped, Accedo shall terminate its relationship with said vendor.

Customers

If a customer of Accedo engages in corrupt practices, in any shape or form, Accedo's CEO, CFO and VP of People & Culture shall be notified and they shall immediately notify the customer's top management or HR/CSR departments. The Customer shall be warned that Accedo does not accept such behavior and an expectation of immediate remedy shall be taken. In most cases, Accedo's customers are fairly large companies, but Accedo shall still make reasonable efforts at alerting the right individuals in that company. If that customer has an official whistle-blower policy, such policy shall be followed.

Signals of bribery and corruption

Bribery and corruption can be hard to identify. It is impossible to list an all-inclusive listing of bribery and corruption attempts, however Accedo's staff and its representatives should generally be on alert if any of the following occur:

- A request that a commission or invoice be paid in cash, in another name, or to an address or bank account in another country.
- A request from a customer or third party to make donations to a special fund.
- Requests for unusual business trips, potentially including family members.
- An unexplained large expense on a travel and entertainment expense report.
- An agent or third party demanding a higher than normal commission for a transaction.
- Any agent or salesperson who says he or she is working with a government official to give our company the contract.

Trade Sanctions approach

Specific regulatory restrictions and sanctions regarding certain subjects and/or jurisdictions must be observed (e.g. EC regulations passed from time to time with respect to particular political or terrorist entities). In addition, based on a risk assessment and relevant legal prerequisites, new and existing counterparties shall be checked against relevant sanctions list. More specifically, the following principles should govern Accedo's approach to international sanctions:

Accedo and its employees strictly follow the sanctions imposed in the jurisdictions in which it operates. Each sanction order is set out in the local legal framework and/or EC Regulation and prohibits or restricts Companies from doing business with certain individuals, entities and countries.

In addition, Accedo and its employees shall take measures to prevent business to be conducted directly or indirectly in countries blacklisted under EU, OFAC and UN regulation.

Continuous screening and mapping (against the above mentioned list of countries) of countries in which Accedo directly or indirectly operates. If in doubt, contact Accedo's CFO who has the latest screening report.

A risk-based approach and due diligence should be carried out in relation to the Accedo's counterparties to ensure that the company is compliant with the applicable sanctions list and relevant laws.

Accedo and its relevant employees must maintain processes to ensure that the organization understands what risks are presented by conducting operations in certain countries or dealing with individuals and entities in those countries from a trade sanctions perspective.

Seek contractual guarantees from counterparties confirming that the counterparty is not directly or indirectly a sanctions target nor located, established or operates in a country that is subject to sanctions.

Gifts & entertainment

Accedo understands that modest and customary business entertainment and gifts can be a legitimate part of conducting business in appropriate circumstances by, for example, promoting successful working relationships and goodwill. Examples of modest and customary business entertainment and gifts include a reasonable celebratory dinner following the closing of a deal or delivering a project. Excessive business entertainment may be interpreted under various laws as an attempt to “buy” business illegitimately, and should always be avoided.

Gifts

Any gift offered or accepted in a business relationship with employees of a commercial company (not owned or controlled by a government entity) must be infrequent and valued at no more than US \$100. If applicable local law sets stricter gift limits than the monetary limits provided here, for example a RMB 200 or less limit applies to certain gifts in China, the local law must be followed.

During a tender or competitive bidding process in which Accedo is selecting suppliers, Accedo staff and their representatives will not request or accept gifts and entertainment from any bidder or prospective bidder. Similarly, if Accedo is attempting to win a tender or bid, Accedo staff and its representatives will not offer or provide gifts and entertainment to any representative of the company running the bid.

Gifts can include anything of value, including meals or entertainment, if the person providing the meal or entertainment is not in attendance. Examples of things that can be considered gifts include bottles of wine, products, tickets to entertainment or sporting events, lodging, discounts on products or services, services, equipment, prizes, transportation or reimbursement of travel expenses, use of vehicles or vacation homes, home improvements, tickets, and favorable terms on a product or service.

As we believe in a diverse and respectful work environment, any sexually explicit, racial, religious, political, and morally offensive gifts and entertainment are prohibited.

Meals and entertainment

Accedo staff may infrequently offer or accept meals and entertainment in connection with a business relationship, as long as they are reasonable and within customary industry practices and if the person paying for the meal or entertainment is in attendance.

Government officials

Stricter and more specific laws and regulations apply when we do business with employees, officials, or representatives of government entities. These stricter and more specific laws also apply to the family members of employees, officials, or representatives of government entities. In many countries, such as China and the United States, government officials are prohibited from accepting anything of value or nothing more than an inexpensive meal or a nominal gift (e.g., valued at less than U.S. \$25).

Note that broadcasters or operators can be considered governmental organizations if a government has a majority share in the business.

Violations of how not to act

Violations of these Ethics Policies will be subject to disciplinary action up to and including termination.

SOCIAL ETHICS & HUMAN RIGHTS

Diversity, Equity, Inclusion and Belonging

We remain committed to creating a culture where everyone has an equal opportunity to grow, develop, succeed and be their truest self. We hold each other accountable to create and contribute to an inclusive culture which includes a focus on increasing gender representation and diversity at all levels across Accedo. We will continue our focus on targeted initiatives and actions which will support our ongoing success and advance our culture. Accedo is also committed to fostering an inclusive culture based on merit and free of conscious or unconscious bias; a culture where everyone is encouraged to be themselves and achieve a sense of belonging within the entire organization.

Accedo promotes and fosters an inclusive and diverse workforce to:

- Expand and sustain an engaged team that is contributing to Accedo's vision, strategy, and business goals.
- Drive innovation through exposure to different ideas and perspectives.
- Better represent the diversity of our communities and customers.

Our commitment to inclusion, diversity and a sense of belonging is reflected at all levels of our company including the Board of Directors, who consider these efforts a key imperative to a successful and sustainable business.

Non Discrimination and Harassment

Accedo's workplace is inherently diverse. Our offices employ people from different nationalities, cultures and beliefs. We actively facilitate employees in cross border assignments and relocations, as we believe there is no better way to understand the true benefits of diversity than by experiencing it. It challenges Accedo's staff and representatives' own beliefs, which makes us grow as human beings and as a company.

We strive to create a culture of inclusion where all individuals feel respected, are treated fairly, have a reasonable work-life balance, and are offered suitable career opportunities. We strongly value the broad spectrum of perspectives arising from interactions between our diverse workforce and our diverse client base around the world. We expect everyone to treat their colleagues with respect by listening to different viewpoints, opinions, thoughts and ideas and embracing a culture of inclusion and do not tolerate any form of discrimination and harassment.

Freedom of Association, Work Environment and Compensation

Everyone at Accedo has the right to individually decide to join or to refrain from joining any lawful employee organization. We are committed to complying with laws pertaining to freedom of association, consultation, and collective bargaining, and to promoting a work environment that fosters communication, openness, and employee engagement.

Accedo provides employees with compensation and benefits that are fair and equitable for the type of work performed and the local business market where the work is performed. Under no circumstances will employees receive less than the minimum wage required by law. Any local laws providing particular benefits and overtime compensation to employees will be respected. We pay special attention to the work environment of parents and caregivers, ensuring that they are able to combine work with the responsibility of being a parent and caretaker, and that the compensation is not in any way negatively impacted by their personal responsibilities. Employees receive full details regarding their pay and deductions for taxes, benefits, etc.

Forced Labor and Child Labor

The employment relationship with Accedo is voluntary, and the terms of employment are mutually agreed on in the employment contract. We prohibit any employment of forced labor or child labor.

Employee Privacy

Being in the industry we are in, we understand the importance of privacy in the digital era. We are committed to providing privacy protection of employee data maintained by Accedo. Every employee has direct access to his/hers personal data and can add, correct or delete data at any time. Employee data will be used only for supporting our company operations and providing employee benefits.

Safety, Health and Environment

Accedo is committed to providing employees with a safe and healthy work environment. We strive for continuous improvement in our products, services and processes to minimize waste and eliminate our carbon emissions.

Doing Business Globally

As a global company, Accedo's business transactions cross many borders. We understand the risks this may involve and are committed to conduct reasonable due diligence and screening of customers and suppliers to ensure compliance with laws that regulate international trade.

Violations of Human Rights @ Accedo

Violations of this policy will be subject to disciplinary action up to and including termination.

FORM OF ACKNOWLEDGEMENT

In Effect: Signature Date Until Further Notice

I hereby certify that I have been provided a copy of the Accedo's Code of Conduct. I understand that I should consult with Accedo's VP People & Culture for further clarification on any aspects of Accedo's Conduct of Conduct.

Attested:

I have been informed of the content, requirements and expectations of this Code of Conduct for Accedo Employees. I will conduct my work and partnership with Accedo with the highest standards, commitments and principles stated in this Code of Conduct.

Date: dd/mm/yyyy

Name & Surname:

Signature:

