

The Way We Play

Code of conduct



Message from the CEO

The Way We Play

At Cartamundi, we often say that we make cards and games. In reality, we do much more than that: we create positive experiences – we make fun and enjoyable ways for people to play together. This works best when everyone plays by the same rules.

A set of game rules

We see this code of conduct as a set of game rules. It clarifies what kind of behaviors we encourage, and what behaviors will not be tolerated.

A pleasant and safe workplace

Our goal is to create a workplace where our people feel comfortable, happy, and secure. A place where you can be the best version of yourself. Where you can share your ideas or concerns, where you know what to expect in terms of health, safety, and labor standards. And a place where we protect the environment, and act ethically.

Adhering to the code of conduct is crucial

We want our workplaces to be fair for everyone. How? By adhering to the code of conduct that clearly outlines your responsibilities, as an individual, and as being part of our organization. The document also helps you navigate local standards, beliefs, and cultures. It's not carved in stone: it will evolve alongside our social, legal, and ethical expectations.

Shared responsibility

To end, I want to be very clear: Every one of us has the responsibility to speak up if we see anything that does not align with our code of conduct. Why? Because we all know that breaking rules ruins a game, but in the workplace, breaking rules can cause serious harm.

I count on each one of you to stick to the rules, to ensure a positive workplace and the sustainable growth of Cartamundi, for years to come.

I invite you to read on to discover how we play at Cartamundi.

Stefaan Merckx
CEO Cartamundi Group

Table of contents

Introduction	4
Mission statement	5
Making an ethical choice	6
Values	7
Everyone's responsibility	8
Respect	9
Our responsibility to each other	10
Fairness, dignity and belonging	11
Human rights and International Labour Standards	12
Protecting personal data	13
Health and safety	14
Ethical sourcing	16
Community support	17
Integrity	18
Our responsibility to our company and shareholders	19
Conflicts of interest	20
Gifts and hospitality	21
Transparent and accurate record-keeping	23
Protecting company assets	24
Protecting confidential information	25
Protecting our and others' intellectual property	26
Speaking on behalf of the company	27
Our responsibility to our business partners and to the market	28
Bribery and corruption	29
Fair competition	31
Unannounced inspections ("dawn raids")	34
Our responsibility to consumers	35
Product safety and product quality	36
Nature	37
Our responsibility to nature	38
Protecting our planet	39
Joy	40
Our responsibility to connecting people through play	41
Social responsibility	42
Responsible marketing	45
Speak up!	46
How to speak up	47
Whistleblower protection	48
Monitoring and improvement	49
Cartamundi's compliance management system	50
Contact us	51
Need help with the rules?	

Introduction

The Way We Play

Mission statement

The Way We Play stands for Cartamundi's commitment to play by the rules, in an honest, fair, and transparent manner, and to take care of each other and of our planet.

This document **explains the business ethics principles and values we adhere to**. It outlines our broad responsibilities to our stakeholders. This includes our people, our company, our shareholders, our consumers and customers, our suppliers and vendors, and the society.

As a global organization, Cartamundi expects its people and partners to uphold these principles, while **complying with local laws, rules and regulations**.

It is also intended as a guide for every person who interacts with Cartamundi to help make the right decision. However, if you are faced with a difficult situation, do not hesitate to contact one of the many resources identified in this code of conduct to ensure you are making the right decision.

We will regularly update our code of conduct to reflect how our business practices adapt to evolving legal and regulatory requirements.



Remember! This code of conduct complements local and global policies, procedures, employee handbooks and other guidelines. It does not replace them.

Making an ethical choice

Making the right decision is not always easy.

When faced with an ethical choice, ask yourself 3 questions before you act:

- **Can I do it?**
- **Should I do it?**
- **How do I do it?**

You can also ask yourself: **“What would my family think about it?”**

If the answer to that question makes you blush, don't do it!

Still unsure about what do to? It is absolutely fine to seek guidance. Actually, you should, this is what Cartamundi expects you to do!

Talk to your manager, your local HR representative, the Legal Department or the VP Group Compliance - they can help.

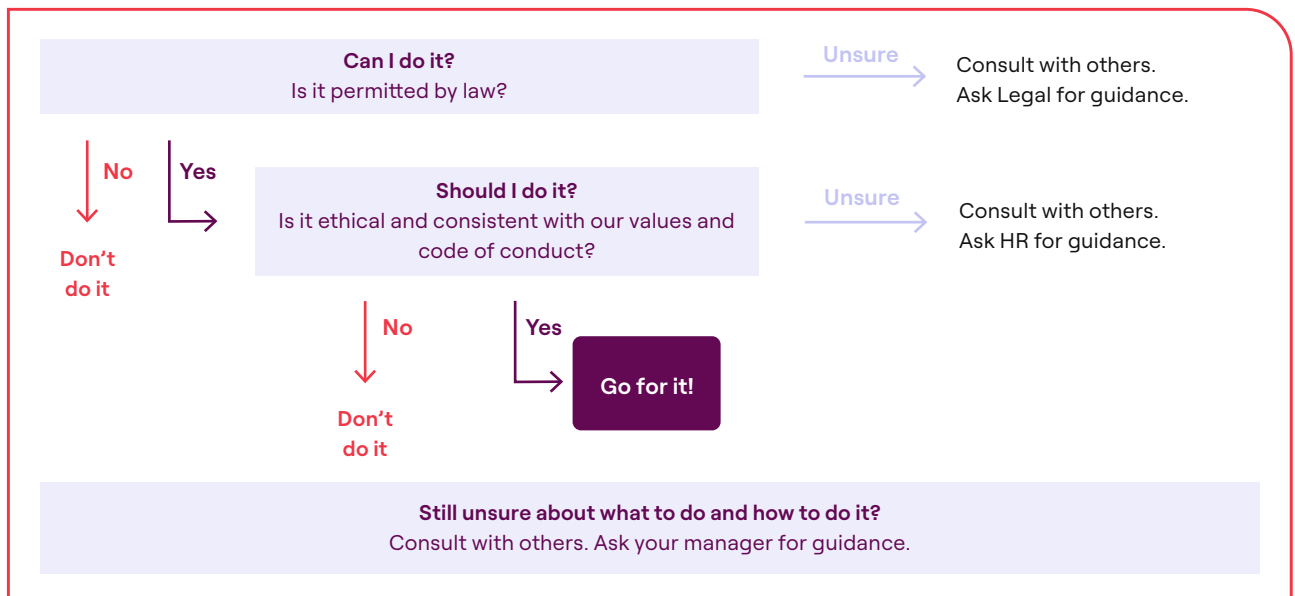


Q: We are a bit short of our sales target this month. My manager asked me to slightly tweak our department's figures in the month-end report so that we can meet our objectives. She says it is in everyone's interests and not a big deal. I don't feel comfortable with this request. What should I do?

A: You have the responsibility to comply with our code of conduct, company policies and with the law, even if your manager asks you to do otherwise.

No one - not even your manager or internal client - has the authority to tell you to do something that is illegal or unethical.

Talk to someone else in management or contact your local HR representative or the Legal Department to seek guidance.



Values

At Cartamundi we adhere to the following values:

We play

We create. And have fun doing so. Our games bring people together. And create magical moments. We play, so you can play.

We can

We are entrepreneurs at heart. Proud of our craftsmanship, creativity and expertise. We are also industry leaders, looking for cutting-edge innovation. And together, we can.

We care

As a family-owned company, we care for all our employees. We care about current and future generations. For our planet and all its creatures. We care by including everyone in the game. And by sharing our magic in everything we do.

We do

We get things done. With energy and enthusiasm. We find creative solutions to any challenge. Big or small. Our approach is fair and transparent. And delivering on our promise. That's what we do.

We connect

We connect. With the world around us. By building partnerships with our customers, consumers, suppliers, and employees. Open-hearted, regardless of our differences. As One Group, One Team.

Aligned with Cartamundi's sustainability strategy, topics addressed in this code of conduct are spread amongst four building blocks:

- Live with Respect
- Live with Integrity
- Live with Nature
- Live with Joy

Do you need help on any of the explained topics?

- Reach out to your local management or HR representative; or
- Consult www.cartamundi.com



Did you know? Our values are the foundation of Cartamundi's group culture. We believe that acting according to these values ties us all together and guides us in doing the right thing.

Everyone's responsibility

Cartamundi expects all its employees (including temporary, part-time, or seasonal employees), its board of directors, contractors, suppliers and generally all individuals whom we are doing business with, to comply with this code of conduct.

Each of us is expected to act with integrity and honesty, show respect to each other and build trust in all circumstances.

Leaders have additional responsibilities. They are role models and have to promote an open dialogue about compliance and ethics issues.

What do we expect from you?

Act ethically

All employees are required to act ethically: doing so will protect one another and Cartamundi's business and reputation.

Speak up!

Speak up and report any situation you believe may violate the code of conduct, company policies or the law. Please check the Speak up! section for more details about Cartamundi's reporting lines.

What happens in case of misconduct?

We will take appropriate actions and preventive steps, such as training, counseling and others to ensure continuous improvement of our processes.

Selecting partners who share the same business ethics

We foster long-term relationships with partners who share our values and commitment to an ethical, responsible and sustainable business. We select them based on our global business ethics principles as outlined in the [Cartamundi Supplier Code of Conduct](#).



Respect

We play together



Our responsibility to each other

We are committed to fostering a work environment where everyone is treated with dignity, fairness, and respect.

We promote professional development, foster a diverse, equitable and inclusive workplace and expect the health, safety, and well-being of our workers to be **protected at all times**.

Cartamundi applies a zero tolerance policy with respect to any violation of these principles. If you witness or suspect any violation taking place or if you feel you are a victim of harassment, discrimination or inhumane treatment, including sexual harassment or bullying, you should promptly report it.

Refer to your local policies and procedures or contact your HR representative for more guidance.

Learn about Cartamundi's diversity and inclusion initiatives in our [Good Neighbor Report](#).

In this section, we explain:

- How we promote fair treatment, dignity and full participation of all our people
- How we ensure human rights and Internal Labour Standards are respected
- How we protect the health and safety of our workers
- How we protect our workers' privacy
- How we ensure ethical sourcing
- How we promote community support and development



Did you know? The term 'workers' does not only refer to full-time employees who have accepted an offer of employment with Cartamundi. Any person who has a written or unwritten contract or arrangement to do work or services personally for Cartamundi for a reward (money or benefit in kind) is considered a worker. This includes temporary workers, part-time workers, casual workers, interim workers, self-employed, contractors, consultants, etc. that we hire to do work for us, and candidates during the application period.

Fairness, dignity and belonging

We foster organizational frameworks that promote the fair treatment, dignity, and full participation of all our people. This includes individuals of different races, ethnicities, national origins, religions, cultures, abilities, ages, genders, gender identities, and sexual orientations. Our approach aligns with global principles of diversity, equity, and inclusion, as well as prohibiting discrimination and ensuring equal opportunity in the workplace.

As a result, we do not tolerate any form of harassment or discrimination.

What does it mean to you?

At Cartamundi, we are committed to fostering a diverse, equitable, and inclusive workplace. In hiring and employment practices—such as wages, promotions, rewards, access to training and information—and in everyday interactions, we ask all employees to uphold the following principles:

DO

- ✓ Include employees of different genders, ages, sexual orientations, religions, languages, abilities, professional experiences, socioeconomic and educational backgrounds to help ensure a diverse workplace.
- ✓ Provide support and resources so that all employees have opportunities to succeed.
- ✓ Recognize and value individual differences and how these contribute to the organization’s culture, innovation, and growth.
- ✓ Report immediately any situation of harassment, discrimination, or violence.

DON'T

- ✗ Tolerate harassment or discrimination based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, social origin, disability, medical condition, pregnancy or childbirth, religion, political affiliation, union membership, covered veteran status, protected genetic information, marital status, or other characteristics protected by law.
- ✗ Tolerate any behavior that includes violence, sexual harassment or abuse, corporal punishment, mental pressure or physical force, bullying, public shaming, or verbal abuse.



Q: I’m considering an applicant in a wheelchair for a job where she’d be collaborating directly with customers. I’m afraid our customers will be uncomfortable with her physical disability. Is this a legitimate reason not to hire her?

A: No. If the applicant is the most qualified person for the job, we should hire her. Denying an applicant a job based on disability is illegal.



Q: A colleague is spreading rumors about the sexual orientation of one of our co-workers. When confronted, this colleague said that they were only joking. Is this appropriate?

A: No, this is not appropriate. Stating “I was only joking” is not an excuse for inappropriate behavior.

Q: What should I do?

A: You should report this to your HR representatives or via the Cartamundi Speak up! line.

Q: What will happen if I report it?

A: Cartamundi will handle your report with due care and confidentiality according to our Speak up! procedure. You will be protected against any type of retaliation if you report misconduct in good faith.



Human rights and International Labour Standards

It is our policy to ensure that International Labor Standards and principles are followed so that the human rights of our workers around the globe are protected*.

This means that:

1. We strictly ban any type of **(modern) slavery** practices such as forced, bonded, or indentured (i.e., contractually required) labor, involuntary or exploitative prison labor, slavery or the trafficking of persons and child labor at any stage of manufacturing.
2. With respect to **child labor**, irrespective of the age at which a person is considered a child on the planet, Cartamundi will not use labor of any child under the age of 15 or under the age for completing compulsory education or under the minimum age of employment in the country, whichever is greatest. Young workers who are under the age of 18 must not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Student work will be properly recorded and paid in accordance with local laws.
3. We ensure that employees will not be required to pay **recruitment fees** when hired, make deposits, or incur debt as part of their employment.
4. We ensure that as part of the hiring process, employees will be given a **written employment agreement**¹ in their native language including terms and conditions of employment.
5. We ensure that our workers are paid a **fair compensation** in accordance with local law and that they are not **working more hours** than the legal maximum applicable².
6. We ensure that our people are allowed **break times and annual leaves** (paid time off) as required in accordance with applicable laws.
7. We ensure that all work is **voluntary** and that workers are free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract in compliance with applicable legislation and collective agreements.
8. Cartamundi and/or any recruitment agents may not hold or destroy, conceal, confiscate, or deny access by employees to employees' **identity or immigration documents**, such as government-issued identification, passports, or work permits, unless such holdings are required by law (usually on a temporary basis for document verification purposes).
9. We promote an **open dialogue** with our employees and enable them to openly communicate and share ideas and concerns with management or local HR regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.
10. We respect our workers' **freedom of association**, which includes the right of all workers, in conformance with local laws, to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly. Naturally, we also respect the right of our workers to refrain from such activities. This respect extends to their **freedom of movement and right to privacy**, including the prohibition of excessive use of force and limitation of freedom of movement by internal security forces, when applicable.

Cartamundi provides suitable and adequate facilities that allow employees to eat and drink meals or beverages on-site, adequate supply of drinking water within the workplace accessible to all employees, plus adequate and suitable sanitary and washing facilities.



Remember! Privacy is a fundamental right that must also be respected in the workplace. For instance, we should not post any personal information that we may have learned about our colleagues on social networks without their consent.

**such as the Universal Declaration of Human Rights, the International Labor Organization's Fundamental Principles and Rights of Work, the UN Guiding Principles on Business and Human Rights, the UN Convention of the Rights of the Child, The Children's Rights and Business Principles and other applicable UN and ILO conventions.*

¹ Depending on applicable laws, a written agreement can be in the form of a signed offer letter, or an employee handbook or other company policy manuals signed for acceptance.

² Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

Protecting personal data

Privacy and security of everyone's data

We are committed to protecting the privacy and security of the personal information of all individuals we interact with.

Personal data is confidential and must be **protected from loss, alteration, destruction, unauthorized access or disclosure**, by adequate security measures both at organizational and technical levels.

Cartamundi expects its people to protect any personal data we collect and process about any individuals, including customers, consumers, suppliers or colleagues, by using good judgment and following applicable privacy laws and company privacy policies.

What does it mean to you?

DO

- ✓ Always handle personal data responsibly and follow all applicable data protection laws and company privacy and security policies and procedures.
- ✓ Collect and process personal data only for legitimate business purposes.
- ✓ Only collect personal data that is strictly necessary for such legitimate business purposes.
- ✓ Store physical data in locked cabinets and electronic data in secured IT environments as mandated by Cartamundi.
- ✓ Only share personal data with those within Cartamundi who have a need to know and are authorized to process such personal data.
- ✓ Immediately report security incidents and data breaches via the [Incident Notification Portal](#) or reach out to the IT Service Desk and to the Legal Department.
- ✓ Immediately transfer any request you receive from contact persons or colleagues regarding privacy matters to your local privacy officer of the Legal Department. Do not answer yourself.
- ✓ Involve your local privacy officer or the Legal Department in any new project that requires the processing of personal data before you start any processing.

DON'T

- ✗ Use personal data for other purposes than those for which it was initially collected and don't use it or store it for longer than necessary in accordance with applicable company retention policies.
- ✗ Share personal data with third parties without a contractual framework being in place unless you are legally required to do so. Seek guidance from the Legal Department in case of doubt.

Personal data (also referred to as personally identifiable information or PII) is any information in whatever format that relates to a natural person and that can be used to identify such person, either directly or in combination with other information.

Examples of personal data are: name, surname, e-mail addresses, dates of birth, IP addresses, cookie IDs, location data, advertising identifiers of your phone, but also factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

Because misusing them may cause greater harm to individuals, some categories of personal data – often referred to as 'sensitive data' – such as data relating to our health, racial or ethnic origin, political opinions, religion, sexual life and orientation, ... may not be processed except in limited circumstances determined by law.



Did you know? Professional contact details may also qualify as personal data.

Seek guidance from the Legal Department if you are uncertain about applicable privacy laws and/or company privacy policies.

Health and safety

Putting safety first

The health and safety of our workers is paramount. Cartamundi is firmly committed to maintaining a healthy and safe workplace and to meeting its obligations under the applicable laws of the places in where it operates. To that end, we have implemented health and safety rules at global and local levels to ensure that all employees have a healthy and safe environment, including dormitories where provided, that comply with the following standards*:

- Occupational health and safety
- Emergency preparedness
- Occupational injury and illness
- Industrial hygiene
- Physically demanding work
- Machine safeguarding
- Sanitation, food and housing
- Health and Safety communication

What does it mean to you?

DO

- ✓ Familiarize yourself with and follow all safety guidelines relevant to you.
- ✓ Respect security and emergency procedures.
- ✓ Identify and control risks, report concerns, accidents and near misses, so all can be properly addressed and future occurrences prevented.
- ✓ Keep your workspace tidy and free from hazards and injuries.
- ✓ Be comfortable giving and receiving feedback on how we can all be safer.
- ✓ Follow smoking, alcohol, and drug use policies.
- ✓ Dress in a manner right for your job.

Not sure which health and safety rules are relevant to you?

Consult:

- your local health and safety management system; or
- your manager or local health and safety officer.

Always report health and safety concerns. If you spot a risk, you need to stop working immediately and report it.

You will never get into trouble for putting safety first.

we **PLAY** it
SAFE.

Health and safety

Drugs & Alcohol

- To ensure a safe and productive environment, the use, possession, distribution, or being under the influence of illicit drugs is strictly prohibited for all employees, contractors, consultants, vendors, and visitors while on company property or conducting company business. Exceptions for prescribed medications, including medical cannabis, may be considered in accordance with applicable laws and safety requirements.
- Never work under the influence of alcohol. If alcohol is served at a Cartamundi-approved function or at any other business event, it is permitted in moderate amounts and should not impair your judgment.

Cartamundi stands committed to firmly confront any substance abuse problems of its employees and to take disciplinary action should these rules be violated as well as to provide required support to individuals who are suffering from alcohol or drug addiction.

Not sure which health and safety rules are relevant to you?

Consult:

- your local health and safety management system; or
- your manager or local health and safety officer.

Always report health and safety concerns. If you spot a risk, you need to stop working immediately and report it.

You will never get into trouble for putting safety first.

we *PLAY* it
SAFE.

Ethical sourcing

Sourcing materials and components responsibly

Our customers and licensors expect us to meet rigorous ethical standards and they are conducting regular audits of our facilities and processes to evaluate them. We welcome their findings and strive to improve our processes where needed.

In turn, we ask our suppliers to commit to upholding the global business ethics principles that are described in our code of conduct and any applicable sourcing policies.

Cartamundi is committed to apply fair purchasing and responsible sourcing practices and to comply with procurement laws and export control laws and regulations.

What does it mean to you?

If you are involved in selecting suppliers and vendors, make sure that they have the capability and commitment to comply with our global business ethics principles as outlined in [the Cartamundi's Supplier Code of Conduct](#). It is good business practice to perform a due diligence on our strategic suppliers and vendors before conducting any business with them.



Did you know? Cartamundi is committed, in compliance with applicable legislation, to sourcing components and materials from companies that do not use **conflict minerals such as cobalt, tantalum, tin, tungsten, and gold** which directly or indirectly finance, or benefit armed groups in the Democratic Republic of the Congo or in adjoining countries.



Community support

Giving back to society

We want to be relevant to the societies in which we live and operate. That’s why we want to give back to society in any way we can.

Our community initiatives include:

- Donating our products to vulnerable groups.
- Using our expertise and our production facilities to make a positive contribution to the communities in which we operate.
- Supporting charity.

Cartamundi encourages its people and business partners to volunteer and to use their strengths to help others.

What does it mean to you?

DO

- ✓ Uphold Cartamundi’s business ethics principles in any volunteering or charitable activity, including conflicts of interests and anti-corruption rules.
- ✓ Seek and obtain prior approval before donating money or making other contributions on Cartamundi’s behalf even if this is a Cartamundi supported initiative. We only donate to officially recognized organizations.
- ✓ Verify that donations and contributions comply with applicable laws.

DON'T

- × Pressure or require others to make charitable contributions to Cartamundi supported initiatives.

Contact the Legal Department, the Global Corporate Social Responsibility Manager, or the VP Group Compliance if you have any questions regarding charitable activities.



Q: I am the co-founder of a small non-profit association that helps children with learning difficulties in my municipality. I know that Cartamundi contributes to better health, sociability and the education of children through the Cartamundi Global Fund. I know that we have spare playing cards in stock that can be used for charity. Can I bring these to my association on behalf of Cartamundi?

A: That is a great idea but make sure you get approval first. Speak to the Global Corporate Social Responsibility Manager or with your local HR representative to arrange for the donation of the playing cards in accordance with Cartamundi’s applicable rules.



Did you know? Cartamundi and the King Baudouin Foundation joined forces to set up the Cartamundi Global Fund which specific aim is to help those between one and eighteen years old through officially recognized organizations that passed our eligibility checks. Find out more about it in our [Good Neighbor Report](#).

Integrity

We play it fair

Our responsibility to our company and shareholders

Acting with integrity towards Cartamundi and its stakeholders is equally important as treating our customers with transparency, fairness, and integrity and building trust with our consumers.

In this section, you will find information about:

- Conflicts of interest
- Gifts and hospitality
- Transparent and accurate record-keeping
- Protecting company assets
- Protecting confidential information
- Protecting our and others' intellectual property
- Speaking on behalf of the company

Conflicts of interest

Avoiding conflicts of interest

Cartamundi expects its people to make decisions in the company’s best interest and not in their own personal interest.

You must avoid situations where a conflict of interest exists between the company’s interests and our your personal interests.

Common situations that could present a conflict of interest include:

- Doing business with family members or close relatives.
- Accepting a second job or starting your own business while working at Cartamundi, or acting as an advisor, consultant, officer, or director of another company while working at Cartamundi.
- Making personal investments in suppliers, customers, or competitors.

You must be transparent about your intended activities.

The appearance of conflict of interest can cause others to think you are acting improperly and must be avoided.

What does it mean to you?

If you think you may be in a conflict of interest, ask yourself the following questions before acting:

1. Will it create a sense of obligation?
2. Will it compromise the Cartamundi values?
3. Will it compromise, even slightly, my professional judgment and objectivity?
4. Will it have the appearance of improper dealings, even if there is no actual conflict of interest?

If you answered “yes” to any of these questions, your decision will likely result in a real or perceived conflict of interest.

If you are unsure about how to proceed, seek guidance from your manager, your local HR representative, or the VP Group Compliance.

Political involvement is also a potential source of conflict of interest

While we encourage civic engagement, Cartamundi expects that any political involvement be responsible. It should not be perceived as influencing decisions that affect Cartamundi’s business. Here again, be transparent about it.



Remember! Transparency is key!
Consult with your HR representative.

A “close relative” includes a current or former spouse or domestic partner, a father, mother, guardian, brother, sister, son, daughter, aunt, uncle, nephew, niece, cousin, grandfather, or grandmother, a mother-in-law, father-in-law, son-in-law, daughter-in-law, sister-in-law, brother-in-law, step, adoptive, and foster relationships, or an individual who resides in your home, the spouse or domestic partner of all of these individuals.



Q: I am working in Procurement. We currently have a need for sustainable office supplies. My sister-in-law has started a local business making drinking bottles from recycled plastic. Is it okay to sign a contract with her?

A: It may be ok, but that is not your decision to make. You can recommend her business but it will have to be reviewed by another colleague in the procurement team on fair and objective criteria, like any partner we intend to do business with.



Gifts and hospitality

Gifting appropriately

When it comes to gifts and favors, you should avoid accepting or giving anything that might make you feel obligated or that may compromise your professional judgment.

Before accepting or giving a gift or hospitality, take a moment to think about its value. And keep in mind that if the gift's public disclosure could harm your or Cartamundi's reputation, it's better to give it a pass. Unreasonable or inappropriate gifts or entertainment might be considered as an attempt to influence the relationship.

How to assess whether or not a gift is reasonable and appropriate?

- Value
- Timing e.g., during a bidding process or before a contract renewal
- Parties involved (e.g., Cartamundi staff, customers, suppliers, third parties)
- Nature of the gift
- Occasion (e.g., Diwali festival in India, weddings)

For instance, a meal at a local diner paid for by a supplier just before contract renewal may be of reasonable value, but the timing makes it look like it is offered to influence business decisions. Therefore, this may not be appropriate.

Respect for external gift and hospitality policies

Clients and suppliers often have established policies on gifts and hospitality. Any offering must comply not only with our internal guidelines but also with those of the recipient.



Did you know? We prohibit offering, giving, soliciting, or receiving any form of bribe or kickback. There are serious civil and criminal penalties for engaging in this conduct. See the section on [Bribery and corruption](#).

Gifts are physical items, cash, vouchers or favors given to or received by employees.
Hospitality refers to meals, entertainment, lodging, or travel provided or received as part of business relationships.

Please consult your local gifts and hospitality policy where available or contact your manager for additional guidance on acceptable gifts, value, timing, and frequency, and for reporting requirements.

Gifts and hospitality

What does it mean to you?

DO

- ✓ Let **your manager** know if you intend to make a gift or if you are given one.
- ✓ Follow your **local gifts and hospitality** policy where available.
- ✓ **Report** expenses related to gifts and hospitality in line with your local reporting requirements and with the Travel and Expense Policy.
- ✓ Offer or accept gifts, meals or entertainment only if they are reasonable and customary, appropriate or occur infrequently. Gifts that are **common** in business, such as pens, free game samples or small goodies may be allowed.
- ✓ Offer gifts, meals or other forms of hospitality only if they comply with the **recipient's gifts and hospitality policy**.

DON'T

- ✗ Make or accept a **gift of money/cash**, unless customary in your region and always subject to the required local management approval.
- ✗ Ever give or accept any gift to influence business decisions or tasks or that **appear to influence** business decisions or tasks. This rule also applies to low value gifts and 'goodies'.
- ✗ Make gifts to a government official without first seeking guidance from the Legal Department or following your local procedure if available. These are regulated and may only be allowed in very limited circumstances or even be prohibited in countries.
- ✗ **Trade** items of value with other businesses for payment, e.g., giving playing cards to a vendor of ink in exchange for payment, unless this practice is explicitly allowed under your local procedure and subject to the required local management approval.
- ✗ **Encourage or solicit** gifts and hospitality like meals or entertainment from any of Cartamundi's current or potential business partners.

Transparent and accurate record-keeping

Books and records

Whether it's an annual report, a purchase order, a timesheet, an expense or safety report, or tax filings, accurate and auditable record-keeping habits form a pledge of smart business decisions. Shareholders also rely on accurate and transparent records to monitor the company's activities.

Complete and accurate books and records are an essential part of an honest and ethical business. To help ensure transparency and protect our reputation, Cartamundi **expects its people to comply with all their record-keeping obligations in a timely fashion.**

Money laundering

We do not condone money laundering. We act with integrity and comply with the law to ensure that our resources always have a lawful and transparent origin.

If you suspect any record tampering, inform your manager or the Legal Department. Intentionally altering records is considered fraud and will not be tolerated.

What does it mean to you?

DO

- ✓ Record transactions and events accurately and in a timely manner.
- ✓ Align budget proposals and economic evaluations fairly and clearly.
- ✓ Protect non-public and personal information you have.
- ✓ Advise customers of errors and promptly apply credits and refunds.
- ✓ Retain and dispose of records correctly and keep all legal records safe.
- ✓ Monitor and report suspicious transactions.

DON'T

- ✗ Engage in inaccurate, deceptive, or secret bookkeeping.
- ✗ Accept money without proven origin.
- ✗ Receive amounts of cash without justification.



Protecting company assets

Legitimate use of company assets

Company assets are essential to operating our business successfully. It is your responsibility to use our assets only for legitimate company business purposes and protect them from loss, damage, destruction, theft, unauthorized or improper use, or waste.

Extortion or blackmail and embezzlement are specific forms of corruption that involve the misuse of company assets. Extortion or blackmail is the practice of obtaining money or other property by the use of force or threats and embezzlement is the theft or misappropriation of funds or assets entrusted to your care but actually owned by someone else.

Cartamundi does not tolerate these practices which are both a criminal offense. Please consult [the Bribery and corruption section](#) for more information.

Different types of assets

Physical or tangible: anything of a tangible nature provided by the company to employees for use in connection with their work at Cartamundi. They include computers, mobile phones, materials, tools, machinery, company vehicles, office equipment, and supplies.

Financial: money, financial instruments, and anything that can be converted to money.

Information: any data related to Cartamundi's business at large, in any available format, created or obtained by Cartamundi.

Intellectual property or technology: things such as our ideas, inventions, improvements, know-how, software, work product, registered and unregistered copyrights, trademarks, patents and trade secrets conceived, developed, or practiced worldwide.



Remember! Cartamundi's equipment, information and communication systems must be used responsibly. This includes safeguarding computer systems and electronic data by ensuring access is limited to authorized individuals, using strong unique passwords, multi-factor authentication, and promptly reporting phishing attempts and cyberattacks or other security incidents.

If you witness a cyber security incident, report it via the [Incident Notification Portal](#) or reach out to your local IT contact.

If you have any questions regarding information security, consult our IT Global Acceptable Use security policy or contact your local or regional IT Department.

Protecting confidential information

Keeping information confidential

Proprietary and confidential information, especially intellectual property that Cartamundi owns, is a valuable asset. It plays an important role in the development of new products and markets, helps us attract new business and maintain our competitive advantage. Cartamundi expects its people and business partners to protect proprietary and confidential business information against unauthorized disclosure or misuse.

What does it mean to you?

DO

- ✓ Limit access to confidential information to those who need to know it to perform their jobs.
- ✓ Sign non-disclosure agreements before discussing any confidential information. Reach out to the Legal Department for guidance.
- ✓ Clearly label confidential information as confidential.
- ✓ Protect access to confidential information by using strong passwords and multiple-factor authentication on your electronic devices and store confidential papers in locked cabinets.
- ✓ Use confidential information only for legitimate business purpose and never for personal gain or to benefit anyone outside of Cartamundi.
- ✓ Use paper shredders when disposing of documents that include confidential information and use special waste disposal techniques or companies to dispose of confidential products.
- ✓ Remember that the obligation to protect the company's confidential information continues after leaving Cartamundi.

DON'T

- ✗ Talk about confidential information in public areas such as planes, elevators, and restaurants, whether talking in person or on mobile phones.
- ✗ Work in a public place when there's a risk of such information being viewed or heard by others.

Confidential information is any information about Cartamundi's business and about the business of our customers, suppliers and business partners in our possession, that has not been made public.

Confidential information includes financial information and projections that are not published in our annual accounts, information about new products and marketing plans, information about the company's general strategy, information about potential acquisitions, divestitures and investments, personal data of our employees, consumers and contact persons at business partners, manufacturing processes, trademarks, patents, trade secrets and other intellectual property, research and development, legal opinions, and generally any information that gives us a competitive advantage and is only known by us.



Did you know? The contents and even the existence of specific contracts and business agreements may also be confidential. Consult with the Legal Department if in doubt about what information is confidential.

Protecting our and others' intellectual property

Respecting ideas, protecting values.

Cartamundi expects its people and business partners to use and protect our and our customers' intellectual property in all its forms at every stage of our business activities with due care.

Intellectual property refers to creations of the mind, such as inventions, literary and artistic works, designs, names and images used in commerce.

Intellectual property can be copyrighted or registered as trademarks or patents.

What does it mean to you?

DO

- ✓ Follow Cartamundi guidelines about the proper use of intellectual property for advertising, marketing, packaging, communication, and contractual purposes.
- ✓ Keep Cartamundi's intellectual property in a safe and secure environment at all time.
- ✓ Report any counterfeit products and other intellectual property misuse immediately.
- ✓ Understand contractual or regulatory requirements so that third parties receiving our proprietary information promise to protect it.
- ✓ Always seek guidance from the Legal Department if you are in doubt about how to use and protect our intellectual property.

DON'T

- ✗ Take unreleased digital or physical product off the premises without permission.
- ✗ Take pictures of unreleased digital or physical product.
- ✗ Share or copy any product specifications outside the organization.



Q: May I use information I gained from my former employer in my new role with Cartamundi?

A: Maybe not. If that information is not generally known outside of your former employer and would give Cartamundi a competitive advantage, that information is very likely a trade secret. You may face civil and criminal prosecution if you disclose it. Check with the Legal Department for guidance on what types of information can and cannot be used in your new role.



Remember! Cartamundi protects the legitimate intellectual property of others as we do our own. The rules outlined in this section extend to the use of our customer's trademarks, logos, names, designs, copyrights, trade secrets and patents. Not following them may expose Cartamundi to financial and legal liability and to loss of business.

Our products must be handled with care

Because they are important company assets, the use of our products by Cartamundi employees, inside and outside the company, may be subject to specific conditions laid down by our product teams.

Physical products which are made available to Cartamundi employees must not leave the premises without permission.

You must handle sensitive products and sensitive information with the utmost precaution and follow any communicated instructions regarding their use. Always follow the local security rules or instructions and ask for clarification in case of doubt.

Speaking on behalf of the company

Honest and respectful communication

Public communications must reflect Cartamundi's views and be honest and respectful of others. We must avoid making misrepresentations or disclosing confidential information as this could harm our reputation and that of others.

Cartamundi expects its people and business partners to use their good judgment to communicate responsibly and consistently in accordance with company communication guidelines where available.

What does it mean to you?

DO

- ✓ Make sure you are duly authorized to communicate publicly for Cartamundi.
- ✓ Follow Cartamundi's communication guidelines.
- ✓ Be conscious of any confidential or sensitive information you are sharing and of external content that may include protected intellectual property.
- ✓ Credit your sources where needed.
- ✓ Use polite and respectful language adapted to your audience.
- ✓ Contact the Director Group Corporate Communication if you are contacted by the press.

DON'T

- ✗ Make public comments regarding Cartamundi, its brands, products or services without the prior approval of your Global Council (GEC or GSC) or the Director Group Corporate Communication.

The same rules apply irrespective of the media that is used to communicate. Employees who speak on behalf of Cartamundi on social media including via professional influencers must be authorized to do so and must follow local communication and use of social media guidelines where available.



Did you know? If you post information on professional networks related to your work at Cartamundi in your own name, you must be transparent about your connection with Cartamundi and mention that the opinions you express are your own and do not represent Cartamundi's view.



Our responsibility to our business partners and to the market

Treating our business partners and the market with integrity enhances our reputation. It supports trusted and reliable business relationships.

In this section, we explain:

- How to stay clear of any form of bribery or corruption
- How to promote fair competition in the market in which we operate
- What to do in case of an unannounced inspection by authorities or customers

Bribery and corruption

Standing firm against bribery and corruption

Bribery and corruption in all of its forms are completely contrary to our values and business ethics principles. Giving and/or taking bribes is not only unethical and illegal, it can also result in processes and procedures not being followed and contractual obligations not being respected. Cartamundi expects its people and business partners to comply with anti-bribery laws and regulations, but also stands firm and supports efforts to eliminate bribery and corruption worldwide.

Extortion or blackmail and embezzlement, which are forms of corruption involving misuse of company assets, are also prohibited practices. Find more about it in the section on [protecting company assets](#).

What does it mean to you?

DO

- ✓ Follow Cartamundi's policies related to gifts and hospitality where available.
- ✓ Record all payments and receipts completely and accurately (see Transparent and accurate record-keeping).
- ✓ Speak up to report any unethical activity (see Speak up!).
- ✓ Seek guidance from your manager, the VP Group Compliance or the Legal Department if you are in doubt.

Corruption is the abuse of entrusted power for personal gain. Accepting or giving bribes, or kickbacks or any other improper payment is a form of corruption and is illegal.

Bribery occurs when someone gives or promises another person something of value to obtain favorable treatment, which is called a bribe. An example of a bribe is if a customer gives you or promises to give you cash or other consideration in exchange for processing the customer's order ahead of other customers' orders.

A **kickback** is giving or receiving personal payments as a reward for the awarding of a contract or other favorable outcome. An example of a kickback is if a supplier pays or promises to pay you a percentage of the supplier's sales to Cartamundi on each order placed with them as a result of your intervention.

A **grease payment** is a small sum of money usually given to government officials with the sole intention of facilitating a transaction. It helps things go a little faster. It is different from a bribe which is paid to get something that you couldn't otherwise obtain. Though grease payments may be allowed in certain jurisdictions, Cartamundi also prohibits grease payments in all circumstances.

Bribery and corruption

What does it mean to you?

DON'T

- × Be persuaded by partners, businesses, or anyone else to engage in bribery or corruption no matter who they are, how big or small, and how much influence they have.
- × Use that type of influence on others.
- × Offer, promise, or give anything of value to a government official or anyone else to gain a business advantage. Anything of value includes cash, gifts, entertainment, travel, and political and charitable contributions.
- × Offer or accept bribes or kickbacks.
- × Make improper payments—either on our own or via third parties.
- × Make facilitating or “grease” payments. These are prohibited at Cartamundi even if they are permitted in certain local jurisdictions.



Remember! Violation of anti-corruption or anti-bribery laws can result in serious civil and criminal penalties. You will not be subject to retaliation of any kind for upholding Cartamundi’s business ethics principles, even if you lose the deal.



Did you know? Using a third party to make or receive a bribe is treated the same as if you directly make or receive the bribe. Also, if a payment is not accepted, a promise not fulfilled or if you don’t even get the business, this can still be considered a bribe.

Fair competition

When we win, we win fairly.

Fair competition laws (or anti-trust laws) are intended to promote vigorous competition in a free market. It is in Cartamundi's best interest to promote free and open competition.

Cartamundi must make its own business decisions, free from understandings or agreements with competitors, suppliers, or customers that unduly or unlawfully restrict competition.

There are two main types of practices that are prohibited under competition laws: horizontal agreements (or cartels) and vertical agreements that have as their object or effect the restriction of free competition in a given market.

Horizontal agreements include agreements, understandings or concerted practices (cartels or coordinated actions) between competitors.

Vertical agreements are agreements between two organizations that operate at different levels of the supply chain, such as distribution, franchising, supply, and agency agreements.



Fair competition

What does it mean to you?

In relation to **competitors**:

DO

- ✓ Seek guidance and obtain instructions from the Legal Department before engaging in any discussion or agreement that includes any aspect of pricing or price formulas, margins, costs, inventory, production, capacity, territories or markets, contracts, customers, or suppliers.
- ✓ Immediately leave any discussions with competitors where competitively-sensitive information is shared or attempted to be shared.

DON'T

- × Discuss or reach agreements on any aspect of pricing or price formulas, margins, costs, inventory, production, capacity, territories or markets, contracts, customers, or suppliers in any circumstances.
- × Exchange competitively-sensitive information.



Q: I am going to a trade show. May I go to a competitor's booth?

A: Yes. You may go to the booth and collect any publicly-distributed material. However, if you talk to anyone at the booth, identify yourself as a Cartamundi employee, and avoid conversations about business. If you overhear one of our competitors talking about their pricing strategy or other competitively sensitive information, leave the booth immediately and report the incident to the Legal Department. Keep all information you have heard confidential and don't use it in the course of business.



Q: Is it any different if one of my friends is a salesperson for a competitor and we occasionally talk about marketing plans when we meet outside of business hours?

A: No. The fact that it is a friend does not make any difference. Not only would this be a violation of competition laws, but you would also reveal confidential information of Cartamundi. You must also remember to protect our customers, suppliers and licensors' intellectual property and refrain from discussing any element of a new product launch or upcoming marketing campaign before it is public (see Protecting company assets and Protecting intellectual property.)

Fair competition

What does it mean to you?

In relation to **customers and suppliers**:

DO

- ✓ Always present Cartamundi services and products in a consistent manner with our values and business ethics principles.

DON'T

- × Seek to obtain competitively-sensitive information by illegal or unethical means nor knowingly use any information obtained in that way.
- × Set or influence resale prices. Recommended resale prices or maximum resale prices may be determined by Cartamundi only and not in collaboration with customers or suppliers.
- × Condition the sale of our products on the purchase of other Cartamundi products without approval from the Legal Department.
- × Impose restrictions to boycott certain customers or suppliers without approval from the Legal Department.



Remember! Anti-trust laws are complex. You should reach out to the Legal Department for guidance and you are required to attend mandatory training on the subject. It is good practice to consult the Legal Department for guidance before attending any trade association meeting or trade show where you are likely to meet competitors.

Violation of competition (anti-trust) laws can result in serious criminal and civil penalties such as monetary fines, including for individuals involved in the violations, and to significant damage to personal and company reputation and loss of business.

Unannounced inspections (“dawn raids”)

Inspections happen. Be prepared.

Government authorities usually have broad investigation prerogatives to verify compliance of a company’s business with applicable laws and regulations, including conducting on-site inspections.

Government officials of supervisory authorities may show up unannounced at any of our premises worldwide and require access to our books, records, personal computers, and archives as well as conduct interviews with our employees. Inspectors usually arrive first thing in the morning which is why such unannounced inspections are called “dawn raids”.

It is extremely important for Cartamundi to cooperate with any ongoing investigation. Be prepared, courteous, calm, and professional. To that end you are required to follow Cartamundi’s guidance and attend the mandatory trainings on this topic.



Did you know? Our customers may also instruct private organizations to conduct external audits of Cartamundi’s business. Representatives of such private organizations also conduct unannounced on-site inspections. The same rules apply.

If your role includes welcoming visitors, keep a copy of the dawn raid procedure and the dawn raid contact list handy.

Our responsibility to consumers

Cartamundi's business would mean little without our customers and consumers trust and satisfaction.

To build that trust, the people, including children, who are using our products must be able to rely on qualitative and safe products.

The protection and security of our consumers' data is also paramount. See the section on [Personal data protection](#) for more information about how we take care of our consumers' data.

In this section, we explain how we ensure the safety and the quality of our products.



Product safety and product quality

Cartamundi is committed to designing, manufacturing and selling products and services, and to providing content that our customers and consumers can trust. The strong reputation of our brands – and those of our customers – is built on our unwavering commitment to delivering safe, high-quality products.

Cartamundi expects its people and business partners to uncompromisingly comply with applicable laws and standards on product safety and quality.

What does it mean to you?

DO

- ✓ Always follow Cartamundi's product safety and quality requirements and procedures.
- ✓ Immediately report any issue – no matter how small – with respect to product safety and quality.
- ✓ Participate in and support product safety, testing and quality controls.
- ✓ Maintain accurate records to ensure traceability of materials, components, and production orders.
- ✓ Ensure all products are correctly labeled with safety information, warnings, and age-appropriate guidance.
- ✓ Cooperate fully with any market action initiated to resolve product-related risks and ensure consumer safety.



Remember! Even the slightest glitch in our manufacturing process and that of our suppliers and subcontractors can adversely impact our product's safety and quality. If you notice anything unusual in or around our processes, report it immediately to the local Quality Department. Your vigilance protects our consumers, customers – and our reputation.



Nature

We play it green

Our responsibility to the environment

Cartamundi is committed to taking positive actions to protect our planet and ensure that we are making responsible use of natural resources as well as conserving, maintaining and protecting the natural environment and living beings.

In this section, you will learn about:

- Cartamundi's environmental responsibility
- All our stakeholders' environmental responsibility



Protecting our planet

Cartamundi's environmental responsibility

What is the material impact on the environment of Cartamundi? We try to answer this question in our Environmental strategy.

Our aim is to:

- Reduce our Green House Gases (GHG) emissions in the coming years with a clear long-term goal.
- Focus on the (re)use of resources and circularity.
- Ensure our people follow applicable procedures to meet our regulatory obligations.

We make this happen by:

- Taking action to reduce energy use.
- Switching to green energy where possible.
- Reducing waste in the production plants.
- Reviewing the resource uses in an attempt to optimize these.
- Promoting a sustainable company culture.

All manufacturing facilities involved in the production of Cartamundi products must comply with all applicable laws relating to the environment.

All our stakeholders' environmental responsibility

Protecting our planet is a joint effort in which all our stakeholders have a part to play.

We expect our business partners to contribute to reducing Cartamundi's environmental footprint in the long run, and to finding sustainable ways to do business.

What does it mean to you?

DO

- ✓ Exercise good judgment regarding the environmental aspects of our use of buildings and real estate, our manufacturing processes, and our products. This includes being **proactive and taking personal actions such as turning off lights, using less paper, shutting off electronics and recycling.**
- ✓ Be mindful of our environment and comply with applicable environmental protection laws as translated into Cartamundi's environmental guidelines and procedures, including those regarding discharge and disposition of hazardous materials that are relevant to your tasks.
- ✓ **Share your creative ideas** to help us improve our company-wide environmental sustainability objectives.



Did you know? As part of our Sustainability program, Cartamundi participates in several initiatives to reduce its negative impact on the environment, such as sustainable packaging, use of renewable energy, energy efficiency programs and electrification of our company car fleet. Did you know, for instance, that already two-thirds of our own facilities are FSC-certified?

Cartamundi has planted its own forest in Turnhout and takes part in the protection of the Amazonian forest. Initiatives such as the company leasing bikes or a company bus as commuting alternatives have also been taken.

You can find more information on these initiatives in our [Good Neighbor Report](#).

Joy

We play it socially responsible



Our responsibility to connecting people through play

Cartamundi is committed to creating products that bring people together, spark joy, and contribute to a more connected and inclusive society. Our games and playing cards are more than entertainment—they are tools for emotional connection, intergenerational bonding, and social inclusion.

In this section, you will learn about:

- How we promote social responsibility
- Our responsible marketing principles



Social responsibility

Cartamundi's social impact through joyful products

What is the social value of Cartamundi's products? This is a question we explored deeply, and it led to our strategy for creating meaningful, joyful experiences.

Our aim is to:

- Design products that foster human connection and shared experiences.
- Support inclusion by making games accessible to all ages and backgrounds.
- Contribute to tackling social challenges through play.

We make this happen by:

- Developing games that encourage intergenerational play and dialogue.
- Collaborating with partners to create inclusive and educational content.
- Supporting initiatives that use play as a tool for social development.
- Ensuring our products are accessible and culturally relevant.
- Promoting the role of play in mental and emotional well-being.

All Cartamundi products are designed with the belief that joy and connection are essential to a healthy society.

All our stakeholders' role in spreading joy and connection

Joy isn't just a byproduct of play—it's a force for social change.

We expect our people and business partners to embrace the social value of our products and to help us bring joy to communities around the world.

We expect our business partners to support inclusive design, engage in responsible marketing, and collaborate on socially impactful initiatives, in line with our [Supplier Code of Conduct](#).



Did you know? Cartamundi collaborates with schools, care homes, and community organizations to bring the power of play to people of all ages. Our games are used in programs that support elderly care, youth development, and social inclusion. We also co-create games that address topics like empathy, diversity, and emotional intelligence.

You can find more information on these initiatives in our [Good Neighbor Report](#).

Social responsibility

What does it mean to you?

DO

- ✓ Recognize the power of play to connect people and create shared experiences.
- ✓ Support the development and promotion of inclusive, accessible products.
- ✓ Share ideas for how our games can address social challenges.
- ✓ Collaborate with partners and communities to spread joy through play.
- ✓ Celebrate the emotional and social impact of our products.



Responsible marketing

Serious about fun, honest about everything else

Bringing people together through play requires that what we say and claim about our products and services is true and not misleading in any way.

At Cartamundi, we are committed to responsibly promoting our products and services in compliance with applicable consumer protection and advertising laws, regulations and industry standards. We aim to create a positive impact on society and the environment by sharing informative content on our products and being honest about our business practices.

Responsible marketing principles

Concretely, we abide by the following marketing practices:

Truthful and accurate claims All product claims must be fact-based and approved by the Quality team or other designated reviewers.

- ✓ We do not exaggerate product features or make promises that cannot be verified.
- ✓ We do not omit disclosure of risks, odds or conditions.

Clear communication Packaging and advertising must clearly state if additional purchases are needed to use the product.

- ✓ We provide instructions and product descriptions that are clear, easy to understand and age-appropriate.

No misleading benefits Marketing materials should focus on the fun, creativity, and shared experiences our products offer.

- ✓ We do not suggest that our products will improve intelligence, social status, or popularity, or that they guarantee financial, social or personal success.

Respect for all audiences Our content must be inclusive, non-discriminatory, and free of stereotypes.

- ✓ We design materials that use diverse imagery and language that reflects a wide range of cultures, identities, abilities and experiences, with accessibility in mind.

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Responsible marketing

Responsible targeting Given the very nature of our products, children and families represent a large part of our consumer base.

- ✓ We pay special attention to the language and tone we use in advertisement and marketing materials.
- ✓ We do not exploit or appeal to vulnerable audiences, including children, through manipulative or pressure-based messaging.
- ✓ In gaming context –paid or organic– we include a clear responsible gaming statement and a helpline number, where feasible.

Transparency in partnerships Influencers, affiliates, and partners must clearly disclose any paid relationships or sponsorships.

- ✓ We ensure that all third-party promotions reflect our brand values and comply with this code of conduct.

Environmental and ethical claims Any statements about sustainability or ethical sourcing must be truthful and supported by evidence.

- ✓ We avoid vague or misleading “green” language.



Speak up!

Whistleblowing

How to speak up

Fostering a speak-up culture

Cartamundi is committed to maintaining an open culture of compliance, good corporate governance, and ethical behavior with the highest standards of honesty and accountability where workers can speak up and report any concerns in confidence.

Cartamundi guarantees special protection of whistleblowers in compliance with applicable whistleblower protection laws.

Internal reporting channels

Several methods are available to report concerns:

Personal contact with your supervisor or local HR representative or with your contact person or their superior if you are not a Cartamundi employee.

Local reporting methods where available

Speak up! form on Cartamundi website

Compliance mailbox via email

These are all internal reporting lines, managed by Cartamundi or by a third party appointed by Cartamundi.

You can find all details about Cartamundi's internal reporting methods on the [Speak up! page of our website](#).

Whistleblowing occurs when someone raises a concern or discloses information which relates to wrongdoing, illegal practices or unethical conduct which has come to their attention through work.

The reporting person is called a **whistleblower**.



Did you know? Cartamundi's internal reporting lines are open to any person who has acquired information that relates to wrongdoing, illegal practices, or unethical conduct in connection with Cartamundi. Such persons do not have to be employees of Cartamundi. Contractors, customers, suppliers, directors, job applicants, volunteers, or other stakeholders, can also raise concerns using Cartamundi's internal reporting channels.



Whistleblower protection

Cartamundi's commitment to whistleblower protection

Cartamundi guarantees that all good-faith reports will be:

- Free from retaliation or penalization, with disciplinary action taken against violators.
- Treated confidentially, with the whistleblower's identity protected whenever possible.
- Handled in compliance with data protection laws for all individuals involved.
- Accepted anonymously where permitted by local regulations
- Diligently followed up by impartial, designated personnel, with appropriate feedback provided.

Internal reporting ensures the strongest protection

Depending on your location, you may have the option to report concerns to local authorities. Cartamundi may not be able to offer the same level of protection to whistleblowers who chose to report directly to local authorities or to disclose a concern to the public. Therefore we always encourage people to report their concerns through our internal reporting channels.

What does it mean to you?

DO

- ✓ Raise and resolve issues that may arise in the course of your work with Cartamundi via our internal reporting channels
- ✓ Report concerns responsibly and honestly

DON'T

- ✗ Penalize or retaliate against those who report issues

Want to report a concern? Go to [Cartamundi's speak up page](#) to find out how.



Did you know? A concern around the conditions of your own employment contract for instance, would not be regarded as a whistleblowing concern and would be more appropriately processed by your local HR Department through the grievance procedure. Please contact your local HR representative for the applicable grievance procedure in your organization.



Remember! Workers are not expected to prove the truth of an allegation. However, they must have a reasonable belief that there are grounds for their concern.

It should be noted that appropriate disciplinary action may be taken against any employee who is found to have raised a concern or raised a disclosure with malicious intent (i.e., intentional, wrongful act taken against another to cause harm and without any good faith basis).

Monitoring and improvement

Learn the rules and play!

Cartamundi's Compliance Management System

Playing by the rules, getting better every day

Cartamundi's compliance and ethics program relies on daily adherence to our code of conduct, company policies, and legal requirements. We count on each other to act with honesty and integrity, helping us identify gaps, adapt to new regulations or industry standards, and take corrective action when needed.

Our Group Compliance Management System applies to all Cartamundi employees, affiliates, and, in some cases, visitors, suppliers, and vendors. It helps us assess strengths and areas for improvement.

On-site reviews

Cartamundi may conduct periodic on-site audits of working conditions, records, and payroll to ensure compliance. While we address issues promptly, our main goal is continuous improvement in both process and execution.

Training of our people is key to provide the right level of information about what Cartamundi expects of them and helps them make ethical decisions while complying with the laws applicable to their area of responsibility.



Did you know? Cartamundi has general and specific training modules in several languages that we will continue to review and implement. You are required to comply with any mandatory web-based or classroom training that we have identified for you.

If you wish to obtain additional training, speak to your manager or your HR representative. We have training available to you and we will be pleased to help you strengthen your expertise or develop new skills.

Contact us

Need help with the rules?

You should always feel confident to reach out to your direct manager, their superior, or to your local HR representative if you have questions regarding this code of conduct.

You may also contact the Legal Department for more specific legal questions.

Still not fully comfortable with the rules? Contact the VP Group Compliance by sending an email at compliance@cartamundi.com.

If you are not a Cartamundi employee, you should speak to your Cartamundi contact person or send us an email at compliance@cartamundi.com.

