



TOTEME

Code of Conduct: Employees 2024

INTRODUCTION

- This Code of Conduct for employees sets out how TOTEME employees are expected to behave and handle situations while working for and representing the company.
- All business conducted as a TOTEME employee should therefore be carried out in line with this Code of Conduct as well as any applicable laws and regulations.
- This Code of Conduct applies to all TOTEME employees, including but not limited to the executive management team and Chief Executive Officer (CEO), managers and employees of all levels, including interns and temporary staff, in-house consultants and workers from temporary agencies.
- We have separate Codes of Conduct for our board of directors, business partners and suppliers (the latter is embedded into a document named Sustainability Commitment).
- Employees can find out more about TOTEME's values and behavior guidelines in the Employee Handbook.

DIVERSITY AND DISCRIMINATION

DIVERSITY

- One of TOTEME's greatest assets is the diversity of its employees and business partners. As an employee, you will work with people of various nationalities, ethnicities, cultures and religions who contribute a wide range of experiences, skills and mentalities.

DISCRIMINATION

- TOTEME does not tolerate discrimination or harassment against any individual, in any form. Every employee must respect others' privacy and rights.
- Employees who are found guilty of breaching the law or this Code of Conduct while working for TOTEME will be subject to disciplinary action, including the risk of termination.

BASIC RULES AND COMMON SENSE

- This policy serves as a guide to understand how TOTEME expects its employees to behave, yet it cannot replace common sense and good judgment. It also cannot address all circumstances that may arise. When in doubt about whether a course of action is legal or in compliance with TOTEME's values, an employee should seek guidance from their supervisor and the company's legal advisors.
- To avoid putting yourself and others at risk, during working hours you are not allowed to consume alcohol, drugs, or any other substance that will influence your ability to perform your duties and make business decisions. At company events, please drink responsibly. For more information on this topic, please read the Alcohol and Drugs Policy.

ANTI-CORRUPTION AND BRIBERY

- Corruption is an act that, through unethical behavior and abuse of power, brings material and/or immaterial benefits to an individual or group, including wealth, an improved reputation, political capital, or access to services. A bribe, or the act of bribery, happens when money, gifts or other incentives are offered to an individual or group in exchange for something another one wants.
- TOTEME has a zero-tolerance policy toward corruption and bribery. This applies to all business dealings and transactions in all the countries in which TOTEME and its business partners operate. Our employees are not allowed to accept or offer bribes on behalf of TOTEME to any organization or person, whether employed privately, in the public sector or by an organization.
- We are committed to enforcing this Code of Conduct to prevent and fight corruption in all its forms. All our employees are additionally required to read and sign our Anti-corruption Policy.

CONFLICT OF INTEREST

Conflicts of interest can take place when personal interests compete or are in conflict with the interests of the company. TOTEME employees should avoid any real or potential situation that could damage their own integrity and/or risk putting TOTEME's interests or reputation at stake.

Our employees shall not:

- Carry out business on behalf of the company with relatives and/or other persons with whom they have a personal relationship.
- Mix personal affairs with business affairs carried out on behalf of TOTEME, or use TOTEME's name or trademarks for private affairs.
- Accept or maintain other employment, task or business outside the company that could conflict with the company's interests.

Our employees must always notify TOTEME if:

- They are in any way related to someone they do business with through their work at TOTEME.
- They, or their immediate family (wife/husband/partner/children living at home) have any financial interests that may compete with TOTEME's interests or the interests of those with whom they do business through their work at TOTEME.
- They want to take a job or assignment or initiate business outside TOTEME and the company's interests while keeping their employment with the company. If this is the case, they must always have the company's written permission.

COMPANY ASSETS AND PROPERTY

COPYRIGHT

- TOTEME owns the copyright to all materials created by employees and/or other representatives on behalf of the company. The term 'materials' includes, but is not limited to patterns, sketches, artwork, IT solutions, and product samples resulting from what has been created on behalf of the company.

PROPERTY

- It is forbidden to use, sell or donate assets or property belonging to TOTEME without previous written consent from the company.

DOCUMENTS AND ACCOUNTS

- Falsifying documents or submitting inaccurate accounts is illegal, regulated by law and thus not allowed under this Code of Conduct.

DONATIONS

- TOTEME does not allow direct or indirect contributions to political parties, political committees or candidates using company resources (including monetary and in-kind resources).

CONFIDENTIAL INFORMATION

Confidential information refers to:

1. Trade secrets and other company information not generally known outside TOTEME.
2. Information that TOTEME has received from a third party, where the information is considered confidential by that party.
3. TOTEME's financial and commercial relationships, trade secrets, buying, offers, strategies, supplier-related information, IT solutions, analyses, employees' personal data, and any other information concerning TOTEME and its business dealings which is not in the public domain.

Employees must never disclose confidential information to anyone outside TOTEME, except with persons, organizations or authorities to whom disclosure is necessary for the purpose of the employment or other company agreements. Employees must only handle confidential information that is associated with their duties.

Reporting a criminal act such as corruption to a designated authority or to a relevant representative at TOTEME is not considered an instance of disclosing confidential information.

NON-COMPLIANCE

CONSEQUENCES

- Most sections of this Code of Conduct are aligned with laws that apply in countries where TOTEME operates. Therefore any deliberate violation of this policy may be considered or lead to a criminal act and may lead to receiving a warning or disciplinary measure, including employment termination or facing criminal charges. The company may also face consequences such as fines, lawsuits or investigations, or suffer damages to its reputation.

REPORTING

- Any violation or suspicion of violation of this Code of Conduct should be reported to either a relevant manager or to a member of the People & Culture team at TOTEME.
- For serious malpractice cases involving senior management, TOTEME employees, stakeholders and the general public you may consult our [Whistleblowing Policy](#) or file a report directly through our provider, [WhistleB](#).

UPDATES

- TOTEME reviews and updates its policies and procedures regularly, therefore this Code of Conduct can be subject to changes. The latest version of this document is available to our employees on the platform BambooHR.
- We will inform all concerned employees whenever this Code of Conduct is changed or updated. Each employee is responsible for staying up-to-date with the most current version.

EMPLOYEE COMMITMENT

- TOTEME employees must ensure they understand and follow the contents of this Code of Conduct.
- By signing this document, you confirm that you have been informed about TOTEME's Code of Conduct, that you have read and understood its contents and that you commit to comply.
- You should always strive to support TOTEME's efforts to prevent corruption and bribery by ensuring that the company's operations are shaped by honesty, transparency, integrity and fairness.
- If you have questions concerning the meaning or application of this Code of Conduct, please contact a relevant manager, the People & Culture Director or the Sustainability Director.

