

# Code of Ethical Conduct of Traxtudio Holdings International

## 1. Fostering Ethical Behaviour

Traxtudio has adopted a code of ethical conduct by which all Traxtudio Holdings International businesses and employees must abide in order to maintain the highest level of integrity and ethical conduct.

In an ever-changing media and entertainment industry, Traxtudio strives to be a reliable, trustworthy company to the benefit of all the countries in which it operates.

The Group is committed to ensuring that all its business operations and relationships foster ethical behaviour and reflect:

- personal integrity,
- a commitment to do what is right, fair and lawful while having
- respect for human dignity and the rights of others,
- and honesty in everything we do.

Traxtudio's code of ethical conduct takes into account the unique circumstances of the various jurisdictions in which the Group's businesses operate. It is binding on all directors, managers and employees.

## 2. Promoting Ethical Behaviour Through Governance

To enable us to create and sustain value(s) over the longer-term it is imperative to ensure good governance and sound ethical behaviour. Furthermore, to ensure sustainability our approach is that the company is governed by our mandatory Code of Ethical Conduct and that any breaches of the Code are investigated.

We adopted a zero tolerance policy towards unethical conduct.

We have an anonymous email system available for employees and others to report breaches of Traxtudio ethical code.

Our preference is to create an open reporting environment, usually through our managers. All cases are investigated and a process is in place to track report and close out all emails received. Actions taken as a consequence of resulting investigations include termination of employment, and cancellation of contracts in the case of suppliers.

### **Focusing on our employees:**

- Our business relationships are based on respect for, and the dignity of, the individual.
- We recognise the efforts of the individual in helping create the success.
- We provide a healthy and safe working environment.
- Unfair discrimination is not tolerated.
- We develop effective processes for communication and consultation.
- Employees may not enter into any kind of personal hedging strategy designed to mitigate or offset their exposure to changes in the value of unvested shares awarded to them as part of their incentive compensation
- We use appropriate dispute resolution procedures and make all reasonable efforts to resolve issues locally.
- We can access a facility to confidentially report breaches of law or regulation, or serious malpractice. We take all reasonable steps to make sure that anyone who makes a report in good faith is protected and does not suffer detriment as a result of making a report.
- We respect the rights of freedom of association.

### **Focusing on our clients:**

- We believe that integrity in our dealings with customers, suppliers is a prerequisite for successful, long-term business relationships.
- We ensure that all advertising and other public communications are accurate.
- In accepting business or entering into contracts, we observe high standards of integrity and act in the best interests of our business.
- We maintain the confidentiality of any sensitive information received from customers.  
(Please see our online Privacy Policy).

## **3. Ethical management practices: addressing the issue of anti-corruption**

At Traxtudio we believe that sustainability of ethical management practices (thus: addressing the issue of anti-corruption) begins with (and also stand or fall at) functional ownership.

Our online reporting system makes it able for anyone to report unethical practises in the business, anonymously, and is available on the footer of our website.