

CORPORATE CODE OF ETHICS FOR ENVIRONMENTAL AND SOCIAL SUSTAINABILITY

1. Introduction

Our company operates in the world of the subscription economy, and with our idea and technology, we are enhancing the concept of product-as-a-service. In a context of rapid business growth and evolution, it is crucial to emphasize our company's commitment to conducting its activities in line with the principles of environmental sustainability, social responsibility, and ethical governance.

This "Code of Ethics" clearly defines the principles and core values upon which Subbyx is founded. It serves as a vehicle for sharing our culture: by adhering to the Code, all employees, collaborators, suppliers, and stakeholders gain the tools for a shared and clear vision of how to generate a positive impact on the planet and the community.

2. Our Commitments

- **People at Subbyx:** People are at the heart of our development and success. We are devoted to attracting, managing, and growing our talents. Building the right team that works together toward a common goal is our everyday aspiration. Being part of a team means listening, engaging in dialogue, and being open to feedback and constructive criticism.
- **Clients:** Client trust is central and non-negotiable for us — we work daily to meet diverse expectations and needs by ensuring contractual transparency and service excellence.
- **Product:** We aim to build a new consumption model, enhancing the product-as-a-service approach, focusing not just on product value, but also on circularity, financial sustainability, and freedom of choice. Our efforts ensure quality, continuity, and customer satisfaction throughout every stage of the relationship.
- **Suppliers and Partners:** We collaborate daily with suppliers and partners to ensure high service standards and consistent excellence.
- **Environment:** Our goal is to encourage the circular economy, integrating both environmental and social sustainability. Environmental responsibility must be a consistent ethical commitment within Subbyx.

3. Our Values

- **Sustainability:** We are committed to both environmental and financial sustainability. Our subscription model encourages device refurbishment and trade-in, reducing waste and extending product life. Financially, clients are not bound by interest-bearing loans and can cancel anytime based on their economic situation. We are part of *1% for the Planet*, a global network of companies and nonprofits creating positive impact for people and the environment.
- **Integrity and Transparency:** All business operations are conducted with honesty, ethics, and legal compliance. Our communication, both internal and external, is clear, transparent, and verifiable.
- **Social Responsibility:** We prioritize the well-being of our people. We provide a healthy, safe, and respectful workplace, promoting fairness and professional growth.
- **Meritocracy, Equality, and Performance:** In a fast-paced, innovative environment, we invest in research, development, and training. We foster a learning-by-doing culture in a fair and inclusive workplace, with opportunities based solely on merit.
- **Team Spirit:** We value building strong teams united around shared goals. Everyone is responsible for their conduct and contributes to an inclusive and collaborative culture that strengthens collective success.
- **Flexibility:** Flexibility is a core pillar. We adapt intelligently, are open to change, and see transformation as essential for sustainable growth.
- **Ambition and Passion:** Passion drives our energy; ambition fuels our vision to grow and leave a mark. Being part of Subbyx means combining the two to be proactive contributors.
- **Inclusion and Respect for People:** We embrace diversity and promote inclusion across cultures, languages, gender, sexual orientation, age, political and religious beliefs. We have zero tolerance for harassment or offensive behavior. Everyone deserves to work in a safe and respectful environment.

Code of Conduct

1. Sustainability and Social Responsibility

1.1 Environmental Sustainability

- **Responsible Resource Management:** From the design stage, we aim to minimize natural resource use. Our subscription model reduces waste by promoting reuse and maintenance over replacement.
- **CO₂ Emission Reduction:** We reduce our carbon footprint by limiting unnecessary travel, optimizing supply chains, and offering employees credits for electric scooter or bike-sharing services.
- **Circular Economy:** Beyond our business model, we apply circular principles internally — minimizing waste, promoting reuse, sustainable materials, and partnerships with like-minded companies.
- **Green Suppliers:** We select partners with recognized environmental certifications and transparent environmental policies.
- **Environmental Awareness:** We invest in training, micro-learning, and workshops on environmental topics, and we promote paperless and plastic-free offices.

1.2 Social Responsibility and Human Rights

- **Dignified Working Conditions:** We offer clear contracts, fair pay, flexible benefits, and strive to improve working conditions.
- **Diversity and Equal Opportunity:** We promote an inclusive workplace with transparent, impartial hiring and advancement processes.

1.3 Ethical Practices and Business Relations

- **Ethical Supplier Selection:** We choose suppliers aligned with our values, aiming for partnerships based on common principles.
- **No Greenwashing:** Our environmental and social impact communications are transparent and data-based.
- **Anti-Corruption:** We reject any form of corruption or favoritism. All decisions must respect legality and fairness. Employees are encouraged to report potential conflicts of interest.

2. People

- **Health and Safety:** We promote a culture of prevention and compliance with workplace safety laws, encouraging training and incident reporting.
- **Ethical Leadership:** Managers and team leaders must model integrity, listening, and inclusivity. We organize leadership days for training and shared growth.
- **Sustainable Workstyle:** We promote eco-conscious habits (e.g., limiting printing, turning off devices, avoiding plastic) and sustainable commuting (bikes, public transport, scooters).
- **Continuous Professional Development:** We measure performance with a fair total reward system and provide ongoing feedback and training based on team dynamics and development needs.

3. Harassment Prevention and Response

- **Zero Tolerance for Harassment and Discrimination:** All forms of harassment (verbal, physical, psychological, digital) are banned, including based on gender, orientation, ethnicity, age, religion, ability, or opinions.
- **Training and Awareness:** We offer training to prevent harassment and toxic behaviors, and promote open discussions on diversity, inclusion, conflict management, and active listening.
- **Reporting Procedures:** Clear internal policies define how to report misconduct confidentially, without fear of retaliation. Reports are handled seriously and impartially, and protection is guaranteed for whistleblowers and facilitators.
- **Digital Conduct Code:** Respectful use of digital tools (email, chat, video calls) is required. Behaviors such as passive-aggressive messages, interruptions, and digital space violations are discouraged to foster healthy remote collaboration.

4. Data Protection and Security

- **Confidentiality and Information Security:** All data is processed securely and lawfully. Company policies follow GDPR and focus on minimization, accuracy, and limited retention.

- **Responsible Technology Use:** We ensure safe, lawful use of IT systems, and train staff in cybersecurity awareness to prevent and respond to threats.
- **Limited Access:** Sensitive data access is role-based, with clear guidelines for proper handling.

Code Implementation and Compliance

1. Governance and Oversight

- **Sustainability Committee:** Composed of ESG representatives, the committee defines, monitors, and updates sustainability goals, promoting environmental, diversity, and human rights initiatives.
- **Code Updates:** Regular reviews ensure the Code remains current with legal, social, and internal developments.

2.1 Violation Reporting

- **Monitoring:** Subbyx encourages prompt reporting of misconduct, supporting investigation via a structured procedure.
- **Protection:** Whistleblower confidentiality is assured, and protection from retaliation is guaranteed.

2.2 Whistleblowing System

- Subbyx has implemented a whistleblowing channel in accordance with legislative updates, allowing all workers and business partners to report violations confidentially.

3. Application and Sanctions

- **Mandatory Compliance:** The Code is binding for all employees, collaborators, suppliers, and stakeholders.
- **Consequences:** Violations may lead to disciplinary action, including termination of employment or contracts.

Conclusion

This Code of Ethics reflects our company's values and commitment to a more sustainable and responsible future. Everyone is expected to respect and actively uphold it.