

 Bloq.it

# Code of Conduct

NEXT

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# 01

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## Introduction

## 1.1 Message from the CEO

To all our Bloqstars and all those who partner with us,

Let me tell you why this Code of Conduct matters.

Every year, around 200 billion parcels move across the globe. **Bloq.it** exists to transform how the world interacts with those parcels, while building the world's leading technology for unattended delivery solutions, making every delivery simple, sustainable, and convenient.

Keeping that promise, millions of times over, requires more than good engineering. It requires trust. Trust is what holds everything together.

Our customers trust us with their operations. Our users trust us with their deliveries. Our partners, investors, and communities trust us to act responsibly. That trust is not a given. We earn it through the decisions we make every day, especially the small ones that nobody sees.

This Code of Conduct is our shared standard. It spells out what we expect from everyone acting on behalf of **Bloq.it: integrity** in how we work, **respect** in how we treat each other, and **accountability** when things go wrong. It doesn't replace our detailed policies, but it provides the foundation they all rest on.

### **Bloq.it's values are the foundation of our culture.**

I know that doing the right thing is not always the easiest thing. Deadlines press. Shortcuts tempt. Problems are easier to delay than to confront. But every time we look the other way, we take on risk that compounds quickly. And every time we speak up, ask the hard question, or hold ourselves to a higher bar, we make Bloq.it stronger, bit by bit.

Please read this Code. Use it as a guide in your day-to-day decisions. And hold us all, myself included, to the standard it sets.



“With great ambition comes  
great responsibility.  
This Code is how we live up to both.”

A handwritten signature in black ink, appearing to read 'Miha', written over a horizontal line.

**Miha Jagodic**  
Co-Founder & CEO

## 1.2 Mission and Vision

Every year, around 200 billion parcels are shipped globally. Our mission is to transform the way these parcels move across the globe – so everyone can send or receive a parcel in a simple, sustainable, and convenient way – whilst becoming the world's largest technology provider of unattended delivery solutions along the way.

This requires daily trust-building with customers, employees, investors and shareholders, suppliers, and the wider community. We do that through consistent behaviours:

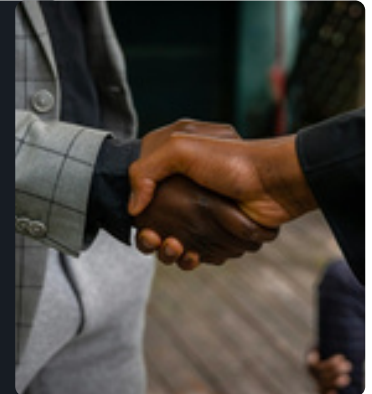
### Integrity, transparency, and speaking up

Act with integrity – do the right thing, not the easy thing.

Put **Bloq.it's** interests first – make decisions with the company's business and growth in mind, not personal gain.

Own this Code and our values – we all protect and strengthen **Bloq.it's** culture through our daily choices.

Act transparently and speak up when something doesn't feel right.



### Collaboration and respect

Treat people with respect and dignity

– regardless of role, location, background, or seniority.

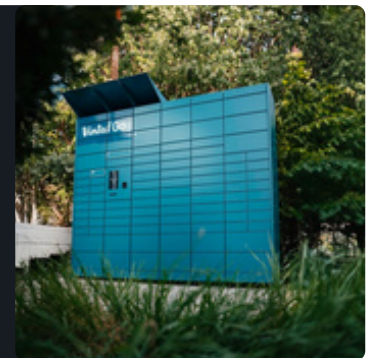
Communicate clearly, respect cultural differences and give constructive feedback

– challenge ideas, never people.

### Sustainability and long-term thinking

Make sustainability real – minimise waste, optimise energy and transport impacts, and favour durable, repairable solutions.

Prioritise long-term value over short-term gains – avoid short-term decisions that undermine sustainability, trust, safety, quality, or compliance.



### Customer focus and delivery

Put customers first – design and operate with the end user's experience in mind.

Build for reliability and safety – prevent harm, reduce incidents, and address issues quickly.

Protect personal data and confidential information.

Act with integrity – be truthful in what we promise and careful in what we commit to deliver.

### 1.3 Core Values

Our values are the foundation of **Bloq.it**'s culture. They guide how we work, how we make decisions, and how we treat people every day.

 <b>OWN IT</b>	 <b>SLAY DRAGONS</b>	 <b>NEVER SETTLE</b>
Foster a culture of accountability by owning both our successes and setbacks. We all make mistakes. Let's make sure we own it and learn from them.	Tackle problems when they appear so they never grow uncontrollably. Seek clarity early, even when it's uncomfortable, so we always know what we face and act confidently.	Always push past the ordinary and aim for the extraordinary in everything we do. Keep aiming higher and never be content with just good enough.

### 1.4 Purpose of the Code

#### What this Code is for

This Code of Conduct sets the baseline standards of behaviour expected at **Bloq.it**. It is a practical guide to help us make the right decisions, protect people and the business, and build trust with those who rely on us.

Clear standards and early action help us prevent harm, avoid misunderstandings, reduce legal and operational risk, and protect **Bloq.it's** reputation. That benefits the company as a whole – including employees, management, shareholders, customers, partners, and any other third-parties impacted by our operations.

The Code cannot cover every situation. When in doubt, stop and ask – and choose the option that best reflects our values, our legal obligations, and our long-term interests.

#### Who this Code applies to

This Code applies to **everyone acting on behalf of Bloq.it**, including:

- directors and officers;
- all employees, in every location, position, and role;
- contractors, interns, consultants, and temporary staff;
- and third parties when representing **Bloq.it** or working with us (for example, agents, consultants, suppliers, and business partners, as relevant to the relationship).

We expect third parties to meet equivalent standards when they work for or with **Bloq.it**.

## Relationship with local law and other internal policies

This Code is an umbrella document. It provides the common principles that sit above our more detailed policies and procedures (e.g., anti-corruption, anti-harassment, information security, health and safety). A non-exhaustive list of key policies is included at the end of this Code under **“Core Policies”**. These may be updated from time to time, so make sure to check it frequently. Where local law sets higher standards than this Code, we follow local law. Where this Code sets higher standards than local law, we follow this Code unless doing so is prohibited by law. If you are unsure which rule applies, or how to apply it in practice, contact your People and/or Legal partner, or the relevant policy owner.





# 02

## Living the code

## 2.1 Shared ownership and participation

Culture is built by people – every day. This Code reflects the culture we choose to create and protect at **Bloq.it**. It is a shared commitment and a common reference for how we work and how we treat others.

This Code does not “belong” to Legal, People, or any single team. It belongs to all of us Bloqstars and we all benefit when everyone takes ownership of this Code and acts proactively. That is why we treat this Code as a living document – improved over time through structured reviews and ongoing feedback channels.

### Everyone is expected to:

- **follow this Code and the policies that support it**
- **act consistently with our values, in every setting (office, remote, travel, customer or supplier sites)**
- **ask early when unsure and seek guidance before acting**
- **raise concerns in good faith and support others who do the same, and**
- **help correct issues – fix what you can and escalate what you cannot.**

### Managers have additional responsibilities and are expected to:

- **lead by example and set the tone for ethical conduct**
- **create an environment where people can speak without fear of negative consequences**
- **make sure their teams understand this Code and the policies relevant to their work, and**
- **take concerns seriously, act promptly, and escalate where needed**



## 2.2 Practical decision-making guidance

When we are unsure whether a particular action or behaviour is aligned with our values and principles, it is essential that, **before we act, we ask ourselves the following questions:**

- Is it illegal or inconsistent with this Code and our policies?
- Would I be uncomfortable if this became public or was explained to a customer, partner, or colleague?
- Could this harm someone, create a safety risk, or expose Bloq.it to security, privacy, or reputational risk?
- Could this decision create a significant negative impact on the environment or on human rights, including in our supply chain?
- Does this create (or look like) a conflict of interest?
- Am I being asked to hide something, skip a control, or “do it quietly”?

If the answer to any question is “Yes”, or “I’m not sure”, stop and ask for guidance before acting. You should reach out to your manager, People (HR), Legal, and/or the relevant policy owner, as appropriate.

## 2.3 Speaking up

### Speaking up

We expect everyone to speak up when something does not feel right. Reporting concerns early helps prevent harm, protect people, and protect **Bloq.it**. Where appropriate, you should either:

- Address the issue directly with the person involved;
- Speak with your manager, a manager you trust or someone from People (HR); or
- Use our confidential **Whistleblower channel** – especially where you are not comfortable raising the issue directly, the matter is sensitive, or you believe it requires independent handling.

You can also share your concerns directly with the Legal team through **compliance@bloq.it**.

Reports should be made in good faith and based on reasonable grounds at the time of reporting.

**Deliberately false reports, or reporting made with malicious intent, may lead to disciplinary or contractual consequences.**



## Non-retaliation

**Bloq.it** has **zero tolerance for retaliation** against anyone who, in good faith, raises a concern, reports a suspicion or asks for guidance, or participates in an assessment or investigation. Examples of retaliation include:

- Threats, pressure, intimidation, bullying or harassment;
- Negative performance evaluations, negative references, or withholding promotion without cause;
- Dismissal, suspension, demotion, loss of responsibilities, or unjustified negative changes to working conditions (e.g., role, hours, location, pay);
- Non-renewal of a fixed-term employment contract without a legitimate business reason;
- Blacklisting or other actions that make it harder to secure work or business opportunities;
- For contractors, suppliers, or other third parties: terminating, suspending, or not renewing a supply or services contract, or otherwise disadvantaging the relationship without legitimate justification; and
- Any other act or omission, direct or indirect, in a professional context, that causes or may cause unjustified harm because the person spoke up.

**Retaliation is a serious breach of this Code and will be addressed promptly. Where warranted, it may result in disciplinary action, up to and including dismissal, in accordance with applicable law and company policies.**

Protection of non-retaliation also extends to people who support the reporter and those connected to the reporter who may be targeted because a concern was raised.

### Whistleblower channel

#### What is the Whistleblower channel for?

**Bloq.it's Whistleblower channel** is a **confidential reporting line** for concerns raised in good faith. It can be used to report **past, current or suspected** breaches of law, this Code, internal policies, or other misconduct, including concerns relating to: harassment, discrimination, bullying, violence, or other inappropriate behaviour; corruption, bribery, fraud, theft, or improper advantages; and conflicts of interest not disclosed or properly managed.

#### Who can use it?

The Whistleblower channel may be used by any person who has a direct or indirect relationship with **Bloq.it**, including employees, shareholders, contractors, suppliers, and other third parties.

#### Confidentiality and anonymity

Our channel allows anonymous reports. Where the reporter chooses to identify themselves, their identity and the report will be handled confidentially to the extent possible and shared only on a need-to-know basis to assess and address the concern.

Reports made through our **Whistleblower channel** are handled by specific members of the Legal team who will act independently and without conflicts of interest.

After being made, a report is acknowledged within **7 days**. The report is then assessed and, where needed, investigated fairly and confidentially. An outcome and follow-up actions are determined, and feedback is provided to the reporter within **3 months** on follow-up measures (to the extent permitted by confidentiality and other constraints) and, where appropriate, the conclusion.

Records of reports and follow-up actions are kept for the period required by law (minimum 5 years).

### **Reporting to external authorities**

As a rule, concerns should be raised internally first. **External reporting is only appropriate where:**

- The reporter has reasonable grounds to believe the concern cannot be effectively addressed internally;
- The reporter has a justified basis to believe that there is a risk of retaliation;
- The reporter submitted an internal report but did not receive information on follow-up measures within the expected timelines (three months); or
- The matter may constitute a crime or an administrative offence punishable by a fine exceeding €50,000.

Competent external authorities may include, depending on the subject matter, any relevant public authority or oversight body, such as: the Public Prosecutor's Office, criminal police / law enforcement bodies, sector regulators and supervisory authorities (including financial supervisors, where applicable), public institutes, inspectorates-general (and equivalent bodies), central government services with administrative autonomy, local authorities / municipalities, and public associations. Where there is no competent authority to receive the report, or where the report concerns a competent authority, the report should be addressed to the National Anti-Corruption Mechanism; if the report concerns that mechanism, it should be addressed to the Public Prosecutor's Office, which will follow up as appropriate (including by opening an investigation where the reported facts may constitute a crime).

### **Public disclosure**

Public disclosure is subject to stricter conditions and should only be considered in exceptional circumstances, where the reporter has reasonable grounds to believe:

- The situation poses an imminent or clear risk to the public interest;
- The concern cannot be effectively addressed even by reporting to external authorities, or there is a risk of retaliation even with external reporting; or
- Internal and external reports have been made, but no appropriate measures were taken within the expected timelines.

#### **Important:**

Sharing allegations with the media or on social media outside these exceptional circumstances may mean the person is not protected under the whistleblowing rules.



**03**  
Standards  
of Professional Conduct

**Bloq.it** expects everyone acting on its behalf to behave lawfully, ethically, and professionally. This means acting with honesty, fairness, and good judgment in every interaction, and protecting the company's interests and reputation.

#### **Comply with the law and internal rules.**

You must comply with applicable laws and regulations, and with Bloq.it's internal rules, policies, and procedures. Whichever is stricter, we follow it.

#### **Act honestly and in good faith.**

We act in good faith and with integrity. Do not misrepresent facts, omit relevant information, or distort data or records. We communicate accurately and meet our commitments – or raise issues early when we cannot.

#### **Act fairly and professionally.**

Treat others with respect and behave objectively, responsibly, and with common sense. Consider how your actions may affect customers, suppliers, colleagues, investors and shareholders, and the wider community.

#### **No unlawful instructions – and a duty to escalate.**

You must never ask someone to do something unlawful or inconsistent with this Code. If you are instructed to do so, or feel pressured to “cut corners”, you must stop and escalate the concern through your manager or a manager you trust, People, Legal, or the Whistleblower channel.

#### **Ask early when in doubt.**

If you are unsure how to act, seek guidance before proceeding. Asking early helps prevent harm and protects everyone involved.



**Bloq.it** has zero tolerance for corruption or any similar or related offense. We do not condone offering, promising, giving, requesting, accepting, or authorizing bribes, facilitation payments, or any other improper advantage – whether directly or through a third party.

### What this means in practice

- Never offer or accept anything of value to influence a decision, secure an advantage, or speed up a process.
- Do not use intermediaries (agents, consultants, suppliers, or partners) to do what you are not allowed to do yourself.
- Keep accurate and complete records – no “off-the-books” arrangements and no misleading descriptions of expenses.
- Gifts and hospitality can be acceptable in some social or business contexts, but only within reasonable limits and where they cannot influence (or appear to influence) a decision

**Follow Bloq.it’s rules regarding gifts, hospitality, expenses, and invitations on Bloq.it’s Anti-Corruption Policy, and seek approval where necessary.**

**Dealings with public officials and public entities and other high-risk situations require extra care.** This includes interactions linked to permits, inspections, customs, public procurement, and regulatory matters, as well as engagement with public entities outside a formal procedure (for example, to share information, contribute to consultations, or discuss draft rules). For these purposes, “public entities” includes state-owned or state-controlled companies and other bodies performing public functions.

Certain interactions with private-sector counterparties may also be high risk in the context of tenders and procurement processes.

These interactions may take many forms, including meetings or calls, written communications and position papers, participation in events or conferences, and contributions to public consultations.

Because these engagements may influence public decisions, they must be handled with extra care:

- Apply a strict approach to gifts and hospitality – never offer anything of value, directly or indirectly, without prior guidance and, where required, approval.
- Engage only if you are authorized and coordinate early with the Board of Directors and Legal when the interaction is sensitive or relates to public decision-making.
- Provide complete and truthful information; do not mislead by omission or selective framing.
- Never seek or accept an “inside track”, non-public information, or any advantage that could distort a fair process – except where the information is lawfully and formally made available to Bloq.it through the applicable procedure (for example, official clarifications or feedback provided in a tender process).
- Use appropriate channels and keep reasonable records of key interactions and materials shared (purpose, participants, and topics).

For detailed rules, thresholds, and processes, review [Bloq.it’s Anti-Corruption Policy](#)

### 3.3 Conflicts of interest and transactions with related parties

#### Conflicts of interest

A conflict of interest arises when personal interests, relationships, or outside activities interfere – or appear to interfere – with acting in **Bloq.it's** best interests. Conflicts can be **actual, potential, or perceived**. Even the appearance of a conflict can damage trust.

Disclosing conflicts early protects you and Bloq.it. It helps ensure decisions are fair, objective, and defensible – especially where hiring, performance, pay, promotions, supplier selection, or access to sensitive information are involved.

Personal relationships can be compatible with a healthy workplace – but they can also create conflicts of interest, perceived favouritism, discomfort for others, and legal risk. The key principle is simple: no one should influence decisions about someone they have a close personal relationship with, and no one should be put in a position where they feel pressured or treated unfairly.

#### Common situations of conflicts of interest

➤ **Supplier selection and management**  
selecting, negotiating with, or managing a supplier where you (or someone close to you) has a personal or financial interest.

➤ **Referrals and introductions**  
recommending a supplier or partner where you may benefit personally. Employee referrals are permitted under Bloq.it's referral program, provided the referral is made transparently and you do not take part in the related decision-making.

➤ **Hiring, evaluation, and supervision**  
recruiting, managing, or evaluating someone you have a close personal relationship with.

➤ **Personal relationships in reporting lines**  
romantic or close personal relationships that affect (or may affect) decision-making, supervision, or team dynamics.

➤ **Outside roles and activities**  
second jobs, advisory roles, or investments that may conflict with your duties at **Bloq.it**.

#### What to do:

**Disclose early**  
if you think a conflict may exist, raise it promptly with your Manager, People, or Legal.

**Do not decide alone**  
do not approve, negotiate, select, or influence outcomes where you have a conflict.

**Keep it updated**  
if circumstances change, disclose again.

**Bloq.it** may require additional safeguards or approvals depending on the situation. Always disclose early and follow the mitigation measures put in place.

For detailed rules and procedures, see the **Policy on Conflicts of Interest & Related-Party Transactions**.

In addition to the rules above on conflicts of interest, transactions involving related parties (e.g., shareholders, directors, officers, or their close family members or controlled entities) require heightened scrutiny and specific approvals to ensure they are fair, transparent, and in **Bloq.it**'s best interests.

For detailed rules and procedures, see the **Policy on Conflicts of Interest & Related-Party Transactions**.

### 3.4 Working conditions, non-discrimination, anti-harassment, health and safety

**Bloq.it** is committed to providing working conditions that are fair, dignified, safe, and healthy – physically, socially, and psychologically. We respect fundamental human rights and do not tolerate forced or compulsory labour, child labour, or any form of exploitation.

**Bloq.it** also aims to support personal and professional development. We seek to provide an environment where people can learn, receive feedback, and grow through fair performance management, access to relevant training, and opportunities to develop skills and take on responsibility – consistent with business needs and applicable rules.

Everyone is expected to contribute to a respectful workplace and to act in line with basic workplace etiquette. Detailed day-to-day rules (for example, office etiquette and local workplace arrangements) may be set out in internal regulations.



#### Non-discrimination and respect at work

**We treat people with respect and dignity and provide equal opportunities.**

**Bloq.it** rejects and condemns any kind or form of discrimination, including on the basis of sex, sexual orientation, age, disability, race, nationality, ethnicity, religion, political or ideological views, union membership, family circumstances (including pregnancy, maternity/paternity, parental status, and caregiving responsibilities), as well as economic status, social background, or any other personal characteristic or status beyond a person's work integrity and performance.

#### Zero tolerance for harassment and violence

**Bloq.it has zero tolerance for any form of harassment** (moral or sexual), bullying, threats, intimidation, or physical violence. Such conduct is never accepted, justified, or overlooked, and this standard applies at all levels of the organisation. This applies in any work-related context – office, warehouses, field work, business travel, events, and online.

Everyone has the right to work in an environment that respects dignity, equality, and professionalism. Any behaviour that undermines inclusion or creates an intimidating, hostile, degrading, humiliating, or destabilising environment is incompatible with our values.

Preventing and addressing harassment is a shared responsibility. Everyone is expected to act proactively, speak up, and report concerns. Managers have a heightened duty to lead by example and ensure concerns are handled promptly and appropriately.

Reports made in good faith – and participation in related assessments or investigations – are protected. Retaliation is prohibited and will be treated as a serious breach of this Code. See [Speaking up](#) for guidance on how to raise concerns and the protections in place.

For operational examples and reporting procedures, see the **Policy for the Prevention of Workplace Harassment**.

## Health and safety

**Bloq.it** complies with applicable occupational health, hygiene, and safety rules. Everyone is expected to follow the laws, regulations, training, and internal requirements that apply to their role and location.

**Bloq.it** aims to ensure that its activities do not compromise the health and safety of employees, contractors and subcontractors, operational partners, nearby communities, and users of our products and services. We take a preventive approach to risk and seek to eliminate hazards where possible and reduce risks where they cannot be eliminated.

- We will:**
- monitor the safety of our sites and activities, taking into account the specific risks involved;
  - implement appropriate health and safety management measures, supported by qualified professionals;
  - provide information, instructions, and training so people can work safely; and
  - maintain appropriate workplace conditions, including clean facilities and access to basic hygiene standards, where applicable to the site.

- Everyone must:**
- take reasonable care of their own health and safety and that of others who may be affected by their actions;
  - keep their work area in good condition and follow safe working practices;
  - use required protective equipment and controls, where applicable, and report hazards, incidents, injuries, and near misses promptly;
  - inform their manager or the responsible teams of any abnormal situation that could compromise the safety of people, facilities, equipment, or assets; and
  - if there is a serious or imminent risk, stop work and escalate immediately.

For operational requirements, see **Bloq.it's Health and Safety Policy** and the procedures that support it.

## Alcohol, drugs, and fitness for work

Being fit for work is essential, including when working remotely or in hybrid mode. You must not work while impaired by alcohol, recreational drugs, or any substance that affects your ability to work safely and professionally. Impairment can create a safety risk for you, colleagues, customers, and other third parties, and may also expose **Bloq.it** to legal, operational, and reputational harm.

Alcohol is not permitted during working time or while representing **Bloq.it**, except where explicitly approved for internal events or appropriate business hospitality with customers or partners. Recreational drugs are prohibited in any work-related context.

If medication may affect your ability to work safely, raise it confidentially with People (HR) or your manager so appropriate measures can be considered.

Working under the influence, or bringing/using prohibited substances in a work-related context, may be treated as serious misconduct and addressed under applicable local law and **Bloq.it's** disciplinary practices.

**Bloq.it** may also take appropriate steps, where lawful and proportionate, to address suspected substance-related safety risks and to investigate potential breaches of these rules.

### 3.5 Care of company assets and resources

**Bloq.it's** assets and resources support our work and our growth. We are all responsible for using them properly, protecting them, and reporting issues quickly.

Everyone is expected to use **Bloq.it's** physical and digital assets responsibly and **for legitimate business purposes only**. This includes, for example:

- equipment and devices (laptops, phones, badges, tools);
- premises and facilities (offices, warehouses, lockers, vehicles, where applicable);
- systems, accounts, credentials, and access rights;
- information, data, software, and intellectual property (IP).

We should all protect assets by following security requirements (e.g., strong authentication, secure storage, locking screens, and keeping devices updated) and by sharing access only on a need-to-know basis.

**It is strictly prohibited to misuse company assets or resources, such as, but not limited:**

- ↘ sharing passwords, access badges, or credentials, or allowing others to use your accounts;
- ↘ using systems to access, copy, or share information you do not need for your role;
- ↘ installing unapproved software or bypassing security controls;
- ↘ using company assets for unlawful activity, harassment, or other improper conduct;
- ↘ removing company property without authorisation or failing to return assets when required;
- ↘ using company funds, expense claims, or purchasing processes dishonestly.

Any loss, theft, damage, or suspected misuse of company assets should be reported immediately.

**Bloqstars are expected to take reasonable care of company equipment and other assets in their possession. Where company assets are lost, damaged, or misused due to an employee's fault (including negligence), the company may require the employee to reimburse the reasonable cost of repair or replacement, as applicable and to the extent permitted by law and company policy.**

For detailed rules and procedures, see **Bloq.it's Information Security** policies, in particular the **Acceptable Use Policy**.

### 3.6 Confidentiality and information handling

**Bloq.it's** work depends on trust. We must protect confidential information belonging to **Bloq.it** and to others who rely on us (customers, partners, suppliers, and employees). This means protecting information against unauthorised access, loss, misuse, or improper change – and ensuring it remains available to those who need it for legitimate work.

When handling Bloq.it information, follow the Information Classification Policy. In practice, that means:

- checking the classification on the document or information asset and handle it accordingly;
- treating it as “Internal Use Only” if there is not explicit classification;
- not sharing or publishing information unless it has been explicitly approved for external sharing.

#### **Need-to-know and least access**

Access and share confidential information only when there is a legitimate business need. Use the minimum access and disclosure required to do your job. Do not access information out of curiosity.

## Handling and sharing

When handling confidential information:

- use only approved tools, channels, and storage locations;
- apply appropriate safeguards based on sensitivity (e.g., restricted access, secure sharing settings, password protection where required);
- keep information accurate and controlled – use the right version and avoid unauthorised changes;
- avoid discussing confidential matters in public places or where you can be overheard, and protect screens and printed documents from casual viewing;
- share with third parties only when authorised and subject to appropriate safeguards (e.g., NDA and contractual protections) and make sure to remove any accesses or demand the return or destruction of the information when the sharing no longer is needed;
- do not copy, export, or transfer company information to personal accounts, personal devices, or unapproved platforms; and
- follow all cybersecurity Policies, rules and recommendations (**Cybersecurity**).

## Retention and secure disposal

Keep information only as long as needed for legitimate business purposes and in line with retention rules. Dispose of information securely, in line with its classification (as detailed in **Bloq.it's** Information Classification Policy).

## Reporting concerns

If you suspect information has been lost, accessed improperly, or shared by mistake, report it promptly through the appropriate internal channels (including the Security Team's processes where applicable).

For detailed requirements on tools, access, devices, remote work, and incident reporting, consult the **Information Security** policies.

### 3.7 Data protection and privacy

**Bloq.it** is committed to protecting personal data and respecting privacy. Personal data includes any information relating to an identified or identifiable person (for example, employees, customers' employees or legal representatives, and end users). Data protection is a legal obligation and a key part of the trust others place in **Bloq.it**.

For any questions related to data protection, contact **privacy@bloq.it**.

## Core principles regarding personal data

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### Use data lawfully and fairly

only process personal data for legitimate business purposes and in line with applicable rules and internal guidance.

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### Use the minimum necessary

collect, access, and share only what you need to perform your role, and only with people who have a legitimate need-to-know.

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### Keep it accurate

do not knowingly use outdated or incorrect personal data.

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### Protect it

apply appropriate security measures and follow internal security requirements.

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### Limit storage

keep personal data only as long as necessary and in line with retention rules.

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Personal data must be handled in line with the confidentiality, information-handling, and security requirements set out in [Confidentiality and information handling](#) and [Cybersecurity](#). If you are unsure whether a tool, export, or sharing method is permitted, stop and ask before acting.

### Reporting incidents

If you suspect a personal data breach (for example, data sent to the wrong recipient, lost devices, unauthorised access, or accidental publication), report it immediately by submitting the Incident Report Form (available [here](#)) or emailing [security@bloq.it](mailto:security@bloq.it). Fast reporting allows **Bloq.it** to protect people and meet legal response deadlines.

### 3.8 Cybersecurity

Cybersecurity is essential to **Bloq.it**'s business, its operations, and its long-term sustainability. A security incident can harm customers and partners, disrupt operations, and expose **Bloq.it** to legal and reputational risk.

**Everyone has a role in protecting Bloq.it's systems and information. At a minimum, you are expected to:**

- ↘ Use strong authentication – keep passwords strong and unique, use multi-factor authentication (MFA) where required, and never share credentials.
- ↘ Be alert to phishing and social engineering – verify unexpected requests, links, attachments, payment or bank detail changes, and any message that creates urgency or pressure.
- ↘ Protect devices and access – lock screens, keep devices under control, use only approved devices and storage where required, and do not bypass security controls.
- ↘ Use secure remote access – follow remote access requirements and use approved tools and connections when working remotely or travelling.
- ↘ Keep software updated – apply updates and security patches promptly and do not disable protective settings.

### **Reporting incidents and near misses**

Report suspected security incidents and near misses promptly, even if you are not sure. Early reporting helps limit harm and supports legal and operational response requirements. Report by submitting the Incident Report Form (available [here](#)) or emailing [security@bloq.it](mailto:security@bloq.it). Examples include lost or stolen devices, suspicious emails, unexpected account activity, malware alerts, accidental data sharing, or any suspected unauthorised access.

For detailed rules, tools, and procedures (including incident response), consult the **Information Security** policies.

### **3.9 Use of AI Tools**

AI tools can improve productivity, but they can also create confidentiality, privacy, and security risks if used carelessly. When using AI tools for work:

#### **Use only approved AI tools and accounts**

do not use personal or unapproved tools for **Bloq.it** work.

Do not input or upload Confidential or Internal Use information, personal data, source code, credentials, security details, customer/partner data, or any other non-public information unless you have explicit approval and the tool is approved for that type of data.

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#### **Treat AI output as untrusted**

verify accuracy before using it, especially for legal, technical, security, financial, or customer-facing content.

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#### **Be alert to prompt-injection and data leakage**

do not follow instructions from AI output that ask you to disclose secrets, change controls, or run commands without verification.

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#### **Protect secrets**

never paste passwords, API keys, tokens, or access links into AI prompts.

### 3.10 External communications and social media

Social media and external communications can help strengthen **Bloq.it**'s reputation – but they can also create legal, confidentiality, and brand risks if handled carelessly.

Use good judgment and think before you post or speak, even in a personal capacity, following the rules below.

#### **Speaking on behalf of Bloq.it**

Only authorised persons may speak on behalf of **Bloq.it** or represent the company's official position. If you are contacted by a journalist, media outlet, or any external party seeking an official comment, do not respond on behalf of **Bloq.it** – redirect the request to the Marketing team (marketing@bloq.it).

Any invitation to speak at public events or contribute content (including written publications) in your capacity as a **Bloq.it** representative must be shared in advance with your manager and cleared by Marketing. Materials that refer to **Bloq.it** (slides, talks, interviews, panels) should be reviewed where appropriate before public disclosure.

#### **Accuracy and confidentiality**

When communicating externally (including online):

- be accurate and do not mislead by omission or exaggeration;
- share only information that is public and approved for external use;
- protect confidential information, personal data, and security-sensitive details; and
- follow brand guidelines when using **Bloq.it**'s name, logo, or visuals.

No partnerships, customers, deals, incidents, financial information, or internal matters should be disclosed without proper authorisation.

#### **Political neutrality**

**Bloq.it** is politically neutral. No person may suggest, directly or indirectly, that **Bloq.it** supports or opposes any political party, candidate, or campaign, or that the company endorses your personal political views. When engaging in political activity personally, do so on your own time and without using **Bloq.it** resources or branding, and where appropriate, make clear that your views are your own and do not represent or bind **Bloq.it** in any way.

#### **Social Media**

Personal social media of **Bloq.it**'s personnel can be a positive channel to share pride in our work. However, **Bloq.it**'s reputation, brand, and confidential information must be protected when using social media.

## ⊗ **DON'T**

**post, send, forward, or share anything that could:**

- ↘ be offensive, bullying, intimidating, or discriminatory;
- ↘ violate someone's privacy (a person or a business);
- ↘ be unlawful;
- ↘ include confidential information (e.g., non-public strategy, figures, customer details, product roadmaps, internal documents, security matters, or incidents);
- ↘ or damage your reputation, Bloq.it's reputation, or a partner's reputation.

## ⊗ **DON'T**

**create a social media account in Bloq.it's name or use Bloq.it branding in a way that suggests an official channel, unless authorised.**

## ☑ **DO**

**think before posting. If you are unsure whether something is appropriate, do not post – ask for guidance.**

If you become aware of derogatory or offensive posts about **Bloq.it**, flag them to Marketing. If the media contacts you about social media content, redirect the request to Marketing as well.

### **Sustainability claims**

When communicating externally about sustainability (including marketing materials, tenders, customer proposals, or public statements), we must be accurate, specific, and able to substantiate what we say.

Avoid vague or unverified “green” claims, exaggeration, or selective framing. If you are unsure whether a sustainability claim is appropriate, stop and ask – coordinate with the Sustainability team and, where needed, Legal and Marketing before publication.

#### **3.11** Charities, donations and volunteering

**Bloq.it** supports giving back to the communities where we operate. At the same time, charitable giving and volunteering can create legal, tax, and reputational risks if not handled carefully – especially where donations could be perceived as a way to influence decisions or obtain an improper advantage.

This section should be read together with **Bloq.it's** Anti-Corruption Policy (including rules on gifts, hospitality, and advantages).

## Personal volunteering and donations

Bloqstars are welcome to support charities or volunteer in a personal capacity. If you do so, you must do it in your own name and not on behalf of Bloq.it.

Do not use Bloq.it branding, email signatures, titles, or company channels in a way that implies Bloq.it sponsorship, endorsement, or responsibility, unless you have prior written authorization.



## Corporate donations and company-supported initiatives

**Bloq.it** may make charitable donations or support volunteering initiatives only where the recipient organization and the initiative have been validated and approved in advance. As a baseline, **Bloq.it** will only consider support where:

- The organization's purpose and conduct are compatible with Bloq.it's values;
- Appropriate due diligence is completed (including verification of the organization's legal status and legitimacy, ownership/control where relevant, and basic sanctions and integrity checks);
- Finance team is involved to assess budget availability, accounting treatment, and tax implications (including whether the organization has an appropriate charitable status in the relevant jurisdiction, where applicable);
- The approval process is followed (including the required internal approvals); and
- The recipient can issue proper documentation for the contribution (for example, a receipt or equivalent evidence of donation).

Any donation or company-supported volunteering initiative requires prior approval by the CEO, with Finance involvement and Legal review where appropriate.

A modern office interior featuring a grid of glass panels. A sign with the word 'NEXT' is visible on the right side. The lighting is dim, with a blue glow from the right.

## 04

# Commitments to other stakeholders

## 4.1 Sustainability and environmental responsibility

**Bloq.it** is committed to building a sustainable business model that minimises environmental impact and supports long-term value creation. We integrate environmental responsibility into how we design, operate, and scale.

**We comply with applicable environmental requirements and expect everyone working on behalf of Bloq.it to act responsibly in their day-to-day work, including by:**

- using resources efficiently and avoiding unnecessary waste;
- following site rules for sorting, storage, and disposal of waste and materials;
- preventing pollution and environmental harm where our activities may have an impact;
- and raising concerns early when something may cause environmental harm or does not align with our commitments.

For detailed requirements, see **Bloq.it's Sustainability Policy** and the procedures that support it.

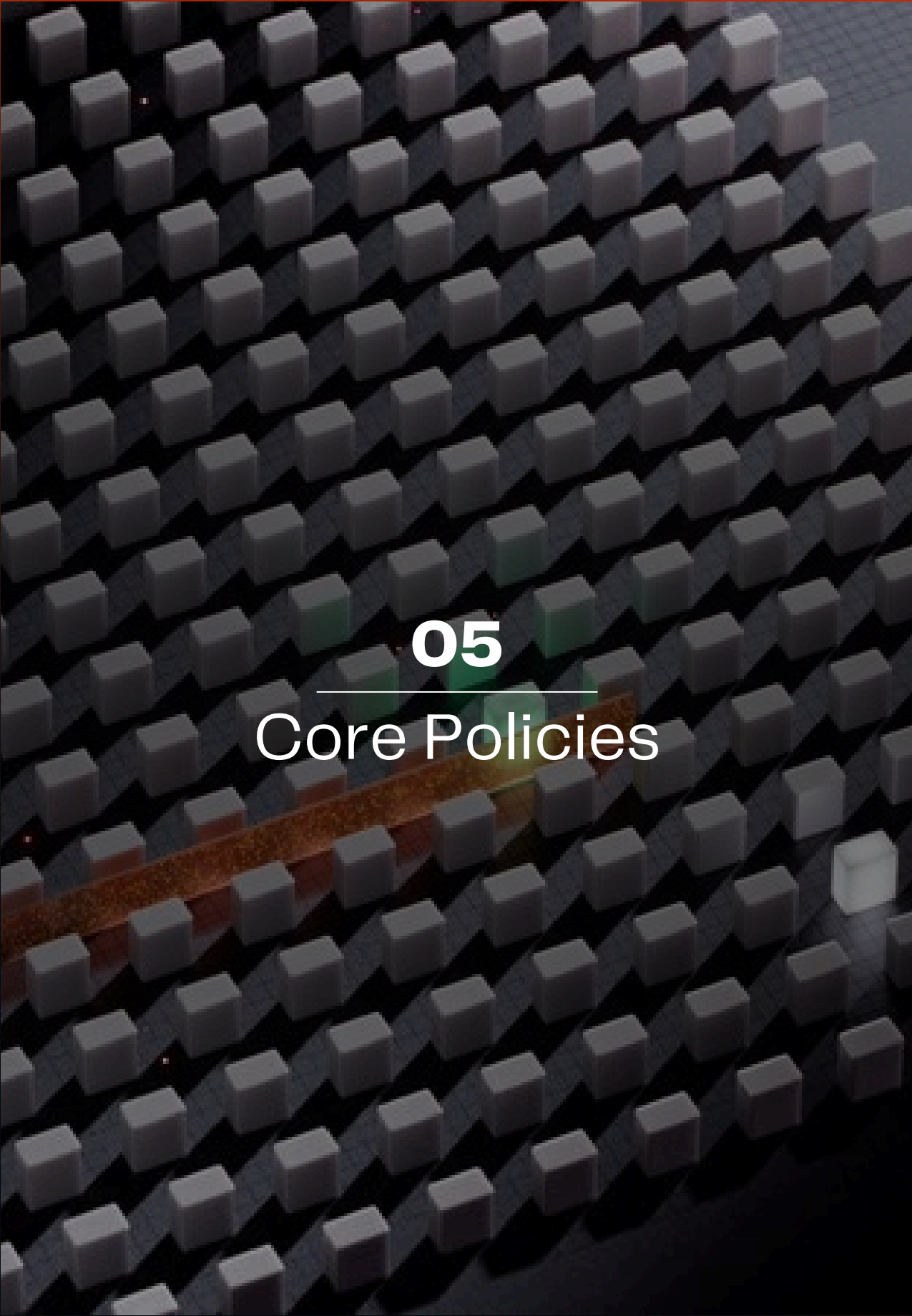
## 4.2 Responsible sourcing and suppliers

**Bloq.it** expects integrity and responsible practices throughout its supply chain. We choose and work with suppliers, contractors, and business partners based on quality, reliability, and lawful, ethical conduct – not on improper advantages or shortcuts.

When selecting and managing suppliers, we act fairly, transparently, and in **Bloq.it's** best interests. This includes appropriate due diligence and ongoing oversight proportionate to the risk and the nature of the relationship.

Suppliers and other third parties working for or with Bloq.it are expected to:

- Comply with applicable laws and contractual obligations;
- Respect fundamental labour standards, including fair working conditions and a strict prohibition of forced labour, slavery, and child labour;
- Follow health and safety requirements and avoid practices that could cause harm;
- Comply with anti-corruption expectations, including rules on gifts, hospitality, and improper advantages;
- Protect confidential information and personal data shared with them; and
- Cooperate with reasonable requests for information, audits, or corrective actions where required.



**05**

Core Policies

This Code sets common principles and baseline expectations. More detailed rules are set out in **Bloq.it's** policies and procedures, which must be followed where applicable to your role.

All policies and procedures can be found in **Bloq.it's** [Integrated Management System](#) (IMS).

Below is a non-exhaustive list of key policies and procedures that support this Code and provide more detailed rules:

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↘ **Anti-Corruption Policy**

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↘ **Conflicts of Interest & Related-Party Transactions Policy**

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↘ **Policy for the Prevention of Workplace Harassment**

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↘ **Health and Safety Policy**

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↘ **Sustainability Policy**


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↘ **Security Policies:**

- Acceptable Use Policy
- Access Control Policy
- Asset Management Policy
- Information Classification Policy
- Information Security Policy
- Information Security Risk Management Framework
- Mobile Device Policy
- Remote Working Policy
- Secure Software Development Policy
- Security Incident Response Plan

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**This list will be updated regularly. Please revisit it frequently.**



# 06

## Consequences of breaches

Breaches of this Code, or of the policies and procedures that support it, may constitute misconduct and may result in legal action by **Bloq.it**. Any measures taken will follow applicable local law and **Bloq.it**'s internal practices.

Depending on the circumstances, a breach may include guidance, training, remediation, process changes, formal warnings or, in case of **Bloq.it**'s employees, disciplinary measures, including termination of employment, and recovery of losses where appropriate.

In some cases, **Bloq.it** may be required – or may consider it appropriate – to involve competent external authorities. This may include situations involving suspected criminal conduct, serious safety or environmental incidents, significant data/security incidents, fraud or corruption, or when responding to lawful requests from authorities.

# 07

## Effective date, monitoring and review

This Code enters into force on July 1, 2026 and will be monitored to ensure it remains effective, practical, and aligned with **Bloq.it**'s risks, operations, and legal obligations.

The Code shall be reviewed yearly and also when needed, including following:

- material changes in applicable law or regulatory expectations;
- significant incidents, complaints, or substantiated breaches;
- audit findings or control weaknesses;
- major changes to **Bloq.it**'s business, footprint, or operating model; or
- updates to key supporting policies.

Legal is responsible for coordinating implementation, monitoring, periodic review, as well as training and awareness, in collaboration with relevant functions (including People, Security, and other policy owners).

