

Code of Conduct

A message from our CEO

At Appen, our reputation is built on the trust and respect we earn from our customers, partners, and each other. Our commitment to ethical behaviour, integrity, and accountability is the foundation of everything we do. This Code of Conduct (Code) reflects our shared values and principles. It serves as a guide to help us make decisions and take actions that align with our mission and culture.

As we navigate complex challenges and opportunities, this Code will help us maintain our ethical standards and foster a positive work environment. If you ever face uncertainty or ethical dilemmas, remember that support is always available – reach out to your colleagues, manager, or other resources provided in this Code.

The Code of Conduct defines the principles that guide our behaviour, choices, and actions. However, it's up to all of us to bring those principles to life and make them meaningful through our actions.

Ryan Kolln

Our Expectations

Outlined below are our expectations of all directors, officers, employees, interns, contractors, and consultants.

1. Compliance with Policies, Laws, and Regulations

We adhere to all company policies, procedures, and guidelines, and comply with all legal and regulatory requirements.

This includes:

- Completing mandatory training via Appen University,
- Ensuring understanding and compliance to customer requirements for accounts and projects, and
- Reviewing our policies and seeking clarity if aspects of this Code or any of our policies are unclear or additional guidance is required.

2. Personal and Professional Conduct

We are expected to conduct ourselves in a professional manner whether in-person, online, or through any form of communication. This includes:

- Communicating clearly and professionally with colleagues, clients, and partners and treating all individuals with respect and dignity, and
- Caring about the reputation of Appen, so when we release information about Appen, we do so responsibly. We ensure that communications are accurate, and do not breach any

confidentiality or privacy considerations. Only certain employees are authorised to make public statements.

3. Integrity and Fair Dealing

We conduct business in an honest, ethical, and transparent manner. Fair dealing and ethical conduct should guide all interactions, including with our customers, suppliers, competitors, employees, and contractors. This includes:

- Ensuring that all business communications and transactions are truthful, accurate, and not misleading.
- Not engaging in anti-competitive practices, including price-fixing, market allocation, or other forms of unfair competition, and seeking advice before dealing with any competitor.
- Respecting the intellectual property rights of others, including patents, trademarks, and copyrights, and protecting the Company's own intellectual property.
- Avoiding any situation where our personal interest's conflict or appear to conflict with the interests of Appen. A conflict of interest can arise in situations where personal, familial, or financial interests interfere with your duties to the Company. We disclose any potential conflicts to management.
- Never making or receiving improper payments, benefits or gains. Always dealing ethically.
- Not buying or selling shares in Appen at any time when you are aware of non-public market sensitive information about Appen or another company. Note that insider trading is illegal.

4. Health, Safety, and Well-being

We are committed to providing a safe and healthy work environment for all.

We are all responsible for adhering to all safety protocols and reporting hazards or unsafe conditions. We are focused on promoting a supportive culture where physical and mental wellbeing are valued. This includes:

- Following all applicable health and safety guidelines and reporting any potential risks immediately.
- Seeking help via leaders, the HR Team, or EAP, if anyone is facing stress, burnout, or other personal challenges.

Appen does not require pregnancy or medical tests, except where required by relevant laws or regulations, including for workplace safety, and will not improperly discriminate based on test results.

5. Respect and Inclusivity

We are committed to communicating professionally and fostering a workplace that is inclusive, diverse, and free from discrimination and harassment. This includes:

- Embracing diversity and creating an environment that encourages diverse perspectives, innovation, and equitable opportunities.
- Not engaging in any form of harassment or discrimination based on race, colour, gender, sexual orientation, religion, disability, age, or any other characteristic protected by law.

6. Protection of Company Assets

We are entrusted with Company assets, including financial resources, proprietary information, and intellectual property. These assets should be used responsibly and for business purposes.

This includes:

- Not using Company resources for personal gain or for activities unrelated to Company business.
- Safeguarding confidential information by maintaining the confidentiality of sensitive information, including trade secrets, customer data, financial records, and proprietary software, both during and after employment.
- Treating personal information in accordance with Appen's privacy policy and the law.
- Adhering to all cybersecurity protocols and best practices to protect the Company's digital assets and systems.

7. Environmental, Social, and Governance (ESG) Responsibility

We are committed to operating in a socially responsible manner with regards to environmental impact, human rights, and ethical governance practices. This includes:

- Actively seeking to minimise the environmental impact of Appen's operations, products, and services.
- Upholding human rights, labour standards, and ethical practices in all areas of operation, including the supply chain.
- Promoting ethical governance practices and transparency in decision-making processes.

The quick conduct test

Reflecting on a few questions can often help determine if extra caution is needed in our actions. If you find yourself answering "no" to any of these integrity checks, it may signal a potential violation of our Code.

- Is this the right thing to do for Appen?
- Is this behaviour in line with our policies?
- Would I be comfortable telling my family about this or seeing it in the media?

Speaking up and getting support

We all share a responsibility to ensure our behaviours and actions are in accordance with the Code of Conduct. Speaking up when we are in doubt about a situation or when we suspect that there may be a breach is vital to maintaining our values and reputation.

When to speak up:

- If you witness or suspect misconduct, such as fraud, harassment, discrimination, or policy violations.
- If you are unsure about the ethical implications of a decision or action.
- If you have concerns about the fairness or legality of workplace practices.

If you have questions or concerns you can always contact your manager, Chief People Officer, a member of the executive team/ELT, General Counsel and Company Secretary, or the CEO directly.

Appen also has a dedicated, secure online portal called Speeki which you can use any time, 24/7, to report concerns. You can report a concern in the following ways:

- Anonymous web reporting via Speeki at <https://appen.report.speeki.com/>.
- Via the Speeki app which can be downloaded from the Apple store or Google Play for use on an iPhone or Android phones (search for 'Appen' in the app).
- Speak with an officer, director, the company secretary, or a member of the executive team at Appen.
- Speak with Appen's external auditor (currently KPMG).

Our Whistleblower Policy provides further information on the types of concerns that should be raised and how we will support individuals who may have concerns regarding retaliation for raising issues.

By adhering to this Code of Conduct, we ensure that our actions align with our company's mission and values, creating a safe and productive environment for all.

Failure to comply with the Code may result in disciplinary action up to and including termination. Appen prohibits any form of discipline, reprisal, intimidation, or retaliation for the good faith reporting of a potential violation of this Code.

This policy will be reviewed on an annual basis by the People & Culture Committee to ensure it remains appropriate to the business, and amendments approved by a resolution of the Board.

Related policies

- Continuous Disclosure Policy
- Diversity, Equity and Inclusion Policy
- Securities Dealing Policy

Reviews

Date	Change/s	Approved by	Next Review Date
12 February 2025	Policy Updated	Board 25 February 2025	February 2026
14 November 2025	No changes	P&C Committee November 2025	November 2026