

XR EXTREME  
REACH

XR

# Code of Conduct.

November 2025

XR

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# A Message from Our CEO.

At XR, we believe doing the right thing is not just a principle — it's a practice. Our Code of Conduct is here to help guide that practice. This document isn't about rules for the sake of rules. It's about clarity. It's about trust. And it's about making sure we all have a shared understanding of what it means to act with integrity, no matter where we sit in the business.

We're at an exciting moment in XR's journey. The opportunity ahead of us is real, and our ability to capture it depends on how we execute together. That means holding ourselves to high standards, not just in the services we deliver but in how we deliver them. Our culture, our values, and our commitment to each other are what make this company special. They're also what will power our next phase of growth.

At the heart of that growth is our ability to deliver for our customers. XR powers more assets than any other platform in the world. Our distribution network is unmatched. The intelligence we provide helps our customers activate smarter, maximize their investments, and drive meaningful results. That's our edge — and it's built on the capabilities and integrity of our employees.

This Code is a reflection of our commitment to the marketplace, to our customers, and to each other. All employees are expected to understand it, uphold it, and apply it in their day-to-day work. It's how we protect our culture and deliver on our promise, together. Just as important, this Code reinforces our commitment to creating a workplace where people feel safe, respected, and heard. Not everything will always go perfectly, and that's okay.

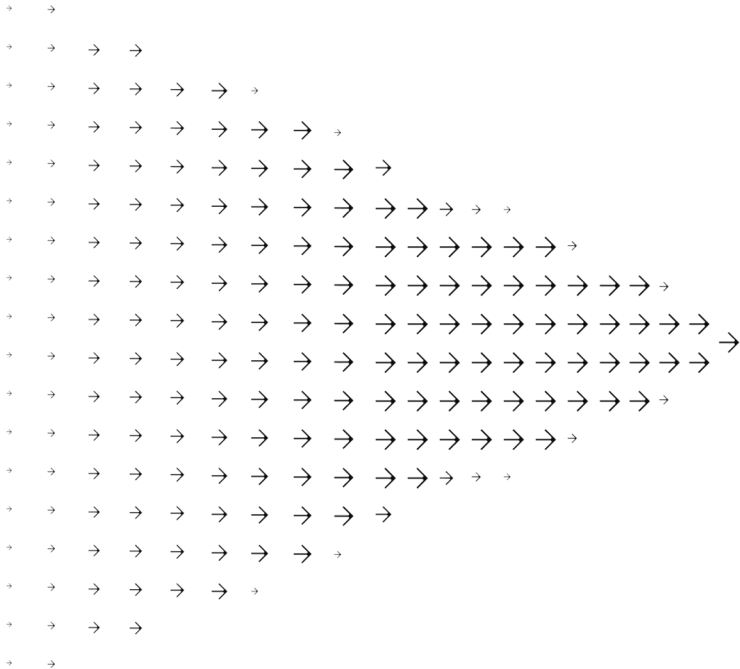
What matters is how we respond. If something doesn't feel right, we speak up and address challenges with empathy and accountability.

Thank you for everything you do to make XR what it is and what it's becoming.

**John Batter**  
**Chief Executive Officer**



Our Code.



# Our Code.

The XR Code of Conduct (the “Code”) sets out XR’s standards regarding integrity and ethics and serves as a guideline for all XR team members around the world to ensure we do the right thing for all our stakeholders: our team members, customers, XR and our communities.

## WHO DOES THE CODE APPLY TO?

The Code applies to the global XR group of companies (together referred to as ‘XR’) and all XR team members. Any reference to “team members” in this Code refers to all employees of XR, without exception. This includes all members of the executive team, managers, directors, interns, remote workers, part-time and full-time employees. We expect our contractors and business partners to adhere to the principles of this Code and/or to follow standards equivalent to those set out in this Code.

## WHAT HAPPENS WHEN OUR CODE IS VIOLATED?

In the event of a violation of the Code, the company may take disciplinary measures in accordance with applicable law. These measures may include mandatory training or mediation, as well as issuing formal warnings or termination of employment. Furthermore, in the case of suspected or proven illegal activities, XR may refer the matter to the appropriate authorities or pursue civil remedies.

## GLOBAL GUIDELINES

The Code includes global guidelines and defines the basic norms and values that we expect our team members to adhere to. As laws and regulations vary across different markets, specific rules and guidelines regarding local practices, workplace conduct, and employment law may be captured in local handbooks or guidelines. Please reach out to your manager or your People Team to understand whether there are additional policies that apply to you and your employee experience.

In case of conflict between applicable law and this Code, the applicable law will supersede the Code. If any provision of the Code is invalid in a particular jurisdiction, the provision will not apply, but should be interpreted as similar as possible to such provision to the fullest extent permitted by law. All other provisions of this Code will continue to apply in full effect. Nothing in this Code is intended to restrict any rights that our employees have under applicable law. If further clarification or interpretation of the policies in this Code is needed, please contact your manager or the People Team.

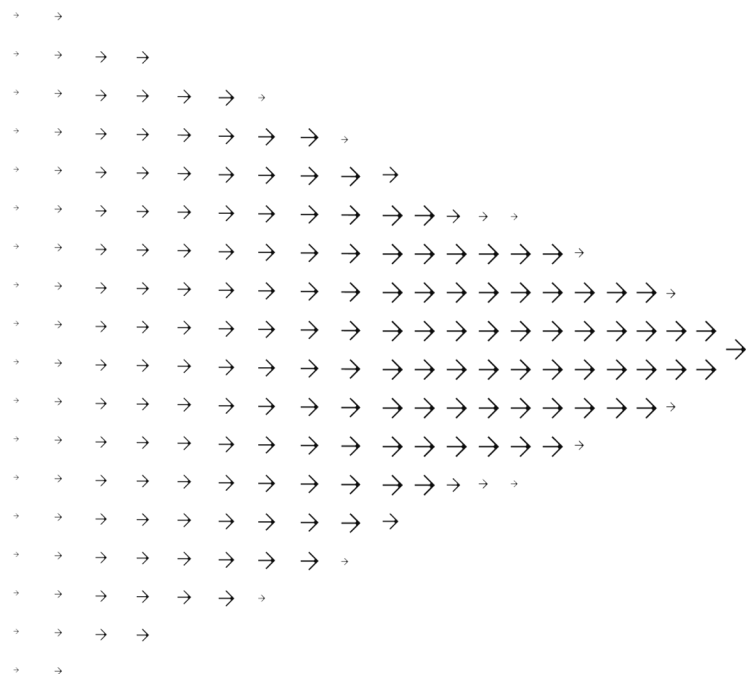
## EXEMPTIONS

Any exceptions to or waivers of this Code or parts hereof, other than required for compliance with mandatory law, must be formally requested with the People Team, and will be subject to review and approval by a member of the Legal Team. In case of a conflict between the terms of your employment agreement with XR and this Code, the terms of your employment agreement will take precedence.

## UPDATES

This Code will be subject to periodic reviews and may be cancelled, revised or replaced by XR at its sole discretion. This version of the Code supersedes and replaces all previous versions. This updated Code reflects our annual review process and includes general updates. No material changes have been made to the substance of the Code compared to the previous version.

## Our Responsibilities.



# Our Responsibilities.

As members of the XR team, we uphold the values that define our company. We are committed to doing the right thing by following this Code and all XR policies.

By adhering to this Code, we ensure:

- Integrity in our decision making
- Compliance with applicable laws and regulations in all jurisdictions where we operate
- Ethical conduct in all our business dealings
- Respectful treatment of our team members
- A safe, healthy and positive work environment
- To avoid conflicts of interest
- Confidentiality and security of XR information and the information of our business partners

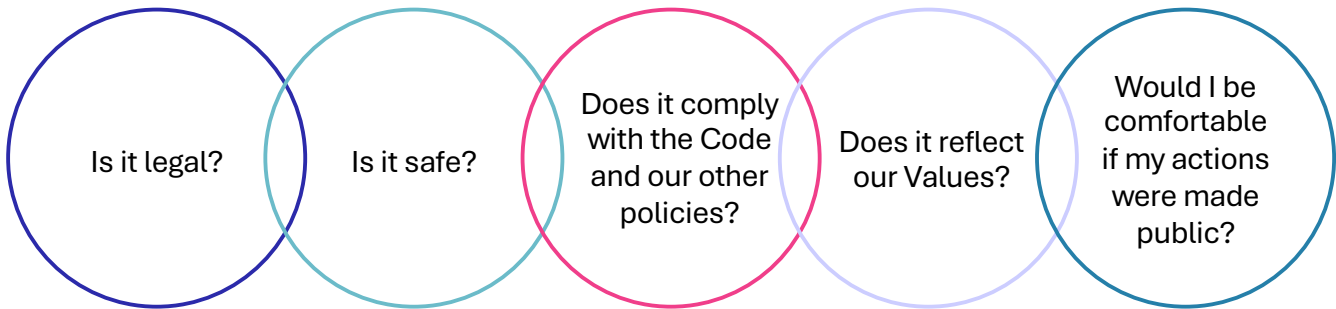
## XR POLICIES

All XR policies and procedures are available through internal and, where applicable, external-facing resources. If you are unsure where to access a specific policy or need assistance locating it, please contact the People Team or Legal Team, who can provide the relevant documents upon request.

Contact details can be found in the CONTACTS section at the back of the Code.

# Making the Right Decision.

Sometimes we face difficult situations where the right choice isn't clear. When you are in doubt about a decision or activity, ask yourself:



If you answer 'yes' to all of these questions, it's probably OK to proceed. If you answer 'no' or 'I'm not sure' at any point, stop and ask advice from your manager, the People Team, the Legal Team or use Your Voice on Bob. This will help you review the situation and make the right decision. Contact details can be found in the CONTACTS section at the back of the Code.

## RAISING CONCERNS

At XR, we value transparency, accountability, and integrity. We expect all team members to do the right thing and encourage employees to speak up if they suspect a violation of this Code or other company policies, without fear of retaliation.

We are committed to an environment where open communication is the expectation, not the exception. When one employee fails to follow our Code or ignores someone else's failure to follow the Code, it can negatively impact all of us. By speaking up, we protect the Company and its reputation.

### OWN YOUR ACTIONS

*What should I do if a coworker asks me to do something I think may be unethical, against policy or unlawful?*

- Refer to the Code
- Use your best judgment and uphold XR's ethical standards
- Report any violation of the Code
- Seek advice if you have questions

Contact details can be found in the CONTACTS section at the back of the Code.



# Reporting Channels.

It may take courage to speak up and report a suspected violation, but it is the right thing to do. The company will always support and protect individuals that speak up. There are various ways to report concerns:

## YOUR MANAGER

Team members can report concerns to their manager. Managers are responsible for addressing employee concerns and escalating issues as needed. If you are not comfortable speaking or reporting to your immediate manager, you can reach out to a line manager or report via one of the channels listed below.

## YOUR PEOPLE TEAM

You can reach out to our People Team to report concerns or request any assistance in addressing workplace issues. Please reach out to your country's dedicated People Team contact.

## XR LEGAL TEAM

Team members can also report concerns directly to the Legal Team and are advised to do so in case of suspected violations of laws or regulations.

## BOB: YOUR VOICE (option for anonymous reporting)

You can also report using our online portal, Your Voice. Although we encourage team members to identify themselves, you can report any concerns or suspected violations of this Code anonymously through [Your Voice](#). Issues logged through Your Voice portal are hosted on the Bob site and are only accessible to the People Team, Legal Team, or an external party if necessary.

# Investigating Reports.

We take any report seriously. Following a report, senior members of the People Team and/or Legal Team will perform an initial assessment to determine the best course of action and whether a broader investigation is needed. In most cases, the reporter will be contacted for additional information.

Any investigation will be performed in an objective manner by members of the People Team and/or Legal Team, who will gather facts through interviews and will review relevant documents. All employees who are requested to cooperate or share information as part of an investigation are expected to comply. Failure to do so, or any attempt to hinder or obstruct an investigation, may result in disciplinary action by the company.

XR will always aim to protect and keep confidential the identity of the person that has made a report and of the individuals who participate in an investigation. Unless required by law, it is at XR's discretion whether it shares the results of an investigation with the person who raised the concern.

## NO RETALIATION

The company strictly prohibits any retaliation against team members who report a potential violation or cooperate with an investigation in good faith, regardless of whether the company finds any violation. This means that no employee will be demoted, reassigned, fired or mistreated in any way for reporting a potential violation.

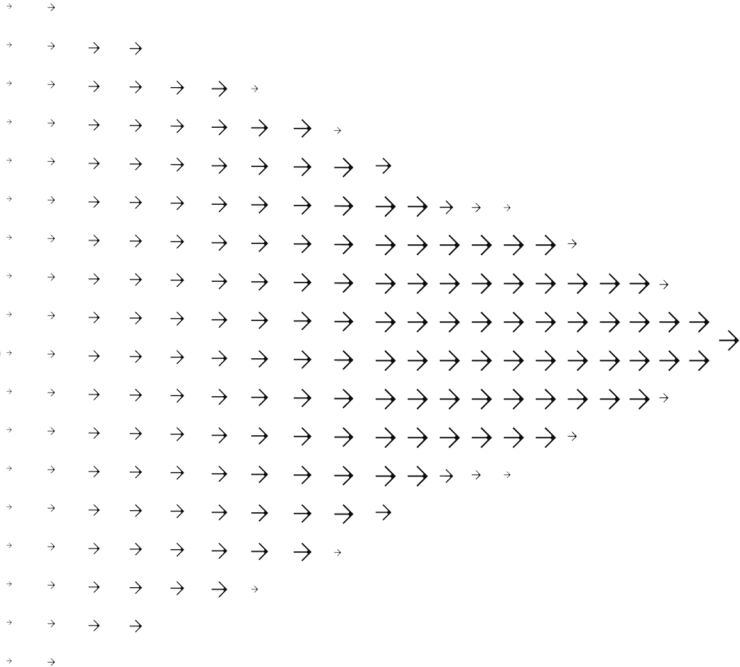
If you believe that you or someone else has been retaliated against for raising a concern or participating in an investigation, please report this in accordance with the Code. The foregoing protection only applies if reporting is done in good faith. Anyone found to have deliberately made false accusations will be subject to disciplinary action.

### OWN YOUR ACTIONS

*What if I report a concern and I'm wrong? Will I get in trouble?*

No. You will never get in trouble for reporting a concern in good faith – meaning you provide information with an honest belief that it's accurate. That's why we conduct investigations. Always speak up if you believe you have a valid concern.

Integrity in Our Teams.



# Own Your Actions.

## ACT WITH INTEGRITY

Always use your best judgement and act in accordance with this Code in all of your actions, interactions and decisions. Together, we protect the reputation and brand of the company.

Be honest and straightforward with each other and with our business partners.

## ACT WITH RESPECT

Contribute to a safe and healthy working environment: XR is a safe place to work for everyone. We are committed to the health, safety and wellbeing of our team members. We promote an environment of respect, where everyone is free to be themselves, and we trust all of our team members to contribute in a positive manner.

Be thoughtful and respectful to each other.

## STRIVE FOR GREATNESS

Together, we help the company grow.

Look for opportunities to innovate our products, grow our business, partner with new clients, and win in the marketplace.

## ACT LAWFULLY

We comply with all applicable laws.

If you have any questions regarding laws or regulations applicable to our business, products or offices, please reach out to a member of the People team or the Legal Team.

## ACCEPT ACCOUNTABILITY

We trust in each other's capabilities and accept accountability for the work that we do.

We lead by example, take credit for our successes, and own up to our failures. In case of a breach of our principles or this Code, we report it in accordance with the Code.

# Human Rights.

XR follows and complies with all internationally recognized human rights standards, including:

- The United Nations Guiding Principles on Business and Human Rights
- The Universal Declaration of Human Rights
- The International Labour Organization (ILO) Core Conventions
- The OECD Guidelines for Multinational Enterprises

## DIVERSITY & INCLUSION

We have a company culture that is diverse, equitable and inclusive, which allows us to provide the highest level of service to our diverse and global client base. We embrace and celebrate the unique traits of all XR team members.

We believe that workforce diversity is essential to our company's long-term success. XR is committed to the principle of equal employment opportunity, and applicants for employment or internal promotions are reviewed on their individual qualifications for a position, and never on the basis of discrimination, favoritism, or nepotism.

Any actions pertaining to the recruitment, hiring, compensation, terms and conditions, career advancement and benefits of employment are based on each individual's qualifications and without consideration of age, color, ethnicity, nationality, gender, sexual orientation, disability, religion, pregnancy, or any other factors.

If you have any questions regarding our commitment to diversity or wish to contribute to our D&I initiatives, reach out to the XR D&I committee:

[dei-committee@extremereach.com](mailto:dei-committee@extremereach.com)

# Anti-Bullying and Harassment.

Everyone has the right to be treated with respect and dignity. XR is committed to providing a work environment free from bullying, harassment, and discrimination.

## Examples of unacceptable behavior include:

Physical intimidation

Sexual harassment

Racist comments or behaviors

Derogatory comments or insults

Violent or abusive behavior

Inappropriate jokes

XR does not tolerate any form of unlawful discrimination. You must not discriminate against anyone on the basis of age, color, ethnicity, nationality, gender, sexual orientation, disability, religion, or any other basis.

All team members are responsible for ensuring that our workplace and organization remain free from bullying, harassment and discrimination. If you experience or witness such behaviour, whether subtle or overt, please report it in accordance with this Code.

## OWN YOUR ACTIONS

*What if you see, suspect or experience harassment or discrimination?*

You should report it to your manager, People Team, Legal Team or anonymously via Your Voice on HiBob.

*What if your manager is the one discriminating against you?*

If you feel your manager is discriminating against or harassing you, seek help by reporting it to the People Team, Legal Team or anonymously via Your Voice on Bob.

Contact details can be found in the CONTACTS section at the back of the Code.

# Fair Labor Practices.

At XR we believe in and are committed to protecting human rights and dignity. XR prohibits and condemns any form of slavery, child labor and human trafficking, and we do not tolerate any of our business partners engaging in such practices. We comply with all laws concerning fair wages, working hours, and safety conditions.

## → Fair Labor Practises.

We comply with all applicable labor laws, including those related to fair wages, working hours, and safe working conditions. We support the right to freedom of association and collective bargaining.

## → Business Partner Expectations.

We expect our suppliers, vendors, and partners to uphold the same human rights standards as XR. They must comply with all applicable labor and human rights laws and provide safe, fair, and ethical working conditions. See our [Supplier Code of Conduct](#) for more details.

## → Respect for Privacy.

We respect the privacy rights of all individuals and are committed to protecting personal data in accordance with applicable privacy and data protection laws.

## PROMOTING A SAFE AND HEALTHY WORKPLACE

XR offers a safe, healthy and inclusive working environment for all employees. In addition to the rules in this Code, all XR employees are required to adhere to any XR safety guidelines and office rules. If you have any concerns about your health and safety at work, or that of your colleagues, please reach out to your People team.

### You can contribute to a safe working environment by:

- Using good judgement in the workplace and outside the workplace at XR sponsored events and client meetings/tradeshows
- Complying with all company policies, including this Code and any local office rules and safety guidelines
- When working remotely, complying with work-from-home guidelines or similar policies issued by the company
- Promptly reporting any unsafe working conditions or other safety issues to your manager or the People team (such as slippery floors, items left in hallways).

**Violence.**

Nothing is more important to XR than the safety of its employees and visitors. Threatening behavior or acts of violence by or against employees or guests of XR will not be tolerated. If you become aware, directly or indirectly, of any acts or threats of violence, please report them immediately.

**Weapons.**

No weapons of any kind are permitted in the workplace or may be carried or used representing the company. XR reserves the right to prohibit employees from carrying any items which XR, in its sole discretion, deems to be potentially dangerous.

**Smoking.**

Smoking, including any use of e-cigarettes and vapes, is prohibited in our office areas (including outside areas) other than in designated smoking areas. XR employees are not permitted to smoke within 15 feet of any entrance to an XR office or in company video meetings. Employees may not take smoke breaks and may only smoke during their breaks or meal period.

**Drugs or alcohol.**

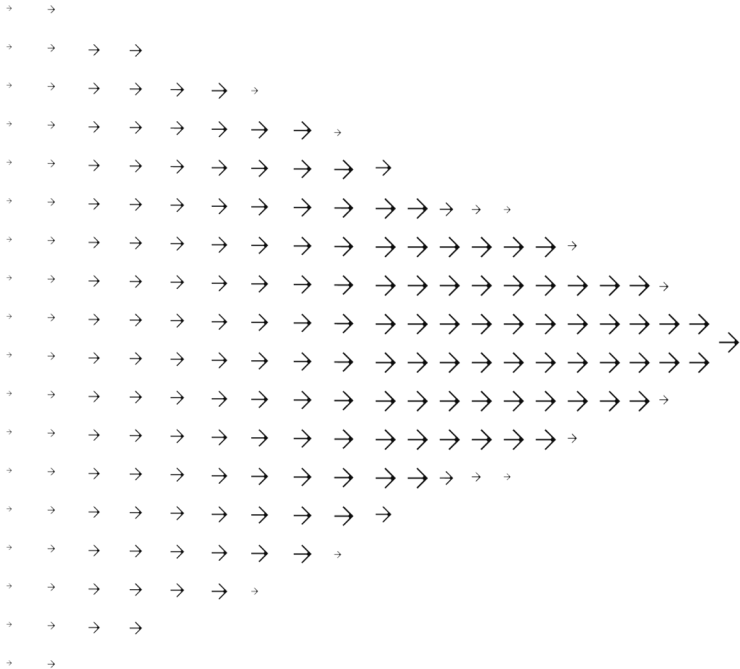
Use of drugs or alcohol during working hours and/or on company property is prohibited, except for moderate consumption of alcohol at company-organized events. You are expected to perform your job duties free from the influence of any substance that could impair your job performance. If you are struggling with substance abuse, please seek assistance. Contact the People team to learn of any assistance programs.

**Any illegal conduct.**

**THE ABOVE LIST IS NOT EXHAUSTIVE. WE EXPECT ALL EMPLOYEES TO USE THEIR BEST JUDGEMENT IN THE WORKPLACE.**



Integrity in Our Work.



# Avoiding Conflicts of Interest.

XR team members should act in the best interest of the company and be alert to potential conflicts between their personal interests and those of the company.

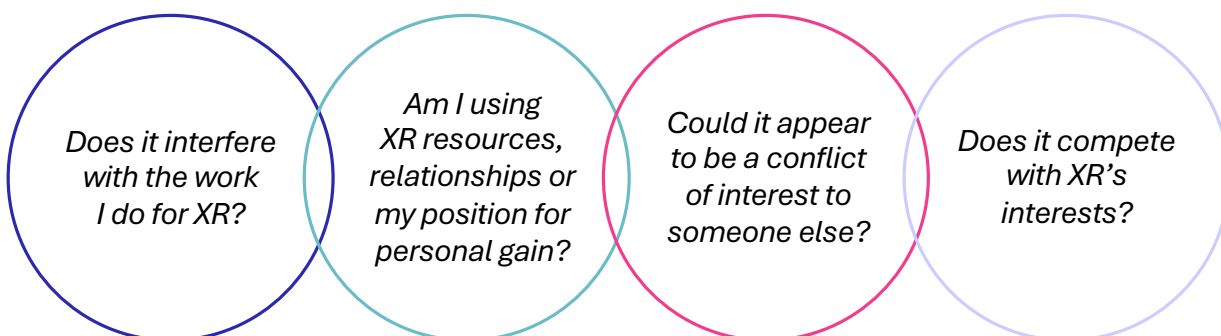
Examples of conflicts of interest include:

- Engaging in activities that compete with or go against the company's interest, including working for a competitor of XR
- Using company resources or business opportunities for personal gain, or for the benefit of friends or relatives
- Accepting a bribe or kickback as part of a business transaction
- Hiring or supervising somebody that you have a strong personal relationship with, such as a partner, close friend or relative

Any potential conflicts of interest must be disclosed to your manager and the People team. XR will assess each conflict objectively before taking a decision on how to move forward. XR may, at its discretion, and subject to applicable law, take appropriate action to address and resolve any actual or potential conflict of interest.

Subject to applicable law, all employees must obtain written approval from their manager and the People team before engaging in any secondary employment. Under no circumstances may employees be employed by or work as contractors for any competitor, client, or business partner of XR during their employment with the company. Furthermore, if a secondary employment is found to interfere with an employee's performance or the interests of XR, the company reserves the right to require termination of such outside employment.

## IS IT A CONFLICT? ASK YOURSELF:



If you answer 'yes' or 'I'm not sure' at any point, stop and ask advice from your manager, the People Team or the Legal Team. This will help you review the situation and make the right decision.

Contact details can be found in the CONTACTS section at the back of the Code.

# Anti-Bribery and Corruption.

XR complies with all applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act 2010. These laws prohibit offering, promising, or giving anything of value to foreign public officials or others to gain an improper business advantage.

XR maintains a zero-tolerance approach to all forms of bribery and corruption. You must never offer, accept, or authorize bribes, kickbacks, facilitation payments, or any other improper payments—directly or indirectly. This applies to all business dealings, including those conducted through third parties. We expect our suppliers and other business partners to adhere to the principles outlined in this Policy. Any suspected or actual breach must be reported immediately to the Legal Department.

## GIFTS AND ENTERTAINMENT

Giving and receiving gifts and entertainment is customary in the course of doing business, provided it is appropriate and not intended to improperly influence a business decision. In certain cases, giving or accepting gifts and entertainment may create a conflict of interest or may appear to be used to gain an improper business advantage. This Code sets out guidelines regarding the giving and receiving gifts and entertainments.

Gifts given or received by partners, friends or relatives are subject to the same scrutiny as gifts that are given or received directly by employees.

In case you are invited to a social event or training where the host company will pay (part of) your travel or accommodation expenses, please seek prior approval from the People team before accepting such an invitation.

Any giving of or acceptance of gifts and entertainment from any government official requires prior written approval from the Legal Team.

Exceptions to the above guidelines should be approved by your manager and the People team. By conducting business responsibly, you help to protect the company and its reputation.

### ACCEPTABLE GIFTS & ENTERTAINMENT

Those that:

- Are reasonable and appropriate
- Are given to build goodwill or further a bona fide business relationship
- Are given without expecting anything else in return
- Align with common business practices. For example, an occasional meal with a business partner, a goodie bag, or client-branded merchandise
- Are not excessive in quality or quantity
- Would not be perceived as an attempt to improperly influence a business decision
- Exclude cash (or a cash equivalent, such as a check or gift card) or stock

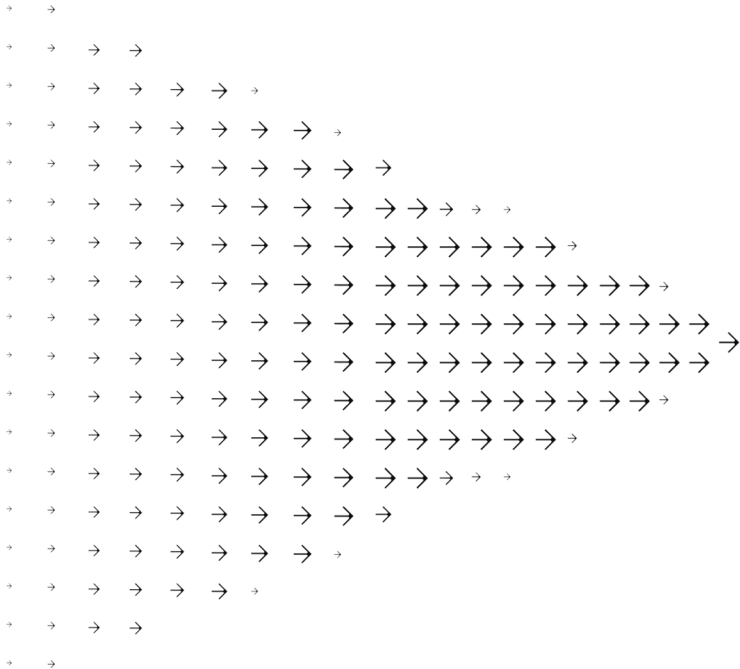
# Fair Competition.

XR is a global leader in the industry because of its platform, its world class employees and its commitment to quality. We win business the right way, by competing in a fair and honest manner, and do not engage in business practices with the intent to distort or restrict competition. We must act in compliance with all competition laws, also known as anti-trust laws. Violations of competition laws can result in criminal prosecution and significant liabilities for XR and its employees.

- Compete fairly and honestly, and refrain from making false statements
- You must never solicit confidential information of our competitors, directly or indirectly, including from clients. This includes, for example, details about pricing and business strategies. If you ever receive such information, intentionally or unintentionally, promptly delete it and notify the XR Legal Team
- Avoid discussions or agreements with competitors on pricing, customer allocation, or any other sensitive business topics. Obtain approval from the XR Legal Team before engaging with competitors or entering into agreements with them
- You should never make false statements about our competitors, their services or pricing
- Any exclusivity provisions in commercial agreements require prior approval from the Legal Team

In case you become aware of practices that are or may be noncompliant with the principles of fair competition, please report this to the Legal Team.

Integrity in Our  
Community.



# Corporate Social Responsibility (CSR)

XR is dedicated to corporate and global citizenship and continues to take steps toward ensuring our employees, clients, and the environments we operate in are treated with care.

To that end, XR's digital business aims to eliminate, or significantly reduce, the necessity for physical materials in the management and distribution of advertising and media content worldwide. Our digital workflow provides immediate environmental benefits by reducing paper and tape requirements, hard copies for revision and approval, packaging, transportation, and storage.

Our global strategy includes working with leading sustainability organizations empowering us to support our clients to achieve their own sustainability goals. We are committed to responsible usage of resources including reducing consumption where possible, recycling where available, and responsible disposal where necessary.

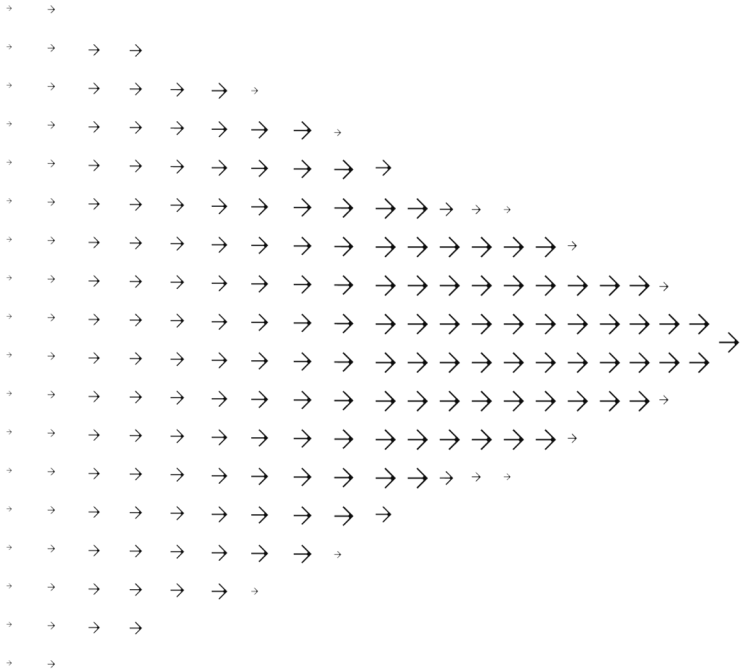
XR continues to work to implement physical facility improvements to reduce energy and water needs.

## TRADE SANCTIONS

XR complies with trade sanctions applicable to our business in all markets in which we operate, including those of the US Office of Foreign Assets Control (OFAC).

Before conducting business in or for a market in which we currently do not operate, please obtain prior written approval from the XR Legal Team.

**Protecting Our Assets  
and Information.**



# Confidential Information.

At XR we receive and handle a lot of confidential information. This includes, but is not limited to:

- Internal XR information, including our know-how and information regarding our business strategies
- Confidential information of our clients and vendors
- Personal data of our employees, the employees of our business partners, and many individuals on the payroll side of the business

Confidentiality and security of this information is extremely important to XR and the company's reputation. All employees are bound by confidentiality obligations pursuant to their employment agreements and/or local laws. Within our organization, access to confidential information is granted on a need-to-know basis.

You should never:

- Share confidential information with someone not authorized to receive it, including your colleagues
- Share confidential information outside of the organization other than required for legitimate business purposes. This includes any disclosure of confidential information to friends or relatives
- Discuss confidential information in places where it can be overheard
- Store confidential information in a place or manner where it can be accessed by unauthorized individuals
- Share confidential information over social media, including Whatsapp and similar messaging tools
- Use confidential information received without authorization. In case you receive such information, please notify the Legal Team

If you are not sure whether information is confidential and/or with whom you can share information, please don't use or disclose this information before checking with the People team or the Legal Team.



# Intellectual Property Rights.

Intellectual property rights are any copyrights, trademarks, trade secrets, know-how, moral rights, patents and other related rights (together “IP”).

We all have a responsibility to ensure that any company IP is used consistent with its intended use. For example, you may not permit any third party to publish or use our company’s logo without approval from the Marketing Team and third parties may not modify any of our technology without the explicit consent of our IT team.

## **XR’s IP.**

To the extent permitted by law, XR owns the rights to all IP associated with its businesses and any IP that our employees create as part of their employment with the company.

## **Third party IP.**

We must respect and carefully manage any use of third-party IP. We should not use another party’s IP, such as images or other content, without having a license to do so.

## **PUBLIC COMMUNICATIONS**

All public communications by the company, including advertisements or promotional material in the media or marketing emails, should only be sent out by those employees designated by the company to do so. Typically, these are members of our Marketing team. This way, we ensure that our communications are clear, consistent and aligned with the company’s tone of voice. If you are contacted by the media or any external party seeking information about XR or its business for any form of publication, please coordinate with and obtain prior written approval from the Marketing team.

## **SOCIAL MEDIA**

We expect our employees to use social media wisely. Do not post or display content that is obscene, threatening, harassing, discriminatory, or otherwise in violation of this Code. You are solely responsible for what you post online and you should never state or imply that your personal views are that of the company, unless you are reposting a company issued communication that has been approved by our marketing team.

Unless you are designated by the company, or it is expected of your role with the company, you should never represent yourself as a spokesperson for XR. Keep in mind that your conduct may affect the reputation of XR and be respectful of our clients and business partners. Employees should not advertise nor sell XR products via social media. You must never disclose confidential information via social media.

Social media posts about your employee experience, such as LinkedIn posts, are permitted, provided that they are appropriate and do not violate this Code. You may not post content, including audio or video content, regarding your colleagues or business partners without explicit consent from such individuals and your local People manager.

# Privacy.

XR respects and protects the privacy of its employees and any individuals from which we collect and process personal data. We adhere to all data protection laws, including the EU General Data Protection Regulation (GDPR), the UK Data Protection Act, and the California Consumer Privacy Act (CCPA).

Personal data is all information that can be used to identify an individual, such as name, email address, and physical address, as well as indirect identifiers such as an IP address. XR will not collect, use or retain or disclose personal data of any person other than for legitimate business purposes, and subject to any appropriate safeguards. We use technical and physical safety measures to protect the security of personal data.

In most jurisdictions, individuals have the right to request access, correction, or deletion of any of their personal data stored by XR. The right of access to and deletion of data is not absolute, and any requests should be reviewed on a case-by-case basis. If you wish to file such a request, or receive or become aware of a request, please immediately contact the XR Privacy Team at [privacy@extremereach.com](mailto:privacy@extremereach.com).

## USE OF COMPANY EQUIPMENT

All XR employees use company issued laptops and other equipment for their daily work, either onsite at XR's premises or while working remotely. All employees have to utilize and maintain such equipment in an appropriate way, according to product standards and with care. Personal laptops may not be used on any internal XR networks.

Company equipment is intended to be used for professional business purposes. Any occasional personal use of company-issued laptops or phones should be reasonable, ethical and should not violate the company's policies or best interests. Company issued equipment must never be used to access material that is illegal, obscene, pornographic, or otherwise inappropriate for a normal business environment. Unless explicitly agreed in writing by the XR Legal Team, all XR issued equipment remains XR's property, and must be returned either on the last day of employment or at the first written request of XR, whichever comes sooner.

When visiting our offices, be thoughtful and efficient using office resources. Do not waste or abuse company supplies, materials, facilities or other property. In case any company equipment is damaged, lost, stolen or accessed without authorization, this should be immediately reported to the IT department and your manager.

Subject to local legislation, XR reserves the right to monitor your use of the office internet, company-issued hardware, professional emails, and company software. Any monitoring will be conducted in accordance with applicable laws and regulations.

# Use of Company Funds.

XR employees should use XR funds and company issued credit cards responsibly. When spending company funds the following guidelines should be followed:

## **No personal use.**

Company funds should be exclusively used for legitimate business purposes

## **Accountability.**

Employees are accountable for their spending decisions. Responsible spending practices contribute to the financial health of our company. Before spending funds, consider alternatives that may be more cost-effective

## **Record keeping.**

All use of company funds must be properly documented. This includes retaining receipts or other documents to substantiate the business purpose of a transaction

## **Compliance with our Travel and Expense (T&E) Policy.**

Any spending on travel and related expenses must be compliant with our global T&E Policy or any local T&E Policy. This includes the accurate recording of expenses in our designated T&E system(s)

## **Prohibition of political contributions.**

Company funds are not to be used for political contributions under any circumstances

Managers are responsible for carefully reviewing and approving T&E reports submitted by their direct reports.

## **MAINTAINING BUSINESS RECORDS**

XR generates a significant volume of records in the regular course of business. We ensure to accurately record and report any financial information, including tax-related information. This includes reporting to external auditors and any regulatory authorities. All transactions made by or on behalf of the company must be properly authorized and documented, in accordance with our internal controls. You should never falsify or unduly delete any information regarding transactions or information in our books or records. Together, we protect the company against fraud.

The company's Data Retention Policy, accessible only to XR employees, sets out the company's guidelines regarding the storage and disposal of records. All XR employees should comply with this Data Retention Policy. As set out in this policy, you may not dispose of records that are needed for a current or pending investigation, audit or legal proceeding.

In case you notice any inaccuracy or omission in the company's financial records, no matter how small the amount, please report this to your manager or the finance team.

# Security.

In addition to its own confidential information and personal data of its employees, XR handles confidential information of many of the world's biggest advertisers, advertising agencies and broadcasters, as well as personal data of thousands of individuals on the Spotlight side of the business.

XR has a dedicated Security Management Team and a robust cybersecurity program adequate for a company of its stature. However, it is not only the responsibility of the Security Management Team to keep our systems and information safe. As an employee, you play a vital role in our commitment to security.

This section sets out guidelines regarding the use of our systems and technology:

## **Protect your credentials.**

Do not share your login credentials or access privileges

## **Use strong passwords.**

Create and regularly update strong, unique passwords for your accounts

## **Authorized hardware and software.**

Only access XR's internal systems with approved company-issued or approved hardware and software. Do not install unauthorized software or modify system configurations without permission from the IT Department

## **Safe browsing.**

Refrain from using company equipment to access potentially dangerous or inappropriate websites

## **Phishing.**

Exercise caution when opening email attachments or accessing links sent over email. If unsure of the safety of an email or attachment, contact the IT Department before opening it

## **Data Retention Policy.**

Adhere to the company's Data Retention Policy

## **Bring Your Own Device (BYOD) Policy.**

XR allows team members to use personal smartphones and tablets that meet company standards for XR business purposes. In order to address and mitigate the risk associated with the BYOD Policy, XR reserves the right to revoke this privilege if users do not abide by the requirements outlined below:

Smartphones and tablets used may only be obtained from legitimate, commercially available sources and must be unadulterated and not rooted, jail-broken or similar. The user must allow XR, either in a device profile, or for the entire device, to enforce password requirements, manage apps, and the right to remotely wipe the device.

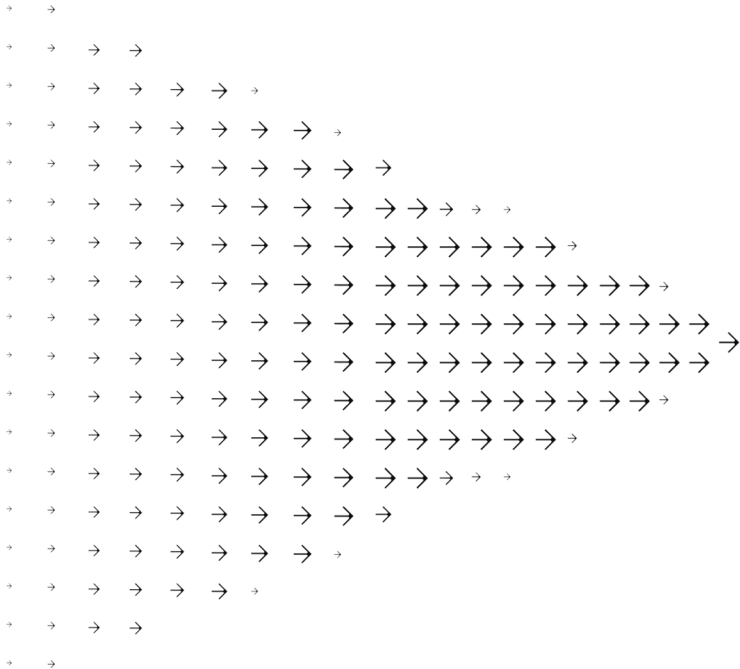
## **Physical Security.**

Keep company devices and confidential information secure, and never leave them unattended in public places or vehicles. Ensure that papers or notes containing confidential information are stored away appropriately at the end of each workday.

## **Reporting.**

If you encounter any suspicious activity, security vulnerabilities, or potential breaches, report them immediately to the IT department or Security Management Team ([smt@extremereach.com](mailto:smt@extremereach.com)). Prompt reporting helps us to investigate and address security incidents effectively, minimizing their impact on the company.

Contacts.



# Contacts.

## XR LEGAL TEAM

[legal@extremereach.com](mailto:legal@extremereach.com)

## XR PEOPLE TEAM

[peopleteam@extremereach.com](mailto:peopleteam@extremereach.com)

## XR PRIVACY TEAM

[privacy@extremereach.com](mailto:privacy@extremereach.com)

## XR SECURITY MANAGEMENT TEAM

[smt@extremereach.com](mailto:smt@extremereach.com)

## DEI COMMITTEE

[dei-committee@extremereach.com](mailto:dei-committee@extremereach.com)

## ANONYMOUS REPORTING

[Your Voice](#) - hosted by Bob

## URGENT ISSUES

(including reporting any breach or security concerns)

Email: [support@extremereach.com](mailto:support@extremereach.com)

Telephone Number: + 1.800.324.5672