

# Code of Business Conduct and Ethics



We keep operations flowing.™



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# CEO MESSAGE

**At Gilmore, it is a clear requirement for our team members to conduct business with the highest standard of ethical behavior and in line with our core values.**

Our Code recognizes and reinforces the importance of conducting business ethically and legally in all environments we encounter. We are expected to uphold high ethical, legal and business standards wherever in the world our business takes us.

In keeping with our values our reputation depends on operating with integrity and doing the right thing, and as such we must foster a culture of transparency and responsibility always. Regardless of what position we have or where we are in the world, each one of us has a part to play in this process as we continue to develop our organization and protect its success.

We also expect those with whom we do business to embrace similar values and standards. In some instances, by acting legally and ethically and following our code we may lose business, and I understand and accept that.

It is important that you take the time to familiarize yourself with our code and the other policies that relate to it. 'Right thing, Right way' is a core value at Gilmore and one we are firmly committed to. We require all our people to consider our values along with the principles of our policy and, like me, keep asking ourselves, "is what I'm doing consistent with what we stand for?"

If it doesn't feel right or you believe a violation of the code has occurred, or is likely to occur, it is your responsibility to act. In the first instance, please consult with your line manager. However, if this is not appropriate or you have concerns with raising it with them, you can always report it using the Gilmore Reporting Hotline or by sending an email to [business.ethics@gilmore.com](mailto:business.ethics@gilmore.com)

Our code sets high standards for us all. Rightly so, Compliance to this code is in our best interests as it maintains our reputation as a trustworthy and reliable organization. I am personally wholly committed to following and supporting our code to the absolute best of my ability and I ask you to do the same.

Many Thanks,

**David Nemetz, CEO**

January 26, 2024



# LIVING OUR VALUES

Our company's foundation is built on our values, which distinguish us and guide our actions. Our code is an important tool setting out how we operate with integrity and live by our core values.

## **F** FORWARD AS A TEAM

Our people are fundamental to the success of our organization. We create a stimulating and open work culture that encourages personal development. We aim to develop our organization around a valued and motivated workforce and to attract, develop and retain the best people.

## **R** RIGHT THING, RIGHT WAY

At Gilmore, we respect the culture, custom and rules of the countries in which we operate. We apply the highest ethical standards to everything we do and we will always strive to do the right thing wherever business takes us.

## **E** ENTREPRENEURIAL SPIRIT

Our entrepreneurial spirit enables us to look beyond expected boundaries. We aim to be recognized as experts and pioneers in our field and encourage a culture of open communication and innovation. We continuously seek growth and recognize and reward new ideas and creative thinking.

## **S** SERIOUS ABOUT SERVICE

When a customer buys a product or service from Gilmore, they buy a lifetime of support and expertise. We also seek to continually improve the service we provide and try to exceed expectations. Our customers will recognize us for service excellence and commitment to quality.

## **H** HELP, SHARE AND COMMUNICATE OPENLY

Leveraging our collective capability is key to our success. We promote teamwork, collaboration and sharing of knowledge and best practice and aim to be open and transparent in everything that we do.

# WHAT IS THE CODE OF BUSINESS CONDUCT AND ETHICS?

**This code is designed to guide your decision-making and help you handle business situations professionally, ethically and legally.**

The Code of Business Ethics and Conduct has the following objectives:

- To ensure Gilmore and Gilmore Personnel comply with all laws and regulation applicable to their business activities in all countries in which they operate.
- To ensure Gilmore and Gilmore Personnel conduct all their business activities with integrity and in an ethical manner.
- To maintain and protect the reputation for business integrity that Gilmore and Gilmore Personnel have built with all parties they deal with.

## Who does this code apply to?

This code applies to all Gilmore Personnel.

Gilmore Personnel consist of the following persons:

- Employees of Gilmore
- Independent contractors, consultants, representatives, and agents retained by Gilmore
- Agency workers retained by Gilmore
- Gilmore also includes any subsidiary joint-venture or consortium under the day-to-day management control of Gilmore.

## What is expected of you?

Gilmore Personnel are expected to perform and work with honesty and integrity and comply with all applicable laws in the course of their business activities, whether or not specifically covered by this policy or any other Gilmore policy.

Gilmore will not tolerate bribery, kickbacks, or corruption of any kind, directly or through third parties, whether or not explicitly prohibited by this policy or by law.

All Gilmore Personnel have a personal responsibility to observe the standards of conduct and other requirements of business ethics whether or not these standards and requirements are also imposed by law.

In the case of Gilmore employees, violations or non-compliance with applicable laws or Gilmore policies may constitute grounds for disciplinary action, up to and including termination of employment and fines and legal action being taken. Any disciplinary action will be taken consistent with Gilmore's policies, practices, and local laws.



## What is expected of you? cont.

For independent contractors, consultants, agents or other representatives conducting business on behalf of Gilmore, violations or non-compliance with applicable laws or Gilmore policies will result in the termination of any relationship with Gilmore possible legal action being taken.

### Different laws in different countries

Gilmore does business globally, and that means you are subject to different laws and regulations. The laws of some countries, particularly relating to corruption and bribery such as the US Foreign Corrupt Practices Act, transcend national borders giving what is known as an extraterritorial jurisdiction.

This means you may be prosecuted in your home country or country of residency as well as abroad, for actions or conduct that took place overseas. You are responsible for knowing and following the laws that apply where you work.

This policy establishes principles for business conduct applicable throughout Gilmore, regardless of location. Where differences exist as the result of local laws or regulations, you must comply with this policy together with any more stringent requirements of local laws and regulations. Talk with your line manager or contact [business.ethics@gilmore.com](mailto:business.ethics@gilmore.com) if you have any questions or are ever in doubt about what to do relating to a matter covered by this policy.

### Reporting suspected non-compliance

If confronted with a request or demand for an improper payment or other violation of this policy, the request or demand must be immediately rejected and reported to Gilmore management. This can be

done via contacting your direct supervisor, a member of the Gilmore executive team, Human Resources or simply emailing [business.ethics@gilmore.com](mailto:business.ethics@gilmore.com)

If you know or believe that an improper payment has been or will be made, you must report such payment. You can use the following method to report any actual or potential breach to Gilmore: [business.ethics@gilmore.com](mailto:business.ethics@gilmore.com).

Reports or questions received will be dealt with in a professional and confidential manner.

In situations where you prefer to place an anonymous report in confidence, use the Gilmore Reporting Hotline, which is supported by an external third-party provider, by calling +1 833-921-5216.

All reports will be held in confidence to the extent consistent with carrying out an appropriate investigation under applicable laws.

Failure to report knowledge of a violation of this policy or failure to assist or cooperate in the investigation of reported non-compliance may result in disciplinary action taken against you. There will be no retaliation, retribution or victimization in any form against an individual who reports, in good faith, a suspected violation of the policy or assists with an investigation, even if the report is mistaken and/or the facts later turn out to be inaccurate or do not trigger any further action.

Any individual who retaliates in any way against a person who has, in good faith, reported a violation or suspected violation of this policy will be subject to disciplinary action.

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# BUSINESS AND PERSONAL INTEGRITY



## Improper payments

Gilmore expressly prohibits improper payments in all business dealings, in every country around the world, with both public bodies and the private sector.

Gilmore and Gilmore Personnel must not make or offer or agree to make any unlawful payment, bribe or other corrupt payment to any person including any customer, agent, intermediary, supplier, employee or regulatory authority or government official (including their employees, agents, representatives and close family members).

Gilmore expressly prohibits the payment of any facilitation payments or other such “greasing” or “enabling” payments—even if that leads to a delay or loss of business opportunity.

## No bribery and corruption

It is vital that all agents, consultants and other representatives who may interact on Gilmore’s behalf with government officials comply with this policy.

An improper payment to gain advantage in any situation is never acceptable and exposes both Gilmore and Gilmore Personnel to possible criminal prosecution and large fines and penalties. Acts or allegations of bribery can do serious damage to Gilmore’s reputation. Gilmore Personnel who are found to be giving or taking bribes, or who permit others to do so on Gilmore’s behalf or who conduct any other acts of corruption, will be subject to disciplinary action, up to and including dismissal and, if appropriate, criminal proceedings.

An improper payment to gain advantage in any situation is never acceptable. Gilmore and Gilmore Personnel may be subject to anti-bribery legislation, such as the US Foreign Corrupt Practices Act (**FCPA**).

An improper payment is not limited to a cash payment but covers anything of value including, without limitation, gifts, sponsorship, forgiveness of a debt, loans, personal favors, internships, entertainment, meals and travel, political and charitable donations, business opportunities and medical care.

## Charitable and political donations

Gilmore requires approval of all charitable and political donations in accordance with Gilmore’s Delegation of Authority (DOA).

In certain circumstances, a charitable or political donation could be perceived as a bribe. If in doubt, please request further assistance by submitting a request to [business.ethics@gilmore.com](mailto:business.ethics@gilmore.com) or calling the Business Ethics Hotline +1 833-921-5216. Gilmore (or their agents or representatives) must not make any donations intended to procure political influence. Gilmore funds and resources may not be used to contribute to any political party or political candidate.



## Facilitation payments

Gilmore makes no distinction between bribes and so-called 'facilitation', 'greasing' or 'enabling' payments to expedite or otherwise procure a transaction. Gilmore Personnel, agents, contractors, suppliers and other representatives shall not make bribes or facilitation payments on behalf of Gilmore.

The only exception would be in circumstances where there is a real and imminent threat to the health, safety, personal security or welfare of any employee or a member of their family, or a co-worker, or loss of a Gilmore's property. An example of this would be where a government official makes a demand for payment together with a threat that if the payment is not made the person may be detained or physically harmed.

If, after initially declining to make a payment, you decide to make a payment due to such threat then this exceptional circumstance must be immediately reported to your line manager, the business ethics email [business.ethics@gilmore.com](mailto:business.ethics@gilmore.com) or through the Business Ethics Hotline +1 833-921-5216. Gilmore will then take appropriate action with regards to reporting the extortion to the correct authorities.

## Agents and third parties

Business practices or other conditions in certain countries require the use of agents or similar third parties to represent Gilmore's interests. In many cases these agents can arrange negotiations and services more efficiently than otherwise might be possible.

Agents and representatives must be carefully chosen because their improper conduct could damage Gilmore's reputation and expose Gilmore and Gilmore Personnel to legal liabilities.

Management approval in accordance with the Gilmore Agent's and Intermediary's Policy approval process is required before finalizing any agent or similar third-party representative arrangements.

All contacts must clearly stipulate that improper or illegal payments are not to be made - this includes any form of facilitating payment. Agents and representatives must be given a copy of this Gilmore Code of Business Conduct and Ethics Policy and asked to confirm their acceptance and compliance with it.

## Conflicts of interest

Gilmore Personnel must avoid conflicts of interest between their private activities or personal interests and their responsibilities and duties owed to Gilmore.

A conflict of interest may arise if you or a close family member receives benefits, other than your employment benefits, because of your position within Gilmore. Gilmore Personnel must not accept (directly or indirectly) any personal payments, services or loans from a competitor, customer, supplier, or contractor of Gilmore, except where this is a normal transaction open to members of the public generally, such as obtaining a loan on standard terms from a bank. The hiring and promotion of family members is governed by the Nepotism Policy. Gilmore Personnel must immediately declare any actual or potential conflicts of interest to their line manager or HR contact.

## Gifts, entertainment and hospitality

Gifts, entertainment, and other hospitality, whether given or received by Gilmore Personnel, must not place the recipient under any obligation and should not be capable of being misconstrued.

Gifts, entertainment and/or other hospitality, whether given or received by Gilmore Personnel, must:

- Be nominal
- Only be given or accepted if within the bounds of recognized business practice
- Be related to a business purpose
- Not be intended to influence a business transaction

Gifts given or received must be approved in writing according to the DOA. In general, Gilmore Personnel must not offer or accept a gift, entertainment and/or other hospitality more than a nominal value from or to any customer of Gilmore, or from or to any person or company having current or prospective dealings with Gilmore such as a supplier or contractor, if such gift, entertainment and/or other hospitality is worth more than a nominal value. When in relation to a government official, officer or employee of a governmental organization or public body or any of their close family members, all gifts must be pre-approved in accordance with the DOA.





## Gifts, entertainment and hospitality cont.

However, Gilmore recognizes that there may be situations where it is culturally appropriate to offer or receive something from a customer or supplier that exceeds nominal value – where it is a gift or entertainment (for example golf or other sporting events) with a related business purpose. In such situations you must obtain written approval in accordance with the Gilmore Delegation of Authority (DOA) policy before accepting or extending such an offer. Gifts given or received must be in line with the Gifts, Entertainment and Hospitality Policy.

## Insider trading

Gilmore Personnel are prohibited from trading in shares or other securities in Gilmore or any publicly traded company based on inside information.

Many countries have laws prohibiting the use or disclosure of material, non-public and unpublished price sensitive or inside information that generally is not available to the public that could, if publicly known, affect the market price of Gilmore's customers or competitors publicly traded shares.

You must not deal in shares in any company based on inside information, nor disclose that information to any third-party or close family member who might use it to deal in such shares or encourage any third-party to carry out any dealing in such shares.

## National and international trade

Gilmore will not engage in any activity or business practice that is in breach of any applicable competition and/or antitrust law to which they may be subject. Gilmore is committed to conducting its business in an open and competitive fashion. Any activity that undermines this commitment is unacceptable.

## Conflict minerals

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (**the 'Dodd-Frank Act'**) requires publicly traded companies to report annually to the US Securities and Exchange Commission on whether the products they manufacture or contract to manufacture contain conflict minerals. In addition, the EU Conflict Minerals Regulation came into force on January 1, 2021. As a result, many of our customers are now focusing on whether and to what extent their products contain conflict minerals and whether such conflict minerals come from the Democratic Republic of Congo and the adjoining countries named in the legislation.

Conflict minerals, also known as '3TG', are defined as tantalum, tin, tungsten and gold. Gilmore strives to be a good corporate citizen. Managing our obligations in relation to conflict minerals is a part of our corporate responsibility and Gilmore complies with OECD's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Therefore Gilmore is committed to:

- Identifying which Gilmore products may be impacted and targeting our efforts accordingly
- Undertaking reasonable due diligence with our supply chain to understand the origin of the minerals contained in products they provide to Gilmore
- Asking our suppliers to work towards ensuring that any conflict minerals contained in products supplied to Gilmore originate from conflict free sources
- Engaging with our customer regarding their disclosure obligations

## Export controls and economic sanctions

Gilmore must comply with all applicable export control laws and US economic sanctions when conducting international business.

The UN, the European Union as well as the US and the UK (and other countries) impose restrictions on exports and sanction dealings with certain countries, entities and individuals.



## Export controls and economic sanctions cont.

For example, the US Government has put in place a number of economic sanctions that would prevent their citizens (including non-US nationals who work for US companies or anyone physically located in the US) from having anything to do with transactions for certain embargoed countries. Serious penalties fines, revocation of permits to export and event imprisonment can apply when these laws are broken.

If your work involves the sales, shipment, electronic transfer or disclosure of technical information, soft

ware, goods or services across national borders between Gilmore, or with third parties, you are required to keep up to date with applicable rules and regulations as dictated by the United States Department of State. The Economic Sanctions Programs list as published online at <https://www.state.gov/economic-sanctions-programs> shall be reviewed frequently by all personnel involved in sales, shipment/logistics, electronic or paper information transfer, software or any other area of commerce across national borders.

### The combination of export controls and economic sanctions means there are frequent restrictions on:

- Exports and re-exports of goods, technology and software to specific countries, entities and individuals, and for certain end-uses
- Disclosure of certain technology and software source codes to nationals of a prohibited country
- Involvement of nationals of the country imposing sanctions in any business dealings with the sanctioned country or with persons in the sanctioned country
- New investments or other transactions with a sanctioned country and sanctioned individuals

## Competition/antitrust regulations

Competition or antitrust laws apply to every level of business in many of the countries in which Gilmore operates. The laws apply not only to Gilmore but also to our competitors, suppliers and customers. It is important to be aware of the laws, not only to avoid infringement but also to ensure that suppliers or customers are not engaging in anti-competitive activities that could damage Gilmore's business.

Some competition or antitrust laws - such as US and EU laws - can apply even when the conduct occurs outside the relevant country borders. Although the laws may differ from country to country, the following examples illustrate some of the most common illegal competition and antitrust law activities:

- Price fixing and bid rigging
- Agreements between competitors regarding which suppliers or customer they will not deal with
- Agreements between competitors to reduce production or output
- Agreements between competitors not to compete for certain customers or accounts or in certain geographic areas
- Misrepresentations about a competitor's products or services

Gilmore will ensure that Gilmore Personnel will not suffer retaliation, retribution or victimization for seeking to report any concerns about competition or antitrust issues.

# PROTECTING GILMORE EMPLOYEES



## Health, safety and the environment

Gilmore is firmly committed to the health and safety of its workforce and those affected by our operations. Gilmore's business activities are governed by stringent HSE principles designed to ensure best practice and compliance across our operations.

All Gilmore Personnel must conduct their duties and responsibilities in compliance with Gilmore's policy on health, safety and the environment.

Any workplace accidents, near misses, unsafe practices and conditions must be reported to your line manager and our Health, Safety and Environmental functional leader.

## Equal opportunities

Gilmore is an equal opportunities employer. Gilmore will hire, evaluate and promote employees on the basis of their qualifications, demonstrated skills, achievements, experience and performance.

Gilmore is committed to ensuring that Gilmore Personnel are able to work in a professional, safe and discrimination-free environment that promotes equal

employment opportunities and prohibits discriminatory practices, including any form of discrimination on the basis of gender, race, sexual orientation, disability, religious beliefs, age or any other status protected under applicable law.

Accordingly, all Gilmore employment policies will seek to ensure equal employment opportunities for all Gilmore Personnel. The hiring and promotion of family members is governed by the Nepotism Policy.

## Harassment

Gilmore will not tolerate any form of abuse or harassment, in any Gilmore department, towards Gilmore Personnel or others. Gilmore is committed to ensuring that you are able to work in an environment that is free from harassment, including victimization and bullying, and in which personnel treat each other with mutual respect and dignity.

Gilmore does not tolerate any form of harassment on the basis of gender, race, sexual orientation, disability, religious beliefs, age or any other status protected under applicable law.

## Modern slavery and human trafficking

Gilmore has a zero-tolerance approach to modern slavery and human trafficking and has a number of policies and procedures in place to guard against the risk of slavery, human trafficking, forced and bonded labor and labor rights violations. These policies include, but are not limited to, the Modern Slavery & Human Trafficking policy, Supply Chain Policy, recruitment, and induction procedures. Gilmore is required to comply with all applicable laws.

All employees joining Gilmore undergo an extensive preemployment vetting process in line with the laws and customs of each jurisdiction. This may include proof of the right to live and work in that jurisdiction and background checks to protect the business and our clients in the event of the individual working in sectors that involve security risks. Gilmore also ensures all employee earnings comply with the relevant pay related legislation of each jurisdiction.

As an organization, Gilmore undertakes to procure goods and services in a sustainable and ethical manner in compliance relevant local laws. Our zero tolerance principles are built into contracts, tenders and communications with our suppliers, contractors, and subcontractors.



## Modern slavery and human trafficking cont.

Gilmore is committed to transparency in its supply chain and ensuring that our internal procedures, processes, and contracts do not make demands of suppliers, contractors and sub-contractors that may lead them to violate human rights.

## Freedom of association

Gilmore recognizes the International Labor Organization's (ILO) Declaration on the Fundamental Principles and Rights at Work and acknowledges that freedom of association is a cornerstone of the ILO Declaration. Gilmore is committed to ensuring that our employees have the right to create and join organizations of their choice without fear of reprisal or interference. This includes the right to establish and affiliate to confederations and trade unions, subject to the specific domestic legislation in each country.

Freedom of association is intended to ensure the interests of employees on a range of employment standards, including working time and health and safety.

Any association, trade union or organization must reflect Gilmore's values and align with this policy in its entirety. You are required to refrain from joining or promoting any association, trade union or organization that is likely to cause offense to colleagues, clients and third parties and/or which may bring Gilmore into disrepute.

You must notify your line manager, the human resources department or the Business Ethics Hotline +1 833-921-5216 as soon as possible if you believe or suspect that a conflict with the guidance laid out in this policy has occurred or may occur in the future.

Where appropriate, and with the welfare and safety of local workers as a priority, Gilmore will give support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chain.

Any employee found in breach of this practice may face disciplinary action, up to and including dismissal and we may terminate our relationship with other individuals and organizations, should their conduct fall below the standards as described throughout this policy.

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## Substance abuse

Gilmore will provide a safe and productive working environment by ensuring that the workplace is free from any form of substance abuse. All Gilmore employees and representatives should be fit and ready to always carry out their work duties while at work or on Gilmore business.

Gilmore employees and representatives are prohibited from being at work or on Gilmore business while impaired by drugs or alcohol or with illegal drugs present in their system.

The use, possession, sale or distribution of illegal drugs and the misuse of legal drugs or other substances is prohibited. Except where authorized by the CEO or a direct report of the CEO, who is a member of the Executive Leadership Team, alcohol consumption is not permitted within a Gilmore workplace or work site.

# PROTECTING GILMORE'S ASSETS

## Accounting systems and procedures

Gilmore will maintain accounting systems and procedures that always enable it and all other relevant parties at all times to obtain a true and fair view of its assets and liabilities, profit and loss and cash flow.

All Gilmore accounts and records must be recorded in a manner that clearly identifies and describes the true nature of business transactions, assets or liabilities, and properly and promptly classifies and records entries that conform with generally accepted accounting principles and standards, and specifically international financial reporting standards (IFRS) for Group reporting. Accounting records must be retained for as long as required by law or generally accepted practice.

## Fraud

Gilmore will not tolerate fraud and has established procedures to prevent, detect, report and investigate suspected fraud. Fraud generally involves some form of deceit, theft, trickery, or making of false statements, breach of trust and guilty intention with the object of obtaining money or other benefit.

A fraudulent act can have significant consequences for Gilmore and the individuals involved, including loss of sales and access to financing, withdrawal of licenses, litigation and damaged reputation.

Fraud includes, but is not limited to:

- Dishonesty or fraudulent act
- Embezzlement
- Forgery or alteration of business documents
- Misappropriation of Gilmore, customer, supplier or contractor assets
- Conversion to personal use of cash, supplies or any Gilmore asset
- Unauthorized handling or reporting of Gilmore business transactions
- Falsification of Gilmore Company records or financial statements
- Misrepresentations about Gilmore products or services

If you suspect that fraudulent activity may have occurred, you must immediately report such suspicion to your direct supervisor, or by sending an email to [business.ethics@gilmore.com](mailto:business.ethics@gilmore.com) and/or calling the Business Ethics hotline +1 833-921-5216.

## Money laundering

Gilmore will not condone, facilitate, or support money laundering. Gilmore will comply with all relevant national and international laws and regulations covering money laundering.

Money laundering is a generic term used to describe the process by which individuals or companies try to conceal illicit or illegal funds (including the proceeds of crime) within their business in order to make these funds look legitimate.

Money laundering legislation is designed to assist and protect legitimate businesses from being used by criminals for such a purpose. Many of the countries in which Gilmore sells products have some form of anti-money laundering legislation.

The legislation may place criminal corporate liability on Gilmore as well as criminal personal liability on and Gilmore Personnel involved. Any instance or suspicion of money laundering activities should be immediately reported to your direct supervisor, or send an e-mail to [business.ethics@gilmore.com](mailto:business.ethics@gilmore.com) and/or call the Business Ethics hotline +1 833-921-5216.



## Confidentiality

Gilmore Personnel must protect confidential information and trade secrets in their possession from unauthorized use or disclosure, including any confidential information relating to customers, suppliers, contractors, employees and other third parties. Gilmore will comply with the provisions of confidentiality undertakings that they enter into, including those relating to potential acquisition targets, divestment, joint ventures, collaboration arrangements or other potential business opportunities.

Confidential information can be broadly defined as technical information concerning products and services, manufacturing and development process information, engineering designs, drawings and layouts, software code, know-how, pending patent applications, invention disclosure statements and the like which is not publicly available.

Confidential information would also include non-public business information such as non-public financial information, employee information (including email lists), analyses, forecasts, customer and supplier lists, strategic and operating plans, corporate organization plans, audit materials or reports, legal opinions and advice,

information regarding litigation or potential litigation and proposed transactions and the like.

The release (intentional or inadvertent) of any confidential information to third parties without appropriate controls and/or protection can damage Gilmore and, in some cases, breach contractual obligations and violate the law.

Gilmore Personnel must not disclose to third parties any non-public material. If your work requires you to discuss such information with outsiders (for example in negotiating a transaction), such discussions must only occur with the protection of a written confidentiality or non-disclosure agreement.

Gilmore will also have obligations with respect to the confidential information of customers, suppliers and other third parties with whom we have a business relationship. Improper handling of sensitive business, financial, or technical information, or of original ideas provided to Gilmore by customers, suppliers and other third parties can lead to a loss of trust and legal claims against Gilmore for damages.

## Intellectual property (IP)

Intellectual property rights including patent rights, copyright, design rights, database rights, trademarks and service marks in all inventions, documents, logos, designs, and computer programs created, devised, or undertaken by Gilmore Personnel, save as otherwise specifically agreed, belong to Gilmore.

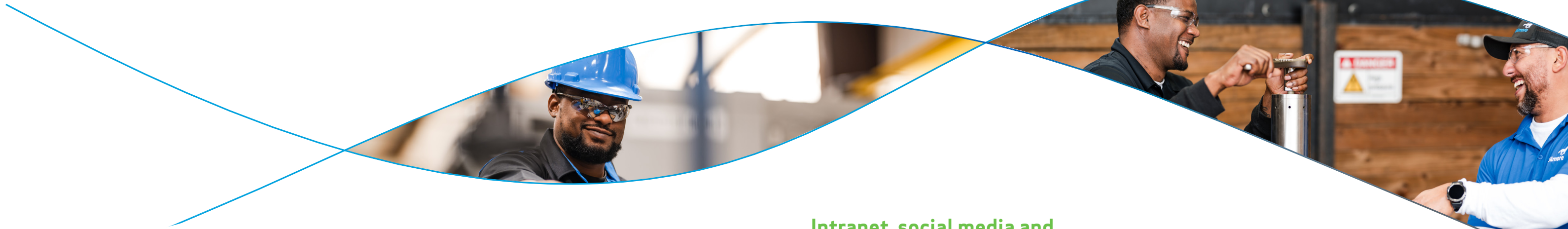
Gilmore owns the copyright (or other IP rights) in all the work that Gilmore Personnel create on behalf of Gilmore. Gilmore will respect the valid intellectual property rights of third parties and will not knowingly infringe such rights. Gilmore is under a general duty to ensure that all relevant contracts of employment or contracts for services provide for the ownership

of relevant intellectual property rights by Gilmore. Unauthorized use of others' intellectual property can expose Gilmore and Gilmore Personnel to legal claims and damages. Gilmore will own the copyright (or other IP rights) in all the work that Gilmore Personnel create on behalf of Gilmore or with the use of Gilmore property and assets.

## Data privacy

For Gilmore to provide employees, agents, clients and contractors with Gilmore's services, Gilmore needs to collect personal data for correspondence purposes and/or detailed service provision. Gilmore is commit

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ted to ensure that the information we collect, and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

Gilmore will comply with local data privacy laws and legislation affecting the acquisition, maintenance, and use of personal data, for both employees and contractors, clients, and agents, whether such information is held electronically or otherwise.

Gilmore Personnel with access to personal data must only use it for the purpose for which it was collected and must adhere to high levels of confidentiality when using it.

If you wish to make a complaint about how your personal data is being processed by Gilmore, or how your complaint has been handled, you have the right to lodge a complaint directly with the local data privacy supervisory authority and/or Gilmore's data protection representative.

### Improper use of IT systems

Computer hardware, and software and information stored on Gilmore's IT systems are Gilmore property. You must use Gilmore's IT systems responsibly and primarily for the business purposes for which they are intended. Gilmore Personnel using IT systems for personal reasons must apply high ethical standards, comply with applicable laws and regulations and support Gilmore's information security requirements.

The use of Gilmore IT systems may be monitored for the purposes of information security, operational management, maintenance, business needs and to ensure that all use is compliant with all laws, regulation, and Gilmore policies.

By using Gilmore's IT systems, you accept that, unless prohibited by law, Gilmore reserves the right to access and disclose all information contained on our IT applications and devices, including all computers, mobile phones, USB drives and other electronic media.

### Intranet, social media and third-party websites

The material provided on Gilmore's Intranet are potentially sensitive and of a highly confidential nature. It is the responsibility of all Gilmore employees to prevent others from gaining unauthorized access. All Gilmore Personnel are expected to adhere to the guidelines outlined in Gilmore's IT & Media Policy and Acceptable Usage Policy.

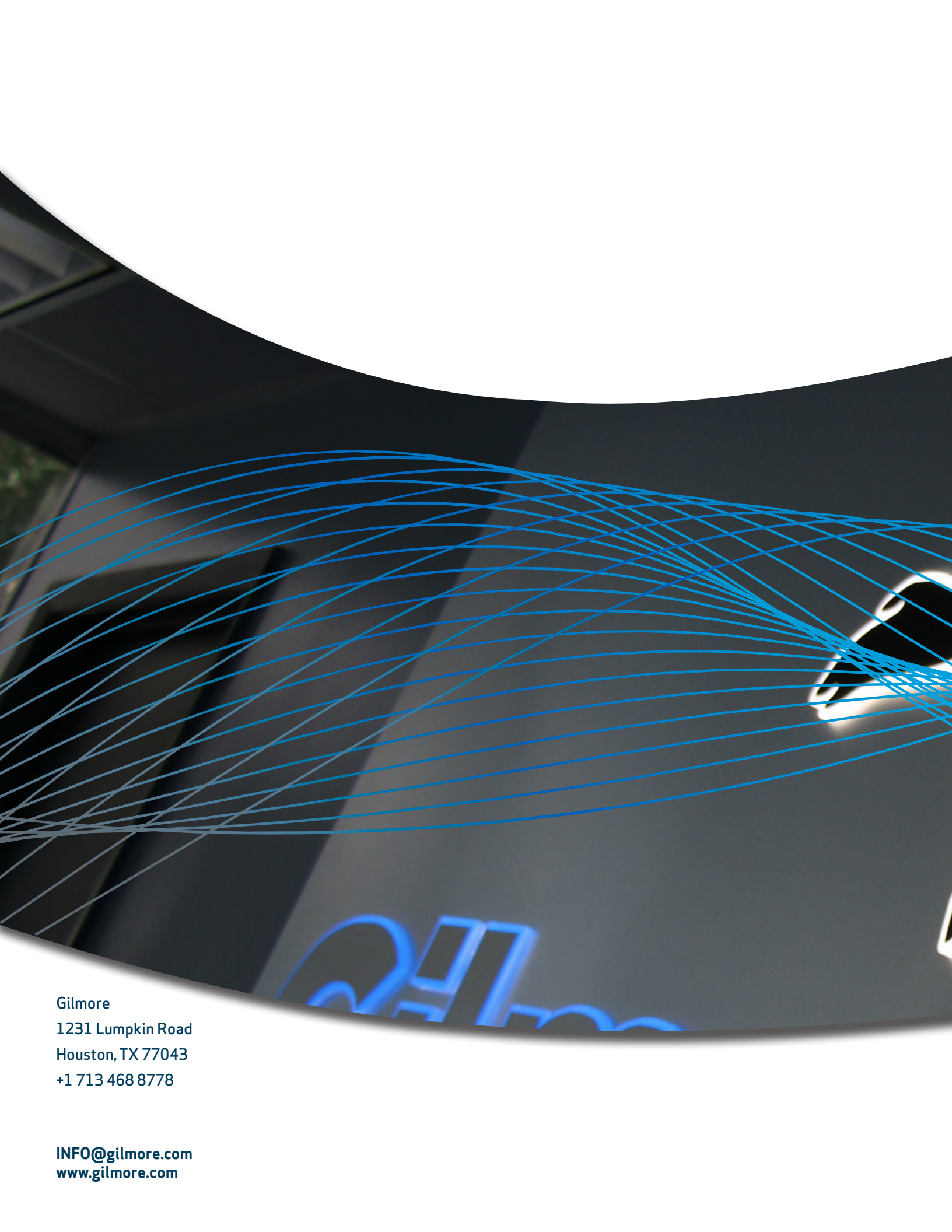
Any use of the internet or internal and external social networking sites should be in line with the company's Social Media Policy.

Social networking sites should only be used during work hours for work-related communications.

Gilmore generally views the use of social media and blogs for personal use positively, and it respects the right of employees to use them as a medium for self-expression. However, employees are not authorized to officially represent Gilmore on such platforms without prior permis-

sion from the marketing team. All our external communications require careful consideration and a unique understanding of legal and media issues. The Gilmore brand is best reflected by its people, and what you publish may reflect on us all.

Any issues or queries regarding the use of social media for work purposes should be directed to the marketing team.

The background is a curved, dark blue surface. It features a complex pattern of glowing blue lines that form a grid or mesh, curving across the frame. In the lower right, there is a blurred, glowing blue logo that appears to be the letters 'GILMORE'.

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