



UNiDAYS

CODE OF CONDUCT



OUR CULTURE & VALUES

At **UNiDAYS** we believe
conduct matters and that
everyone is important.

CULTURE

We nurture a culture of fairness, equality, and accountability, with neither blame nor bias, underpinned by empathy, compassion and mutual respect.

We actively listen and provide feedback constructively, ensuring good communication and teamwork remain at the heart of everything we do.

We strive to foster a “**no BS, no jerks**” environment where we can **be builders, clear on our purpose**, willing to explore boundaries and **jump into the unknown** – confident in our shared vision and consistent support.

VALUES

Our values define us and transcend all aspects of our business, especially how we interact with each other internally, and how we deal with our members, partners, suppliers, and governments externally.

SERVING OUR MEMBERS

Our core mission is to give students the power to make every experience more valuable and rewarding.



Our vision is a world where we can support, enable, and inspire young people to be their best selves.

We believe young people are the hope for a cohesive, inclusive, and just society that can create lasting positive change and we provide them with a trusted global digital platform that connects them to brand products, services, and experiences.

In pursuit of this mission, we encourage you to apply the UNiDAYS values in your work and interactions with each other and our members, and to follow these guiding principles:

ENSURE OUR SERVICES ARE RELEVANT, USEFUL, AND MEANINGFUL TO OUR MEMBERS:

We know the student experience and recent graduate experience can be stressful and we value our members' time and energy. We urge our team to view our services from a member's perspective. Ask yourself, "is what I am doing going to improve the student or graduate experience for our members?"

PROTECT THE PRIVACY AND RIGHT TO FREE EXPRESSION OF OUR MEMBERS:

Know your responsibilities under these procedures, and collect, use, and access user personal information only as authorised by our Security Policies, our Privacy Policies, and applicable data protection laws.

BE RESPONSIVE TO FEEDBACK AND PROACTIVE ABOUT IMPROVEMENTS:

Recognise relevant user feedback when you see it and do something about it. We take pride in responding to communications from our users, whether questions, problems or compliments. If something is broken, aim to fix it. If at any time you feel our members could be better served - let us know. We are always open to improvements, no matter how bold. Continually improving our products and services takes all of us.

Our relationship with our members is central to our success. As you can tell, we think pretty highly of them and want them to feel the same way about us.

SUPPORT AND RESPECT EACH OTHER

We spend a lot of time at work so it's important that we enjoy being here. We want each person to feel respected and able to perform to the best of their ability.

We promise to treat everyone at **UNiDAYS** with respect and count on you to do the same.

Remember, **no BS, no jerks.**

To that end, we expect you to:

- Promote ethical behaviour in the work environment;
- Promptly report dishonest, unethical, or illegal activities by other employees to your manager, the Legal or People team, or, if you wish to remain anonymous, the confidential Whistleblower Hotline;
- Participate fully in any investigation of alleged misconduct with UNiDAYS;
- Comply with this Code, the FUNdamentals, your employment contracts, and any policies that UNiDAYS implements from time to time;
- Maintain a healthy and safe workplace;
- Ensure that the workplace is free from discrimination and harassment with respect for diversity and every individual.

We take pride in having a workplace that is respectful, professional, free from all forms of discrimination, harassment, bullying and retaliation and which gives people a platform to shine!

UNiDAYS promotes equal opportunities

We don't tolerate discrimination, harassment, bullying, or any mistreatment by or of employees, consultants, contractors, guests, members, or partners in the workplace or in work-related situations on the basis of sex, race, colour, nationality, ethnic or national origin, ancestry, citizenship, religion or belief, age, physical or mental disability, medical condition, sexual orientation, veteran status, marital status or civil partnership, genetic information or characteristics (or those of a family member), gender reassignment, gender orientation, pregnancy or maternity, or any other category protected under applicable federal, state, or local law. You can find more information in our policies.

Our aim is that our people will be truly representative of all sections of society and reflect our diverse and dynamic member base.

If you suspect that harassment, bullying, discrimination, or retaliation, please report it immediately to the People Team or our Whistleblower Hotline (see below).

We understand that not everyone will be comfortable with a direct approach and that's completely fine. You can raise the issue formally through our grievance process or even anonymously through our Whistleblower Hotline. We want you to know that we treat all allegations confidentially and we promise that you won't be victimised where you raise a concern in good faith.

Please refer to our full policies on Anti-Harassment and Bullying and Whistleblowing for more detailed information.

MANAGE WITH COMPASSION AND ACCOUNTABILITY

Effectively Handle Concerns

If a Representative comes to you with a concern, you have a special responsibility to listen and act. Handling concerns appropriately is critical to preserving trust and protecting your team members and UNiDAYS.

If a Representative raises a concern we advise you to take the following steps:

- Remove distractions and listen carefully. Thank the Representative for speaking up—remember that they've just done something difficult and very important for you and UNiDAYS.
- Respond respectfully and take every concern seriously, even if you disagree. Show that you are committed to solving the problem.
- Take steps to protect the person's confidentiality—avoid discussing the conversation with others on your team but feel comfortable seeking guidance from your own manager if you have any questions.
- Promptly report violations of the Code or UNiDAYS policies to the Legal Team.

Set a Positive Tone

Managers play a vital role in upholding the Code. As a leader, you have a special responsibility for setting the culture and the work environment on your team. The way you make decisions, and handle concerns, different opinions, and even bad news, will set the foundation for trust with your teams, customers, and stakeholders. Your success and the success of your team depends on the trust you build together.

We encourage Managers to:

- Review the Code at least annually;
- Talk to your team about ethics and integrity, and be clear that you expect work to be done ethically;
- Lead by example, by modelling ethical decision-making;
- Ensure your team knows that for results to matter, they must be achieved the right way. Then, satisfy yourself that results have been achieved the right way;
- Take steps to make sure your team knows you will listen, even if they have something difficult to say.

AVOID CONFLICTS OF INTEREST

At UNiDAYS our dedication to our members is genuine and critical to our success.

To achieve our goals we need every Representative to be committed to our mission and in the best position to contribute to our collective effort. You are expected to use your judgment to act, at all times and in all ways, in the best interests of UNiDAYS while performing your job duties. As such, it is your responsibility to avoid situations where an actual or apparent conflict of interest could occur with respect to your obligations to UNiDAYS. Generally, a conflict of interest exists when a personal interest or activity interferes with your professional judgment or the best interests of UNiDAYS.

The best rule for any situation that may present a conflict of interest is to “abstain and disclose”.

If it is not possible to avoid participating in the event or activity creating the conflict, (1) promptly disclose the potential conflict to your supervisor and submit a request to the People Team, and (2) remove yourself from any decision-making responsibilities that are or have the appearance of being related to the conflict until you receive appropriate guidance from the People Team.

POLITICAL CONTRIBUTIONS

At UNiDAYS we value fair play. Business contributions to political campaigns are strictly regulated by federal, state, and local law where we operate. You may not use any UNiDAYS funds for political contributions of any kind to any political candidate or holder of any national, state or local government office. You may make personal contributions but should not represent that you are making any contribution at UNiDAYS's request or behalf.

OUTSIDE INVESTMENTS AND BUSINESS ENGAGEMENTS

UNiDAYS Representatives may not work at another company as an employee, independent contractor or consultant, or serve on its board of directors, where the affiliation gives or appears to give rise to a conflict of interest or interferes with your ability to perform your work for UNiDAYS. If you are unsure if your outside work of affiliation with an outside interest could create or appear to create a conflict of interest, please reach out to the People Team.

GIFTS AND HOSPITALITY

Sometimes clients, suppliers and agencies may be so impressed with you and the service you're providing that they want to offer you a gift or hospitality as a thank you. We think that's awesome, but we need to make sure that the gifts and hospitality are appropriate to accept. Refrain from accepting or being influenced by inappropriate gifts. Gifts in the form of cash payments are not allowed, regardless of the amount. Before accepting any gift or hospitality consult the Gift and Hospitality Guidelines in the FUNdamentals. If you plan to expense any gift or entertainment to be provided to a client or business partner, please review the Global Travel & Expense Policy.

OUTSIDE EMPLOYMENT

At UNiDAYS we are big believers in the entrepreneurial spirit--it's how we started UNiDAYS. We recognise that our Representatives may have other passions outside the great work we do at UNiDAYS. That said, we want to make sure all of our Representatives are committed to our mission and our Members and unfortunately, sometimes these passion projects, side hustles, and second jobs can conflict with that goal. Also depending on your role, your employment contract might prohibit you from taking on other employment outside of UNiDAYS. In order to avoid potential conflicts we ask that you get approval from your manager and the People Team and/or Legal Team before accepting any job, engagement, or opportunity, whether paid or unpaid, that could adversely affect your ability to fulfil your commitment to UNiDAYS. We'll be open-minded about your request, and who knows, it may be a skill or idea we can develop together.

CORPORATE OPPORTUNITIES

Avoid acting on business opportunities discovered through your work. Business opportunities discovered through your work here belong first to UNiDAYS, except as otherwise agreed to by UNiDAYS.

POTENTIALLY CONFLICTING RELATIONSHIPS

UNiDAYS does not prohibit dating among Representatives, nor does it prohibit relatives from working together within, for, or on behalf of the UNiDAYS. However, if a potentially conflicting relationship, romantic or otherwise, involves two Representatives in a direct reporting relationship in the same chain of command or otherwise creates an actual or apparent conflict of interest, the Representatives must disclose the relationship to the People Team. While both Representatives have a responsibility to disclose any such potential conflict, if you are a manager, your failure to properly disclose may result in more serious discipline. Upon learning of any potential conflict, UNiDAYS may reassign at least one of the individuals to a different position or role. In any event, where your significant other, relative, or any other potentially conflicted person is within your chain of command, you must recuse yourself from any decision-making concerning the person's compensation, promotion, discipline, or termination and must refrain from participating in their performance review.

If you have a personal or financial relationship with any service providers to UNiDAYS, such as vendors, suppliers, or contingent workers for which you have work-related responsibilities you must disclose that relationship to the Legal Team and recuse yourself from any decision-making regarding that service provider.

In addition, UNiDAYS's Board of Directors may from time to time adopt separate policies concerning directors' conflicts of interest in order to address the particular circumstances arising from their role as members of the board. Any such policy will supersede the conflicts of interest guidelines above to the extent applicable.


OBEY THE LAW

We think this one goes without saying. UNiDAYS takes its responsibilities to comply with laws and regulations very seriously and each of us is expected to comply with applicable legal requirements and prohibitions.

Failure to comply with laws may result in civil and/or criminal fines and penalties to us, as well as significant harm to the company's reputation. While it's impossible for anyone to know all aspects of every applicable law, you should understand the major laws and regulations that apply to your work. Also, as a global company, UNiDAYS expects that you will comply with all local laws and customs of the location where you work or visit.

If you have a specific question that relates to your work reach out to your manager or the Legal Team. Whilst we expect each Representative to know enough to determine when to seek advice from a manager or other appropriate teams, such as the Legal Team, the People Team, or Finance, a few specific laws are easy to violate unintentionally and so are worth pointing out here.

- **We are committed to complying with all anti-bribery laws**, including the UK Bribery Act, the US Foreign Corrupt Practices Act (FCPA), anti-boycott laws, and any similar local country laws. Any form of bribery, direct or indirect, is strictly prohibited. That means you must not offer a bribe or kickback to, or accept one from, any person, at any time, for any reason.
- **International Human Rights Laws such as the Modern Slavery Act 2015.** We expect Representatives to refrain from engaging in modern slavery, child labour, and human trafficking and to report any instances they are aware of whether it deals with UNiDAYS, its partners, or any suppliers.
- **Competition Laws are designed to promote free and fair competition.** Generally speaking, these laws prohibit arrangements with competitors that restrain trade in some way, abuse of intellectual property rights, or use of market power to unfairly disadvantage competitors. We expect Representatives to refrain from (i) agreeing with competitors about prices, (ii) sharing competitively sensitive information (e.g., prices, costs, market distribution, etc.) with competitors, or (iii) entering into a business arrangement or pursuing a strategy with the sole purpose of harming a competitor. Certain conduct is absolutely prohibited under these laws and could result in your imprisonment, not to mention severe penalties for UNiDAYS.



Since it's impossible to spell out every possible ethical scenario we might face, we rely on your good judgment to uphold a high standard of integrity for ourselves and our company. We expect all UNiDAYS Representatives to be guided by both the letter and the spirit of this Code. If you have a question or concern feel free to seek advice from your manager or other appropriate teams or individuals, including the Legal Team, the People Team, or Finance.

PROTECT UNiDAYS'S INFORMATION AND ASSETS

UNiDAYS has to gather and use certain information about individuals.

This can include information about our members, partners, suppliers, contractors, business contacts, Representatives and anyone we have a relationship with or may need to contact. No one likes to have their information leaked to the rest of the world, especially if it's false or private which is why UNiDAYS is serious about its commitment to the confidentiality, accuracy, and protection of our information and assets.

Keeping our information secure means protecting everything from UNiDAYS's commercial and financial details to employee data and our members' personal information.

CONFIDENTIAL INFORMATION

UNiDAYS's confidential business information is a valuable asset that everyone must protect. UNiDAYS Representatives are required to use our confidential information for business purposes only and to keep such information in strict confidence. This responsibility extends to confidential information of third parties that we have received under non-disclosure agreements. Confidential information includes without limitation, proprietary data, trade secrets, and know-how such as software and product designs, product plans, inventions, processes, designs, drawings, engineering, partner lists, employee data (other than your own), financial information, budgets, pricing, business plans, or other business information.

Your confidentiality obligations mean that you may not share any such information outside of UNiDAYS unless the appropriate non-disclosure agreements are in place. For help in establishing such an agreement, if you have questions about provisions of a non-disclosure agreement already in place, or if you have questions about whether certain information can be disclosed, please contact the Legal Team. Additionally, Representatives should also refrain from sharing confidential information internally beyond those persons who legitimately need to know it for purposes of their job. We have an open and transparent culture, and this is not intended to stifle the ongoing conversation and sharing that has facilitated so much of our success. We trust you will use your judgment to determine what is appropriate to share with your colleagues at UNiDAYS in furtherance of your and others' jobs. Please always keep in mind that improper use or disclosure of confidential business information could seriously damage UNiDAYS's reputation with members, partners, and the general public, expose us to liability, and cause harm to our business.

We ask that you not bring with you or share with anyone at UNiDAYS any confidential or proprietary information belonging to any former employer or other person or entity to which you owe an obligation of confidentiality under any agreement or otherwise. If you have questions or concerns regarding such information contact the Legal Team or People Team and we will assist you in any way possible to preserve and protect the confidentiality of proprietary information belonging to third parties. This Code is not intended to restrict an employee's legal right to discuss the terms and conditions of their employment.

UNIDAYS'S ASSETS

UNIDAYS provides its Representatives with a range of valuable assets to help you perform your work at the highest level. These assets include computer equipment, mobile devices, communications platforms and equipment, software, office and electronic equipment, and facilities. You are expected to treat these assets with care and use them with the interests of the business in mind and in accordance with the Information Security Policy. This means that assets should be well maintained and not subject to unreasonable use.

We seek to respect your personal privacy. However, as permitted by local law, it is important for you to understand that information created, accessed, transmitted, or stored using our technology resources, such as email messages, computer files, slack, or websites in your browsing history, are company resources and assets. We may access, monitor, or inspect UNIDAYS resources, assets, and property at any time without your prior approval, knowledge, or consent to the extent allowed by law. This includes monitoring and retrieving information that is stored or transmitted on UNIDAYS electronic devices, computers, equipment, and systems.

While we recognise that personal use occurs, it should not be excessive and should not interfere with the performance of your business duties. If UNIDAYS determines that personal use inhibits business use, we may request that you adjust or cease your personal use of the device.

THIRD PARTY CONFIDENTIAL INFORMATION

During your employment with UNIDAYS, you may have access to information systems or tools that enable you to view certain information relating to members, partners, and suppliers. These tools and information are important and necessary to enable you to perform your work effectively; however, it is of the utmost importance that UNIDAYS Representatives treat this data access with extreme sensitivity and caution and that you limit access to this data to the extent required for you to do your job. This data is confidential and subject to privacy protections in many jurisdictions. The trust of our members and partners is earned through your responsible use of this data. All UNIDAYS Representatives must review and comply with our privacy-related policies, including our Privacy Policy, Information Security Policies, and Data Retention Policy among others. These policies are available in Hibob. If you have any questions or concerns contact the IT Team or Legal Team and we will be happy to assist.

PROCUREMENT AND CONTRACTS

Protecting UNiDAYS's assets and information is the responsibility of every UNiDAYS Representative. That's why it's essential that each Representative follows the proper procedures and conducts the appropriate due diligence prior to entering UNiDAYS into any agreement or spending UNiDAYS's money.

UNiDAYS Representatives are required to:

- Review and understand UNiDAYS's Procurement Policy (available on Hibob) to follow the appropriate procedures stated in the policy when entering the company into agreements with suppliers.
- Refrain from altering, fabricating, falsifying, forging or altering any part of a contract or record.
- Never sign a contract on behalf of UNiDAYS unless you are approved and authorised to do so. Certain contracts must be reviewed by the Legal Team or Department Heads prior to signature. If you are unsure whether your agreement or contract requires such approval consult the Procurement Policy if it's a supplier agreement, check with your manager, or directly contact the Legal Team.
- Prior to submitting an agreement for approval, make sure you have read the contract, understood its terms, and have decided that the agreement is in the best interest of UNiDAYS and have had the agreement reviewed by the Legal Team.

REPORTING POSSIBLE VIOLATIONS

In line with our culture of accountability we hope you'll feel able to raise any issues with us.

It is everyone's responsibility to recognise potential problems and help ensure an effective workplace.

If you suspect a violation of this Code, any UNiDAYS policies, or the law, you have an obligation to report this. You may report violations to your manager, the People Team or the Legal Team. If you wish to remain anonymous, you may contact the Whistleblower Hotline, EthicsPoint, staffed by our vendor partner "NAVEX Global", at <http://makingmyunidaysbetter.ethicspoint.com/>. But please, do not conduct your own investigation.

Regardless of how any suspected violation is reported, there will be no form of reprisal for doing so. UNiDAYS will investigate fully all matters related to alleged violations and take appropriate action. Any Representative who feels that he or she has been subjected to any behaviour that violates this Code should immediately report such behaviour to his or her supervisor or using the channels described above.

Any breach of the above policy may result in disciplinary action and termination in accordance with the company's policies as outlined in FUNDamentals or policy that is in effect at the particular location.



Thank **you!**

UNiDAYS

WAIVER TO THIS POLICY

Any waiver of this policy must be given in writing. Waivers may be requested through the Legal Team. Waivers respecting officers and directors may require approval by the Board of Directors and will be promptly disclosed to the Global General Counsel.

WHAT IF I HAVE A CODE RELATED **QUESTION OR CONCERN?**

If you have a question or concern, please reach out! You can contact your manager, the People Team, the Legal Team (legal.team@myunidays.com) with your question and we'll do our best to promptly respond to you.