



# Pricefx Global Code of Conduct



Hi Team,

When I took the reins as CEO in 2022, I knew I was inheriting something special from Marcin. He and his cofounders had built an amazing business centered on cutting-edge products, creating customer value, and maintain a top-notch culture. As we all know well by now, that culture is driven by Pricefx's "F words" of being Fast, Flexible, Friendly, and Fair.



The first 3 F-words tend to get the most attention, however, one of the things that impresses me most about Pricefx is our ability to commit to fairness even when no one is talking about it. Fairness is baked into everything we do, and no matter which part of the business I'm spending time with or what I'm working on, I see all of us living out this value. Very few companies can say that.

We're entering an exciting phase of the Pricefx journey, one in which we're setting ambitious business goals. Those goals are framed in terms of things like revenue and profitability, but, as Marcin said in his versions of this letter, it remains critical that Pricefx does not lose sight of our commitment to fairness. Fairness makes Pricefx a great place to work, it makes our customers and partners happy to work with us, and it keeps Pricefx ahead of our competitors. So, though you may not always see the word "fairness" in our targets, know that we can't achieve those targets without it.

Our continued emphasis on fairness starts with remaining committed to the principles described in this Code of Conduct. I hope that each of you will, like me, read this document carefully and do your best every day to live by its principles. Sure, you may see references to laws and regulations, but I believe you'll find the Code of Conduct to be a helpful roadmap for bringing fairness to life.

With our collective commitment to fairness, we will ensure that Pricefx continues to see the success we're all working so hard to achieve.

Let's Go!  
Ronak Sheth, CEO

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# WELCOME TO THE CODE







## Introducing the Fourth F-Word

Fast. Flexible. Friendly. By now, we would be surprised if our “F-Words” are not tattooed on your brain. We would also be surprised to find them tattooed elsewhere, but if you love Pricefx that much, we won’t stop you.

The F-Words are really important to Pricefx’s culture. They embody so much about how we do what we do and why we have been successful. However, there is a fourth F-Word that is equally important to us: **Fair**. We have built an extraordinary business with a customer-centric culture, neither of which would be possible without a commitment by all of us to treat others fairly. So we thought it time to adopt it officially.

## What “Fair” Means

In short, a lot! The simplest version is that Pricefx is committed to treating fairly each person and entity with whom we come into contact when operating our business. Put another way, Pricefx is committed to complying with the highest ethical standards and all laws and regulations that apply to our business. If that seems vague or open-ended, you’re right, but the rest of this Code should clarify, so keep reading.

As you read on, keep in mind that laws can change and might differ from country to country. If an applicable law or regulation imposes a higher standard than what is in this Code, that is the standard that will be binding on you. Pricefx’s Legal, Risk & Compliance team (referred to throughout as “**Legal, Risk & Compliance**”) will do its best to keep you in the loop if a situation like this arises. Otherwise, stick with this Code and you’ll be in a great spot.



## If You're Reading This, it Applies to You

Pricefx's reputation for the best pricing product, excellent customer service, and great integrity is the direct result of our collective efforts. Each of us is personally responsible for supporting our core values, which require compliance with the law and ethical standards and a collective commitment to fairness.

This Code applies to all employees and non-employees (i.e., contractors, consultants, and advisors) of Price f(x) AG and each of its subsidiaries. If this is you (why else would you be reading this?), you must comply with this Code at all times.

## This Code Doesn't Stop at our Walls

Of course, this Code applies to your interactions with and behavior toward other Pricefx employees and non-employees. However, it also applies to your interactions with and behavior toward others you come into contact during your work with us. This includes individuals representing our customers, partners, suppliers, investors, and any other third parties with which we do business.

Further, you are not subject to this Code only when you are at a Pricefx office or only during business hours. This Code applies in all locations, at all times, and in all situations in which you are carrying out Pricefx business or otherwise representing Pricefx. Remember that your social media-based activities can violate this Code, even if carried out from personal, non-Pricefx accounts (e.g., making discriminatory / offensive statements on your personal Facebook or LinkedIn).



# FAIRNESS IN OUR CULTURE

Fairness in our culture means treating each other with dignity and respect; opposing discrimination, harassment, & other inappropriate types of treatment; and making those around you feel safe. We cannot attract or retain top-notch talent (like you, superstar) without a culture that gets people excited to come to work, to do so as their best, truest selves, and to trust that their success here will be based solely on their merit.

Wondering what you can do to ensure our culture embraces fairness? You have come to the right place. Keep in mind, though, that this is a serious and complex topic that Pricefx may choose to address in separate policies and guidance in the future. We will let you know if and when those are published, but you should check Confluence (People and Legal, Risk & Compliance) regularly for current policy and guidance documents.



## Fair Treatment for All

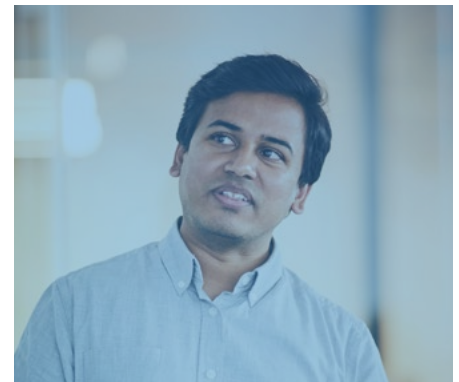
Pricefx is an equal opportunity employer and does not harass or discriminate—or tolerate harassment or discrimination—in any form. Pricefx will make reasonable accommodations required under applicable law to protect the rights of persons with disabilities. The following definitions are important:

- **“Discrimination”** means taking any adverse action based on an individual’s actual or perceived race, color, sex, age, national or ethnic origin, citizenship, veteran status, religion, gender (including gender identity), sexual orientation, marital status, disability, genetic information, or any other legally protected characteristic.
- **“Harassment”** means any unwelcome conduct based on one of the characteristics listed above that interferes with an individual’s work performance or creates an intimidating, hostile, or offensive working environment.

Now that the lawyers have gotten that out of their systems, allow us to translate:

***Treat everyone you encounter at Pricefx with the same respect and fairness with which you would want to be treated, and do not treat people differently because of the way they look or sound, where they come from, who they love, or anything else along those lines.***

Employment-related decisions (e.g., hiring, firing, promoting, demoting, or changing compensation) must be made only with reference to business-related information. Keep the irrelevant stuff (e.g., age, race, or sexual orientation) out of the process.







## Modern Slavery and Child Labour

Modern Slavery and child labour are serious problems that violate human rights, and it is crucial for Pricefx to do its part to address them. We are committed to upholding high ethical standards by regularly checking and ensuring that neither Pricefx nor our suppliers, potential partners, or contractors are involved in such practices. Our dedication lies in maintaining ethical behavior and striving to prevent any instances of modern slavery, child labour, or human trafficking within our scope.

Pricefx undertakes, in accordance with ILO Core Labour Standards, not to use child labour (i.e., not to employ persons younger than 15 or, if higher, the minimum permissible age under applicable law). Furthermore, Pricefx does not use forced labour – all work at Pricefx is always carried out voluntarily and is not required under threat of punishment, and, in accordance with the ILO Core Labour Standards, Pricefx will always refrain from the use of forced or unlawful compulsory labour, in particular in the form of bonded labour, human trafficking, slavery, slave-like practices, servitude or other forms of domination or oppression in the workplace environment, such as economic or sexual exploitation and humiliation, and will further ensure that its employees maintain control over their identity documents and that they do not pay fees or other payments in order to be employed.

## Sustainable Approach

We are committed to conducting business not just ethically, but also in a socially conscious manner. Pricefx integrates socially responsible and sustainable practices into all aspects of its operations, contributing to a more sustainable future and reducing environmental impacts. Our Corporate Social Responsibility Statement outlines this commitment through various initiatives, emphasizing values such as community engagement, ethical practices, and environmental sustainability.

## Safe Workplace

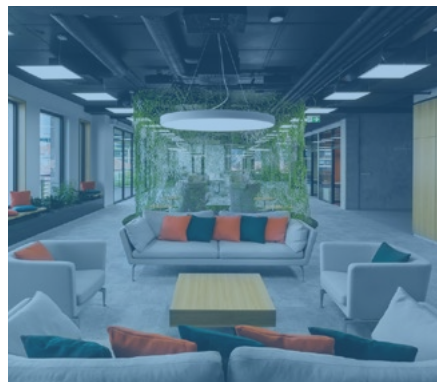
Few things are more important to workplace culture than maintaining a safe working environment. Your co-workers and our office visitors should always feel safe and comfortable with Pricefx. Of course, we will always operate our facilities in line with environmental, health, and safety regulations. In addition, you should note the following:

- **Violence and Weapons**

No one may bring a weapon to work or a work-associated event under any circumstances. Pricefx will not tolerate any amount of violence or threats of violence by or against any of our employees, contractors, or others. This includes threats made outside of work (e.g., on social media) and/or on non-work systems.

- **Drugs and Alcohol**

Abuse of drugs and alcohol detracts from the health and safety of our employees and is not permitted. Of course, we know you are aware we keep beer in our fridges (and we drink it). Alcohol consumption is not banned in our offices nor is it (usually) prohibited at other work-related events. That said, we expect all of our employees and contractors to use good judgment and to consume responsibly without making others feel uncomfortable or impairing work performance. Illegal drugs may not be brought to Pricefx offices, nor may they be brought to or consumed at work-related events or during working hours. Pricefx may, on reasonable suspicion of impairment, request an alcohol and/or drug screening of an employee and take all necessary and appropriate action in response to a failing result (in all cases to the fullest extent permitted under applicable law).





## Workplace Relationships and Nepotism

Pricefx values and rewards merit above all else when making employment-related decisions. To maintain this merit focus, Pricefx keeps a close eye on workplace relationships and nepotism:

- **Workplace Relationships**

We get it: You spend a lot of time here, and that might mean you find love here. And that's great! But workplace romantic relationships can interfere with our culture. You should avoid making employment-related decisions that would impact a partner, and reporting relationships between partners are not permitted.

- **Nepotism**

Family might be everything to you, but that does not allow you to favor family members to the detriment of others, be they co-workers or prospective partners or suppliers. As with workplace relationships, you should remove yourself from any business decision (employment-related or otherwise) involving a family member or close friend. Note specifically that hiring managers may not refer family members (including partners) for positions over which they have hiring responsibility, and Pricefx's Employee Referral Program does not apply to referrals of family members or partners.

To be clear, there is no blanket ban on working with your friends, relatives, and/or significant others. However, if these working relationships can compromise our commitment to fairness, we will take any actions that we think are necessary to avoid adverse effects, which may include (for example only) changing reporting structures or reassigning one or both individuals. You should talk to the People team if you would like guidance on a workplace relationship or working with a close friend, family member, or partner.



# FAIRNESS IN OUR BUSINESS PRACTICES

Fairness in our business practices means operating and competing with integrity and respecting our customers, partners, suppliers, investors, and other third parties (yes, even our competitors). We would lump all of this together as observing “ethical business practices.” As is often the case, there is a lot to unpack there, but this Section highlights some of the most important items.

As with Section 2 above, many topics in this Section are important and complex and may be handled in greater detail in separate policies and guidance. We will keep you in the loop when those things are published, but you should check Confluence (People and Legal, Risk & Compliance) regularly for current copies of our policies and guidance.





## Confidential Information and Intellectual Property

The success of our business depends on protecting our confidential information and intellectual property. It also requires us to be equally careful in protecting our customers', partners', investors' and other third parties' confidential information and intellectual property.

When you joined Pricefx, you signed one or more contracts that impose on you some confidentiality obligations concerning Pricefx's and third-party confidential information (including that of former employers). Nothing here limits those obligations, but we want to remind you of some key points:

### Protecting Pricefx

- **Understand what "confidential information" is.** In some cases, documents or information will be marked as "confidential," "secret," "proprietary," or something similar. If you see these markings, you should consider the document or information confidential. However, we realize it will not always be that easy. If something is not marked as confidential, think about whether, if it were your information, you would want the whole world to see it. If the answer is no, there is a good chance Pricefx or, if applicable, the third-party owner would consider it confidential.
- **Do not access confidential information unless you need it to do your job.** If you do not need to see it to perform a job-related task, avoid looking at it.
- **Do not disclose confidential information to third parties.** Confidential information, whether ours or a third party's, should not leave the walls of Pricefx unless we have specific written authorization to disclose it.
- **Do not disclose confidential information to other employees or contractors that do not need it.** This is related to the two points above. If you do not need it, you should not have access; the same goes for other Pricefx employees and contractors, even if they are on your team.
- **Respect Pricefx if and when you leave.** Your confidentiality and IP protection obligations to Pricefx follow you when you leave us. Do not use our confidential information or IP in future endeavors.



# "Respect is how to treat everyone."

- Richard Branson

## Respecting Former Employers

- **Respect your former employers and any other person to which you have made confidentiality promises.** You should not bring to Pricefx or use at Pricefx any confidential or proprietary information that you learned from a former employer or any other person to which you owe an obligation of confidentiality.
- **Do not discuss previous employers' confidential information.** Remember that you and your coworkers probably owe similar duties of confidentiality to your and their former employers. Avoid asking about specifics concerning coworkers' prior work or divulging confidential information concerning your own former employers.
- **Excuse yourself from potential conflicts.** If you worked on a project at your former employer (e.g., pitching to a specific customer, coding a specific functionality) and are being asked to work on a substantially similar thing here (e.g., pitching to that same customer, coding that same functionality), let your manager know so that we can avoid putting you and/or Pricefx in a risky situation.

Protecting our intellectual property is especially complex. Your involvement is crucial, and a significant part of that involvement is observing your confidentiality obligations, including the guidelines above. From time to time, you may be asked to assist Legal, Risk & Compliance in taking actions that protect our IP (e.g., ensuring third parties sign appropriate IP assignment or licensing contracts, signing documents to facilitate a patent application). Unless otherwise provided under applicable law, such assistance is mandatory and not subject to additional compensation.

## Data Privacy and Security

Few legal issues have received as much attention lately as data privacy and security, and for good reason. As data becomes more and more valuable to both individuals and businesses, the risks and potential negative effects of data compromise increase. With that increased risk comes increased privacy and security obligations, whether arising under laws and regulations (e.g., the GDPR), certification standards (e.g., ISO 27001), or customer contracts (or some combination of the three).

If you ever find yourself processing personal data, you must take precautions to ensure that you do not violate data privacy requirements. If you are not sure which data falls into the personal data category, check the Legal, Risk & Compliance Confluence page for more details. In general, we are talking about any information that relates to an identified or identifiable living individual. These requirements can be complex, but you should always observe at least the following:

- **Minimize your data processing** by collecting only the personal data you need and using it only as required for the particular task at hand.
- **Do not leave personal data exposed** in the office, e.g., by leaving printouts in the printer or allowing others to see your monitor when you are away from your desk.
- Delete personal data whenever you **no longer need it**.
- Keep the systems in which you store personal data to a minimum and ensure that **each such system has been approved by Pricefx IT**.
- **Understand your rights and obligations** by reading the applicable Pricefx GDPR for Employee notices, available on Confluence. **Participating in all required data privacy and/or security training sessions**, whether held by Pricefx or a third party (e.g., a customer).

In addition to observing privacy requirements, each of us is responsible for ensuring that Pricefx keeps customer, employee, and other data (personal or otherwise) secure against unauthorized access, use, or destruction. Again, there are many things you can do to ensure data security, but you can start by observing the Pricefx BYOD Security Policy or Company Device Policy (whichever is applicable for you) (see Confluence).

As an ISO 27001 and SOC 2 Type 2 - certified organization, Pricefx maintains several separate data privacy and security policies that may be relevant to your work here. Those policies, to the extent applicable to you and your role, apply in addition to (and not instead of) the matters described in this Code. Please reach out to [dp@pricefx.com](mailto:dp@pricefx.com) with questions concerning your data privacy and/or security obligations.

## Conflicts of Interest

Conflicts of interest arise when you prioritize your, a friend's, a partner's, a family member's, or anyone else's interests over competing interests of Pricefx. Conflicts of interest can harm our business, our culture, and our (and your) credibility. Keep an eye out for the following situations that can create conflicts of interest:

- **Outside Employment, Business Relationships.** Avoid accepting employment, board positions, or consulting engagements from, or establishing similar relationships with, Pricefx competitors or business partners where your judgment could be impaired in a way that harms—or could harm—Pricefx. Do not start any new business that will compete with Pricefx in any way. Reach out to your manager before starting a business, accepting a position, or taking any action that could create a potential conflict of interest.
- **Business Opportunities.** Business opportunities identified by or through Pricefx belong to Pricefx. You cannot pursue any of these business opportunities without Pricefx unless authorized in writing in advance by a member of the Executive Team.
- **Working with Friends, Relatives, and Partners.** As described in Section 2(c) above, doing business with or having a co-working relationship with a friend, family member, or partner can compromise workplace fairness and create conflicts of interest. Avoid being involved in business- or employment-related decisions that could impair your judgment or prevent you from putting Pricefx's interests first.
- **Outside Inventions.** Inventions that you contribute to outside of work but that relate to Pricefx and/or your work here are subject to the intellectual property assignment language that you have agreed to under your employment agreement. Let Legal, Risk & Compliance know if you need assistance understanding the intellectual property aspects of side projects.
- **Personal Investments.** Avoid making personal investments in companies that compete or do business with Pricefx where that investment could cause you to act in a way that harms Pricefx.
- **Gifts, Entertainment, and Business Courtesies.** Accepting gifts, entertainment, and business courtesies can create actual or apparent conflicts of interest, especially if the value of the item received is significant. Pricefx employees and contractors are not permitted to receive items of significant value, though acceptance of inexpensive "token" non-cash gifts is permissible. We also permit acceptance of reasonable, bona fide meals and entertainment from potential customers or other business partners, so long as they are not excessive and do not suggest any corrupt intent.

The above situations are examples only and do not cover all of the possible examples of a conflict situation. Conflicts of interest can be hard to identify and even harder to manage, so please reach out to Legal, Risk & Compliance if you think you find yourself, or may soon find yourself, facing a conflict of interest. While conflicts of interest should be avoided to the fullest extent possible, Pricefx from time-to-time may approve certain conflicts of interest where (1) such situations are disclosed in advance, (2) appropriate measures are taken to reduce the actual or apparent conflict, and (3) Pricefx stands to be the predominant beneficiary of the conflicted transaction. At a minimum, any conflicts of interest must be specifically disclosed and approved in advance in writing by two members of the Executive Team (not including any member that is party to such conflict of interest).



## Doing Business Internationally

Pricefx is and has been virtually since its founding, a global organization. Our entire business network, from employees to customers to suppliers, is spread across multiple countries and continents. This is an important measure of our success, but it also introduces a lot of legal- and compliance-related complexity. In addition to subjecting us to a large number of laws and regulations, this raises specific risks in terms of laws and regulations related to “international trade.” We’re talking specifically here about (i) anti-corruption and bribery, (ii) economic sanctions, (iii) anti-money laundering, and (iv) export controls.

Owing to the importance and complexity of these topics and to our aggressive growth (both past and future), Pricefx has implemented the separate International Trade Policy. This policy deals with the above topics in detail and is required reading for any person at Pricefx who deals with external parties located in another country. This policy applies in addition to (and not instead of) the matters described in this Code.

## Financial Practices

Pricefx employees must act responsibly and exercise sound judgment when dealing with company finances. If your job at Pricefx involves spending money, providing items of value, entering into contracts, or maintaining our books and records, you are expected to keep and submit (as applicable) reasonable and accurate records and otherwise comply with our internal financial and accounting controls and signature authority requirements. You can view the Pricefx Signature Authority matrix on the Legal, Risk & Compliance Confluence page, and you should contact your manager and/or accounting ([accounting@pricefx.com](mailto:accounting@pricefx.com)) if you have questions about your financial, recordkeeping, or similar obligations.

## Communications and Records

We live in a digital world, where it seems like a new method of communication is invented every day. As communication methods appear and proliferate, it is important that we continue to communicate responsibly, regardless of the outlet.

- ***Work-Related Communications and Records.***

Communications and records related to your work here, specifically those through your Pricefx accounts, should be professional and accurate. Be mindful of what you put in writing, and always remember that your business communications could become part of the public record should Pricefx be involved in legal actions and are subject to monitoring by Pricefx (subject to any limitations imposed by applicable law). On a related note, Pricefx may from time to time be legally required to preserve certain communications and records. If you are contacted by Legal, Risk & Compliance concerning a situation like this (typically referred to as a “Legal Hold” or “Preservation Order”), you will be prohibited from destroying, deleting, or modifying the communications and records subject to the hold or order. Legal, Risk & Compliance will work closely with you in any such situation.

- ***External Communications.***

Maybe you are an Instagram celebrity or your Twitter feed is so funny you’re adding thousands of new followers every day. Maybe you have fewer than 100 Twitter followers. No matter who you are or what your follower count is, unless you have received permission from Marketing (including when asked to promote exciting Pricefx news), you are not permitted to make endorsements or statements on behalf of Pricefx or suggest that you are an official spokesperson of the company. In keeping with your confidentiality obligations, you are also not permitted to make public statements concerning Pricefx’s confidential information, including things like our financial health, sales numbers, or target customer lists. These restrictions apply equally to statements made from your personal email, social media, and other accounts. Remember also that communications through these personal accounts can form the basis of a violation of this Code, so always use common sense when interacting with Pricefx contacts or making Pricefx-related statements through your personal accounts.



# BRINGING FAIRNESS TO LIFE

If you have gotten this far, you should have a better understanding of what it means to embrace “fair” as our fourth F-word. Now comes the hard part: keeping it going. It takes a lot of (hard) work, but this Section describes a few of the ways we can bring fairness to life.



## Living the Values and Speaking Up

Writing down the rules only gets us so far. What really counts is your commitment to this Code, and that commitment means (at least) two things.

First, this Code means very little if you do not live its values every day you come to work (whether in person or virtually). By embodying our commitment to fairness, you will go a long way toward ensuring everyone else does the same.

Second, we cannot implement and maintain this Code successfully if you are not transparent and forthcoming when you think you have identified an ethics or compliance issue (i.e., a breach of this Code or any other Pricefx policy, applicable law / regulation, contract, or other applicable compliance standard) or if you would like advice on navigating a difficult ethics or compliance-related issue. We encourage you to speak up any time you have reasonable grounds to believe (direct knowledge or high confidence) that an issue has occurred or is very likely to occur. This “reasonable belief” is important: false or unfounded allegations that you knew were not true or that you should have reasonably known were not true are harmful to the person or entity (including Pricefx) against which such false allegations are made, and legal protections for so-called “whistleblowers” may not apply to knowingly false or negligently made allegations.

With all that said, we want everyone here to feel comfortable reporting issues promptly and providing other feedback, so there are a few ways for you to do so:

- ***Talk to your manager***

If you see something that makes you uncomfortable, you can take it to your manager, who will be responsible for escalating it to Legal, Risk & Compliance and/or the People Team.

- ***Talk to People Team***

You can always reach out and speak to the Pricefx People team with any issues related to our workplace culture. You may contact them instead of, or at the same time as, your manager.

- ***Talk to Legal, Risk & Compliance***

Our Legal, Risk & Compliance group is responsible for this Code and ensuring it is observed by everyone at Pricefx. They are great resources should you need help in identifying, reviewing or resolving issues.



- **Report through EthicsPoint**

EthicsPoint is an online and telephone reporting tool provided by a third party (NAVEX Global). You can submit an EthicsPoint report online at [www.pricefx.ethicspoint.com](http://www.pricefx.ethicspoint.com). If you prefer to report by phone, you will need to go to [www.pricefx.ethicspoint.com](http://www.pricefx.ethicspoint.com) and select your country, at which point you will be provided the appropriate phone number for submitting your report that way. EthicsPoint is designed to enable efficient and thorough reporting of issues. Importantly, EthicsPoint allows you to report issues anonymously if desired. More information on EthicsPoint, including how it should be used and what is done to protect anonymity, can be found at the URL above. If you have any questions related to EthicsPoint, please reach out to Legal, Risk & Compliance.

Please remember that other feedback tools (e.g., LutherOne) should not be used for reporting ethics and compliance issues. Use of improper tools can impair Pricefx's ability to investigate and/or remediate issues appropriately.

Pricefx strongly encourages reporting through the channels described above, as internal reports give us the best chance of identifying issues, remediating those issues, mitigating their effects, and preventing similar issues from arising in the future. However, you may have a legally protected right to report certain issues to competent government authorities (e.g., the EEOC in the US or a national data protection authority in the EU), either in lieu of or in addition to reporting internally. Pricefx recommends that you be familiar with the relevant government authorities and processes in your home city, state, country, and/or region. Finally, note that public disclosures (e.g., posting to the Internet via social media) may not enjoy the same level of legal protections as internal or government reports, and you should exercise caution before making any public statements related to actual or suspected ethics or compliance issues.

Each of the reporting channels described in this section is available to employees and contractors. Additionally, non-contractor external parties (e.g., representatives of customers or suppliers) may report suspected ethics or compliance issues through EthicsPoint at the URL referenced above. If you are contacted by an external party about a potential issue, you should remind them of their ability to submit a report through EthicsPoint.



## Reviewing and Remediating Issues

Once an issue has been reported, the issue is in the hands of Legal, Risk & Compliance. Pricefx will take all credible reports of issues under this Code seriously and will conduct a full and fair investigation of any such report in accordance with our Internal Investigations Process (a copy of which can be found on the Legal, Risk & Compliance Confluence page). To highlight a few key points:

- Investigations may require us to talk with you (if not reported anonymously) and/or anyone that may be relevant to understanding or remediating an issue. In particular, Legal, Risk & Compliance may involve internal resources with relevant subject matter knowledge, e.g., members of the People team (where the issue relates to employee relations or company culture) or members of the Accounting team (where issues arise concerning company finances).
- While we want to keep things confidential to the fullest extent possible and appropriate, we cannot guarantee confidentiality around investigation and remediation, particularly if it implicates external law enforcement agencies to which we may decide or be required to report issues.
- The outcome of any investigation is subject to Pricefx's sole discretion, though violations of any aspect of this Code or applicable law could result in employee discipline up to and including termination (subject in all cases to applicable law).

## No Retaliation Policy

Pricefx does not permit retaliation in any form. "Retaliation" means adverse treatment of a person in response to that person's (or that person's family, friend, colleague, or other contact's) filing a good faith report of a suspected violation of this Code or applicable law, contract, or standard, expressing an intent to do so, exercising a right provided under applicable law (e.g., filing a discrimination grievance with a government authority), or assisting with an investigation related to this Code.

Retaliation can take many forms, all of which are prohibited under this Code consistent with applicable law. Actions that can constitute retaliation include suspension or dismissal from employment, demotion or withholding promotion, changing duties or hours adversely, or providing an unfounded negative performance review.

If you feel that you have been treated adversely in a way that constitutes retaliation, you should report that right away through one of the channels described above.

### Providing Training and Further Information

From time to time, Pricefx may create training sessions concerning portions of this Code, some of which may be mandatory for all or a subset of Pricefx employees or contractors. We will give you advanced notice of these training sessions, which may be provided live or online.

There is a lot here, so we understand if you have questions or found some of it confusing. We want to make sure every Pricefx employee and contractor understands what is expected of them and how they can contribute to keeping our culture fast, flexible, friendly, and fair. You can contact the following people at any time for more information or with questions, comments, or concerns:

Who to Contact	Why to Contact Them	How to Reach Them
Legal, Risk & Compliance	You have any questions about the information contained in this Code or otherwise need to talk about something related to your work with Pricefx.	<b>Compliance</b> <ul style="list-style-type: none"><li>Michaela Kubisova: michaela.kubisova@pricefx.com</li></ul> <b>Legal, Risk</b> <ul style="list-style-type: none"><li>Ryan Farrell: ryan.farrell@pricefx.com</li></ul> <b>Security</b> <ul style="list-style-type: none"><li>Jaroslav Podgorski: jaroslav.podgorski@pricefx.com</li></ul>
IT	You want to know more about data security or have questions about our BYOD policies or IT systems and equipment.	<b>IT</b> <ul style="list-style-type: none"><li>Pavel Zeman: pavel.zeman@pricefx.com</li></ul>
People & Culture	You have any questions related to your employment by Pricefx.	<b>People (HR) Operations</b> <ul style="list-style-type: none"><li>Jakub Mares: jakub.mares@pricefx.com</li><li>people@pricefx.com</li></ul>

### The Future

Finally, this Code only does us good if it reflects the present state of our business and the world around us. Legal, Risk & Compliance is always looking for ways to improve the Code and is vigilant about legal, regulatory, or other changes that may impact it. This Code will therefore be updated from time to time, and you will be required to comply at all times with the then-current version of the Code. Remember that you can look to Confluence for the current version and should check in regularly for updates to this Code or other policies and guidance.



**THANK YOU**