



# Code of Conduct

**matchmycolor GmbH**  
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# Code of Conduct matchmycolor LLC

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## 1. Application

This Code of Conduct (the "Code") applies to all directors, officers and employees of matchmycolor LLC and its affiliated companies ("matchmycolor" or "We").

## 2. Compliance with Laws and Regulations; Customs and Trade Compliance

matchmycolor is committed to adhere to all applicable laws, regulations and internal matchmycolor requirements. Every employee of matchmycolor is expected to comply with all laws, regulations and matchmycolor's policies, procedures, principles and standards, including this Code. Such compliance is the key obligation and condition of employment by matchmycolor. Employees must seek guidance from management whenever they face a question about the applicable laws and policies.

matchmycolor is committed to comply with the applicable customs regulations, export controls and trade sanctions laws by ensuring that matchmycolor does not engage with persons or companies listed on a sanctioned party list and by complying with the laws regulating the distribution and use of our products and services in geographies in which we select to operate.

## 3. Protection of Environment, Health and Safety

We strive to minimize the environmental impact of all our activities on the environment and to engage in a sustainable development by engaging in the reduction of matchmycolor's carbon footprint, waste and water usage, by recycling where possible and by aiming at efficiently using natural resources. matchmycolor aims at ensuring workplace safety and appropriate conditions for its and its affiliated companies' employees, directors and officers, for our customers, for the communities in which matchmycolor is present and for others working or interacting with matchmycolor. matchmycolor follows all applicable environmental, health and safety laws and regulations of Switzerland.

## 4. Fair Treatment; Equal Opportunity

matchmycolor strives to create a workplace, where every employee, director and officer feels welcome, supported and has the equal opportunity to succeed, and which is free from harassment and intimidation. Matchmycolor prohibits discrimination based on color, race, religion, age, sex, national origin, gender identity or expression, disability, marital status, sexual orientation and political affiliation.

matchmycolor will not tolerate any form of discrimination, harassment, retaliation, bullying or incivility.

Matchmycolor is committed to conduct its business so that the rights and dignity of all people are respected.



## 5. Conflicts of Interest

matchmycolor is committed to manage any conflict of interest, which exists whenever the interest of an employee, director or officer of matchmycolor is or is perceived to compete with matchmycolor's legitimate business interests. Business decisions need to be based on matchmycolor's business needs and every employee, director or officer of matchmycolor is expected to place the interests of matchmycolor above its personal interests when taking decisions relating to work.

Every employee, director and officer of matchmycolor must disclose any conflict of interest, where competing actions, interests or relationships complicate the performance of work related duties and responsibilities in a objective and effective manner, or where any family member or friends could benefit improperly as a result of a position with or relation to matchmycolor. Employees, directors and officers shall avoid situations that could result in an actual or perceived conflict of interest and excuse themselves from any situation, in which a conflict of interest could impact the business judgement.

## 6. Anti-Corruption

matchmycolor does not tolerate any form of bribery or corruption and is committed to not giving, offering, promising to give or accept, request or agree to be given anything of value to improperly influence any decision or to make a sale or secure any other improper business advantage for matchmycolor. We will not engage in any corrupt activity or bribery by utilizing any third party. Matchmycolor will use due diligence when selecting and engaging with third parties, pay fair market value for services and document business transactions appropriately.

Employees, directors and officers of matchmycolor are prohibited to make or accept any gift in connection with their employment with the exception of cultural courtesies.

## 7. Competition Law Compliance and Fair Competition

matchmycolor engages only in fair competition and ensures that all interactions with competitors are of appropriate nature. We will not enter into any agreements or activities that unfairly restrict or prevent competition, or in any unfair business practices. In all matchmycolor does, we endeavor to conduct our business in a fair and straightforward manner.

## 8. Protection of Confidential Information and matchmycolor's Assets

matchmycolor is committed to safeguard confidential information and personal information and to prevent unauthorized disclosure or use by its employees, directors or officers. matchmycolor also respects the intellectual property rights of third parties and will not inappropriately acquire, collect or use such third parties' confidential information.

When matchmycolor processes personal information, we appropriately inform the people whose information is being processed on how it will be processed and we obtain, where required, the necessary consent and authorizations. matchmycolor is committed to ensure its compliance with the applicable data privacy laws.

These obligations of our employees, directors and officers extend beyond employment at matchmycolor.

It is every employee's, director's and officer's duty to safeguard and utilize matchmycolor's assets (including its intellectual property and know-how) with care and according to their intended use. All employees, directors and officers must use good judgment to ensure that these assets are not wasted, misused, stolen or lost.

## 9. Accurate Reporting & Accounting

matchmycolor is committed to keep accurate and complete financial books, records and accounts that accurately reflect matchmycolor's substance and actions and that provide a true and fair view of its financial situation.