



Group Code of Conduct & Ethics



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Foreword

Dear all,

At Rubix, we share the conviction that the success of our Group rests on our people. Together, we are committed to conducting business properly, responsibly and ethically, to the benefit of each of us, as well as our customers, suppliers, shareholders and the communities in which we live and work.

This Code of Conduct & Ethics (“**Code**”) applies to all Rubix employees and those individuals and organisations acting on our behalf wherever we operate. It reflects our values and the behaviours we expect from everyone representing Rubix and provides guidance on how to achieve those standards.

The Executive Board of Rubix has endorsed this Code and shall lead its implementation by example.

Sincerely,

David Morkeberg

Chief Executive Officer

27 February 2026

1. Our values

Our core values are to:

- Act with integrity
- Own and take action
- Stay curious
- Never settle
- Embrace perspectives



It is our collective responsibility to ensure these values are displayed, known, understood and lived every day, in all of our locations, and demonstrated in both our internal and external relationships.

2. Who does this Code apply to?

Compliance with this Code is mandatory for all employees, consultants and individual contractors, interns and agents acting for Rubix Limited and/or any of its subsidiaries worldwide, as well as joint venture and business partners (“**Rubix Personnel**”). Additionally, we expect all third parties that we interact with and have business dealings with to manage ethics and compliance risks to a high standard, particularly with regard to anti-corruption and bribery, international human and labour rights, export control and sustainability.

3. Operational Compliance

In order to support our core values, we have comprehensive processes and procedures to ensure compliance with all applicable laws. It is of utmost importance that all Rubix Personnel understand our shared responsibility for compliance and behave in an ethical and law-abiding manner at all times.

The application of this Code shall be subject to any restrictions or rights arising from the law in each jurisdiction in which Rubix operates. Where differences exist between this Code and local law or regulations, the highest standard of behaviour shall apply.

Rubix Personnel who violate this Code may be subject to disciplinary action (up to and including termination). Where an action is also in breach of the law, Rubix Personnel may also be subject to prosecution under civil or criminal law.

4. Business Practices

4.1 Product & Services Safety and Quality

At Rubix, quality and safety mean making sure that our products and services meet or exceed our clients’ expectations and fully comply with all applicable legal requirements and standards. We are committed to satisfying our clients by offering high-quality products that have proven their efficiency and safety.

4.2 Responsible Marketing

At Rubix, promotion and marketing of our services and products must always be accurate, in accordance with their characteristics, and should avoid any confusion for our customers. All applicable laws and regulations, including those relating to product specification, data protection and sustainability, must be understood and adhered to when implementing marketing and communication campaigns.

4.3 Prevention of Bribery and Corruption

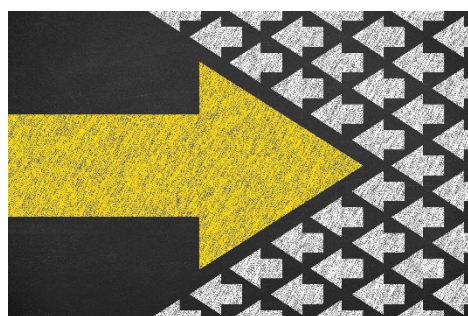
At Rubix, we require that all transactions with third parties are carried out in accordance with all applicable laws relating to anti-bribery and corruption, including the UK Bribery Act 2010 and the French Loi Sapin II Law. Rubix Personnel must understand and comply with Rubix's [Anti-Bribery & Corruption Policy](#) and [Gifts and Hospitality Policy](#) at all times. In addition, all Rubix Personnel must undertake the Rubix Anti-Bribery and Corruption training within three months of joining Rubix. This training is found on the [Rubix Academy](#).

Rubix has a zero-tolerance policy with respect to matters of anti-corruption and bribery. Violations of anti-corruption and bribery laws are not only a serious breach of this Code that can lead to internal disciplinary procedures, but may also lead to criminal penalties and sanctions being imposed against Rubix and the individuals involved.

4.4 Fraud

Fraud of any kind is strictly prohibited. All Rubix Personnel must act honestly and transparently in every aspect of our business. Fraud includes any intentional act or omission designed to deceive others, resulting in financial or personal gain for oneself or improper loss to the company, our partners, or customers. This may include falsifying records, misrepresenting information, manipulating financial statements, diverting assets, or engaging in any other deceptive practice. We are committed to preventing, detecting, and responding to fraud in line with applicable laws and industry standards, and we expect all Rubix Personnel to report suspected fraudulent behaviour immediately through the appropriate channels. Any breach of this policy may result in disciplinary action, including termination, and may also lead to civil or criminal liability.

4.5 Conflict of interests



Rubix Personnel must avoid any activities in or outside Rubix which cause, or could cause, a position of conflict between the interests of Rubix and their personal interests (or those of their friends or family). Where it is not possible to avoid such a conflict, Rubix Personnel must disclose the matter in writing to their line manager, country CEO, or the Group General Counsel, in each case with a copy to the Internal Audit team at compliance@rubix.com.



4.6 Gifts and Hospitality

Giving and receiving gifts and hospitality may be a legitimate contribution to good business relationships, however, the giving or accepting of gifts or hospitality may in some cases be seen as providing an unfair advantage and amount to an ethical breach and/or corruption. To avoid the improper offering or acceptance of gifts or hospitality, all Rubix Personnel must comply with the [Gifts and Hospitality Policy](#) and ensure that the offer or acceptance of gifts or hospitality are appropriately recorded on the [Gift and Hospitality Register](#) where required. If you are in any doubt, please contact a member of your local legal department or compliance team.

4.7 Sanctions

Rubix is committed to complying fully with all applicable sanctions regulations in the countries in which it operates. The main sanctions' regimes that apply to Rubix are those adopted by the United Kingdom, the European Union, the United Nations and the United States.

The [Sanctions Policy](#) details three distinct categories of country (as summarised below) and the rules that must be applied in respect of each of category. The three categories of country are:

- a) **Prohibited Countries** - where Rubix Personnel are prohibited from transacting;
- b) **Restricted Countries** - where Rubix Personnel must obtain the prior consent of the Group General Counsel before transacting; and
- c) **Countries of Concern** - where the relevant screening procedure must be followed before transacting.

Further details of the relevant countries and procedures are set out in the [Sanctions Policy](#) along with guidance on identifying "Suspicious Counterparties" where additional due diligence must be undertaken before transacting.

In addition, Rubix's sales and purchasing are subject to export, re-export and import laws and regulations. Each country has its own specific regimes which may require Rubix to obtain general or specific licences, particularly where the transaction includes **dual-use goods**. Any exports, re-exports and imports should be assessed by the relevant regional team and any required licenses must be obtained before the transaction occurs. Further guidance can be found in the [Sanctions Policy](#).

4.8 Free and fair competition and anti-trust law

Antitrust or competition laws exist around the world and govern competitive behaviour. These laws are complex and vary from country to country, but they share the same goal: protecting consumers and consumer choices by ensuring companies compete fairly on their merits. Rubix is committed to promoting the principles of fair and open competition based on compliance with competition law. Anti-competitive agreements of any kind with competitors about prices, terms and conditions of business, market allocation and other economically sensitive issues will not be tolerated, and all arrangements and actions must be in compliance with the [Competition Policy](#). Rubix Personnel in roles involving direct

engagement with customers or suppliers, where there is a higher risk of inadvertent breach of competition laws, are required to complete mandatory Competition Law training which is available on [Rubix Academy](#) (the training is also accessible to all Rubix Personnel irrespective of job title).

Penalties for violating competition or antitrust laws are severe and include not only significant fines, but also personal criminal liability (including imprisonment) for the individuals involved. If you are in any doubt about whether any arrangements may be in breach of applicable competition or antitrust laws, please contact a member of your local legal department or compliance team.

5. Company assets and information

5.1 Intellectual Property

Rubix has an extensive IP portfolio comprising UK, European and international trademarks (including “Rubix”, “Roebuck”, “Giss”, Spartex”, “Mecaline” and other exclusive brands), patents and domain names. This intellectual property is a key part of our business and it is important that if any Rubix Personnel become aware of any misuse of Rubix’s IP, that they bring it to the attention of your local legal team or Group Legal department as soon as possible.

5.2 Confidential Information

At Rubix, we are committed to protecting our trade secrets, knowhow, and all other confidential information. We are also committed to protecting the confidential information of our suppliers and customers.

Confidential information is information that we learn, receive or develop as part of our work and which is not otherwise publicly available. It includes: our pricing information (both from our suppliers and also given to our customers); discount structures; names and contact details of our customers and suppliers; strategic, financial or business plans and information concerning our products. Confidential information is not always in writing - information that is disclosed orally can also comprise confidential information.

Confidential information is one of our most valuable business assets and must be protected and kept confidential. Unauthorised use or disclosure could destroy its value and give others an unfair competitive advantage.

Confidential information and trade secrets must not be used or disclosed to a third party without appropriate authorisation in line with your local practices, and without an appropriate legal agreement in place. Where the relevant confidential information belongs to a customer, supplier or other third party, the information should not be disclosed unless it is permitted by any underlying non-disclosure agreement.





Our confidential information belongs to Rubix; it does not belong to any Rubix Personnel even if Rubix Personnel have had access to it and/or used it in their business dealings. Each of you are under an obligation to keep our confidential information confidential, irrespective of whether such obligation is in your employment agreement or engagement letter (as it is implied by law). You must only use confidential information for Rubix business purposes and not for any private gain or to damage Rubix's interest or reputation.

5.3 Data privacy

Rubix is committed to respecting your privacy in respect to any personal data we may hold, and to ensuring that and such data is stored and processed in accordance with all applicable laws. We necessarily need to hold some personal data for each Rubix Personnel as a consequence of you being employed or engaged by us. Details of how Rubix handles your personal data can be found on the local privacy notices that can be obtained from your local HR department.

Our storage and processing of personal data must always be in compliance with applicable data protection laws including EU GDPR (General Data Protection Regulations) and the UK GDPR via robust controls and processes. To ensure that you understand your obligations under GDPR, all Rubix Personnel must complete the Rubix - GDPR Awareness training within three months of joining Rubix available on [Rubix Academy](#).

5.4 Information Security

Rubix is committed to protecting the security of all forms of information (written, spoken and digital) used in our business activities, during all steps of the information life cycle: creation, storage, usage, communication and deletion. We have implemented appropriate security solutions in accordance with best business practice in our sector and regularly audit the functionality of implemented security solutions.

Rubix Personnel must comply with information security rules implemented by Rubix and communicated country by country in the local IT policies. These rules have been put in place to ensure that our information (including confidential information) is protected and that Rubix is able to defend itself against cyber-attacks. As cyber-attacks become increasingly sophisticated, it is of utmost importance that all Rubix Personnel complete the Rubix - Information Security Awareness training within three months of joining Rubix, available on [Rubix Academy](#).

5.5 Use of IT and Communication Systems

We provide you with IT equipment, technology and systems to support you in performing your role and achieving Rubix's objectives. We expect this equipment and systems to be used primarily for business purposes and any personal use must be incidental and reflect sound judgement. The viewing, downloading or accessing of any illegal or inappropriate content is strictly prohibited and may result in disciplinary action being taken against you (up to and including dismissal).

Any unauthorised access to, or unauthorised attempt to access, any Rubix secure network or resource is strictly prohibited. Similarly, any installation of (including attempts to) or

distribution of any “pirated” or other software products that are not appropriately licensed for use by Rubix is also strictly prohibited.

Social Media can be an excellent way to raise awareness of our business, engage with our target audiences and increase traffic to our websites, similarly AI solutions can add value to our work. Please ensure these tools are used appropriately.

All Rubix Personnel must understand and comply with our [Acceptable Use Policy](#) and ensure that AI technology is used in accordance with our [Artificial Intelligence \(AI\) Policy](#).

6. Financial Integrity

6.1 Records

In compliance with law and best practice, Rubix keeps accurate accounting books and records, and maintains a system of internal accounting controls to ensure that all transactions are properly authorised, controlled and transparent.



Any business records that Rubix prepares, publishes or provides to authorities, shareholders and creditors, must be complete in terms of the applicable accounting principles. All financial records must be prepared correctly, in time and in accordance with the applicable legal requirements by Rubix Personnel according to their field of activity and area of responsibility.

6.2 Money laundering

Money laundering is the process by which the proceeds of criminal conduct are dealt with in a way to disguise their criminal origins. There are various offences found in local legislation and the laws criminalise both the process of overt money laundering as well as the failure of otherwise legitimate businesses to report suspicions of money laundering.

Money laundering offences can be committed by a number of different individuals coming into contact with the proceeds of crime. This applies broadly to the proceeds of any type of crime, for example, serious criminal offences like murder or drug trafficking, as well as the proceeds of regulatory breaches (for example, profits gained from a breach of health and safety regulations).

Rubix is committed to ensuring it is not involved in money laundering activity directly or indirectly. Periodic risk assessments are carried out across Rubix in order to identify risk areas. All Rubix Personnel must comply with the money laundering risk assessment processes and ensure any potential instance of money laundering is reported to the Group General Counsel.

6.3 Tax

Rubix is committed to full compliance with all applicable tax laws and treaties and full disclosure to relevant tax authorities. The Group’s tax affairs are managed in a way which

take into account Rubix's wider corporate reputation in line with Rubix's overall high standards of governance.

In line with applicable legal obligations, Rubix shall not engage in tax evasion or the criminal facilitation of national or international tax evasion. Consequently, it is forbidden for any Rubix Personnel to engage in any form of knowing or deliberate facilitation of national or foreign tax evasion. Rubix Personnel shall promptly report any actual or suspected evasion of tax or any request or demand from any third party to facilitate the evasion of tax to their local legal or compliance team or the Group General Counsel.

7. Workplace environment

Rubix is committed to ensuring that Rubix Personnel work in an environment that is respectful, promotes health and wellbeing, and is free from harassment, bullying and discrimination.

7.1 Diversity, equality and inclusion

Rubix recognises the value of a diverse workforce. Our objective is to maintain an inclusive environment where our colleagues can make the best use of their skills, free from discrimination or harassment. We recruit, train, develop and reward employees based on merit, regardless of gender, ethnic origin, age, religion, sexual orientation, gender identity, disability, or any other factor unrelated to performance or experience. We take steps to ensure that any vacancies are advertised to a diverse labour market and applicants will not normally be asked about health or disability prior to a job offer being made.



At Rubix, we take appropriate steps to accommodate the requirements of all Rubix Personnel, wherever possible, to ensure that all people are treated equally. Discrimination against anyone of any protected characteristic, either direct or indirect, is prohibited.

7.2 Harassment and bullying

Harassment is any unwanted physical, verbal or non-verbal conduct which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

We will not tolerate any act of harassment and bullying at the workplace. Any misconduct will be firmly condemned. If you believe you are a victim of, or you witness, any instance of harassment or bullying please report it to HR or through the whistleblowing process. The matter will be treated in a serious and confidential manner.

In addition, all Rubix Personnel must undertake the Sexual Harassment in the Workplace training, within three months of them joining Rubix. This training is found on the [Rubix Academy](#).

7.3 Workplace violence

Rubix is committed to providing you with a safe environment to work in. We prohibit any act or threat of physical violence as well as any verbal abuse made in the workplace and we will respond promptly to any threat of violence or act of aggression. Any allegations of workplace violence will be investigated and victims will be provided with appropriate support. Any individual found to have acted in a violent manner will be subject to disciplinary action (which may result in dismissal).

8. Sustainability and Social Responsibility

Rubix is committed to having a positive impact on society, through effective management of social, environmental and ethical issues. We believe this is key to strengthening long-term relationships with all of our stakeholders. We also see strong sustainability practices as integral to the successful delivery of our strategy, as we increasingly leverage our scale and technical expertise to support our customers on their sustainability journeys. Our sustainability strategy and targets are detailed in our annual Environment, Social and Governance (ESG) Report accessible on the Group Sustainability webpage ([Rubix: Sustainability](#)), where we also provide transparent updates on our performance, in line with the Global Reporting Initiative (GRI) reporting approach.

8.1 Health and Safety



Health and safety at the workplace are fundamental to the good functioning of our company. Rubix commits to complying with all enforceable legislation which governs safety at work, in order to guarantee a safe and healthy workplace and working conditions. In keeping with these objectives, Rubix provides adequate and timely health and safety training to make sure our people act in accordance with health and safety requirements. All Rubix Personnel must complete

the Health and Safety Essentials training within three months of joining Rubix. This training is found on the [Rubix Academy](#).

8.2 Human rights

Rubix is committed to respecting and promoting internationally recognised human rights, as set out in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labour Organisation's (ILO) eight core conventions, and the ILO Declaration on Fundamental Principles and Rights at Work. Rubix also expects suppliers to adhere to the same standards in human rights protection, as described in Rubix's [Supplier Code of Conduct](#). Where our Codes and local requirements are not aligned, we aim to enforce the most stringent approach.

8.3 Prevention of Slavery, human trafficking and child labour

As a group with headquarters located in the UK, Rubix complies with the provisions of the UK Modern Slavery Act 2015 and issues a [Modern Slavery Statement](#) annually.

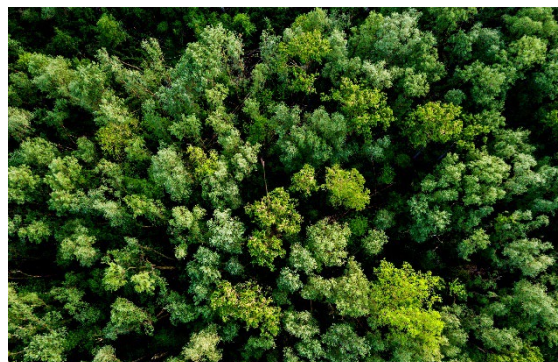
Rubix does not condone and will not participate in any form of human exploitation, including child or forced labour, slavery or people trafficking. Rubix is committed to ensuring that slavery, forced or child labour or human trafficking do not occur in its supply chain or in Rubix's business. Rubix also expects suppliers to adhere to the same standards in human rights protection, as described in Rubix's [Supplier Code of Conduct](#). Where our Codes and local requirements are not aligned, we aim to enforce the most stringent approach.

8.4 Conflict Minerals and conflict zones

In line with regulations imposed by the U.S. Securities and Exchange Commission ("SEC"), Rubix undertakes to implement all reasonable measures in its supply chain to ensure that no banned materials such as tantalum, tin, tungsten and gold, imported from a conflict zone, are used in the manufacturing process of any products supplied by Rubix. Please see Rubix's [Supplier Code of Conduct](#) for further information regarding Rubix's supplier's requirement to comply with this commitment.

8.5 Environment

Rubix integrates environmental considerations into the way the Group operates. We seek to limit our impact on the environment and make efficient use of natural resources. The Group expects suppliers to take a similar approach in their management of environmental issues. Rubix also seeks opportunities to work in partnership with suppliers to drive continuous improvement and innovations that deliver a reduced environmental impact. As well as being an environmental imperative, this creates opportunities for the Group, both in reducing our own footprint and in enabling the provision of products and services that support customers in achieving their sustainability targets too.



Rubix encourages employees to play their part in supporting our environmental objectives, including in relation to reducing the Group's use of energy and water across our operations and limiting the amount of waste that we produce.

9. Whistleblowing Procedure

The Group has a [Whistleblowing Policy](#) which establishes mechanisms for Rubix Personnel and third parties to raise concerns related to actual or suspected violations of the law, this Code and other group policies.



Rubix offers a range of channels for Rubix Personnel to report concerns, including via an independent, confidential service managed by Safecall, a third-party service provider. Rubix commits to protecting whistleblowers and will not condone any form of retaliation as a result of raising a concern. The Whistleblowing Policy is published on our Group employee intranet and on our external website, www.rubix-group.com.

Safecall is also available to our customers and suppliers as a secure and confidential channel through the whistleblower email address: rubix@safecall.co.uk, your local Safecall telephone number is also available via the [Whistleblowing Policy](#) or you may submit a report on the following link <https://www.safecall.co.uk/report/>.

10. Version Control

Version	Author	Approver	Date
1.0	Group General Counsel	Group CEO	October 2022
2.0	Group General Counsel	Group CEO	27 February 2026