



Code of Conduct

[Author]

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Letter from our CEO

Dear colleagues,

Platinumdex's Code of Conduct is your guide for conducting business with veracity and integrity; and creating productive, long term business relationships with our customers, suppliers, and one another.

The Code applies to each of us: management, employees, in-house contractors, and employees of subsidiaries or affiliates. In particular, all supervisory and management personnel, including all of our officers and directors.

By following these guidelines, we will achieve success for our company and ourselves, while making sure our performance improves continually. While we outline our expectations, we cannot cover every single eventuality or case of conduct, but we trust you to always use your best judgement.

Please read and understand these principles, and consciously apply them in your work.

Yours Sincerely

Alexander Rogan
Chief Executive Officer

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1. Our Values

Our values serve as the foundation from which we work and drive our organisation forward each day with a shared sense of purpose.

- We do what is right, Integrity is the foundation of our business. We are honest, transparent, and always do the right thing by acting with the highest standards of ethics and fairness.
- We deliver excellent experiences. We strive to achieve the highest levels of performance in everything we do. We deliver the best experience possible to our channel partners and to each other.
- We keep our promises and deliver on our commitments. We set clear expectations, then empower and trust each other to make decisions to achieve our collective goals.
- We support each other. We listen to and support each other. We work together, always looking for better, more innovative ways to be agile, reduce complexity and improve our business.
- We win together, we believe our diverse global workforce drives our success. We provide an inclusive, welcoming and enriching environment for our colleagues and their ideas.

2. An Introduction to the Code

The Code is our guide for making the right business decisions based on integrity. It's a resource that provides answers and direction when facing complex and challenging situations.

Why We Have a Code

The Code reflects Platinumdex firm commitment to conducting business in alignment with our shared values, policies, and applicable laws. The Code defines our expected behaviour when interacting with each other, our business partners, and our communities.

2.1 How the Code Applies to Me

We are all accountable for knowing the Code and speaking up when we see misconduct. Always ask yourself if your actions are consistent with our shared values. This Code cannot provide every answer, so if you are not sure about something, seek guidance.

2.2 Who Must Follow the Code?

The Code of Conduct applies to everyone at Platinumdex. This includes our Board of Directors, executives, employees, and agents acting on behalf of Platinumdex around the world. We also expect our business partners to follow these same principles. The Code connects us all, ensuring consistency in the way we do business, regardless of culture or location.

Your responsibilities as an employee of Platinumdex are to:

- Act with integrity, respect and professionalism.
- Make decisions that are well-founded and within the law.
- Never compromise Platinumdex reputation or your own.
- Be honest.
- Ask and speak up when you are in doubt or witness misconduct.
- Ensure compliance is part of your team culture.

2.3 Additional Expectations for Leaders

Leaders are expected to create an environment that supports a culture of compliance and open communication, where employees feel comfortable raising concerns without the fear of retaliation. All leaders are expected to:

- Follow the Code, Platinumdex policies and applicable laws and regulations.
- Be available to anyone who raises a concern and take employee concerns seriously.
- Never retaliate against anyone who raises a concern and protect others from possible retaliation.
- Report suspected misconduct immediately. Never cover up or ignore misconduct or retaliation.
- Lead by example, holding yourself and others accountable, avoiding even the appearance of violating the Code or law.
- Integrate compliance into your team culture.
- Create an environment that encourages straightforward communication around issues or concerns related to the Code or applicable laws.
- Recognise employees that demonstrate integrity and a commitment to compliance.
- Be proactive, identify potential weaknesses, and take corrective action when appropriate.

If Leaders fail to report known violations in our company, they may be subject to discipline, including termination. Leaders are also expected to exercise proper oversight in their areas of responsibility so they are aware of things that might create risks for our company and take action to mitigate those risks.

2.4 Waivers

Any waivers or exceptions to the Code must be disclosed to the compliance team along with the reason for the request. The request will also be reviewed. If the waiver involves an executive officer, only the Chief Executive Officer, Chief Compliance Officer and the Chief Financial Officer of the Board of Directors can grant this waiver, which must be disclosed as required by the rules of law.

2.5 The Cost of Non-Compliance

Failing to comply with the principles of our Code can put our company's reputation at risk. For our shareholders, vendors, and customers, it is important to know Platinumdex is a reliable business partner. Companies with strong cultures of integrity tend to be respected in the marketplace, leading to a competitive advantage and positive business outcomes.

Employees who violate the Code, Platinumdex policies or the law face disciplinary action, up to and including termination of employment, even if they do not personally benefit from the violation. If a violation of law occurs, penalties may be imposed by a regulator or a court.

Speaking up Early Can:

- De-escalate a situation.
- Minimise risk and disruption to our business.
- Bring clarity and resolve potential issues in a timely manner.
- Protect victims of harassment, discrimination or other types of misconduct.

2.6 Non-Retaliation

Platinumdex is committed to protecting the rights of individuals who report concerns about suspected misconduct in good faith.

Platinumdex does not tolerate acts of retaliation - such as firing, demoting, or harassing anyone because they submit a good faith report or participate in an investigation.

If you believe someone has retaliated against you, you should report the matter immediately.

Any act of retaliation is a violation of the Code and is grounds for discipline, up to and including termination. See the Anti-Discrimination, Anti-Harassment, and Non-Retaliation Policy for more information.

3. Application to Business Partners

We expect our business partners to act ethically, responsibly and in accordance with the principles established by our Code and applicable law. If you are responsible for hiring or managing a third party, it is your responsibility to ensure they have a good reputation and understand the requirements of our Code. Platinumdex Supplier Integrity Principles establish and communicate the fundamental requirements for being a supplier of goods or services to Platinumdex.

4. Raising a Concern

You have a responsibility to raise concerns and ask questions. Promptly raising concerns allows our company to address problems early before more serious consequences occur. If you have a question or concern, your immediate manager is normally the best place to start. If you are not comfortable talking with your manager or if your concern is not addressed, you should contact another member of management, Human Resources, an Ethics Advisor, the Legal Department or Platinumdex Compliance Team.

No matter how you share a concern, Platinumdex will address it promptly and make every effort to safeguard your privacy during and after the investigation. Your obligation is to tell the truth and participate in the investigation as needed.

5. The Internal Process

Platinumdex will investigate all good faith reports and take appropriate action when necessary by following these steps:

1. Assemble a team of qualified and independent investigators.
2. Gather facts and conduct interviews.
3. Keep the appropriate level of management informed throughout the process and help them determine the next steps based on facts.
4. Communicate regularly with the person who reported the concern.

6. Discipline for Violations

All employees are responsible for knowing the Code and company policies. Employees and business partners must comply with applicable laws and regulations in the countries where they do business. Violations of the Code,

company policies or the law may carry serious consequences for individuals and Platinumdex, such as damage to our reputation, fines and possible civil or criminal liability. Employees engaging in unethical or illegal behavior will be subject to disciplinary action, up to and including termination.

Platinumdex will refer cases to government authorities where appropriate.

7. In the Workplace

7.1 Preventing Harassment and Discrimination

Platinumdex maintains a workplace culture that is always respectful and professional. Platinumdex will never make decisions that are based on race, religion, color, national origin, age, gender, disability, sexual orientation, veteran status, gender identity or expression, or any other factor protected by law. Platinumdex also makes all reasonable accommodations for qualified employees with disabilities.

If you experience or become aware of any act of discrimination or harassment, contact your manager or any of the other reporting options. For more information, refer to the Anti-Discrimination, Anti-Harassment and Non-Retaliation Policy.

7.2 Health and Safety in the Workplace

Platinumdex is committed to having a workplace that is safe, healthy, and non-threatening. We have a number of health and safety-related policies and procedures in place in our various locations and are committed to compliance with safety laws in all countries in which we operate. We continuously review and improve our work practices and the safe operation of our facilities. Our company prohibits the sale, purchase, use or possession of illegal drugs—or the misuse of alcohol or prescription drugs—while on company premises or conducting company business. If alcohol is offered at a company or business event, it is your responsibility to conduct yourself professionally.

Our Work Environment, Working Conditions and Human Rights

Platinumdex operates around the world, and we embrace the diversity of our workforce. We are committed to the fair and equitable treatment of all people and prohibit harsh or inhumane treatment of any employee.

We comply with the employment laws in all countries where we operate. Platinumdex follows all applicable wage and hour laws, including minimum wage, overtime, and maximum hour rules. Employment must be freely chosen. Human trafficking, forced, bonded, or involuntary labor is forbidden, as is the exploitation of children and child labor. The company also fully respects our employees' right to freedom of association.

8. Protecting Information

Our employees and business partners trust us with some of their most important information. We are committed to treating that information with care and to respecting reasonable privacy expectations of our colleagues and business partners.

Confidential information should only be shared with fellow employees who are authorised and have a legitimate business need to know. You must protect all confidential information that is in your possession.

- Unless you are authorised, you must not reveal confidential information to anyone outside Platinumdex.
- If you are authorised to share confidential information with a third party and have a legitimate business need, you must have a properly executed nondisclosure agreement in place prior to any confidential discussions.
- Do not sign another company's nondisclosure agreement or accept changes to our standard nondisclosure agreements without approval from the Legal Department. See the Worldwide Disclosure Policy for more information.

8.1 Personal Information

We collect and retain certain confidential personal information that is necessary to conduct our business and help our company operate effectively.

Personal information like phone numbers, names, email addresses and other information may be subject to special rules. You must respect and safeguard the confidentiality of this information and not access, share or otherwise use these records unless there is a legitimate business need, and it is in accordance with local laws.

8.2 Records Management

A business record is any document, including electronically stored information, that relates to Platinumdex business operations. It is your responsibility to ensure that records are retained in accordance with the Platinumdex Records Management Policy and Retention Schedule, which outlines the period that records must be retained to satisfy legal and regulatory requirements. Records may be stored in hardcopy or electronic format, and must be protected, legible and retrievable always. When a record has met its retention requirements, it should be permanently deleted or destroyed.

Certain records may be identified as being relevant to an investigation, audit, or litigation. At that time, you may receive a 'legal hold' from the Legal Department with instructions to keep certain documents (in paper or electronic form). This means that under no circumstances should any documents related to the legal hold be deleted, altered, or destroyed. Failure to comply with a legal hold may result in disciplinary action, as permissible by law. In addition, never falsify or inappropriately modify business records. Doing so is not only unethical, it may also be a crime.

8.3 Intellectual Property

It is our obligation to protect Platinumdex assets and enforce our company's intellectual property rights (IP). To the extent permitted by law, our company owns the rights to all IP that is created by Platinumdex employees if it is related to the company's business.

We must also respect the IP that belongs to other companies. Be especially cautious when using another company's name or logo, as this could infringe that company's intellectual property rights. We uphold all licensing agreements belonging to third parties when operating software programs on a company computer or other IT resource. Only software properly licensed by Platinumdex is permitted to be used for business reasons.

9. Using Platinumdex IT Systems

You must use any equipment provided by Platinumdex responsibly. While Platinumdex allows personal use of company-supplied technologies in certain circumstances, you must exercise professionalism and common sense when using Platinumdex IT resources for personal purposes. You may not download unlicensed software or

copyrighted materials. Be prudent when sending electronic messages, including email, instant messages, and text messages. These communications are permanent and can be forwarded without your permission or knowledge.

We may never use company IT resources to perform illegal or unethical activities, such as downloading inappropriate material, or anything that could be considered obscene, pornographic, indecent, or offensive. Platinumdex may monitor and restrict the use of its IT resources to the extent allowed by law. For further guidance, please consult Platinumdex IT Security Policies.

10. Cybersecurity

Platinumdex could be harmed by cyber risks including fraud, ransom, and information theft, which could impact the financial health and the reputation of the company. Cybercriminals leverage an increasingly sophisticated arsenal of tools and methods to perform their attacks, including targeted phishing, ransomware, and distributed denial-of-service.

While Platinumdex is constantly improving our technical countermeasures, every employee needs to adhere to important rules while working in our connected world:

- Understand and abide by the rules defined in the Cybersecurity & Acceptable Use Policy.
- Use passwords that are strong, secret and different for each application.
- Keep your digital identities separate between your work and personal life.
- Exercise reasonable due care when responding to unsolicited messages to avoid falling for phishing attacks, giving away sensitive information or opening attachments. Always verify that internal communication is genuine by looking for the digital signature ribbon.
- When asked to perform wire transfers, you must exercise due care by reviewing all supporting documentation and must seek additional clarification from personally known counterparties if anything looks suspicious or unusual.
- Never store confidential corporate information on systems not managed and controlled by Platinumdex or in the cloud, without appropriate approvals from the IT Security team.
- Actively participate in the Security Awareness Program.

11. Gifts, Travel and Entertainment

Gifts, travel, and entertainment provided to or received from business partners, which includes trips, events, services, meals, benefits, and other things of value must always be reasonable.

Before any gifts are provided or received, you should determine if this is acceptable under our Gifts Policy. You are prohibited from providing, offering, or receiving gifts, travel or entertainment that inappropriately influences business decisions or is provided to gain an unfair advantage.

- Platinumdex employees may never solicit gifts, travel or entertainment. For further information, please refer to our Hospitality and Gifts Policy.
- Rules related to gifts, travel and entertainment for government officials are much stricter than those set forth here. Refer to the "Doing Business with the Government" section of this Code for additional information.

12. Conflicts of Interest

Platinumdex prohibits conduct that creates an actual or potential conflict of interest that interferes with your ability to act or make decisions impartially and in the best interests of our company. Be aware that even the perception of a conflict could create an issue. You are required to report conflicts of interest following the process outlined in our Conflicts of Interest Policy. Having a conflict of interest is not necessarily a violation of our Code and Policy - but failing to disclose it is.

13. Financial Investments or Interests

Financial investments or interests with other companies or individuals related to your work at Platinumdex must not result in unusual gains for those third parties, for you or for other employees.

14. Personal Relationships

Personal relationships with others can lead to conflicts of interest, in circumstances where either person in the relationship could receive or give an unfair advantage or preferential treatment related to our business because of the relationship.

15. Outside Employment

While working for Platinumdex, you may not work for any competitor, customer, or vendor. Any outside job or other activity—including self-employment—may not affect your job performance at Platinumdex or compete with Platinumdex interests.

16. Board Memberships

You may not serve as a director or in a similar governance position for any for-profit entity without the approval of a Platinumdex leader at or above the Vice President level. Executive Officers may not serve on the board of directors of any for-profit entity without the prior approval of Platinumdex Chief Executive Officer.

You do not need Platinumdex approval to serve in governance positions for non-profit, community, charitable, or social organisation's provided your service does not conflict with Platinumdex best interests.

17. Accurate Books and Records

As a publicly traded company, Platinumdex has a responsibility to its shareholders. All our transactions, including revenue, expenses, marketing funds and rebates must be accurate and complete in our books and records and reflect the real purposes of such transactions in accordance with all applicable laws.

We must complete transactions only as authorised by management, and only use company funds for authorised business purposes. False or misleading entries in our books and records are strictly prohibited. Platinumdex maintains and adheres to internal controls to ensure these requirements are met. If you are aware of or suspect a violation of our accounting or auditing standards, you must report it immediately through one of the various reporting mechanisms. Report a Concern.

18. Financial Integrity and Reporting

Financial reporting must be honest, complete, and timely. All books, records and accounts must accurately reflect financial transactions and events and conform with Generally Accepted Accounting Practice UK standards, regulations and Platinumdex internal controls. Any falsification, concealment, misstatement, omission or alteration of any document or record is prohibited. Any public disclosure must be complete, fair, accurate, timely and understandable and done in accordance with our Disclosure Policy.

All Platinumdex assets must be protected against misuse, loss, fraud, money laundering and theft. Appropriate care must be exercised when overseeing the use of Platinumdex assets and when approving new customers and vendors, as well as transactions with existing customers and vendors.

19. Authority to Make Commitments on Behalf of Platinumdex

To make sure all our contracts are in Platinumdex best interest, contract and payment approval is delegated to certain employees. If you are authorised to sign agreements or make commitments on behalf of the company, you have a responsibility to adhere to the proper approval and authorization processes before you agree to any contract on Platinumdex behalf. This applies to oral and written agreements, as well as to any business commitments or other obligations you may arrange for our company.

20. With Business Partners

Understanding and Complying with Partner Policies

The trusted relationships we have established with our business partners are vital to the success of our company. It is your responsibility to read and understand their applicable policies before initiating any transaction or operation. Do not assume your personal contact with the partner is an authorised representative who can approve changes or exceptions to such policies on behalf of the partner. We must be transparent and clear when working with our business partners and must not engage in operations, transactions or practices that do not comply with the policies of our partners.

Platinumdex is committed to purchasing products directly from the original manufacturer whenever possible and to selling products directly to resellers. However, in limited circumstances it may be necessary to acquire products from other sources or sell products to sub-distributors. Please refer to the Non- original equipment manufacturer (OEM) and Sub-Distributor Policy for more information.

20.1 Interaction with Our Business Partners

It is important to Platinumdex that our relationships with business partners are respectful and honest. These relationships are based on lawful, efficient, and fair practices. Platinumdex will not engage in unfair, deceptive, or misleading practices, even if directly or indirectly requested by a partner.

20.2 Doing Business with the Government

Doing business with the government differs from doing business with other partners. Special rules may apply to hiring current or recently retired government officials, their families, and to any conduct that could seem to improperly influence objective decision making.

All billings to the government or government contractors must be truthful, accurate and conform to all pertinent laws and regulations. Contracts with the government must be strictly followed. Do not deviate from contract

specifications involving products, components, testing or other items without prior written authorization from the government agency or government contractor.

21. In the Marketplace

21.1 Anti-Bribery and Anti-Corruption

We comply with all applicable anti-corruption laws, such as the Bribery Act 2010. Even though the Bribery Act is a UK law, it applies to Platinumdex everywhere we do business.

These laws prohibit giving or offering or promising to give anything of value to government officials or private individuals to obtain or retain business or to gain an improper advantage. A bribe can also include non-tangible items such as offers of employment, confidential information or favors.

Platinumdex does not tolerate any form of bribery. We cannot make improper payments on our company's behalf or engage an agent, or any other type of third party, to make an improper payment for us, nor can we accept bribes of any kind. Penalties for bribing government officials are very severe. For more information consult Platinumdex Anti-Bribery Policy.

21.2 Competition and Antitrust

Platinumdex believes in fair and legal competition, and we abide by competition and antitrust laws everywhere we operate. These laws prohibit agreements and practices that improperly restrict or distort competition.

Violations can carry serious consequences for Platinumdex and for you, including corporate or personal fines, and even criminal sanctions in certain countries.

Certain agreements with competitors are almost always illegal, such as agreements to fix prices, bid rigging, the allocation of customers and territories, and the exchange of commercially sensitive information. If a competitor attempts to engage you in conversation about anti-competitive behavior, stop the conversation, and report the incident to the Legal Department immediately. Any agreements with competitors must be reviewed by the Legal Department.

It is also important to exercise caution when working with vendors and customers. Restrictions on resale prices and divisions of customers or territories are potentially illegal. Always make independent business decisions. You should never agree with a business partner about a minimum or maximum price for our products or set a price at which a customer must resell a product, without consulting the Legal Department. For more information, consult Platinumdex Antitrust and Competition Law Policy.

21.3 Competitive Information

Keeping up to date with information about our competitors and the market helps us to compete effectively. However, we must only gather competitive information in a manner that is legal. We want to win fairly. Never obtain information about competitors using misrepresentation, deceit, or false pretense. We respect the obligations of new employees not to disclose confidential information about their previous employers. We may never misrepresent our identity when collecting information about a competitor, nor may we try to persuade another person to breach a confidentiality agreement. For more information, consult the Antitrust and Competition Law Policy.

21.4 International Trade Controls

As a global company, we must comply with all regulations that apply to international trade, such as regulations on the import, export and re-export of goods and technology. Failing to do so could threaten our ability to continue to conduct business internationally, and could result in fines, penalties, and even criminal prosecution. Generally, exports are products, services, technology, or information shipped to a person or company in another country. In addition to referring to the physical transfer of goods, “exporting” can include activities such as traveling abroad with company information, downloading software or the release of source code and technical specifications.

Imports are goods purchased from an external source and brought into another country. Import activities are subject to laws, regulations and possible duties and taxes.

If you have reason to believe a particular transaction or shipment violates laws or internal procedures, or if you need more information about how these requirements apply to your work, consult your manager, the Regulatory Compliance Department or your local Regulatory Compliance Leader.

21.5 Anti-Boycott and Trade Sanctions

In addition to export and import laws, Platinumdex must also adhere to trade sanctions imposed by the United Kingdom and other countries that restrict or prohibit business activities with certain countries or individuals who live in or originate from those countries.

As our company and many of our vendors are based in the UK, we must follow UK laws and regulations that prohibit us from cooperating with requests to participate in boycotts or other restrictive trade practices the UK does not support. Our company cannot take any action or make any declaration that could be viewed as cooperating with an illegal boycott. These laws extend to foreign subsidiaries of UK companies, and apply regardless of the location where we conduct business. For more information, consult Platinumdex Anti-Boycott Policy.

21.6 Insider Trading

As an employee of Platinumdex, you may have access to “inside” information regarding our company or other publicly traded companies with which we do business. Inside information is both material meaning it would influence a reasonable investor to buy, sell or hold stock and nonpublic which means it is not generally known to the trading public. Information is usually considered non-public until two full trading days have passed from the day the information appeared in the public domain.

Having inside information gives you an unfair advantage in personally buying or selling stocks. Therefore, you may never buy or sell our company’s stock if you are in possession of inside information, even if your decision to trade is unrelated to this inside information. Similarly, you may not use inside information about a business partner to trade in their respective stock.

Engaging in insider trading violates our company’s policy, the securities laws of the United States and the laws of many other countries where we do business. Violations of these laws can carry civil and criminal penalties for those involved. Failure to comply with this policy will also subject the individuals involved to disciplinary action, up to, and including, termination.

If you need more information or have any questions as to whether the information you possess qualifies as inside information, consult the compliance team and the Platinumdex Insider Trading Policy.

21.7 Anti-Money Laundering

The term money laundering is used to describe the process whereby individuals or organisations try to make illegal funds look legitimate or conceal them. Such individuals or organisations may also use others to make payments to circumvent tax laws or other laws. Platinumdex is committed to complying with anti-money laundering and anti-terrorism laws. Penalties for violations include large civil and criminal fines. Examples of indications of potential money laundering:

- Requests to pay more than the applicable or agreed upon price
- Payments from an unusual account
- Requests to make payments in other currencies
- Requests to pay in cash
- Payments from a third party who is not related to the account

For more information regarding our Cash Compliance, Anti-Money Laundering, and Anti-Terrorism, contact the Compliance team.

21.8 External Inquiries

To protect our name and brand, only authorised individuals can speak with external parties on behalf of our company. Inquiries from the media or investors regarding business activities, results, plans or public policy positions should be referred to the Investor Relations & Corporate Communication Department or the Department that is responsible for public relations in your country or region. In addition, Platinumdex employees may not provide endorsements of other companies or products without appropriate authorization.

Sometimes we may receive requests from a governmental authority regarding our business. If you receive any such request for information, please contact the Legal Department immediately. Do not remove, destroy, or alter any documents, data or records that may be relevant to the inquiry by the government.

22. Social Media

Personal use of social media can have an unintended impact on our company. Your communications can be interpreted as official Platinumdex statements if you discuss Platinumdex or our business partners on social media. Only designated employees are authorised to represent our company on any form of social media.

Employees are expected to adhere to Platinumdex Social Media Policy and to conduct themselves professionally when using any type of social media. You are prohibited from using company resources to transmit harassing, abusive, offensive, obscene, or illegal materials.

23. In Our Communities

23.1 Corporate Social Responsibility

Platinumdex is committed to being a responsible corporate citizen. From charitable giving and volunteering to “green” initiatives, we recognise our responsibility to make a positive impact in the communities in which our employees live and work, and to inspire our employees to do so as well.

23.2 Political and Charitable Activities

Platinumdex believes in contributing to and supporting the communities where we work. When volunteering, you must use your own time, unless you have prior approval from your manager. Company charitable donations need to be properly approved and documented and allowed under local laws, practices, and company policies.

Platinumdex generally does not permit the use of any company funds or assets, including facilities, equipment or trademarks for political campaigns or candidates. Also, you may not use our company's name while taking part in political activities without prior authorization.

23.3 Respect for the Environment - Sustainability

Platinumdex recognise that a healthy and sustainable environment is critical to our society, economy, business, and people. We strive to comply with all applicable environmental laws and regulations. We believe that our business should be conducted in a manner that embraces sustainability, recycling, and the use of renewable resources. We are committed to being a leader in developing best practices in these areas for technology services market.

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