

UNiDAYS

CODE OF CONDUCT



TABLE OF CONTENTS

OUR CULTURE & VALUES	3
SERVING OUR MEMBERS	5
SUPPORT AND RESPECT EACH OTHER	7
AVOID CONFLICTS OF INTEREST	10
OBEY THE LAW	14
PROTECT UNIDAYS' INFORMATION AND ASSETS	16
REPORTING POSSIBLE VIOLATIONS	20

The **UNIDAYS** Code of Conduct ("Code") reflects our core values and ethical standards that apply to all of us, all of the time.

Our Code provides a blueprint on how to conduct business and directs us where to go when we have questions or concerns. It ensures we value the diversity of cultures, people, and experiences. It represents a document where words can manifest actions.

By living these values and proudly upholding our Code, you too can personally ensure that we continue to achieve the right results in the right way.

* If any part of this Code conflicts with local laws or regulations, only the sections of this Code permitted by applicable laws and regulations will apply, any policies that are specifically applicable to your jurisdiction will take precedence to the extent they conflict with this Code.

**All Board members, employees, directors, officers, consultants, contractors, volunteers, interns, and any agents or representatives of UNIDAYS (including Myunidays Limited, Unidays Inc. and any and all subsidiaries) (collectively, "Staff" "you" "your") are responsible for understanding and complying with our Code.

***This Code does not change any legal or contractual obligations that you may otherwise have with UNIDAYS.

OUR CULTURE & VALUES



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

CULTURE

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

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

We strive to foster an environment where we can **be builders, clear on our purpose**, willing to explore boundaries and **jump into the unknown**—confident in our shared vision and consistent support.

VALUES

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

SERVING OUR MEMBERS



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

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

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

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

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

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

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

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

BE RESPONSIVE TO FEEDBACK AND PROACTIVE ABOUT IMPROVEMENTS:

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

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

**SUPPORT
AND RESPECT
EACH OTHER**



We spend a lot of time at work, so it's important that we enjoy being here.

We want each person to feel respected and able to perform to the best of their ability.

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

TO THAT END, WE EXPECT YOU TO:

- Promote ethical behaviour in the work environment;
- Report yours or others wrongdoing as soon as practicable to do so;
- Promptly report dishonest, unethical, or illegal activities by other employees to your manager, the Legal or People Team, or, if you wish to remain anonymous, the confidential Whistleblower Hotline at makingmyunidaysbetter.ethicspoint.com;
- Participate fully in any investigation of alleged misconduct with **UNiDAYS**;

- Comply with this Code, the FUNdamentals, your employment contracts, and any policies that **UNiDAYS** implements from time to time;
- Follow any reasonable management instructions;
- Maintain a healthy and safe workplace;
- Complete any mandatory associated training offered by **UNiDAYS**;
- Work with **UNiDAYS** to foster a diverse and inclusive workplace, free from unlawful discrimination and harassment.

SUPPORT AND RESPECT EACH OTHER cont...

WE TAKE PRIDE IN HAVING A WORKPLACE THAT IS RESPECTFUL, PROFESSIONAL, AND WHICH GIVES PEOPLE A PLATFORM TO SHINE.

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

If you suspect harassment, bullying, discrimination, or retaliation, please report it immediately to the People Team, Global General Counsel or our [Whistleblower Hotline](#).

We understand that not everyone will be comfortable with a direct approach and that's completely fine. You can raise the issue formally through our grievance process or even anonymously through our [Whistleblower Hotline](#). We want you to know that we treat all allegations confidentially and that we prohibit victimisation of those who have raised a concern in good faith or with a reasonable belief that the disclosure is in the public interest, depending on the region.

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

AVOID CONFLICTS OF INTEREST



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

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

THE BEST RULE FOR ANY SITUATION THAT MAY PRESENT A CONFLICT OF INTEREST IS TO “ABSTAIN AND DISCLOSE”.

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

AVOID CONFLICTS OF INTEREST cont...

POLITICAL CONTRIBUTIONS

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

OUTSIDE INVESTMENTS AND BUSINESS ENGAGEMENTS

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

GIFTS AND HOSPITALITY

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

AVOID CONFLICTS OF INTEREST cont...

OUTSIDE EMPLOYMENT

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

CORPORATE OPPORTUNITIES

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

POTENTIALLY CONFLICTING RELATIONSHIPS

UNiDAYS does not prohibit dating among Staff, nor does it prohibit relatives from working together within, for, or on behalf of **UNiDAYS**. However, if a relationship, romantic or otherwise, involves two Staff members in a direct reporting relationship in the same chain of command, or otherwise creates an actual or apparent conflict of interest, the Staff members must disclose the relationship to the People Team. Upon learning of any potential conflict, **UNiDAYS** may reassign at least one of the individuals to a different

position or role. In any event, where your significant other, relative, or any other potentially conflicted person is within your chain of command, you must recuse yourself from any decision-making concerning the person's compensation, promotion, discipline, or termination, and you must refrain from participating in their performance review.

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

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

OBEY THE LAW



We think this one goes without saying.

UNiDAYS takes its responsibilities to comply with laws and regulations very seriously and each of us is expected to comply with applicable legal requirements and prohibitions.

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

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

- **We are committed to complying with all anti-bribery laws**, including the UK Bribery Act, the US Foreign Corrupt Practices Act (FCPA), anti-boycott laws, and any similar local country laws. Any form of bribery, direct or indirect, is strictly prohibited. That means you must not offer a bribe or kickback to, or accept one from, any person, at any time, for any reason.
- **International Human Rights Laws such as the UK Modern Slavery Act 2015.** We expect Staff to refrain from engaging in modern slavery, child labour, and human trafficking and to report any instances they are aware of whether it deals with **UNiDAYS**, its partners, or any suppliers.
- **Competition Laws are designed to promote free and fair competition.** Generally speaking, these laws prohibit arrangements with competitors that restrain trade in some way, abuse of intellectual property rights, or use of market power to unfairly disadvantage competitors.

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

PROTECT **UNiDAYS'** **INFORMATION** **AND ASSETS**



UNiDAYS has to gather and use certain information about individuals.

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

Keeping our information secure means protecting everything from **UNiDAYS'** commercial and financial details to employees' and members' personal information.

PERSONAL INFORMATION

UNiDAYS employees must handle personal information of members, other employees, suppliers, contractors, business contacts and prospective employees in accordance with **UNiDAYS'** Privacy Policies (including but not limited to the Data Protection Handbook) and

applicable data protection laws. If you have any questions about the handling of personal information, please contact the Privacy Team.

CONFIDENTIAL INFORMATION

UNiDAYS' confidential business information is a valuable asset that everyone must protect. **UNiDAYS** Staff are required to use our confidential information for business purposes only and to keep such information in strict confidence. This responsibility extends to confidential information of third parties that we have received under non-disclosure agreements. What **UNiDAYS** considers to be confidential information is defined in your employment contract.

If you have questions about whether certain information can be disclosed, please contact the Legal Team. Additionally, you should also refrain from sharing confidential information internally beyond those persons who legitimately need to know it for purposes of their job. We have an open

and transparent culture, and this is not intended to stifle the ongoing conversation and sharing that has facilitated so much of our success.

We trust you will use your judgment to determine what is appropriate to share with your colleagues at **UNiDAYS** in furtherance of your and others' jobs. Please always keep in mind that improper use or disclosure of confidential business information could seriously damage **UNiDAYS'** reputation with members, partners, and the general public, expose us to liability, and cause harm to our business.

We ask that you not bring with you or share with anyone at UNiDAYS any confidential or proprietary information belonging to any former employer or other person or entity to which you owe an obligation of confidentiality under any agreement or otherwise. If you have questions or concerns regarding such information contact the Legal Team or People Team.

PROTECT UNiDAYS' INFORMATION AND ASSETS cont...

UNiDAYS' ASSETS

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

We seek to respect your personal privacy.

However, as permitted by local law, it is important for you to understand that information created, accessed, transmitted, or stored using our technology resources, such as email messages, computer files, slack messages or websites in your browsing history, are company resources and assets. We may access, monitor, or inspect

UNiDAYS resources, assets and property at any time, without your prior approval, knowledge or consent, to the extent allowed by law. This includes monitoring and retrieving information that is stored or transmitted on **UNiDAYS** electronic devices, computers, equipment, and systems. More information can be found in **UNiDAYS'** IT & Security Monitoring System Policy.

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

THIRD PARTY CONFIDENTIAL INFORMATION

During your employment with UNiDAYS, you may have access to information systems or tools that enable you to view certain information relating

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

PROTECT UNiDAYS' INFORMATION AND ASSETS cont...

PROCUREMENT AND CONTRACTS

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

When onboarding a new supplier to **UNiDAYS**, it is important that due diligence is carried out in relation to Information Security and Data Privacy. This is to ensure that the supplier has robust security and data privacy practices in place to protect **UNiDAYS'** information.

UNiDAYS STAFF ARE REQUIRED TO:

- Review and understand **UNiDAYS'** Procurement Policy (available on Hibob) to follow the appropriate procedures stated in the policy when entering the company into agreements with suppliers.
- Refrain from altering, fabricating, falsifying, forging, or altering any part of a contract or record.
- Never sign a contract on behalf of **UNiDAYS** unless you are approved and authorised to do so. Certain contracts must be reviewed by the Legal Team or Department Heads prior to signature. If you are unsure whether your agreement or contract requires such approval, consult the Procurement Policy if it's a supplier agreement, check with your manager, or directly contact the Legal Team.
- Prior to submitting an agreement for approval, make sure you have read the contract, understood its terms, decided that the agreement is in the best interest of **UNiDAYS** and had the agreement reviewed by the Legal Team.
- Raise a request on the internal Zip Procurement platform for any new supplier onboarding. This will ensure the request is reviewed by the appropriate stakeholders and also that the supplier due diligence questionnaire is sent to the supplier for completion. As part of the Zip request process, the IT Asset and Record of Processing Activity (ROPA) questionnaires will also be launched (where applicable) and assigned to the internal business owner for completion, for record-keeping purposes.

REPORTING POSSIBLE VIOLATIONS



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

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

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

Regardless of how any suspected violation is reported, there will be no form of reprisal for doing so. UNiDAYS aims to investigate matters related to alleged violations and to take appropriate action.

Any Staff member who feels that they have been subjected to any behaviour that violates this Code should immediately report such behaviour to their supervisor or use the channels described.

Any breach of the above policy may result in disciplinary action and termination of employment.

We take the commitments outlined in our Code so seriously that any breach of the Code may be treated as potential gross misconduct and addressed under our Disciplinary Policy.

UNiDAYS

THANK YOU!

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

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