

# AltoVita Code of Conduct

Last updated: Aug 2025



# Table of Contents

Introduction

Scope

Purpose

Responsibility for the Code

Code of Conduct

Workplace Environment

Business Practices

Company Assets and Information

Process for review

2

2

2

3

5

5

8

13

15

| Code Version | Date of revision and publication | Name of person responsible for revisions |
|--------------|----------------------------------|--|
| 1            | 19 May 2023                      | Associate General Counsel                |
| 2            | 20 May 2024                      | People Manager                           |
| 3            | 13 Aug 2025                      | Chief of Staff                           |

# Introduction

Kravlux Limited (hereafter known as **AltoVita** or the **Company**) sets high standards for protecting its brand identity, valued assets, and reputation along with the information its customers and partners have entrusted us with.

AltoVita's Code of Conduct (the **Code**) embeds our core expectations and business values into our business; these are: trust, adaptability, humility, tolerance and acceptance and tenacity. It also reflects our commitment to protecting the Company by our compliance with the laws and regulations that apply to our business.

## Scope

AltoVita's Code applies to all persons working for us (or any group company), including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns and individual temporary or fixed term contractors, wherever located.

This Code does not form part of any contract of employment or contract to provide services and we may amend it at any time.

## Purpose

The purpose of this Code is to:

- Set out AltoVita's values and how they relate to both our day-to-day work and the key ethical issues faced by AltoVita's business.
- Provide information and guidance to ensure all staff are aware of AltoVita's expectations around conduct and ethics whilst working for the company, particularly in relation to:
  - how we conduct ourselves when carrying out AltoVita's business; and
  - ensuring that any regulatory and legislative requirements are met and that the confidentiality and protection of Company information and assets are assured.
- Sets out our responsibilities in relation to regulatory and legislative requirements and ensures that the Company policies, culture and mission are clearly communicated to all staff.

# Responsibility for the Code

AltoVita's CEO and COO have overall responsibility for ensuring the Code complies with our legal and ethical obligations, and that all those under the Company's control comply with it.

The People Team have primary and day-to-day responsibility for implementing this Code, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in managing ethics and conduct on behalf of AltoVita.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this Code and are given adequate training on the issues covered by it.

You are invited to comment on this Code and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the People Team.

## Your responsibilities

You must ensure that you read, understand and comply with this Code.

You must also:

- Notify your line manager or the People Team as soon as possible if you believe or suspect that a breach of this Code has occurred or may occur in the future.
- Familiarise yourself with and abide by all AltoVita company policies. Any questions relating to policies are expected to be directed to the policy owner listed in such policy or to your line manager for clarification or assistance.
- Co-operate with any investigation that the Company undertakes.
- Seek help or advice from the People Team if you have questions about any aspects of the Code.
- Not abuse your employment benefits, including time off, holidays, insurance facilities or other benefits AltoVita offers.
- Understand and comply with specific laws and regulations that apply to your specific role.
- Adhere to all employment-related, financial crime, information security and data privacy policies
- Complete any mandatory associated training that is offered to you.

# How to Report Breach of Code of Conduct

If you witness or experience a breach of the Code of Conduct, report it as soon as possible to help ensure swift and appropriate action.

- Report the breach by email to [whistleblower@altovita.com](mailto:whistleblower@altovita.com)
- Provide details including date & time of incident, description of the incident, names of any individuals involved in or witnesses, if applicable.

All investigations will be conducted confidentially and where possible, the process will be kept anonymous to protect the identities of those involved.

Retaliation against anyone who reports a breach in good faith is strictly prohibited. Reporting is a crucial step in maintaining a safe, respectful and fair working environment for everyone.

## Consequences of failure to comply

Disciplinary action, up to and including termination and/or legal proceedings, may result from any failure to comply with:

- this Code;
- any applicable laws, rules or regulations; and
- any other AltoVita policy in force from time to time.

The disciplinary actions will vary based on the violation committed. Possible consequences include:

- demotion;
- reprimand;
- suspension; or
- termination, when dealing with serious offences.

Should you have any questions or feel that a fellow co-worker or even the Company is not meeting AltoVita's commitment set out in this Code, you must immediately inform a member of the senior management team to investigate.

# Code of Conduct

## Workplace Environment

### Diversity, Equity and Inclusion

AltoVita aspires to continue nurturing a diverse, equitable and inclusive work environment, and commits to working towards becoming an even more diverse company to reflect the diversity of our clients and partners, and to make all our team members feel included and able to bring their authentic selves to work. We consider diversity, equity and inclusion as business critical, now more than ever, and part of our DNA.

Our aim is to encourage and support diversity, equity and inclusion and actively promote a culture that values difference and eliminates discrimination in our workplace.

Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit against objective criteria that avoid discrimination. When recruiting or promoting, we will aim to take steps to improve the diversity of our workforce and provide equality of opportunity.

We are also committed to providing equitable treatment to all those we deal with as an organisation, including our customers and suppliers and to work to ensure our products and services are accessible to a diverse community.

Internally, AltoVita is committed to using data to drive our diversity, equity and inclusion progress to ensure we become an employer of choice for diverse talent at all levels. Externally, AltoVita is working towards empowering our customers to make more diverse choices through the launch of minority filters to promote minority and diverse suppliers.

You should familiarise yourself with AltoVita's Diversity, Equity and Inclusion policy to ensure you understand and abide by AltoVita's commitment to diversity equity and inclusion.

### Discrimination, harassment and bullying

At AltoVita we believe that people have the right to work in an environment which promotes equality of opportunity and does not allow discriminatory practices. AltoVita does not tolerate any form of discrimination, harassment, or victimisation by or against any internal or external stakeholder (such as, but not limited to, employees, contractors, suppliers, clients or guests).

AltoVita takes a strict approach to breaches of its Diversity, Equity and Inclusion policy, any

Sensitive

breaches of which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination and victimisation may amount to gross misconduct resulting in dismissal.

AltoVita is committed to providing a working environment free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect. We consider a safe and supportive environment as being integral to the wellbeing of all staff and the success of our business.

All staff should familiarise themselves with the company's Anti-harassment and Bullying policy for full details of AltoVita's approach to harassment and/or bullying in the workplace. Such behaviour will not be tolerated at AltoVita and if you have been harassed or bullied by an employee the matter may be dealt with under the Disciplinary Procedure as a case of possible misconduct or gross misconduct. If the harasser or bully is a third party such as a client or supplier, we will consider what action would be appropriate to handle the situation.

## Workplace Violence

Everyone has a right to a workplace that is free from violence and harassment, including any gender-based violence and harassment, as such, AltoVita has a zero-tolerance approach to violence in the workplace, which includes both physical and verbal harassment. Any instances or allegations of violence in the workplace will be taken very seriously and should be reported through our Grievance Procedure. Instances of workplace violence will be dealt with in accordance with our Disciplinary Procedure and may constitute gross misconduct and lead to termination, and could result in a criminal conviction.

## Health and wellbeing

AltoVita takes health and safety issues seriously and is committed to protecting the health, safety and wellbeing of all company staff and those affected by our business activities. Please familiarise yourself with our Health and Safety Policy which contains details of our responsibilities as an employer along with your responsibilities whilst working for the Company.

As a remote company, AltoVita's Health and Safety Policy is focused around our employees' and contractors' interaction points with the company: computer screens, home-office set-up, and online experience with our team, customers and suppliers.

Any breach of health and safety rules or a failure to comply with our Health and Safety Policy will be taken seriously and may result in disciplinary action being taken against the offender.

You may also refer to our Wellness Program for more information on how we tackle fatigue and promote mental wellbeing by encouraging an active pursuit of healthy habits on a daily basis. Our Wellness Program can be enjoyed by all full-time **AltoVitians** (company employees and contractors) who have successfully completed their probation period.

## **Roles and Responsibilities**

All staff should fulfil their roles and responsibilities with integrity and respect toward our customers, suppliers, stakeholders and the community.

Line managers must not abuse their authority. AltoVita expects line managers to delegate duties to their team members considering their competency and workload. Likewise, the Company expects team members to follow their team leaders' instructions and complete their duty with skill and in a timely manner.

## **Professionalism in the workplace**

All staff are expected to act and show integrity and professionalism whilst at work, as well as during any activity outside of work that may impact the Company's reputation.

This is particularly important to remember during external events. AltoVitians often attend conferences, award ceremonies or other events involving late nights with clients, prospects or partners. Although these events are a wonderful occasion to celebrate our industry and hard work, AltoVitians must ensure they behave in a professional manner at all times when representing the Company, whether during the working day or during the evening. This includes observing the reasonable instructions of AltoVita in connection with such events, for example dress codes.

All staff are required to remain open for communication and dialogue with all internal and external stakeholders during working hours.

## **Drugs and alcohol**

AltoVita is committed to providing a safe, healthy and productive working environment. This includes ensuring that all staff are fit to carry out their jobs safely and effectively in an environment which is free from alcohol and drug misuse.

We expect you to demonstrate responsible behaviour at work, work-related functions and work-related social events and to act in a way that will not have a detrimental effect on our reputation. If you entertain clients or represent us at external events where alcohol is served, you are considered to be "at work" regardless of whether you do so outside normal working hours. Consequently, we will expect you to remain professional and fit for work at all times.

On a regular work day, we will not accept staff arriving at work under the influence of alcohol, or whose ability to work is impaired in any way by reason of the consumption of alcohol. While alcohol consumption at a work event or client meeting might be appropriate, AltoVitians must maintain composure, control and professionalism at all times.

Use of drugs (other than prescription or over the counter medication, as directed), is never acceptable while at work or representing AltoVita.

Notwithstanding the expectation that you arrive at work fit to carry out your job and to be able to perform your duties safely without any limitations due to the use or after-effects of alcohol or drugs, we want to promote a culture which understands and is sympathetic to the problems associated with alcohol and drug misuse in which staff with dependency problems are encouraged to seek help and are supported.

## Business Practices

One of AltoVita's core values is to uphold responsible and fair business practices in all jurisdictions served by our Company. As such, AltoVita's senior leadership team is committed to promoting and maintaining the highest level of ethical standards in relation to all its business activities and expects all staff working for and with AltoVita to discharge their responsibilities with the same duty of care and attention, and to act ethically and responsibly whenever dealing with company finances, products, partnerships, suppliers, clients and public image. Our reputation for maintaining lawful business practices is of paramount importance to our organisation and we expect you uphold it at all times.

### Conflicts of interest

To ensure that all business decisions are made in the best interests of the Company, we expect our staff to avoid any personal, financial, or other interests which may hinder their capability or willingness to fulfil their job duties. We are responsible for advising all employees and contractors of their obligation to disclose conflicts of interest and therefore maintain high ethical standards.

When competing interests impair our ability to make objective, unbiased business decisions there is a conflict of interest. You may face a conflict of interest when your professional duties as an employee of AltoVita and your personal interests diverge. They may take the form of financial interests in an AltoVita supplier or customer business, recruiting a close family member or engaging in employment outside AltoVita.

As our employee, you are expected to:

- Maintain the highest possible standard of integrity in all your business relationships, both inside and outside the organisation in which you work.
- Reject any business practice which might reasonably be deemed improper (including improper practices which might benefit AltoVita).
- Never use your authority or position for personal gain.
- At all times, act with impartiality, independence and integrity.
- Avoid being, or giving the appearance of being, in a position which may result in an actual or perceived detriment to AltoVita's reputation and/or interests.

## Sensitive

It is not possible to define all situations or relationships which may create a conflict of interest, so each situation must be evaluated individually. However, some of the more obvious conflicts include:

- Having any interest, dealings or shareholdings in any business which either is a competitor, customer, supplier or AltoVita partner or is seeking to become one.
- A close family member (including children, in-laws, partner or spouse) having any interest, dealings or shareholdings in any business which either is a competitor, customer, supplier or AltoVita partner, or is seeking to become one.
- Having a close or longstanding relationship/friendship with a business which either is a competitor, customer, supplier or AltoVita partner, or is seeking to become one.

Actual conflicts of interest must be avoided and potential conflicts of interests carefully managed by disclosing any such interest to your line manager, to ensure that you do not become involved in or influence situations where actual conflicts of interest occur. In all cases, individuals have a responsibility to assess the potential conflict. Actual or perceived conflicts of interest must be disclosed to your line manager or the Finance Director. If you are in doubt as to whether a conflict of interest exists, discuss the situation with your line manager or the Finance Director.

Your obligation to avoid and declare any conflicts of interest should be observed in conjunction with compliance with our Anti-corruption and Bribery Policy.

## Bribery and Corruption

AltoVita has a zero-tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings and relationships; thus, implementing and enforcing effective systems to counter bribery in line with the Bribery Act 2010.

All employees and associated persons are required to:

- Comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business for the Company.
- Act honestly, responsibly and with integrity.
- Safeguard and uphold AltoVita's core values by operating in an ethical, professional and lawful manner at all times.

Bribery of any kind is strictly prohibited at AltoVita. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a bribe.

You are required to familiarise yourself with the Company's Anti-Corruption and Bribery Policy which details your responsibilities and the relevant reporting procedure for unlawful conduct, suspicions or concerns to enable investigations and appropriate action to be taken against

Sensitive

bribery and corruption. Any breach of the Anti-Corruption and Bribery Policy constitutes a disciplinary offence and will be dealt with in accordance with the company's Disciplinary Procedure, it may also lead to criminal liability.

## **Gifts and Hospitality**

AltoVita strongly discourages employees from accepting gifts or hospitality from third parties unless permitted under our Anti-Bribery and Corruption policy.

It is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know, or suspect is offered, or provided with the expectation that it will obtain a business advantage for them.

Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is also strictly prohibited. Facilitation payments are not commonly paid in the UK but they are common in some other jurisdictions. Any business deal where the hint or suggestion of a 'facilitation payment' in dealing with a foreign jurisdiction should be reported to your line manager or the Chief Information Security Officer immediately.

You should refer to AltoVita's Anti-Bribery and Corruption Policy for details on our policy regarding accepting gifts from third parties, your obligations to declare any gifts and the limited instances in which gifts may be permitted according to our policy and the applicable legislation.

## **Anti-Money Laundering**

Money laundering is the practice of concealing or disguising the origins of proceeds derived from criminal activity by creating the appearance that the proceeds are derived from a legitimate source. The underlying criminal activity can include obvious crimes such as drug trafficking, fraud, bribery or organised crime. In some jurisdictions, it can also include tax evasion, export control offences or regulatory crimes.

Engaging in any transaction or activity which you know or suspect constitutes money laundering or terrorist financing is strictly prohibited. You are required to comply with the instructions of the Finance team in respect of any payments to and from third parties and appropriate due diligence should also be performed on third parties, where required.

It is the policy of AltoVita to comply with all applicable anti-money laundering and counter-terrorist financing laws and regulations in all countries in which we do business. Our Anti-Money Laundering Policy addresses what you must do in order to comply with those laws and regulations.

## **Anti-facilitation of Tax Evasion**

At AltoVita, we are committed to conducting all our business in an honest and ethical manner. We take a zero-tolerance approach to the facilitation of tax evasion, whether under UK law or under the law of any foreign country. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and to implementing and enforcing effective systems to counter tax evasion facilitation.

We take our legal responsibilities very seriously in this area and we will uphold all laws relevant to countering tax evasion in all the jurisdictions in which we operate, including the Criminal Finances Act 2017.

The prevention, detection and reporting of tax evasion and foreign tax evasion are the responsibility of all those working for us or under our control. You must ensure that you read, understand and comply with our Anti-Tax Evasion Policy at all times and you are required to avoid any activity that might lead to, or suggest, a breach of our Anti-Tax Evasion Policy. You must notify your line manager or the Finance Director as soon as possible, if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

## **Trade Sanctions and Import/Export Controls**

The nature of AltoVita's business means the activities and transactions the business undertakes may be subject to the sanctions regimes of multiple jurisdictions, including the UK, UN, EU, and US, as well as other jurisdictions in which it operates, such as Singapore. We committed to complying with, and to conducting all our business in the spirit of, all sanctions laws and regulations to which we are subject.

Failure to abide by the requirements of our Sanctions Policy could expose our business to significant economic and reputational damage. Failure to comply with any applicable sanctions laws would constitute a breach of legal requirements in addition to a failure to abide by AltoVita's expectations.

Failure to abide by the requirements of our Sanctions Policy may also result in criminal, administrative and civil liability to the Company, its affiliates or their respective directors, officers and employees. If you are ever unsure how to react to a situation in this area, you should always seek guidance from the Finance Director, CEO or COO before taking any action.

## **Slavery, Human Trafficking, Child Labour and Human Rights**

AltoVita is committed to acting ethically and with integrity in all our business dealings and relationships. We take a zero-tolerance approach to modern slavery and AltoVita is committed to implementing and enforcing effective systems and controls to ensure modern slavery or human rights breaches are not taking place anywhere in our own business or in our supply chain.

Sensitive

Modern slavery is a crime and a violation of fundamental human rights. It can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

You must notify your line manager as soon as possible if you believe or suspect that any form of slavery, human trafficking, child labour or other human rights breaches are taking place or may occur in future. You are also encouraged to raise any concerns about issues or suspicions of modern slavery in any parts of our business or supply chains of any supplier at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally, or the working conditions within any tier of our supply chain constitutes any of the various forms of slavery, we encourage you to raise it with your line manager or the People Team.

## **Environmental Operational Compliance**

At AltoVita, we encourage our suppliers, clients and staff to take sustainable steps (and leaps) to promote the wellbeing of our environment.

You are required to comply with all environmental laws when carrying out your role and to comply at all times with our Environmental Policy. We are not only committed to reducing our own impact on the environment, but we also use AltoVita's platform to promote sustainable practices by both our suppliers and clients; our Environmental Policy is not just a policy and we feel a responsibility to the environment beyond legal and regulatory requirements.

Please refer to AltoVita's Environmental Policy for more details of our commitment to taking sustainable steps to benefit our environment and for your obligations in this regard.

## **Sustainability**

At AltoVita, sustainability is a core pillar of both our internal and external company aims. For more details on how we are committed to supporting our customers in their pursuits of more sustainable choices please refer to our CSR Policy in conjunction with our Environmental Policy.

Given the remote-only nature of our team, internally our most important role as a company when it comes to the environment is to educate and encourage all AltoVitians to make sustainable decisions. Furthermore, we commit to keeping sustainability front-of-mind, and ensuring more sustainable practices are implemented by us whenever relevant or possible.

## **Company Assets and Information**

All staff are expected to treat AltoVita's property and information with respect and care. You must ensure that you: (i) do not misuse company equipment or use it frivolously; (ii) respect all

Sensitive

intellectual property and confidential information and only use such property and information as required to fulfil your business responsibilities; (iii) protect any company facilities and property from damage and vandalism; and (iv) comply with AltoVita's policies and procedures in relation to our company assets and information.

## **Intellectual Property**

AltoVita takes the maintenance, protection and exploitation of our intellectual property rights and those of third parties very seriously. You are required to respect all incorporeal property belonging to us or third parties which you have access to during your employment at AltoVita, such as trademarks, copyright and other intellectual property rights, and you must only use them to carry out your business responsibilities. Our intellectual property, for example AltoVita's trademarks, are valuable assets of our business as they distinguish our products and services from those of our competitors and serve as a badge of origin. If we use our intellectual property improperly or inconsistently, or allow others to do so, its protection could be weakened or lost.

Your employment contract or contractor agreement covers ownership of intellectual property rights by the Company if these are created in the course of employment and contains other protective clauses relating to intellectual property.

You should respect third-party intellectual property rights when carrying out your duties and you must not use any materials in a manner which may infringe any third-party intellectual property right. If you have any questions about our intellectual property or that of a third party, please contact the CISO, CEO or COO.

## **Confidential Information**

AltoVita's confidential information is information that is not available to the public which concerns our business and includes, but is not limited to, AltoVita's (i) assets, affairs, financial data, customers, clients, suppliers, partners, plans, intentions or market opportunities; and (ii) internal operations, processes, product information, know-how, designs, trade secrets, intellectual property or software (including those of our group companies).

Access to and use of AltoVita's confidential information should be restricted to authorised users on a "need to know" basis. When exchanging assets with organisations or third-party suppliers, the confidentiality of our assets should be communicated and appropriate non-disclosure agreements should be entered into or other protective measures should be taken, where required. You should familiarise yourself with our Information Classification Scheme and contact our Chief Information Security Officer if you require more information or guidance on protecting our confidential information.

## **Data Protection**

At AltoVita we set ourselves high standards for protecting our information and the information

Sensitive

our clients, customers and partners have entrusted us with. The confidentiality, integrity and availability of information, in all its forms, are critical to the ongoing functioning and good governance within AltoVita. Failure to adequately secure information increases the risk of financial and reputational losses from which it may be difficult for the business to recover.

Our Data Protection Policy outlines AltoVita's approach to establishing guidelines around Data Protection. It provides the guiding principles and responsibilities necessary to safeguard the Company's personal and confidential information assets and you are required to familiarise yourself, and act in accordance with, its contents.

Any questions regarding our Data Protection Policy should be directed to the Chief Information Security Officer.

## **Use of Information and Communication Systems**

Our Information Security Policy sets out the mandatory minimum baseline requirements in relation to information security at AltoVita. It provides the guiding principles and responsibilities necessary to safeguard the security of AltoVita's valued assets. Failure to adequately secure valued assets increases the risk of financial and reputational losses from which it may be difficult for AltoVita to recover and we take our legal responsibilities in this area very seriously to protect the confidentiality, integrity and availability of our IT systems, which are critical to ongoing functioning and good governance within the business.

You are required to read and familiarise yourself with our Information Security Policy, Acceptable use Policy, Information Classification Scheme and Security Incident Management Policies. You should also familiarise yourself with our Data Breach Process and Data Retention Policy. Any questions or suggestions on these policies should be raised with our Chief Information Security Officer.

## **Use of devices**

Devices required for the performance of your role will be provided by AltoVita where appropriate and in accordance with our guidance on IT Assets set out in our Information Security Policy. The use of personal devices for business purposes requires authorisation by your line manager and any personal devices must be used in accordance with our Information Security Policy. Employees and contractors can bring their own devices to AltoVita workspaces for personal use and shall not access the Company or any group company information from personal devices unless in accordance with the Information Security Policy.

Any questions regarding the use of devices or business IT Assets should be directed to the Chief Information Security Officer.

## **Social Media**

## Sensitive

Social media offers exciting and innovative ways for AltoVita's business to thrive. However, you must take care to avoid making any social media communications that could damage AltoVita's business interests or reputation, even indirectly. You must not use social media to:

- Defame or disparage AltoVita, our staff or any third party;
- Harass, bully or unlawfully discriminate against staff of third parties;
- Make false or misleading statements; or
- Impersonate colleagues or third parties.

You must not comment on social media about sensitive business-related topics, such as our performance, or do anything to jeopardise our trade secrets, confidential information and intellectual property. You must not include our logos or other trademarks in any personal social media posting or in your profile on any social media, unless expressly authorised to do so by your line manager.

If you disclose your affiliation with us on your profile or in any social media postings, you must state that your views do not represent those of AltoVita (unless you are authorised to speak on our behalf). You should also ensure that your profile and any content you post are consistent with the professional image you present to clients and colleagues.

If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from posting it until you have discussed it with your line manager.

If you see social media content that disparages or reflects poorly on us, you should contact your line manager, the CISO or the People Team.

Any misuse of social media should be reported to the CISO, CEO or COO as breach of these guidelines may result in disciplinary action up to and including dismissal. You may be required to remove any social media content that we consider constitutes a breach of these guidelines and failure to comply with such a request may in itself result in disciplinary action.

# Process for review

This Code will be reviewed annually or as required following:

- any legislative changes or changes to industry guidance that might impact its content;
- any changes to other associated internal policies, processes or procedures; or
- any breach or other incident relating to the issues addressed in this Code.

# Acknowledgement

I \_\_\_\_\_ (employee name), acknowledge that on  
\_\_\_\_\_ (date), I received and read a copy of AltoVita's  
Code and understand that it is my responsibility to be familiar with and abide by its terms.