



Code of Ethics

January 2023



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Our Approach

This rebuy Code of Ethics represents a strong ethical commitment while serving as a guide to proper business conduct for all stakeholders. We at rebuy always do everything to ensure business is done in a legal, ethical, and transparent manner.

The guidelines here apply to all rebuy stakeholders, including executives, team leads, managers, employees, suppliers, agencies, temporary employees, subcontractors and consultants.

rebuy encourages its employees to be fair and honest in all interactions related to their job. The success of our business is based on the trust and respect we have earned from our employees, customers, suppliers, and investors. All staff are expected to adhere to this Code in their professional and personal conduct, treating others with respect, honesty, and kindness.

Managers and leaders shall demonstrate the importance of this Code and are responsible for promptly addressing any related questions or concerns.

As a company, rebuy is always open to questions or feedback at any time and will not permit any form of punishment or retaliation against any party, internal or external, for reporting suspected misconduct in good faith.

Should you experience or witness unethical behaviour of any kind, you can report it using the following two mechanisms:

1. You can use this form to anonymously report the concern or incident in [English](#) or [German](#). You do not need to provide an email address and no other personally identifiable information is recorded. This means we can't and won't contact you for additional information. Please bear this in mind when completing the form: We will be unable to contact you for clarification and it is unlikely you will be updated on any action(s) we may take on the basis of this report.
2. If you can give consent to be contacted afterwards, please use this form to report the concern or incident in [English](#) or in [German](#). We may contact you to gather more information should further action be required.

Who will be informed?

- If you choose to remain anonymous, you won't be expected to disclose your identity in any way and your need for discretion will be respected.
- If you provide consent to be contacted, the member of the Legal or People team assigned to your case may get in touch with you, but they won't disclose any personally identifiable information to anyone else.

What are the next steps?

- The Legal and People Team will work with General Management to assess the nature of the unethical behaviour and take all necessary actions. Where you have provided consent for further contact, any additional information you share will similarly remain confidential.

Product

1. We follow legal standards & make ethical decisions

Ethical behaviour is based on value-based decision-making. That we respect the legal system and comply with all applicable laws, rules, and regulations is a given. We respect the terms of every legitimate contractual agreement entered into as valid and binding, and we do not abuse our rights.

Decisions in dealings with all rebuy's stakeholders – internal or external, permanent or contractual – should always be made on an ethical basis.

→ **Q&A: What questions can I consider to help me identify situations that may be unethical, inappropriate, or potentially illegal?**

If in doubt, consider the following questions:

- Is what I'm doing legal?
- Does it reflect our company's values and ethics?
- Does it respect the rights of others?
- Have I been asked to misrepresent information or deviate from standard procedure?
- If what I am doing (or asked to do) were to be reported about in the press, would it have a negative impact on rebuy's reputation?

2. We promote fair competition and proper business conduct

Our relationships with business partners are built upon trust and mutual benefits. We are dedicated to ethical and fair competition, and market our products and services based on their quality, functionality and attractive pricing. We endeavour to make independent pricing and marketing decisions and will not collaborate improperly with our competitors. We will not offer or solicit improper payments or gratuities, nor will we engage or assist in unlawful boycotts of particular customers.

→ **Q&A: What are examples of competitively sensitive information that should not be shared?**

- Any current or future customer- or product-specific pricing information
- Ongoing projects planned for internal or external implementation
- Contracts
- rebuy's internal cost structure
- Any strategically relevant information that is not specifically marked as public information

3. We fight all forms of corruption

We firmly condemn and do not tolerate any form of corruption. It is prohibited to directly or indirectly offer, promise, give, request, solicit or accept any unfair advantage or benefit in order to obtain, retain, or facilitate business in any way. This may include cash or cash equivalents, gifts, discounts, travel, personal hospitality or other benefits. We do not permit facilitation payments to government officials or private business to secure or speed up routine actions.

We shall avoid any actions that create a perception that favourable treatment was sought, given, or received in exchange for personal

benefits. Bribes or advantages are not always immediately identifiable as such, which makes it important to learn how to spot them.

As a general rule, staff should never accept or offer any financial payments, gifts, or invitations that might create a feeling of obligation or pressure to return the favour. However, small gifts or invitations offered outside of a negotiation context, do not, in themselves, constitute corruption.

If you are in any doubt, you can reach out to us anonymously using this form in [English](#) or [German](#). Alternatively, you can provide your details with consent for us to get back to you by using this form in [English](#) or [German](#).

4. We ensure maximum confidentiality, information security, and protection of intellectual property

We are committed to keeping our business information confidential and protecting our intellectual property. We have developed effective security measures and confidentiality guidelines, and our staff are obligated to uphold them. Proprietary information that must be treated carefully includes all non-public information that might do harm to the company, its customers, or its business partners if disclosed to unauthorised parties.

→ Q&A: Am I allowed to discuss work-related issues with a family member?

If in doubt, consider the following questions:

- Would you discuss this issue with a colleague? If not, you should avoid talking about it outside of the office.
- Did anyone at work mention confidentiality issues related to the topics you want to discuss?
- Have you carefully assessed the level of confidentiality of the information you want to share or discuss? Is it internal, external, public, or private information?
 - If the information is publicly available, there is no need to worry. If not, ask yourself if discussing that specific topic out-

side of the company could harm rebuy, its customers, or its business partners in any way.

- Still unsure? You can check the details of your contract. The extent to which you can share information can vary depending on your position and/or role in the organisation.

5. We promote integrity and transparency on financial reporting

Our books, records, accounts and financial statements must be maintained in appropriate detail and must accurately reflect our transactions. We condemn all forms of money laundering, so we are committed to doing business only with partners involved in legitimate business activities with funds derived from legitimate sources. We are committed to fair taxation and the avoidance of all tax evasion practices.

Fraud, defined as the act or intent to cheat, steal, deceive, or lie, is unethical and often criminal. All types of fraud are strictly prohibited. These can include submitting false expenses reports, misappropriation of assets, misusing company property, or making untrue financial or non-financial entries in financial records or statements.

6. We prevent all conflicts of interest

A conflict of interest exists when an employee's personal interest (these can also involve friends, family, customers, competitors, suppliers, or contractors) interferes with the best interest of rebuy. Our decisions shall be based on objective and fair assessments that preclude the possibility of any improper influence. Determining whether a conflict of interest exists is not always easy to do, but in case of doubt, remember the priority is always to be transparent.

→ Q&A: How do I recognise a conflict of interest?

- Serving as a board member for another company or organisation
- Owning or having a substantial interest in a customer, competitor, supplier, or contractor
- Having a personal or financial interest or potential personal gain in connection with any company transaction
- Hiring or supervising family members or other closely related individual

In any situation where an employee becomes romantically involved with a fellow employee at any level in the organisation, both parties are expected to bring their relationship to the attention of their manager or a representative from the Legal or People team to assess potential conflicts of interest.

Any conflicts of interest must be declared to their manager or a representative from the Legal or People team as soon as they occur or become apparent.

7. We respect your privacy and protect your personal data

We respect people's privacy. We acknowledge customers', employees' and other individuals' need for assurance that their personal data is being processed appropriately and in line with a legitimate business purpose and act accordingly. We only collect and store personal information that is strictly required and correctly inform the data owners on the ways we use their data. Effective security measures ensure the confidentiality, integrity, and availability of personal information as required.

→ Q&A: Can I provide a colleague' personal address to a business partner who's said they would like to send them something?

As much as we want to build strong relationships with all stakeholders, it is not appropriate to disclose any kind of personal information relating to a colleague to third parties. In this situation, you can kindly suggest the partner addresses the package to the rebuy office while marking it for the intended recipient.

Planet

8. We protect the environment

At rebuy, we go above and beyond the minimum in environmental standards. Every day, our actions as a company help make the circular economy a lived reality. We know that this transition can only be achieved by working together.

The rebuy business model is being compared against and aligned with the United Nations' Sustainable Development Goals. Our disruptive buying and selling strategy gives us the unique opportunity to change the way media products and consumer electronics are purchased and used.

Our central purpose is to make circular living accessible to all, one transaction at a time. As part of this, we strive to keep improving all our operations to better fulfill our customers' expectations while continuously improving our environmental impact. Please examine our [Sustainability Report](#) for further insights into our contribution to the UN's SDGs.

Environmental policy and commitment

At rebuy, we are committed to reducing our environmental impact. We strive to improve our environmental performance over time, and we continue to initiate various projects that will improve our environmental footprint and handprint.

This commitment extends to our customers, our colleagues, our suppliers, and the communities in which we do business.

We are committed to:

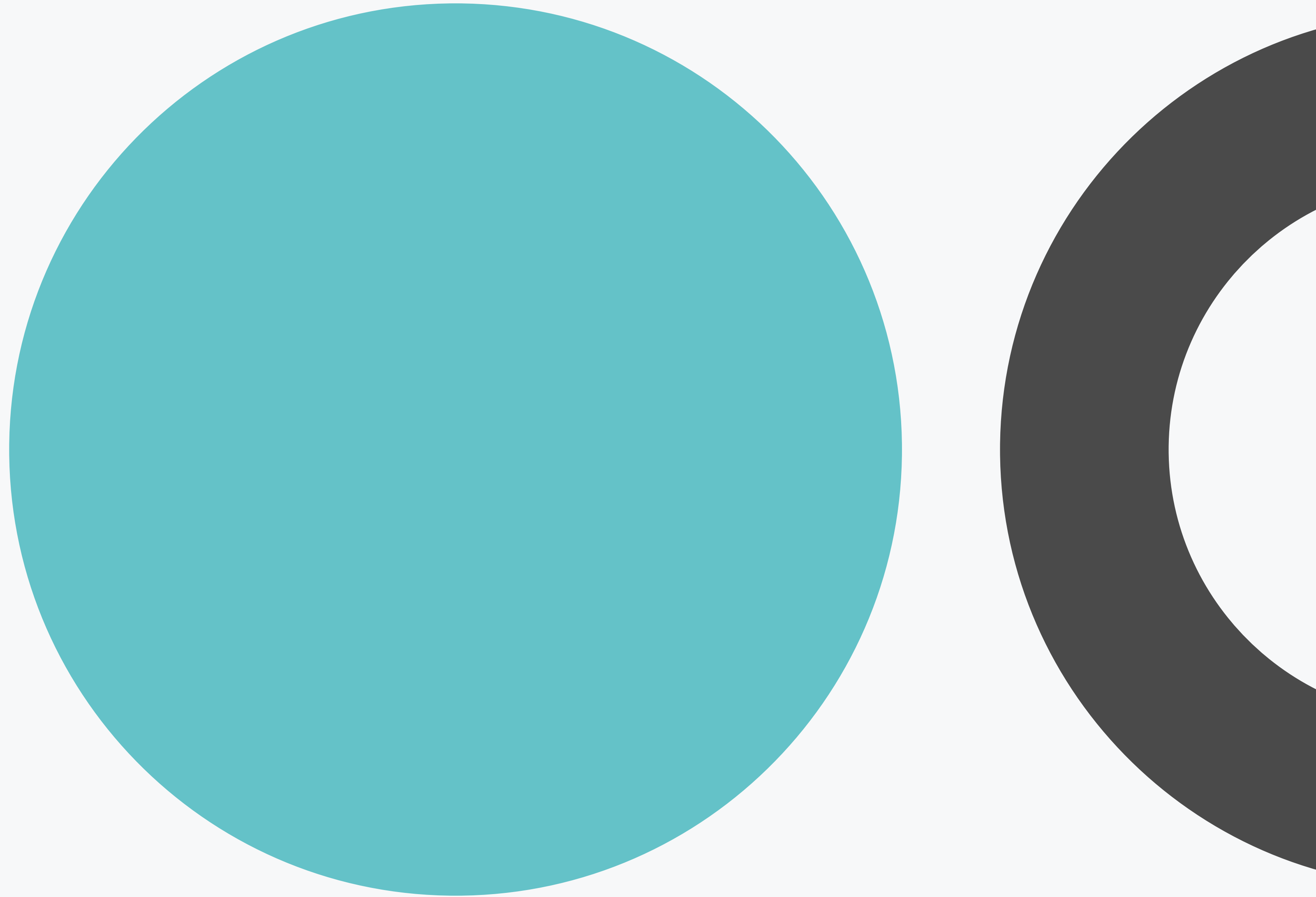
- Compliance with all applicable environmental regulations
- Reducing and offsetting our company's carbon footprint
- Minimising resource consumption
- Managing waste responsibly
- Raising environmental awareness among our staff and empowering them to get involved in our pro-environment activities
- Avoiding operational activities near sites with significant and sensitive biodiversity

Sustainable packaging commitment

Addressing climate-related challenges through circularity is rebuy's central purpose, and the focus of all we do. We ensure all our operations and practices are aligned with this vision, including our packaging practices. That is why we have set group-wide targets:

- To end the use of all single-use plastic in packaging by the end of 2023
- To increase the use of reusable packaging
- To move ever closer towards 100% recyclable packaging
- To continuously look for sustainable packaging and alternative solutions

People



9. We respect human rights and fair labour practices

We respect the human dignity and rights of each individual and community with whom we interact through our work. We shall not in any way cause or contribute to the violation of human rights, but instead treat everybody with respect and care, upholding human rights while fighting all forms of discrimination.

We promote equality in our employment practices with a fair employment and remuneration policy and full compliance with applicable laws. This is matched with a zero-tolerance policy to all forms of employment of or contracting of child or slave labour, including any form of forced, compulsory, or bonded labour in our supply chain.

At rebuy, we are proud to be able to keep a very close eye on our value chain. Grading, repair, packaging, and shipping are all processed in our own directly managed facilities. When required, our Europe-based business partners provide support throughout the repair process. Building trust and upholding transparency throughout the value chain precludes any risk of involvement in child or forced labour.

10. We fight discrimination and harassment

We are an equal opportunity employer and do not tolerate any form of discrimination, harassment, or other types of abuse. No direct or indirect discrimination is permitted based on any trait or circumstance irrelevant to job performance, such as gender or sexual identity, marital status, age, skin colour, disability, religion, social status, national or ethnic origin, political opinion, appearance, or any other characteristic. Any kind of discriminatory behaviour, harassment, bullying or victimisation is prohibited and will be properly dealt with.

→ Q&A: Harassment isn't always obvious, so what should I look out for?

- Intrusion into someone's personal life
- Unsolicited sexual advances of any kind
- Attempts to discredit or spread rumours about someone
- Degrading comments or insults of any kind
- Attempts to discredit or spread rumours about someone
- Degrading comments or insults of any kind

These are only examples. If you are unsure about a situation you have observed or are experiencing, you can reach out to us anonymously using this form in [English](#) or [German](#). Alternatively, you can provide your details with consent for us to get back to you by using this form in [English](#) or [German](#).

11. We provide a healthy and safe workplace

At rebuy, we provide a safe and healthy work environment for everyone. We comply with local workplace safety legislation and make every effort to avoid all kinds of injury and negative health impacts. First aid equipment, protective equipment, and fire extinguishers are also provided in appropriate locations. All staff are obliged to follow and comply with all relevant health and safety regulations at all times.

12. We act as a responsible corporate citizen

At rebuy, we want to do our part in overcoming societal challenges by providing meaningful support for social projects and initiatives. It is our responsibility to be the best corporate citizen possible and give back to local communities.

Circularity is at the core of our business, so it makes sense for us to act in a circular way even beyond the conventional confines of a business model by giving back. This includes donating goods to charities and others in need. We participate in several philanthropic activities with partners and other organisations every year to round off our circular approach. Colleagues are also able to participate in voluntary work during their working hours and we actively support such initiatives.

