

SKANACID CODE OF CONDUCT

At Skanacid, we strive to employ the highest ethical standards, demonstrating honesty, fairness and accountability in every decision and action.

Scope: This Code of Conduct ("Code") applies on a worldwide basis to Skanacid, and its subsidiaries. This Code applies not only to the activities of WE in every region but also to its officers, directors, employees, agents and shareholders.

Our Responsibilities Generally: We are responsible for complying with this Code and with all Skanacid policies and practices. We comply with the laws, rules and regulations of the countries in which Skanacid do business and with specific Skanacid policies regarding legal and ethical conduct. We support the principles outlined in The Council of PR Firms Code of Ethics and Principles. Those policies may be amended or supplemented from time to time.

We are responsible for raising questions about the Code and underlying policies, and seeking guidance, whether from a manager, or a member of the Human Resources team. Ignorance is not an excuse for violating this Code.

Our Responsibility to Comply with Laws: We comply with all applicable laws, rules, and regulations. In some instances, local or foreign laws may differ from the principles outlined in this Code. Generally, in those situations the more restrictive policies, laws or regulations would apply. Some of the laws you may encounter are summarized below.

Antitrust and Competition: We do not discuss pricing policies and terms, business or marketing plans and any other confidential business matters in our contacts with competitors. If a competitor raises any of these issues, no matter how casually, stop the conversation, explain that it is against our policy to discuss such matters and communicate the incident.

Anti-corruption and Bribery: We do not pay or offer to pay money or give anything else of value to individuals, government officials, officials of public international organizations, political candidates or political parties for the purpose of obtaining or retaining business for Skanacid. We will not engage an intermediary (such as an agent) to provide such payments. Violations of the anti-corruption and bribery laws (and other similar laws) may cause Skanacid to incur fines and can also lead to fines or jail terms for the individuals involved.

Insider Trading: We do not trade in securities of clients or other companies or advise others to do so, based on material inside (nonpublic) information gained about those clients or companies in the course of our duties for Skanacid.

Anti-money Laundering: Money laundering laws prohibit engaging in any financial transaction if it is known that the funds used in the transaction were derived from illegal activities. They also can apply to efforts to conceal the identity, source, or destination of money. We are committed

to being transparent and complete in recording and documenting all transactions, and ensuring that the underlying activities, sources, and destinations of the funds comply with applicable laws and regulations.

Our Responsibilities to Our Clients, Suppliers and Competitors: Even in a competitive environment, we must act ethically in our dealings with other companies.

Gathering Competitive Intelligence: We may learn about a client's or a competitor's services and activities if such information is based on publicly available information, such as public presentations, public marketing documents, journal and magazine articles, advertisements, and other published information or private non confidential sources. We should not seek information illegally or in a way that involves a breach of integrity or breach of any confidentiality or employment agreement. We must never misrepresent our identities when attempting to collect competitive information. Direct exchange of competitive intelligence with our competitors is prohibited.

Gifts and Business Entertainment: Developing strong working relationships with our clients, suppliers and other business partners is important to our growth. Business gifts and entertainment are sometimes used to strengthen these bonds. However, we must always exercise caution when offering or accepting business courtesies.

We may give or accept gifts of a nominal value on an infrequent or occasional basis, such as during the holiday season but only as a reasonable business courtesy. Gifts of cash or cash equivalents (e.g., vouchers and gift certificates) are never permitted. Routine business-related entertainment is also generally acceptable. Examples include a business lunch or dinner, sports outings, or cultural events. However, we may not give or accept gifts covering nonbusiness expenses, such as travel for a client, family member or supplier.

Generally, we may offer or accept a gift, favor or entertainment as long as it (1) does not make the recipient feel obligated or give the appearance of an obligation; (2) does not exceed generally accepted local business practices (refer to your local professional organization, e.g., CIPR (UK), PRSA (US), CIPRA (China) for additional information); (3) is of nominal value; (4) cannot be construed as a bribe or payoff; (5) does not violate applicable law, our own agency policies or the policies of the recipient's company; and (6) is not solicited.

Offering gifts, entertainment or other business courtesies can be problematic when dealing with a government official. The U.S. Foreign Corrupt Practices Act and the UK Bribery Act specifically prohibit offering or giving anything of value to government officials to influence official action or to secure an improper advantage. This not only includes traditional gifts, but also things like meals, travel, political or charitable contributions and job offers for government officials relatives. Skanacid should never give gifts to thank government officials for doing their jobs.

Unfair Methods of Competition and Deceptive Practices: We will not make false or misleading representations about Skanacid's services or products, falsely disparage a competitor or its products, or make service or product claims without facts to substantiate them.

Political Activity: Skanacid will comply with all applicable laws regarding campaign contributions, lobbying, and ethics standards that apply to dealings with public officials and government employees. Only designated Skanacid officers and employees are authorized to communicate with elected officials regarding the public policy issues that affect Skanacid or its clients.

Our Responsibilities to WE: We must use only Agency resources, Agency property and Agency opportunities for the benefit of Skanacid and its Agency clients.

Business Records: We honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy. Examples include, but are not limited to, accurately recording your worked hours and PTO and expense reimbursement requests as directed by Skanacid. We create, retain, and dispose of business records in compliance with all applicable legal and regulatory requirements. We are always honest, direct and truthful in discussions with regulatory agency representatives and government officials.

Conflicts of Interest: The term "conflict of interest" describes any circumstance that could cast doubt on our ability to act objectively regarding Skanacid. We avoid situations that we know, or should know, create actual or potential conflicts of interest, or the appearance of a conflict of interest, and immediately disclose them to Skanacid if they arise. This includes instances where an employee, or a member of his or her family, receives personal benefits because of his or her position with Skanacid or with a client. We cannot use Agency property for personal gain or take for ourselves business opportunities that arise through the use of Agency property, information or position.

Protection of Proprietary Information: We must safeguard Skanacid proprietary information, client information, and all other third-party proprietary information entrusted to Skanacid, from loss, theft, and unauthorized modification, access and disclosure. All nonpublic information related to Skanacid or client business should be considered confidential. We also keep confidential any information received in confidence from an actual or prospective client, supplier, or business partner. We do not bring or use any confidential information obtained from a former employer. Our obligation to protect confidential information continues even after we leave, Skanacid.

Signature and Spending Authority: Only certain Skanacid employees or officers are authorized to sign contracts for Skanacid or commit Skanacid to spend money. Do not sign any document committing Skanacid to anything unless you have the required signing authority. Notably, do not enter any "side letters" with clients that purport to change, add to or cancel a

signed agreement or that commit Skanacid to do or not to do anything (including, without limitation, promises to waive services fees or not charge during a "ramp up" period). Do not commit Skanacid to spend money unless you have sufficient budget and approval of the budget owner. You should combine the total cost of a purchase when making this determination. Do not attempt to get around the limits of your spending authority by turning a single purchase from the same vendor into several smaller purchases.

Our Responsibilities to Each Other: We are each responsible for creating and maintaining a work environment free from harassment and other inappropriate behavior.

Diversity and Inclusion: We affirm the principles of equal employment opportunity, and we practice and promote such policies in all locations as appropriate under the law. Our policies affirm this principle of diversity, inclusion, and freedom from discrimination in all aspects of the employment relationship.

Harassment: We are committed to provide work environments that are free from unlawful harassment and discrimination. Our policies prohibit harassment and provide employees with an effective complaint process.

Environment, Safety and Health: We are committed to provide safe and healthy work environments and to being an environmentally responsible corporate citizen. The Skanacid standard, at a minimum, is to comply with all environmental, safety and health laws and regulations. We are committed to minimizing the impact of our business on the environment with methods that are socially responsible and economically sound.

Communicate: Human Resources has primary responsibility for enforcing this Code and all Skanacid policies on legal and ethical conduct, as well as issuing guidance and explanatory materials, subject to supervision by the Skanacid Board. We are each responsible for immediately reporting any suspected unethical or illegal conduct. Skanacid will not take retaliatory action against any employee who reports suspected violations in good faith. All reports of misconduct will be investigated as appropriate. Nothing in this Code is intended to restrict communications or actions protected or required by state or federal law.

Certification: All employees acknowledge the Code to certify their understanding and their commitment to comply with it.