



CODE OF BUSINESS CONDUCT AND ETHICS

Edition: 2

SIMTEL TEAM S.A.

Date:
19.12.2025

Code of Business Conduct and Ethics

**Approval
Responsible
& Date Version
Review**

Board of Directors Decision no. 70 of 19.12.2025
Legal / HR Department
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Annually or when the regulatory framework is amended

Version history	Date	Description of the change	Approved by
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1. Purpose

The Code of Business Conduct and Ethics sets out the mandatory ethical standards for all Simtel employees, directors, administrators and collaborators.

2. Principles and rules

Simtel conducts its business in accordance with the highest standards of integrity, responsibility and compliance, promoting ethical and respectful behavior in all business relationships.

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SIMTEL TEAM S.A.

J2010000564406, Tax No. 26414626
Registered office: Bucharest, sector 6, Splaiul Independenței nr. 319L,
Brussels Building (Building B), Entrance A, Ground Floor
Subscribed and paid-up share capital: 1,628,346.2 Lei



These principles and rules apply to all employees, members of management bodies, collaborators and, where relevant, business partners of Simtel.

2.1. Integrity and Respect

Simtel promotes an organizational climate based on integrity, mutual respect and fairness. Our employees and representatives act with honesty, good faith and professionalism, treat all persons with respect, without discrimination or harassment, avoid conflicts of interest and declare them transparently when they arise, respect the values and organizational culture of the Company.

Any behaviour contrary to these principles is unacceptable and may lead to disciplinary action.

2.2. Anti-myth, anti-fraud (gifts, hospitality, sponsorship)

The company applies a zero-tolerance policy towards bribery, corruption, fraud and any form of improper influence.

2.2.1. Gifts & Hospitality

The offering or acceptance of gifts, benefits or hospitality is permitted within Simtel only if it is of an occasional and reasonable nature, does not seek to influence business decisions, respects value limits and internal procedures.

Gifts or benefits that exceed the thresholds set must be declared and approved according to internal procedures.

2.2.2. Sponsorships and donations

Sponsorships and donations are made transparently and exclusively for legitimate purposes. These cannot be used to obtain undue advantages and are subject to a formal approval and monitoring process.

Any suspicion of bribery or fraud must be reported immediately through dedicated internal channels.

2.3. Fair competition

Simtel, through its employees, complies with the rules of fair competition and the applicable competition legislation. The conclusion of anti-competitive agreements, the unauthorized exchange of sensitive information with



competitors, the abuse of a dominant position, any practice that restricts or distorts competition are prohibited.

Employees are regularly instructed to avoid any behavior that could be interpreted as contrary to the principles of fair competition.

2.4. Privacy and data protection; Cybersecurity

Simtel protects confidential information and personal data, as well as the information systems used in carrying out its activity. Employees are required to comply with personal data protection requirements, use data and information only for legitimate purposes, protect confidential information from unauthorized access, comply with cybersecurity policies and procedures, and promptly report any security incident or data breach.

2.5. Responsible use of AI and Simtel resources

2.5.1. Artificial intelligence

Simtel promotes the responsible, ethical and transparent use of artificial intelligence solutions, in accordance with applicable legislation and ESG principles.

Mainly, the use of AI within Simtel respects fundamental rights and privacy, avoids discrimination and prejudice, ensures data and systems security, and is subject to appropriate human oversight.

2.5.2. Simtel Resources

Financial, material, IT, informational resources are used within Simtel exclusively for the professional purposes for which they were allocated, in a responsible and efficient manner and in compliance with internal procedures.

The misuse of resources is prohibited and is sanctioned according to Simtel's internal regulations.

2.6. Health, safety, environment

Simtel is committed to ensuring a safe and healthy working environment, compliance with occupational health and safety legislation, prevention of accidents and occupational risks. In terms of the environment, Simtel complies with legal environmental requirements, promotes the efficient use of



resources, aims to reduce the negative impact on the environment, encourages environmentally responsible behaviors.

3. Whistleblower reporting and protection

The company has implemented a whistleblowing mechanism available on <https://simtel.ro/whistleblowing/> website or at compliance@simtel.ro insuring address, to encourage whistleblowers' actions to report behaviors contrary to this Code. Each communication channel provides protection against retaliation and confidential handling of complaints.

4. Review

The policy is reviewed annually or when changes occur in the regulatory framework.