

Code of Conduct A-B-C
Trust. Innovation. Learning. Authenticity. Fun!

To our members of the EasyShop Network,

At EasyShop we create, build and foster Trust by doing what is right. Trust is the foundation of who we are as an organization.

What does doing the right thing mean?

At EasyShop it means embracing the spirit of the EasyWay!

Over our 40-year history in logistics experience in different organizations that has taken us to this newest beginning, the way of doing business has grown and changed moreover now with Artificial Intelligence, but our belief in doing the right thing has endured.

Our continued success depends on each of us supporting the EasyWay! in all our work. It is also essential that we ensure everyone at EasyShop knows how to apply the EasyWay! to their work. We want our customers, consumers, associates and business partners to know that we do what we say and say what we believe. This reputation, which we have built over time and rebuild each day, is what sets us apart. It is the foundation of our Company.

The EasyShop Alphabet of the Code of Conduct (the ABC) contains the standards we must follow to ensure we apply EasyWay! in our daily work. The ABC provides clear guidance on specific situations we might face and tells us what to do when we have questions or concerns.

Why do we have an EasyShop Code of Conduct?

We have the EasyShop Code of Conduct to define clear expectations for ethical behavior, compliance, and mutual respect across our network. It protects our reputation, customers, employees and partners by guiding day-to-day decisions, preventing misconduct, and ensuring legal compliance. The Code fosters trust and teamwork, empowers people to speak up without fear, and sets standards for responsible partnerships. By aligning individual actions with our values and long-term vision, the Code helps us deliver reliable service, build lasting relationships, and create sustainable growth for EasyShop and the communities we serve.

What is expected of me?

Every EasyShop team member must act with integrity, professionalism and respect. Follow the Code of Conduct and all applicable laws and policies; be honest in communications and accurate in records; protect confidential and customer information; avoid conflicts of interest and disclose any that arise; use company resources responsibly; and treat colleagues, customers and partners with dignity. Raise concerns promptly and cooperate fully in investigations—retaliation is not tolerated. Seek guidance when unsure, complete required training on time, and show accountability by admitting mistakes and helping to fix them. Small, consistent ethical choices build trust and safeguard our reputation.

Additional expectations for managers of others' Managers must model The EasyWay and set the tone for their teams. Beyond individual responsibilities, managers must actively promote an ethical culture: ensure team members receive required training, create safe channels for reporting concerns, respond promptly and fairly to

issues, and protect reporters from retaliation. Conduct due diligence when hiring or engaging third parties, monitor compliance within your area, and document corrective actions. Give clear expectations, provide constructive feedback, and reward behavior that aligns with values. Hold people accountable while supporting development—balancing performance with principled decision-making ensures team trust and long-term success.

How to raise questions and concerns?

Recognizing what is right

Know the standards: follow the Code of Conduct, company policies and law. “What is right” usually aligns with honesty, respect, transparency, and the long-term interests of customers, colleagues and EasyShop. Warning signs include requests to hide information, pressure to bypass controls, unusually vague invoices, gifts or favors tied to decisions, or instructions to alter records. If something feels off, speak up — early questions often prevent bigger problems.

Ways to raise questions and concerns

1. Ask your manager first: raise routine questions or clarifications with your direct supervisor. They can often resolve issues quickly.
2. Escalate upward: if uncomfortable with your manager or the response is inadequate, contact the next level manager or HR.
3. Contact the Compliance Officer / Executive Management: for legal, regulatory, or serious ethical concerns, notify Executive Management.
4. Provide facts and evidence: describe what happened, who was involved, dates, documents and witnesses. Keep records of your report and any follow-up.
5. Cooperate with investigations: answer questions honestly and preserve relevant documents.

Protections and expectations

Reports made in good faith will be investigated and treated confidentially to the extent possible. Retaliation is strictly prohibited — if you experience retaliation, report it immediately. Raising concerns is a responsibility and an essential part of protecting our people, customers and company.

How does EasyShop handle reports?

All reports of potential misconduct are taken seriously and logged promptly. Reports may be made to a manager, HR, DG Compliance Officer, Executive Management, or the confidential hotline. Every report is screened to determine the appropriate level of review and, where needed, an investigation is opened. We protect confidentiality to the greatest extent possible, notify affected parties when required by law, and document all steps and outcomes in our records. Findings and corrective actions are recorded and tracked until closure.

Cooperating in investigations

If you are interviewed or asked to provide information, respond truthfully, promptly and fully. Preserve and provide relevant documents, communications and evidence, and avoid altering or destroying materials. Do not discuss the matter with colleagues in ways that could compromise the investigation. If you have concerns about fairness or bias, raise them to HR or Executive Management immediately.

Consequences of breaching the ABC

Violations of the Code (ABC), whether intentional or due to reckless disregard, may result in corrective measures including counseling, retraining, suspension, demotion, termination, restitution, and referral for civil or criminal prosecution where appropriate. Contractual partners and third parties who breach our standards may face contract termination, financial penalties, and exclusion from future work with EasyShop.

Retaliation will not be tolerated

EasyShop strictly prohibits retaliation against anyone who, in good faith, raises concerns, participates in an investigation, or reports suspected violations. Retaliatory conduct will itself be investigated and disciplined up to and including termination. If you believe you have been subject to retaliation, report it immediately through the same reporting channels.

Building Trust

We build trust...with each other Promoting respect in the workplace Diversity and inclusion No discrimination Preventing harassment Fair labor practices Ensuring Health and Safety in the workplace's Workplace health and safety Drug and alcohol use Workplace violence

We build trust...for others FCPA Our FCPA policy Compliance Working with agents and other third parties Associates' responsibilities Reporting possible violations of the ABC Frequently asked questions Respecting third-party information Communicating with the media and analysts

We build trust...in the organization Potential conflicts of interest Disclosing conflicts of interest Guidance on business, financial and personal relationships Frequently asked questions about conflicts of interest Guidance on gifts and representing the organization Keeping EasyShop information secure EasyShop confidential information EasyShop intellectual property Appropriate use of EasyShop resources and technology Physical property EasyShop technology and electronic communications Social media.

We build trust... at EasyShop by keeping accurate books and records. At EasyShop we create, build and foster Trust by doing what is right. Trust is the foundation of who we are as an organization.

Our continued success depends on each of us supporting EasyWay! in all our work. It is also necessary that we all make sure everyone at EasyShop knows how to apply EasyWay! to their work. We want our customers, consumers, associates and business partners to know that we do what we say and say what we believe. This reputation, which we have built over time and rebuild every day, is what sets us apart. It is the foundation of our Company.

The EasyShop Alphabet of the Code of Conduct (ABC) contains the standards we must follow to ensure we apply EasyWay! in our daily work. The ABC provides clear guidance on specific situations we might face and tells us what to do when we have questions or concerns.

This ABC is an extension of EasyWay! and a reminder that we have a consistent way of operating across our Network. Please read it carefully; take responsibility for following the behaviors and policies set out here and keep it handy for yourself and any new associate in the organization.

We are committed to creating a workplace aligned with EasyWay! and that supports associates in reporting potential violations. Retaliation of any kind runs counter to EasyWay! and will not be accepted.

Thank you for your daily efforts in building EasyShop and for living EasyWay!

The EasyWay!

The EasyWay is EasyShop's guiding philosophy — a simple, practical code for how we work, behave and grow together. It sets the scope for our Code of Conduct and shapes daily choices around trust, teamwork, ethics and loyalty to our shared vision. The EasyWay is how we live our values so the long-term outcome is clear: a trusted, resilient company that creates opportunity for customers, communities and colleagues.

Core principles

- Trust first: We act transparently, keep commitments, and protect the confidence others place in us. Trust is earned through honesty, accuracy and consistent behavior.
- Do the right thing: Ethics drive decisions. We follow law and policy, speak up about concerns, and prioritize integrity over short-term gain.
- Team over ego: Collaboration wins. We share information, support teammates, and celebrate collective success while holding each other accountable.
- Customer focus, human-centered: We solve real problems for real people with empathy, simplicity and reliability.
- Long-term loyalty: We commit to the company's vision beyond quarterly wins — investing in relationships, systems and culture that endure.
- Learn and adapt: Mistakes teach us. We iterate quickly, share lessons, and build processes that make the right action easier tomorrow.

How we live it

- Clear conduct: Follow the Code of Conduct; report issues without fear of retaliation. Leaders model behavior and remove obstacles to doing right.
- Everyday habits: Communicate openly, meet deadlines, admit errors, and offer solutions — small consistent acts build reputational capital.
- Responsible partnerships: Vet and monitor third parties; require they meet our ethical standards and reflect The EasyWay.
- Celebrate accountability: Reward people who uphold values and correct course when values aren't met.

Ultimate outcome by practicing The EasyWay, EasyShop becomes more than a business: it becomes a trusted network where customers choose us, colleagues thrive, partners align, and communities benefit. Our long-term success is the sum of countless honest actions, repeated over time. That is how we create lasting value — simply, ethically, together.

Dino Nassi
CEO

