



Code of Ethics Policy

What does this policy cover?

Document control

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Approver	Chief People Officer and COO
Confidentiality classification	Public

1. Purpose

This document sets out Valiantys’ commitments, expectations, and operating principles under this policy.

2. Scope and applicability

Scope: All employees, officers and representatives; applies globally.

Applicability: Applies to all employees and relevant stakeholders covered by the scope. Business units may add local appendices where required.

3. Key commitments

- Act with integrity, prevent corruption, manage conflicts of interest and fraud risks.
- Respect human rights, fair working conditions, and non-discrimination.
- Protect confidential information and data; ensure responsible information management.
- Provide reporting channels and apply consequences for breaches.



4. Objectives, targets and KPIs

Objective	Target (annual review)	KPI(s)	Accountable owner
Ethics training	Annual completion of Code of Ethics training	60% of employees complete annual Code of Ethics training; 100% of new joiners within 30 days	People & Culture
Anti-corruption	Prevent bribery and improper advantages	100% of allegations investigated; 100% of investigations closed within 60 days	Legal / Compliance
Data & confidentiality	Promote responsible information handling	80% complete security/privacy training annually; 100% of incidents investigated and remediated	Legal / Compliance

5. Implementation

- Policy owner maintains this document, coordinates implementation, and reports progress at least annually.
- Leaders and managers ensure the policy is applied in day-to-day operations and cascade expectations to their teams.
- Training/awareness activities are delivered as applicable to the policy (at least annually where relevant).
- Records/evidence are maintained to demonstrate implementation (training logs, registers, meeting minutes, assessments, audits, action plans).

6. Monitoring and reporting

Progress against objectives and KPIs is reviewed at least annually. Results, gaps, and corrective actions are documented to support continuous improvement.

7. Continuous improvement

- Identify gaps from KPI results, audits, incidents, or stakeholder feedback.
- Define corrective actions with owners, timelines, and expected outcomes.
- Track action completion and effectiveness; update objectives/KPIs during annual review.
- Update this policy annually and communicate changes to relevant stakeholders.

8. Communication and training

This policy is communicated to relevant audiences and made accessible in the appropriate internal repository. Training and awareness are delivered as required by the policy objectives and role exposure.

9. Contacts

For questions or guidance, contact the Policy Owner or the CSR Committee via the established internal channels.



10. Forward

As a global leader in Atlassian services, we at Valiantys (hereinafter referred to as “the Company” or “Valiantys”) are committed to our partners and want to give meaning to our mission: to support our customers and employees in the transformation of teamwork by offering agile solutions with a lower environmental impact. It is also our *raison d'être*, as well as that of our consultants and experts who share our values based on honesty, curiosity, and pragmatism.

As a result, the choices we make are guided by our values: talk straight, never stand still, be mindful of what matters, make every interaction remarkable, share and take part. The development of our activities is resolutely in line with the desire to build long-term and lasting relationships with our customers and partners, based on mutual benevolence, trust and interest. Likewise, each of our employees is an ambassador for these values and acts, in all circumstances and in all places, with integrity. Indeed, we consider that respect for business ethics is fundamental.

This is why we wish to achieve our commitment through this Code of Ethics (“the Code”), which aims to formalize our business ethics policy, to set the ethical standards and principles of reference for our employees and to bring them to the attention of all Valiantys stakeholders.

11. Objectives of the Code of Ethics

The purpose of this Code is to set the standards and principles that Valiantys employees must follow when faced with ethical dilemmas in the workplace. It also empowers all Valiantys stakeholders to act responsibly. Beyond the legal aspect, it indicates Valiantys' commitment to the general interest. This Code may be subject to change. If an employee has questions about ethics, it is important to refer to this Code. If they have any questions, they can also ask their superiors for clarification. If the answers provided are unclear or incomplete, they can contact the Corporate Social Responsibility Committee via email at esg@valiantys.com.

This Code of Ethics is complemented by a Whistleblowing Policy which sets out the mechanisms set up when an employee has doubts about practices that may affect the Company.

12. Implementation of the Code of Ethics

This Code is intended for all Valiantys activities, its subsidiaries, as well as all employees.

The principles set out in this Code enable Valiantys to maintain and strengthen the trust of its customers and stakeholders. Each employee must be aware, respect and ensure that the values and commitments of this Code are applied.

Failure to comply with any part of this Code may result in sanctions, in accordance with local disciplinary regulations.

We believe that every employee is responsible for becoming familiar with Valiantys policies so that they may integrate them into every aspect of the business.

Valiantys considers violation of the law, Valiantys policies, and this Code of Ethics to be a serious matter. Any violation may subject an employee to disciplinary action, up to and including termination of employment. Additionally, those who work with us, including contractors, consultants, volunteers, and their representatives



(collectively, “third parties”), are expected to maintain professional conduct and follow all applicable laws and regulations.

Certain violations may be referred to legal authorities for investigation and civil or criminal prosecution. If you become aware of the violation of any law by Valiantys, whether by its officers, employees, or any third party doing business on behalf of Valiantys, it is your responsibility to promptly report the matter to your immediate supervisor or report it via the whistleblowing procedures. While Valiantys strives to address matters internally, nothing in this Code should discourage you from reporting illegal activity, including any violation of the law whether local or foreign, rule or regulation, to the appropriate regulatory authority. This Code should not be construed to prohibit employees from testifying, participating, or otherwise assisting in any administrative, judicial or legislative proceeding or investigation.

- **Addressing Conduct that is Harmful to Our Culture and Values**

Valiantys respects the rights of all employees to express themselves. We believe that open dialogue and free expression of ideas is critical to our business. However, Valiantys will take all reasonable and appropriate steps to address situations where an employee’s conduct or speech endangers the safety of others, violates others’ rights to be free from harassment, discrimination, and retaliation, or otherwise conflicts with Valiantys’ culture and values, up to and including termination of employment.

- **Honest and Ethical Conduct and Fair Dealing**

Valiantys employees should endeavour to act honestly, ethically, and fairly in both internal and external dealings, including interactions with coworkers, affiliates, partners, service providers, and any other third parties with which Valiantys may conduct business. Statements regarding Valiantys’ business must not be untrue, misleading, deceptive, or fraudulent. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice. Employees are also prohibited from creating or submitting false, inaccurate, or misleading invoices, receipts, or other financial or business-related documents to Valiantys or related businesses.

- **Unacceptable Behavior**

If conduct adversely affects or is otherwise detrimental to the interests of Valiantys, other employees, or customers, it may result in disciplinary action, up to and including immediate termination. Guidelines for such disciplinary actions are detailed in the Local Employee Handbooks.

13. Corporate Social Responsibility Committee

In order to ensure the proper functioning of its ethical approach, Valiantys has set up a Corporate Social Responsibility Committee. It is composed of members of the Management Committee, Employee Representatives and Corporate Social Responsibility members, who meet quarterly. The Corporate Social Responsibility Committee is responsible for the monitoring and application of the Company's Corporate Social Responsibility Policy; it is intended to support Valiantys' ethical approach and can be consulted for any question relating to the application of this Code via email at esg@valiantys.com. It ensures that the alert system is applied within the Company and ensures that the whistleblowing mechanism is properly functioning, in the event of any violations of this Code.



14. Compliance with legislation

Valiantys undertakes to comply with the laws and regulations relating to the principle of loyalty in force in the countries where it operates. This Code of Ethics serves as the overarching guidance for the Company. It is complemented by the specific policies and regulations of the various countries in which Valiantys operates. These local supplements address geographical considerations and ensure compliance with regional requirements. It is the responsibility of each of Valiantys' employees to be aware of and comply with applicable national laws and regulations, as well as Company policies and guidelines related to their areas of activity.

15. Our commitments

Valiantys' goal is to build and maintain long-lasting relationships based on trust with its customers, suppliers and partners. This trust is built over the long term through a continuous improvement approach.

15.1. Customers

Valiantys' priority is the satisfaction of its customers. Thus, the Company is very attentive to their requirements and ensures that the service delivered meets the highest quality standards. The relationship with customers is based on honesty and transparency in order to better understand expectations and thus create value.

15.2 Suppliers & Partners

Valiantys attaches great importance to the fair and transparent choice of suppliers. Thus, they are chosen according to a transparent, fair and impartial purchasing and selection process according to predefined, explicit and transparent criteria: quality, cost, deadline, and also taking into account the environmental and social impact of the products offered, and in accordance with our Sustainable Procurement Policy.

Valiantys treats its suppliers honestly and fairly, in compliance with applicable laws and regulations. Payment to suppliers is made in accordance with the terms of the contracts, and in compliance with the payment deadlines, provided that they have fully fulfilled their obligations. Valiantys uses mediation to facilitate the amicable settlement of any disputes arising during the performance of the contract.

15.3 Fair practices and compliance with regulations

Valiantys' suppliers behave ethically in their business relationships and are committed to complying with the laws and regulations relating to the principle of loyalty in force in the countries in which they operate. Thus, they ensure that the rules of competition are respected so that they are fair and equitable. Any unfair practice is prohibited.

15.4 Gifts & Invitations

The relationships forged between Valiantys' employees and clients can lead to the exchange of gifts or invitations on special occasions. When a gift or invitation is received as part of the employee's duties, it is essential to keep their superiors informed and to be transparent. It is important to ensure that the gifts received are in accordance with Valiantys' ethical principles, and in accordance with its Gifts and Hospitality Policy.



15.5 Anti-corruption and conflict of interest

In the exercise of its activities, Valiantys rejects and condemns all practices related to corruption or influence peddling. We have "zero tolerance" for corruption. We fight against all forms of corruption, active or passive, and exclude ourselves from any situation that may present a conflict of interest. It is paramount to be careful with any practice aimed at influencing a business decision.

It is essential for an employee to inform their superiors in the event of a real or potential conflict of interest that could influence their judgment and decisions, in accordance with the whistleblowing procedure detailed in the Whistleblowing Policy.

15.6 Fight against fraud, money laundering and terrorist financing

Partners, when conducting their business, must comply with anti-money laundering and counterterrorist financing laws and regulations. We believe that each employee has a role to play on a daily basis in the fight against fraud, by exercising particular vigilance with regard to the protection of information in line with his or her responsibilities, in order to protect the Company from any misappropriation or fraudulent use of its tools, data, or any other resource. In the event that an employee witnesses an act of attempted fraud, they have the duty

to inform their superiors, through the whistleblowing procedure detailed in the Whistleblowing Policy.

15.7 Privacy & Data Protection

Valiantys undertakes to keep confidential the technical, commercial and financial information communicated by its suppliers and customers and to protect individual's personal data in compliance with the regulations in force. As such, the parties undertake to comply with the obligations incumbent on them in their respective capacity as data controller or processor and acknowledge that they accept the following provisions in accordance with the Privacy Policy of Valiantys. In addition, Valiantys undertakes to keep only the data necessary for its activities. Employees are informed of the procedures for collecting, managing, storing and accessing data authorized and in accordance with the governing data privacy laws applicable.

15.8 Protection of company assets

Each Valiantys' employee is responsible for protecting the assets and resources entrusted to them in the course of their activity. These resources and assets must be used only in connection with their professional activities, and returned to Valiantys promptly upon cessation of service.

15.9 Financial Audit

Valiantys is committed to ensuring that all material financial information is accurate and transparently disclosed. These financial documents are kept securely.

15.10 Respect for industrial and intellectual property rights

Valiantys undertakes to respect intellectual and industrial property rights and to comply with national and international legal rules; it is prohibited from exploiting, through the manufacture, sale, or use of the property of a third party, any trademark, patent, industrial design, or copyright.

16. Our commitments as an employer



Valiantys is committed as an employer to promote a healthy and safe working environment for its employees. Human rights are respected throughout its value chain. Valiantys ensures that there is no discrimination, harassment or violence in any form.

16.1 Respect for human rights

Valiantys undertakes to respect and promote the fundamental principles and rights as described in the Universal Declaration of Human Rights issued by the UN in 1948, as well as the working conditions required by the Conventions of the International Labour Organization (ILO) and to comply with the legislation in force in each country where it operates. Valiantys also ensures respect for human rights throughout its supply chain and monitors the practices of its suppliers. Valiantys is also aligned with the commitments of the United Nations Global Compact.

16.2 Hygiene, Health & Safety

The health and safety of Valiantys' employees is one of its top priorities.

Valiantys strives to maintain a safe and healthy working environment that complies with relevant regulations. The company undertakes to implement a health and safety policy that aims to guarantee each employee a working environment that does not pose a danger to his or her health and safety, to maintain an environment in which the dignity of persons is respected (ILO Conventions Nos. 155 and 120) and to take all necessary measures to limit accidents at work that may occur in the performance of routine tasks of an employee.

Valiantys offers training for its relevant employees on health and safety risks and carries out detailed occupational risk assessments (occupational health and safety risks). Each employee must notify the safety manager of their site or their superiors in the event of an accident as well as any installation that could endanger the safety of workers.

16.3 Effective abolition of child labour

Valiantys attaches particular importance to the prohibition of child labour and forced labour. Its suppliers are prohibited from employing children in violation of the provisions of the International Labour Organization conventions (ILO Conventions No. 138 and No. 182).

16.4 Prohibition of all forms of forced or compulsory labour

Under no circumstances shall a supplier engage in forced and compulsory labour or slavery, or any other practice of servitude or involuntary labour, as defined in ILO Fundamental Conventions Nos. 29 and 105.

16.5 Working Time and Remuneration

Valiantys complies with all regulations to which it is subject relating to compensation, benefits and hours of work.

16.6 Moral and sexual harassment

Valiantys is committed to ensuring that the right to respect and human dignity is respected within the Company. It is prohibited to use any verbal or physical threat, violence, including sexual or gender-based violence, or any form of harassment (ILO Conventions Nos. 29 and 111).



16.7 Elimination of discrimination

Valiantys shall not discriminate, exclude or be preferred on the grounds of racial or ethnic origin, sex, religion or belief, political opinion, trade union activity, disability, age and sexual orientation in recruitment and professional development and ensures equal treatment (ILO Convention No. 111). Valiantys offers awareness training regarding diversity, discrimination and/or harassment.

16.8 Equal opportunities on the basis of merit and competence

Valiantys is committed to promoting equal treatment and equal opportunities in accordance with the ILO's fundamental Conventions No. 100 on Equal Remuneration for Men and Women for Work of Equal Value and No. 111 on the Principle of Non-Discrimination. Valiantys also implements professional trainings that include skills development trainings with the aim of developing professionally.

Valiantys expects that all relationships among persons in the workplace will be free of unlawful bias, prejudice and harassment. Therefore, it is Valiantys policy to ensure equal employment opportunity without discrimination or harassment on the basis of race; color; religion or creed; sex or gender (including pregnancy, childbirth, breastfeeding or related medical conditions); age; physical or mental disability; medical condition; military or veteran status; national origin or ancestry; citizenship status; genetic information; marital and partnership status; sexual orientation; gender identity or expression; credit history; unemployment; status as a victim of domestic violence, stalking or sex offenses; height; weight; arrest or conviction record; affiliation with a spouse or domestic partner falling within the protected categories of this policy; or any other characteristic protected by law. The Company also prohibit discrimination based on the perception that anyone has any of those characteristics, or is associated with a person who has or is perceived as having any of those characteristics.

16.9 Freedom of association and the right to collective bargaining

Valiantys recognizes the right of its employees to join a trade union organization of their choice.

17. Our commitments to the environment

We are aware of the impact of our activities on the environment and strive to minimize this ecological impact. It is the responsibility of every Valiantys employee to try to reduce this impact as much as possible.

The environment is a major concern for Valiantys and we are committed to protecting it. We deploy an Environmental Policy on issues relating to the preservation of natural resources and the fight against global warming in particular.

At Valiantys, we are committed to fulfilling our mission, supporting our customers and employees in the transformation of teamwork by offering agile solutions with a lower environmental impact.

As a recognized player in our industry, it is fundamental to achieving these goals that our partners share the same values. This is why we invite them to take note of our commitments, embodied in this Code, and to join our ambitions to sustain our relationships of trust and to be part of a process of continuous progress together.



EMPLOYEE ACKNOWLEDGEMENT:

PLEASE SIGN AND RETURN TO THE GENERAL MANAGEMENT IN CHARGE OF PEOPLE AND CULTURE

I acknowledge that I have received and read a copy of Valiantys Code of Ethics. I understand that I am responsible for complying with the policy during my employment with Valiantys.

I HAVE CAREFULLY READ THIS ACKNOWLEDGEMENT.

Date: _____

Signature: _____

Printed Name: _____

DocuSigned by:

Claire Almstead

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30/12/2025

Read and approved

Legal & Compliance

DocuSigned by:

Holly Mitchell

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Read and approved

Chief Operating Officer

Valiantys - Confidential - Assessment Submission Copy