



# ESG Statement & Code of Conduct

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## ESG Statement & Code of Conduct

At Titania, operating responsibly and ethically is a core priority. We are committed to maintaining high standards of governance, acting with integrity, respecting people, and minimizing our environmental impact. We recognize that trust, sustainability and long-term success depend on how we conduct our business and how we work with others.

Titania's approach to environmental, social and governance matters is designed to support responsible decision-making, manage risk, and promote ethical and sustainable business practices across our operations and wider ecosystem.

This ESG Statement and Code of Conduct is provided for general information and assurance purposes only. It does not form part of the EULA or any agreement between Titania and its Licensees, Suppliers or Partners, unless expressly incorporated by reference.

### 1. Purpose & Scope

This ESG Statement and Code of Conduct sets out Titania's commitments and standards across environmental, social and governance matters and the minimum expectations we place on third parties who conduct business with or on behalf of Titania.

This document applies to:

- all Titania employees, contractors and representatives;
- all suppliers, subcontractors, consultants, vendors and other third-party service providers ("**Suppliers**"); and
- Titania's authorized partners, including resellers, distributors and other channel partners ("**Partners**").

Suppliers and Partners are responsible for ensuring that these standards are communicated, understood and embedded within their own organizations and, where relevant, their wider supply chain.

Titania may work collaboratively with Suppliers or Partners to address identified concerns or areas for improvement. However, serious or unresolved failures to meet these standards may affect current or future commercial engagement.

This document forms part of Titania's broader governance framework and supports compliance with applicable legal, regulatory and ethical requirements.

### 2. Ethical Business Conduct

Titania is committed to conducting business with integrity, professionalism and transparency. All individuals working for or on behalf of Titania are expected to act responsibly and in good faith, and to uphold the standards set out in this Code of Conduct.

In particular, this includes:

- acting honestly, fairly and in good faith;
- avoiding conflicts of interest;
- safeguarding confidential, personal and commercially sensitive information;
- using Titania systems, assets and resources responsibly; and
- treating colleagues, customers, partners and Suppliers with dignity and respect.

Unethical, misleading or dishonest conduct is not acceptable and may result in appropriate action in accordance with applicable employment terms, partnership agreements or supplier contracts.

### 3. Legal & Regulatory Compliance

Titania, its Suppliers and Partners are expected to comply with all applicable laws and regulations relevant to their activities when working for or on behalf of Titania.

This includes, where applicable, compliance with laws relating to:

- anti-bribery and corruption;
- data protection and privacy, including UK GDPR;
- information security and cyber security;
- employment and labor standards;
- health and safety; and
- any industry-specific legal or regulatory requirements relevant to the services being provided.

Compliance with all applicable laws is a fundamental condition of working for, with or on behalf of Titania.

#### 4. Anti-bribery & Corruption

Titania maintains a zero-tolerance approach to bribery and corruption and is committed to conducting business ethically, transparently and in compliance with applicable laws, including the UK Bribery Act 2010.

Individuals working for or on behalf of Titania are expected to act with integrity and must not engage in any activity that could give rise to an actual or perceived improper advantage. In particular, they must not:

- o offer, give, request or accept bribes or other improper advantages;
- o provide or accept cash or cash-equivalent gifts;
- o offer or accept excessive, inappropriate or inducive gifts or hospitality;
- o make political or religious donations on Titania's behalf; or
- o engage in any conduct intended to improperly influence a business decision.

Any permitted gifts or hospitality must be proportionate, reasonable and transparent, and must be appropriately recorded. Gifts or hospitality must never be offered during procurement or contract negotiations, and prior approval must be obtained before offering anything to public officials.

#### 5. Privacy & Data Protection

Titania is committed to respecting individuals' privacy rights and protecting personal data in accordance with applicable data protection law, including UK GDPR.

All personal data must be:

- o processed lawfully, fairly and transparently;
- o collected and used only for legitimate, agreed purposes;
- o limited to what is necessary for those purposes; and
- o kept secure and retained only for as long as required.

Suppliers and Partners who process personal data on Titania's behalf must implement appropriate technical and organizational measures to protect that data and must process it only in accordance with Titania's instructions and applicable law.

#### 6. Information & Cyber Security

Titania maintains information security practices aligned with recognized industry standards, including ISO 27001, to protect the confidentiality, integrity and availability of its information and systems.

Individuals working for or on behalf of Titania are expected to act responsibly and in a manner that supports the security of information. This includes:

- o protecting confidential and sensitive information;
- o restricting access to authorized individuals only;
- o using secure and, where appropriate, encrypted methods for storing and transmitting information; and
- o promptly reporting any suspected or actual security incidents.

Suppliers and Partners must not:

- o install unauthorized software on Titania systems;
- o connect unapproved hardware, devices or services;
- o use unencrypted removable media; or
- o bypass, disable or weaken Titania's security controls.

#### 7. Human Rights, Fair Treatment & Inclusion

Titania is committed to respecting human rights and fostering a fair, inclusive and supportive working environment. We expect all individuals working for or on behalf of Titania to treat others with dignity and respect and to act in a way that supports equality of opportunity and ethical labor practices.

- o **Diversity, Equality & Non-discrimination** - Discrimination based on protected characteristics is not tolerated. This includes discrimination based on age, disability, gender identity, marital status, pregnancy or maternity, race or ethnicity, religion or belief, sex, or sexual orientation.
- o **Dignity at Work & Anti-harassment** - Titania is committed to maintaining a working environment in which all individuals are treated with dignity and respect. We maintain a zero-tolerance approach to bullying, harassment

(including sexual harassment), victimization and intimidation. Any concerns should be raised and handled promptly, sensitively and without fear of retaliation.

- **Human Rights & Modern Slavery** - Titania is committed to preventing modern slavery, human trafficking and other exploitative labor practices. Although Titania does not currently meet the statutory threshold requiring a formal Modern Slavery Statement, we act in accordance with the principles and intent of the Modern Slavery Act 2015.

Suppliers and Partners are expected to uphold equivalent standards within their own organizations and, where relevant, within their supply chains. This includes prohibiting forced, trafficked and child labor, ensuring employment is freely chosen, adopting ethical recruitment practices, and respecting workers' rights and freedom of movement.

## 8. Health, Safety & Wellbeing

Titania is committed to providing safe, healthy and supportive working environments for those who work for or on behalf of Titania.

- **Health & Safety** - Individuals working for or on behalf of Titania are expected to take reasonable care for their own safety and the safety of others. This includes complying with applicable health and safety laws, following safe systems of work, maintaining equipment appropriately, and promptly reporting accidents, incidents and near misses.
- **Wellbeing** - Titania recognizes that wellbeing, including mental health, is an important part of a safe and productive working environment. We encourage awareness of wellbeing risks and the adoption of responsible working practices that support both physical and mental health

Suppliers and Partners are expected to uphold equivalent health, safety and wellbeing standards within their own organizations and in connection with any work carried out for Titania.

## 9. Environmental Responsibility

Titania recognizes environmental stewardship as an important part of responsible and sustainable business operations. We are committed to complying with applicable environmental laws and to taking reasonable, proportionate steps to reduce our environmental impact where practicable.

This includes reducing waste and resource consumption, promoting energy-efficient ways of working, and considering environmental factors as part of procurement and operational decision-making.

Where appropriate to the nature and scale of our operations, Titania seeks to understand and reduce its environmental footprint over time. We aim to embed environmentally responsible practices into day-to-day activities and business decisions, while remaining mindful of practicality and business context.

Suppliers and Partners are encouraged to demonstrate environmental awareness and responsible resource management when carrying out work for or on behalf of Titania.

## 10. Subcontracting & Supply-Chain Integrity

Suppliers must obtain Titania's prior written approval before subcontracting or outsourcing any work relating to Titania or its services.

Suppliers remain responsible for the acts and omissions of their subcontractors and downstream partners and must ensure that equivalent standards to those set out in this Code of Conduct are applied throughout their supply chain where relevant.

This includes ensuring that subcontractors and downstream partners act ethically, lawfully and in a manner consistent with Titania's expectations relating to integrity, human rights, information security and responsible business practices.

## 11. Whistleblowing & Reporting Concerns

Titania encourages the reporting of concerns relating to unethical behavior, legal or regulatory breaches, or conduct that may undermine trust, integrity, safety or compliance with this Code of Conduct.

Individuals working for or on behalf of Titania should be able to raise concerns in good faith and without fear of retaliation. Concerns may be raised confidentially and will be handled promptly, fairly and appropriately.

Concerns relating to Titania-related activities should be reported to: [Whistleblowing Officer - Governance Manager, Titania Ltd](#)

All reports made in good faith will be taken seriously and investigated in a proportionate and sensitive manner.

## 12. Review & Related Information

This ESG Statement and Code of Conduct is reviewed periodically to ensure it remains appropriate and reflects relevant legal, regulatory and business developments.

Further information about Titania's approach to governance, information security and data protection is available through Titania's Legal & Trust Center, including our Information Security Statement and privacy-related documentation.