



sellerX

CODE OF

ETHICS



## Hello SellerX-Family,

Our company is on a mission to combine expertise, technology and dedication to create a portfolio of trusted products that touch people's everyday lives. Each of us shapes our path to build the next generation of brands that people value and love across the world through our daily actions and decisions.

Having our mission and vision in mind, we are aware that the world around us is changing faster than ever and our speed of growth requires us to evolve quickly. Therefore, we want to stress that it is integral to our mission and vision to create an environment where everyone is accountable for their actions and creates a culture that is characterised by integrity and respect.

In order to have these ideas structured and enforceable and to ensure that at SellerX we conduct business ethically, honestly and in full compliance with applicable laws and regulations, we created this Code of Ethics.

Our Code of Ethics ensures a common commitment to ethical standards to which we hold all of us (the entire staff of the SellerX group), our partners and our suppliers accountable. We expect all of our stakeholders to respect this Code of Ethics and act with integrity in accordance with it. The Code is structured as follows: (I) Our Values, (II) To Whom Does This Code Apply?, (III) Our People, (IV) Our Community, (V) We Follow the Law, (VI) How to Act Ethically? and (VII) How to Report a Concern?

We decided to create this Code of Ethics because at SellerX, we seek to do better and improve ourselves. We are aware that we also have a responsibility towards our planet and our people, as well as the communities in which we operate. Having this in mind, we strive to implement sustainable practices in different areas of our business and also encourage all of us to work towards sustainable change on an individual level in our day-to-day work.

We are aware that we are still at the beginning of this journey but we are certain that this is the right path. We want to work together with our co-workers, suppliers and partners for a responsible e-commerce environment and build the next generation of brands.

Thank you for your commitment.

Philipp & Malte

## (I) OUR VALUES

In everything that we do at SellerX, we are guided by our values

### INTEGRITY

We do things the right way with a transparent, honest and fair approach.

### DARING

We're not afraid to take calculated risks, ask tough questions and make swift decisions.

### CREATIVITY

We put collaboration front and centre, constantly inventing and optimizing to improve the status quo.

### PASSION

We're excited by what we do, committed to learning and driving our business forward with a dedicated team.

### TOGETHERNESS

We succeed as a team; we're inclusive and respectful, always caring about each other and valuing different backgrounds, cultures and opinions.

### COMMITMENT

We hold ourselves to the highest standards, proudly going the extra mile to deliver the best experience to our customers.

### AGILITY

We're solution-orientated, adapting our fact-driven approach as needed and iterating until we succeed. Accountability

### ACCOUNTABILITY

We believe that leadership isn't bound by job titles – it's about having initiative and taking responsibility.

## (II) TO WHOM DOES THIS CODE APPLY?

This Code of Ethics helps implement our core values by establishing certain minimum standards of behaviour in key areas. The Code sets clear guidelines for our staff, partners, suppliers and all of our stakeholders.

This document applies to all staff who work for the SellerX group (regardless of the level and type of engagement, including officers, directors, managers, team leaders, employees, temporary, agency, interim, sub-contractor or consultant staff) as well as to any other organisations who do business with us.

This Code is not meant to cover all possible situations that may occur. It is designed to provide a frame of reference against which to measure our activities. You should seek guidance when you are in doubt about the proper course of action in a given situation, as it is ultimately your responsibility to do the right thing. When in doubt, please ask questions to the Compliance and Legal team by legal.compliance@sellerx.com. In case you would like to submit your concern on an anonymous basis, please use the [whistleblowing form](#). Please also consult our Compliance Policies that include more detailed rules and procedures on specific topics.

SellerX is committed to following this Code of Ethics strictly and to adapt additional specific clauses as needed under exceptional circumstances (e.g. due to the change in the applicable laws).

## (III) OUR PEOPLE

### 1. Diversity & Inclusion

At SellerX, we are committed to providing an open, friendly, safe, and welcoming environment for every employee and we value a diverse and inclusive environment for people of all backgrounds and identities. This includes, but is not limited to, members of any sexual orientation, gender identity and expression, race, ethnicity, culture, national origin, social and economic class, educational level, immigration status, age, size, family status, political belief, religion, and mental and physical ability. We believe diversity is the key to innovation, successful business and happy employees.

### 2. Anti-Discrimination and Anti-Harassment

SellerX is committed to fostering a positive, supportive workplace that is free from discrimination. All employees should be treated with respect and dignity. We believe this is not only the right path for our employees, clients and partners, but is also essential in creating an environment where people can do their best work.





At SellerX, we believe that no person should experience any form of workplace harassment. Disciplinary action will be taken against employees who are found to have harassed another individual, including employees who interfere with or retaliate against a complaint. SellerX will treat any complaint of harassment or discrimination as a serious matter. All complaints will be investigated and handled in a confidential manner except where disclosure is necessary to conduct an investigation, to protect other employees, or required by law.

Discrimination is any negative action or attitude directed toward someone because of protected characteristics including, but not limited to:

- **Age**
- **Religion**
- **Race / ethnicity / nationality**
- **Disability / medical history**
- **Marriage / civil partnership**
- **Pregnancy / maternity / paternity**
- **Gender identity / sexual orientation**

We will not tolerate any kind of discrimination that creates a hostile environment for employees, partners or other stakeholders. Any behaviour that makes another person uncomfortable is not tolerated at SellerX.

We recognise that sometimes discrimination is unintentional, as we all have unconscious biases that may be difficult to identify and overcome. If we conclude that an employee has unconsciously discriminated against others, we will support them through training and counselling and implement processes to mitigate biases. However, unwillingness to change behaviour could result in termination.

We will not be lenient in cases of assault, sexual harassment or workplace violence, whether physical or psychological.

Our stance on anti-discrimination and anti-harassment applies to all employees, contractors, suppliers and any other third parties who are performing services on behalf of the company and applies in all locations whereby they are engaged in employer sponsored activities.

We should all strive to prevent and address discrimination in the workplace. Be aware of your implicit biases and speak up whenever you or your colleagues are discriminated against. If you have experienced or witnessed direct or indirect discrimination such as sexual harassment or bullying please contact [peopleteam@sellerx.com](mailto:peopleteam@sellerx.com). In case you would like to submit your concern on an anonymous basis, please use the [whistleblowing form](#) but please note based on the information or type of direct or indirect discrimination an investigation may not be launched if the concern is submitted as anonymous.

### 3. Integrity and respect for each other

At SellerX, we strongly believe that a healthy and respectful work environment is key to producing the best work as a company. Each of our decisions will affect our colleagues, partners and customers and, therefore, we are deeply committed to fostering a culture and workplace of integrity and respect. We know that this is essential to create a work space where people feel valued, supported and have the right tools to be creative and successful.

We find strength in diversity. It enables us to have a broad range of perspectives and ideas, which results in beneficial outcomes for both the individual and the organisation itself. We encourage a respectful working environment that is defined by an open dialogue collaboration and is based on learning from each other.

### 4. Health and safety

SellerX is committed to providing healthy and safe working conditions. We constantly work towards compliance with all applicable legislation and regulations and aim to continuously improve our health and safety performance.

We are firmly opposed to employ or contract child or slave labour or any form of forced or compulsory or bonded labour. We condemn all forms of illegal, unfair, unethical labour practice that exploits workforce, destroys social security or serves as tax evasion, including but not limited to undeclared and "grey" work or holding back wages.

All staff must follow and comply with all relevant health, safety and environmental protection laws, regulations and rules at all times.

## (IV) OUR COMMUNITY

### 1. We always put product quality and safety first

Good compliance is at the core of everything we do. Compliance cannot be delegated; everyone is accountable for understanding and meeting their compliance obligations.

We are committed to put product quality and safety first, at all times. Our vision is to create a portfolio of trusted products that touch people's everyday lives and the reputation and success of SellerX is founded upon providing safe, high-quality products.

### 2. We choose our partners with care

We expect that our values will be respected by our business partners - suppliers, service providers and subcontractors. We want to work with businesses that, like SellerX, aim to operate with integrity and in compliance with the human rights standards and international labour law standards (as further outlined below, in point 4 on human rights).

In order to ensure this, we make continuous efforts to improve our supply chain due diligence. We expect from our suppliers that they will comply with this Code of Ethics, the terms of the supplier agreements and our Supplier Code of Conduct. Additionally, each of our business partners shall further cooperate with us, respond to our questionnaires, complete monitoring tasks and undergo our risk assessments and audits. As part of that, we encourage our suppliers to develop due diligence processes for their suppliers and we oblige them to be in a position to provide us with comprehensive and detailed information about the structure of their supply chain (location, materials etc.).

Each SellerX supplier, business partner or service provider is bound by the principles established in this Code of Ethics and is subject to supply chain due diligence as outlined above.

### 3. We work for a sustainable future

At SellerX, we care for and respect the environment. We are committed to minimise our environmental impact and to succeed without compromising the needs of future generations. To accomplish this, we combine economic, environmental and social factors in our operations and our business decisions. We consistently assess our activities and their direct impact on the environment. We are driven by a constant desire to evolve. Our sustainability efforts are guided by our goal to build the next generation of brands that people value.



## 4. We respect and promote human rights

We at SellerX are committed to respecting human rights. We recognise that, as a business, we have the ability to contribute to positive human rights impacts. We expect ourselves and our partners to comply with the human rights standards and not directly or indirectly interfere with, contribute to, lead or participate in any actual or possible violation of human rights.

We are present in many countries, and we are particularly vigilant on issues covered by the Fundamental Conventions of the International Labour Organization (prohibition of child labour and forced labour, respect of freedom of association), promotion of diversity, women's rights, respect for the rights of people to use their natural resources and the right to health.

## 5. We value fair competition and fair business conduct

We believe that protecting fair and ethical competition and preventing consumers from anti-competitive behaviours is crucial for a healthy and competitive economy. We build our relationships with business partners on mutual trust and do not engage or intend to engage in business practices which have the objective or the effect of preventing, restricting or distorting competition.

Following the principles of fair competition is mandatory for every SellerX employee. Everyone should make their strategic decisions independently and conduct business in a fair and ethical manner. Any illegal cooperation with competitors, offering improper payments or incentives, exploitation of suppliers or other unlawful practices are expressly prohibited.

Our processes ensure that we comply with all applicable trade controls, restrictions, sanctions and import-export embargoes, and that we market our products in a fair manner and in compliance with the applicable packaging regulations. This is a key for our vision to succeed - to build a next generation of brands that people value and love across the world.

## (V) WE FOLLOW THE LAW

### 1. Compliance with laws and regulations

Integrity is at the core of our values. In order to ensure that we conduct our business with integrity, we are strongly committed to complying with applicable laws and regulations and to following the commercial practices of lawful business. This is highly relevant not only from a purely legal perspective but also from an ethical, commercial and reputational standpoint.

Apart from compliance with applicable laws, everyone at SellerX should be committed to obey every binding agreement that we are a party to, negotiate such agreements in good faith and do not abuse the rights granted therein. Everyone at SellerX should also act in accordance with this Code of Ethics, Compliance Policies and other internal policies.

### 2. Anti-corruption and anti-bribery

We do not tolerate any form of corruption. It is prohibited to accept, receive, offer or propose, either directly or indirectly, any unfair advantage or benefit in the course of business activities. Such benefits can have a material form (cash, gift) or an immaterial form (personal advantage). Any violation or facilitation of violation will be considered gross misconduct and may have severe consequences. Please consult our Compliance Policies for more details.

Of course, we may accept or give occasional or customary gifts and hospitality of a minor value. It should be considered on a case-by-case basis and taking into account the factual circumstances, for example, the intention of the parties, the timing and the value of the gift and whether it is given openly.

### 3. Whistleblowing

If you have reasonable grounds to believe that any stakeholder - a managing director, employee, contractor, supplier, consultant or other person who has business dealings with SellerX - has engaged in any potentially dishonest, fraudulent or corrupt conduct, we want to encourage you to inform SellerX about illegal behaviour in order to clarify and stop such conduct. We encourage anyone to inform us of any potential violations or illegal behaviour via our [whistleblowing system](#). All information that we receive will be treated confidentially and sensitively. You will not be required to provide your name when making a disclosure. If you report on an anonymous basis, you will still qualify for the protections in this policy.

### 4. Security, privacy and proper use of company's assets

At SellerX, we are committed to comply with all applicable personal data protection and privacy laws and to ensure the highest standards of confidentiality, security and integrity. The legal, technical and organisational measures at SellerX are being regularly



revised and improved to ensure that any personal data and confidential information are being protected and processed appropriately. We will not process personal data illegally.

Each of SellerX employees (including consultants, freelancers and everyone that has access to any assets or systems) is obliged to use SellerX resources with respect and should not misuse SellerX assets or use it carelessly. Everyone should be acquainted with our IT Security Policy (as part of the Compliance Policies) and follow the appropriate security measures and confidentiality rules outlined therein. In particular, we expect that everyone will act in compliance with the legal requirements, apply appropriate practices and follow our procedures to ensure the legality of data processing activities.

At SellerX, we respect property rights and we aim at ensuring the protection of confidential information and trade secrets. We will not illegally acquire or intend to illegally acquire any trade secrets or other proprietary / confidential information. We will not engage in any intellectual property rights violations.

## 5. Bookkeeping, financial integrity and taxes

SellerX and all of its employees are responsible for ensuring that SellerX meets all its obligations under the financial, tax and anti-money laundering legislation in every jurisdiction in which it does business. There is also a strong business conduct and ethical dimension to fair bookkeeping, financial integrity and tax compliance.

SellerX has and will continue to uphold the highest levels of tax compliance, ethics and integrity in all types of transactions and interactions. We want to engage only with partners that share the same values and who use funds from legitimate sources.

We are committed to maintaining our books, records, accounts and financial statements in required detail, in a manner which properly reflects all our transactions and in line with all applicable laws. We are also committed to fair taxation and to preventing any tax evasion practices.

Everyone at SellerX should follow our financial, accounting and tax procedures. Everyone is also responsible for ensuring that any invoices and transaction documents that they submit are accurate, honest and are delivered in a timely manner.

## 6. Anti-Fraud

We strongly condemn and prohibit any form of fraud, i.e. any intent or actual action of cheating, deceiving or misrepresenting (e.g. altering any legal or financial documents or certificates, submitting false reports or invoices). We consider that such behaviour is not only unethical but in many cases, criminal. Our Compliance Policies contain further and more detailed rules and procedures on this matter.

## 7. Conflict of Interests

Everyone at SellerX has an obligation to act in the best interests of SellerX, its brands and its clients. A conflict of interest can arise when there is a conflict between what is in your personal interest (financial or otherwise) and what is in the best interest of SellerX, its brands and/or its clients. Even if you do not have an actual conflict of interest, if other people perceive one, they may still be concerned that you cannot act properly and impartially. Conflicts of interest often arise in relation to:

- **Personal investments**
- **Outside employment, advisory roles, board seats, and starting your own business**
- **Business opportunities found through your work at SellerX**
- **Relationships with co-workers, friends and family**
- **Giving or receiving business gifts above a nominal value**
- **Personal use of SellerX business assets**

It is important to avoid situations that may potentially lead to a conflict of interest, whether real or theoretical. Being seen or thought to be in a conflict of interest can damage your reputation, and the reputation of SellerX. If you find yourself in a conflict of interest position or a situation where you believe that others perceive you to be in a position of conflict, you must immediately advise us so that action can be taken to resolve the situation. In case of any questions or doubts, please reach out either to the HR team ([peopleteam@sellerx.com](mailto:peopleteam@sellerx.com)) or to the legal team ([legal.compliance@sellerx.com](mailto:legal.compliance@sellerx.com)).

## (VI) HOW TO ACT ETHICALLY

At SellerX, we are aware that our individual actions collectively impact our company culture, our community and our future success. Throughout our careers, each of us is faced with new challenges and questions and it can be difficult to anticipate and train for them all. Therefore, we rely on principles, such as this Code of Ethics as well as our Compliance Policies and further internal policies to guide our actions. These principles help us apply the right judgement to the situations we may face now and in the future.

We define 'ethical conduct' as a decision-making process guided by our values. In case of doubts, you can ask yourself these key questions to identify situations that may be unethical, inappropriate or illegal and to decide whether the action is in line with this Code of Ethics:

- Is this the right thing to do?
- Is this legal?
- Is it in line with our company values, mission and vision?
- Is it in line with this Code of Ethics, Compliance Policies and SellerX rules and policies?
- Is it done with integrity, loyalty and respect for the rights of others?
- Would it be fine if this action becomes publicly known and published in the media?
- Is it a misrepresentation or a deviation from a standard procedure?

## (VII) HOW TO REPORT A CONCERN?

Our company supports an open and transparent workplace where employees feel comfortable reporting any concerns they may have. If an individual reports a concern, we will take all measures to protect the member's identity and ensure that they are treated in a fair and confidential manner. Retaliation for reporting a concern is not tolerated at SellerX.

If you have knowledge of a possible violation of this Code of Ethics, Compliance Policies or legal or regulatory requirements you must notify either your manager or the Compliance and Legal team by [legal.compliance@sellerx.com](mailto:legal.compliance@sellerx.com) but when in doubt, please ask questions. In case you would like to submit your concern on an anonymous basis, please use the [whistleblowing form](#).

Please note that any violation of this Code of Ethics by SellerX staff will be subject to the disciplinary procedures (as outlined in the Compliance Policies).

