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Business Code of Conduct

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1 Purpose

At Xampla, we believe that sustainable business success is achieved through ethical conduct, responsible innovation, respect for people, and environmental stewardship.

This Code of Conduct sets out the standards of behaviour expected of everyone who works for, represents, supplies, partners with, or conducts business with Xampla. It establishes the minimum standards expected across our operations and value chain and reflects our commitment to conducting business responsibly, ethically and sustainably.

We recognise our responsibility to employees, customers, suppliers, investors, communities and future generations. As a company developing plant-based materials and technologies designed to replace conventional single-use plastics and synthetic polymers, we seek to create positive environmental and social impact through responsible innovation and sustainable business practices. Through everything we do, we strive to create lasting value for our stakeholders while contributing to a more sustainable future.

2 Scope

This Code applies to:

- Employees at all levels.
- Directors and officers.
- Contractors, consultants and agency workers.
- Suppliers and service providers.
- Customers, business partners and strategic collaborators.
- Distributors, agents and representatives.
- Any individual or organisation acting on behalf of Xampla.

We expect all organisations within our supply chain and business network to uphold standards that are consistent with this Code.

3 Our Commitments

Xampla is committed to:

- Conducting business ethically and lawfully.
- Respecting internationally recognised human rights.
- Maintaining safe and healthy working environments.
- Promoting diversity, inclusion and equal opportunity.
- Preventing modern slavery and exploitation.
- Protecting the environment and supporting sustainable innovation.
- Preventing bribery, corruption and unethical business practices.
- Protecting personal data, confidential information and intellectual property.

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- Building responsible and transparent supply chains.
- Providing mechanisms for reporting concerns without fear of retaliation.
- Continually improving our products, services, business practices, environmental performance and management systems, while encouraging learning, innovation and constructive challenge.

4 Compliance with Laws and Regulations

Xampla complies with all applicable laws, regulations and industry standards in the jurisdictions in which it operates.

Where local laws and this Code differ, we will seek to apply the higher standard wherever legally permissible.

All individuals and organisations subject to this Code are expected to understand and comply with applicable legal and regulatory obligations.

5 Human Rights

5.1 Our Commitment

Xampla recognises that its activities and business relationships may impact the rights and dignity of people throughout its operations and supply chain.

We are committed to respecting internationally recognised human rights and conducting business in accordance with:

- The UN Guiding Principles on Business and Human Rights.
- The International Bill of Rights or the rights under the Universal Declaration of Human Rights.
- The ILO Declaration on Fundamental Principles and Rights at Work.

We commit to:

- Avoiding causing or contributing to adverse human rights impacts.
- Seeking to prevent and mitigate human rights risks within our business relationships.
- Promoting fair and respectful treatment of all individuals.
- Taking appropriate action where human rights concerns are identified.

We operate a human rights due diligence process that follows the UN Guiding Principles on Business and Human Rights. This process is reviewed at least annually and includes:

- Identifying potential and actual human rights risks across our own operations and our value chain, including raw material sourcing, contract manufacturing, and pilot plant activities.

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- Assessing identified risks by severity and likelihood, prioritising those with the greatest potential impact on people.
- Acting to prevent, mitigate, or remediate impacts, integrating findings into relevant business decisions (e.g. supplier selection, contracting).
- Tracking the effectiveness of our actions and communicating on progress.
- Providing access to remedy where Xampla causes or contributes to an adverse human rights impact.

This commitment has been formally approved by Xampla's Board.

5.2 Fair Treatment

Xampla is committed to maintaining a working environment in which all individuals are treated with dignity, courtesy and respect.

We have a zero-tolerance approach to all forms of harassment, bullying, intimidation, violence, abuse, victimisation and any other conduct that creates an intimidating, hostile, degrading, humiliating or offensive environment.

Xampla has a zero-tolerance approach to sexual harassment in any form. All individuals are expected to contribute to a culture of mutual respect, professionalism and inclusion. Concerns of harassment or inappropriate behaviour will be treated seriously, investigated appropriately and addressed promptly.

5.3 Equality, Diversity and Inclusion

Xampla is committed to creating an inclusive environment where people are treated fairly and employment-related decisions are based on merit, qualifications, performance and business need.

We do not tolerate discrimination on any legally protected grounds.

We value diversity of thought, experience and background and believe that an inclusive culture strengthens innovation, collaboration and decision-making. We are committed to providing equal opportunities and removing barriers that may prevent individuals from reaching their full potential.

We recognise the importance of disability inclusion and will make reasonable adjustments where appropriate to support participation and accessibility.

We also recognise that individuals may experience multiple and intersecting forms of disadvantage and are committed to fostering a culture where everyone feels respected, valued and able to contribute fully.

5.4 Freedom of Association

We respect employees' rights to freedom of association, collective bargaining and lawful representation, consistent with applicable laws.

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5.5 Third-Party Harassment

Xampla is committed to protecting employees, workers, contractors and other individuals from harassment by third parties encountered in the course of their work.

We have a zero-tolerance approach to harassment, including sexual harassment, committed by customers, clients, suppliers, contractors, visitors, investors, business partners or any other third party.

No individual should be expected to tolerate harassment as part of their role or working environment.

Where allegations or incidents of third-party harassment are identified, reported or reasonably suspected, Xampla will take appropriate action proportionate to the circumstances. This may include:

- Investigating concerns and supporting affected individuals.
- Raising concerns directly with the third party concerned.
- Requiring corrective action.
- Reviewing or restricting access to our premises, personnel or systems.
- Terminating commercial, contractual or business relationships where appropriate.

We encourage all individuals to report incidents of third-party harassment, and we will not tolerate retaliation against anyone who raises a concern or participates in an investigation in good faith.

6 Modern Slavery and Ethical Employment

6.1 Zero Tolerance

Xampla is committed to implementing proportionate, risk-based processes designed to identify, prevent and mitigate the risk of modern slavery within our operations and supply chains. These may include supplier due diligence, contractual commitments, risk assessments, supplier questionnaires and periodic reviews.

6.2 Employment Standards

We expect all workers to:

- Work voluntarily and freely.
- Be free to leave employment following reasonable notice.
- Retain control of their personal identification and travel documents.
- Receive clear employment terms and conditions.
- Receive wages and benefits in accordance with applicable laws.
- Work hours that comply with legal requirements.
- Have access to lawful grievance mechanisms.

6.3 Child Labour

Xampla prohibits child labour and expects all suppliers and partners to comply with minimum-age requirements and applicable labour laws.

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Young workers, where legally employed, must not undertake hazardous work or work that may interfere with their health, safety or development.

6.4 Supply Chain Expectations

Suppliers and business partners must:

- Prohibit all forms of modern slavery and labour exploitation.
- Implement appropriate due diligence procedures.
- Assess modern slavery risks within their own operations and supply chains.
- Cooperate with reasonable requests for information and assessments.
- Notify Xampla of any identified or suspected incidents of modern slavery.
- Take prompt corrective action where concerns are identified.

Xampla reserves the right to investigate concerns and terminate business relationships where serious breaches are identified and not adequately addressed.

7 Health, Safety and Wellbeing

Xampla is committed to providing a safe, healthy and supportive working environment. We expect employees, contractors and suppliers to:

- Comply with applicable health and safety requirements.
- Follow safety procedures and instructions.
- Report hazards, incidents and unsafe conditions promptly.
- Take reasonable care for their own safety and that of others.
- Support a culture of wellbeing and continuous improvement.

Xampla is committed to:

- Preventing work-related injury and ill health through the elimination of hazards and reduction of occupational health and safety risks.
- Encouraging consultation and participation in health and safety matters.
- Supporting the mental health, wellbeing and psychological safety of our people.

8 Environmental Responsibility

Xampla is committed to minimising the environmental impact of its operations, products and value chain while supporting the transition to a more sustainable future. We recognise the challenges posed by climate change, pollution, resource depletion and biodiversity loss and seek to:

- Improve the efficient use of natural resources.
- Use energy, water and raw materials responsibly.

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- Reduce waste, pollution and emissions.
- Support reuse, recycling and circular economy principles.
- Consider environmental impacts throughout product lifecycles.
- Support climate change mitigation and adaptation.
- Protect biodiversity and natural ecosystems.
- Comply with applicable environmental legislation.
- Encourage environmentally responsible decision-making across our value chain.
- Promote sustainable innovation throughout our products and services.

9 Responsible Innovation

Innovation is central to Xampla's purpose and strategy. We are committed to developing materials, products and technologies responsibly, considering their environmental, social and ethical impacts throughout their lifecycle, from research and development through to manufacture and commercialisation.

We promote scientific integrity, collaboration, transparency and evidence-based decision-making across our innovation activities. Through our work, we seek to deliver solutions that create positive outcomes for customers, society and the environment, while supporting long-term sustainability.

Xampla is committed to maintaining the highest standards of scientific integrity. Research, testing, data analysis and reporting must be conducted honestly, transparently and accurately. We do not tolerate the falsification, manipulation or misrepresentation of data, findings or performance information and expect the same standards from those who work with us.

10 Business Integrity

10.1 Anti-Bribery and Corruption

Xampla prohibits bribery and corruption in any form.

No person acting on behalf of Xampla may offer, request, give or receive a bribe, facilitation payment or other improper advantage.

Business decisions must be made fairly, transparently and in the best interests of the organisation.

Xampla prohibits facilitation payments, whether made directly or indirectly through third parties.

We maintain accurate and complete business records, accounts and financial controls and expect the same of our suppliers and partners.

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We apply proportionate risk-based due diligence before entering into business relationships with third parties and may refuse or terminate relationships where corruption risks cannot be adequately managed.

Xampla does not make political donations or provide political support on behalf of the organisation.

10.2 Gifts and Hospitality

Gifts and hospitality must be reasonable, proportionate, transparent and appropriate to legitimate business relationships.

They must never be used to influence decision-making or secure improper advantage.

10.3 Fair Competition

Xampla competes fairly and complies with applicable competition and antitrust laws.

We do not engage in anti-competitive practices or improper market conduct.

11 Product Quality and Responsibility

Xampla is committed to delivering high-quality products and services that meet customer expectations and applicable legal and regulatory requirements. We strive to maintain effective quality management processes, support continual improvement, and encourage a culture where individuals understand their responsibility for quality and customer satisfaction. We seek to:

- Understand and meet customer requirements.
- Deliver products and services that are safe, reliable and fit for purpose.
- Monitor and improve performance through measurable objectives.
- Promote continuous improvement throughout the organisation.
- Maintain management systems that support quality, consistency and accountability.

12 Conflicts of Interest

Individuals must avoid situations in which personal interests' conflict, or may appear to conflict, with the interests of Xampla.

Potential conflicts must be disclosed promptly so they can be reviewed and appropriately managed. Examples include:

- Financial interests in customers, suppliers or competitors.
- Outside employment that affects objectivity.
- Family or personal relationships influencing business decisions.

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- Misuse of company assets, information or position.

13 Data Protection, Confidentiality and Intellectual Property

Xampla respects and protects confidential information, personal data and intellectual property. We are committed to:

- Complying with applicable data protection laws.
- Protecting personal information.
- Respecting intellectual property rights.
- Maintaining appropriate information security controls.
- Using data only for lawful and legitimate business purposes.

14 Responsible Supply Chain

We seek to build long-term relationships with suppliers and partners who share our values and commitment to ethical, lawful and sustainable business practices.

We expect suppliers to:

- Comply with applicable laws and regulations.
- Respect human rights.
- Prevent modern slavery and exploitation.
- Maintain safe working conditions.
- Conduct business ethically and transparently.
- Minimise environmental impacts.
- Safeguard confidential information and personal data.
- Maintain systems that support ongoing compliance with these expectations.
- Support risk-based due diligence, including target-setting and monitoring for suppliers identified as higher risk.

As part of our supplier due diligence process, Xampla may request evidence, information or certifications demonstrating compliance with these commitments.

Suppliers should maintain policies and management systems appropriate to the risks within their operations, including in relation to:

- Human rights.
- Modern slavery.
- Health and safety.
- Environmental responsibility.
- Anti-corruption and business ethics.
- Equality, diversity and inclusion.
- Data protection and information security.

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- Xampla reviews and prioritises suppliers according to their most material human rights risks and monitors progress toward preventing and mitigating identified impacts, in proportion to the scale of the relationship and the level of risk involved.

15 Raising Concerns and Non-Retaliation

We encourage employees, suppliers, contractors and stakeholders to speak up if they become aware of conduct that may violate this Code, applicable laws or our ethical standards.

Reports may relate to:

- Human rights concerns.
- Modern slavery risks.
- Health and safety issues.
- Fraud, bribery or corruption.
- Environmental breaches.
- Harassment, discrimination, bullying or victimisation.
- Any other unethical or unlawful conduct.

Concerns raised in good faith will be treated seriously and investigated appropriately.

Xampla prohibits retaliation against any person who raises a concern, participates in an investigation or assists with compliance activities in good faith. Our reporting channels are accessible not only to employees and direct business partners but to any individual across our value chain who may be affected by our operations, including workers employed by our suppliers. Our grievance process is designed to be legitimate, accessible, predictable, equitable, transparent, and a source of continuous learning, consistent with the UN Guiding Principles on Business and Human Rights.

16 Monitoring and Accountability

Oversight of this Code rests with Xampla's leadership team and Board, which are responsible for promoting a culture of ethical business conduct and ensuring appropriate governance arrangements are in place to support compliance.

We are committed to:

- Periodically reviewing our policies and procedures.
- Assessing ethical, environmental and human rights risks.
- Monitoring supplier compliance where appropriate.
- Providing relevant training and awareness programmes.
- Taking corrective action when standards are not met.

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Where Xampla causes or contributes to adverse impacts, we are committed to supporting appropriate remediation measures.

Xampla will provide appropriate training, awareness and guidance to support implementation of this Code and to promote ethical decision-making across the organisation.

Xampla maintains management systems designed to support quality, environmental performance, occupational health and safety, ethical business conduct and continuous improvement. We regularly review objectives, performance and risks to ensure the effectiveness of these systems and to identify opportunities for improvement.

17 Compliance and Consequences

Compliance with this Code is a condition of employment, engagement and continued business relationships with Xampla.

Failure to comply may result in:

- Corrective action plans.
- Additional monitoring or audits.
- Disciplinary action.
- Suspension or termination of contracts.
- Termination of employment or business relationships where appropriate.

18 Communication and Review

This policy will be formally reviewed annually, or earlier in the event of a significant incident, organisational change, or change in applicable legislation, to ensure its continued suitability, adequacy, and effectiveness.