

### Table of Contents

<ul> <li>Letter from CEO</li> </ul>	3
• The Code	4
<ul> <li>Our Values and Beliefs</li> </ul>	5
<ul> <li>Asking for Guidance and Voicing Concerns</li> </ul>	6 - 7
<ul> <li>All about Our Talent</li> </ul>	8 - 9
<ul> <li>All about Our Communities</li> </ul>	10
<ul> <li>All about Transparency</li> </ul>	11 - 14
<ul> <li>Acceptable use of Ama Group Systems</li> </ul>	15 - 17
<ul> <li>All about Our Clients and Business Partners</li> </ul>	18 - 19
<ul> <li>All about Integrity</li> </ul>	20 - 21
<ul> <li>Conclusion</li> </ul>	22
<ul> <li>Contact and Report Information</li> </ul>	23
<ul> <li>Compliance Report Form</li> </ul>	24

#### Letter from CEO

AMA Group

Dear Team,

At the heart of everything we do is a deep commitment to integrity, respect, and accountability that are more important than ever in today's dynamic and interconnected world. Guided by our mission to create and manage communications that drive our partners' success and impact their customers, we are building a foundation of excellence, fostering meaningful partnerships, and embracing every opportunity to move Forward and Beyond.

Our Code of Conduct is a cornerstone of this journey, helping us navigate both the challenges and opportunities that come with our growth. It ensures that we stay true to the values that define us. Moreover, our Code ensures that every decision we make, every action we take, aligns with our mission to be the preferred communication partner–known for the value

we deliver consistently to our partners and their customers.

The Code isn't just a set of guidelines—it's a reflection of how we interact with each other, with our partners, and with the world. As we continue to innovate, this Code provides the framework for us to do so ethically, respectfully, and transparently.

I encourage you to read through the Code carefully. Thank you in advance for your dedication to excellence, for embracing our mission and vision, and for living the values that will guide us Forward and Beyond.

Sincerely,

Maja Antić



#### The Code

At AMA Group, we take pride in our reputation for creativity, and high work and ethical standards. We have built company reputation by adhering to sound and rightful business ethics and a set of values shared by all of our companies, agencies and divisions. The Code of Conduct ("Code") serves as a statement of our continued commitment to acting with transparency and integrity in all of our business dealings. For purposes of the Code, company means the entire AMA Group, or the agency or business unit that employs you, as applicable.

The Code is not a comprehensive document that addresses every ethical issue that we might face in our work environment or all of the laws and policies that apply to all AMA Group businesses. The Code embodies the general standards of conduct that have always been and continue to be expected of all AMA Group employees, officers and directors in our day-to-day activities. These standards guide our interactions with internal and external stakeholders to promote collaboration and growth. An important part of our commitment to excellence and

responsibility towards our business and our partners' businesses is working closely with firms that reflect and share our values and ethical standards, and uphold the Code in the work they do for AMA Group.

Code provides us with resources to use when we have questions or concerns. We are all expected to certify our compliance with the Code annually. Each of us must take care to know and follow the policies, procedures and laws that apply to our particular job functions.

Laws and regulations are complex, subject to change, and often vary from one country to another. The standards and policies outlined herein do not represent all applicable AMA Group standards and policies, nor constitute a comprehensive list of the laws that apply to the AMA Group and its Agencies. The standards and policies discussed in the Code may be updated, amended, or changed at any time.



#### Our Values and Beliefs

Our values are the foundation of everything we do. They guide our process of creation, shape our interactions, and define our commitment to excellence.

Value #1

# Powered by People, Driven by Agility

#### **Belief**

Our people are the foundation of everything we do. Their expertise enables us to stay agile and adapt to any challenge, ensuring success in a dynamic environment

Value #2

# Customer comes first

#### **Belief**

We believe in Customercentricity. Whether it's our partner or their end consumer, we prioritize their needs to deliver solutions that drive success Value #3

#### Play Fair, Excel to Win

#### Belief

Fair play is at the core of our approach. We play by the rules with integrity and transparency, providing fair offerings while always striving for success and making progress with every step Value #4

# Global vision, local precision

#### **Belief**

Our global experience, regional presence, and local know-how set us apart. By combining international insights with deep understanding of local markets, we deliver communications that drive success at every level

Value #5

# Creative @ Heart

#### **Belief**

### Creativity at every level! Our people use creativity

to drive bold solutions, deliver impactful results, and reimagine what's possible



# Asking for Guidance and Voicing Concerns

#### Non-retaliation

While carrying out your day-to-day business activities, you may encounter situations where the right course of action isn't immediately clear. In many cases, your good judgment—supported by the Code and other Interpublic policies—will serve as a reliable guide. However, if the situation is more complex, don't hesitate to seek guidance.

Under no circumstances will you face retaliation for making a good-faith report. Reporting in "good faith" means you have given all of the information you have, and your report is sincere. Additionally, under no circumstances will you face retaliation (e.g., demotion, dismissal, exclusion from projects, or other negative treatment) for reporting information concerning a potential violation of applicable law or regulation to a government or regulatory entity, and you are not required to inform AMA Group that you intend to, or have, made any such report.

If you believe you have been the subject of retaliation, contact HR or Legal department of AMA Group. Disciplinary action will be taken against anyone who retaliates directly or indirectly against any employee as a result of a goodfaith report, participation in an investigation, or for reporting information concerning a potential violation of applicable law or regulation to a government or regulatory entity. All reports will be handled with appropriate confidentiality, and information will be shared only on a need-to-know basis to ensure a fair and thorough process.

# Asking for Guidance and Voicing Concerns

#### **Disciplinary Action**

To maintain the highest standards of integrity, we must dedicate ourselves to complying with the Code, AMA Group policies and procedures, and applicable laws and regulations. Please note that failure to do so can have serious consequences, including disciplinary action, up to and including termination.

The extent of any disciplinary measures will depend on the circumstances of the violation. All discipline will be applied in a manner consistent with AMA Group's policies and practices, as well as the law.

It is also important to note that applicable regulatory authorities may impose fines and criminal or civil penalties, on AMA Group and atfault individuals.

# Additional Expectations for Managers

AMA Group managers must strive to create a positive work environment through both words and actions. They are expected to serve as ethical role models by exemplifying AMA Group's values at all times. They must also communicate the importance of the Code and ethical conduct to others, including employees, business partners, suppliers, consultants and freelancers. Managers should strive to build a work environment in which employees feel comfortable asking for help and raising concerns about compliance and ethics.

They must also be alert to any situations or actions that may violate the letter or spirit of the Code or AMA Group policy, or may damage AMA Group reputation. It is important that managers take immediate action to address such situation.

When managers receive reports of a situation that is unethical, or suspect that one exists, they must promptly notify the AMA Group Chief People Officer or the AMA Group Chief Legal Officer and work to resolve the issue. Managers who know about, or should know about, misconduct and do not act promptly to report and correct the situation will be subject to disciplinary action. Managers must never engage in or tolerate retaliatory acts made against anyone working on AMA Group behalf and are expected to clearly communicate AMA Group non-retaliation policy.



#### All about our Talent



At AMA Group, we strive to build a diverse workforce that reflects the richness of the global markets where we operate. We are committed to hiring based on skills and qualifications, without bias related to age, gender, religion, sexual orientation, or any other personal characteristic. Our approach to diversity and inclusion also includes efforts to ensure gender balance and the inclusion of people with disabilities.

Our ability to innovate is powered by our people who bring many different perspectives and talents to the table. Most important, we are committed to cultivating a work environment where everyone feels empowered to grow, and where their voice and identity are recognized and respected. We are proud to have a long-standing commitment to advancing diversity, equity, and inclusion.

#### **Non Discrimination**

AMA Group succeeds as a result of our creative, diverse workforce. Our mixed backgrounds, views and talents enrich AMA Group as a whole and help each of us achieve excellence. We therefore must be committed to equal employment opportunity and fair treatment at every stage of the employee lifecycle. We must make all employment decisions based on job-related qualifications and without regard to any legally protected status, such as race, color, gender, age, national origin, religion, creed, sexual orientation, gender identity, marital status, citizenship, disability, veteran status, and any other legally protected status. We must avoid all discriminatory treatment based on any legally protected status. Such treatment is unacceptable and contrary to AMA Groups' policy and our commitment to treat one another fairly.

If you know or suspect that unlawful discrimination has occurred, report the situation immediately to AMA Group Chief People Officer Legal



Department. Please keep in mind that you will not experience retaliation for making a good-faith report.

## Zero Tolerance for Harassment

We must also avoid unlawful workplace harassment, such as unlawful harassment based on any protected status, whether physical, visual or verbal. AMA Group will not tolerate this behavior in any location. "Harassment" includes behavior that has the purpose or effect of unreasonably interfering with another's work performance or creating an offensive, intimidating or hostile work environment. Although in many cases harassment is a pattern of behavior, even one word or act may constitute impermissible and/or illegal harassment. Any employee who experiences or witnesses harassment should report it immediately to their manager, HR, or via established reporting channels. All complaints will be taken seriously and investigated promptly.

#### All about our Talent

## No tolerance for Child Labor

We do not engage in or support the recruitment of child labour in any form. Child labour is strictly forbidden as defined by the International Labour Organization (ILO) conventions, United Nations Conventions, and applicable national laws. In cases where different standards apply, the most stringent shall be followed to ensure the highest level of protection for children.

We expect all our business partners and suppliers to adhere to these commitments and implement equivalent policies within their operations.

#### Personal Relationships

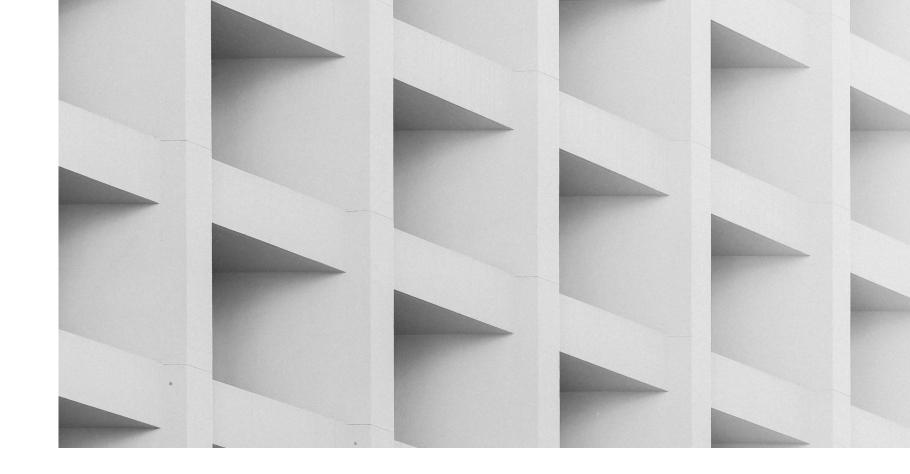
To succeed as a team, we must all treat one another fairly. For this reason, we should avoid having personal relationships (romantic, familial, or close friendships) at work that may harm

our ability to make sound, objective business decisions. This means that none of us may have direct decision-making authority over another family member if any such situation arises, disclose it promptly to Group Chief People Officer. Failure to do so may subject you to disciplinary action.

# Workplace Safety and Health

We are committed to high standards of safety and employee protection. We each have a responsibility to meet this commitment by following all AMA Group safety procedures, as well as applicable laws and regulations designed to promote workplace safety. If you are aware of unsafe working conditions, report the situation to your manager immediately.

To promote a safe workplace, we must never tolerate or engage in any form of violence. "Violence" includes threats or acts of violence, intimidation or attempts to instill fear in others.



If you know of actual or potential workplace violence, report your concerns immediately. If you believe someone is in immediate danger, please contact the local authorities.

As part of our commitment to providing a safe workplace, we are expected to conduct all AMA Group business free from the influence of any substance that could impair our job performance. This includes alcohol, illegal drugs, controlled substances and, in certain instances, prescription medication. In addition, we may not sell, manufacture or distribute illegal drugs or prescribed medication in our workplace. These rules apply to all persons on AMA Group premises at all times. Moderate alcohol consumption at authorized AMA Group events is allowed, but remember your judgment or ability to perform your work duties must not be impaired and that all other AMA Group policies apply in those circumstances.

#### All about our Communities

As individuals and as a company, we are committed to being positive, engaged members of the communities in which we live and work. This means acting with integrity, respecting local laws and customs, and contributing to the social and environmental wellbeing of those around us. We are encouraged to actively support and participate in community initiatives, whether through volunteering, charitable donations, sponsorships, or other forms of civic engagement. These actions help strengthen the bond between our organization and the communities we serve and reflect the values we stand for. Participation in community initiatives is entirely voluntary and will not impact performance evaluations.

# Committed to a greener future

AMA Group is committed to protecting the environment and minimizing our ecological footprint through conscious choices and responsible practices. This means we must comply with all applicable environmental laws

and regulations wherever we do business. We also strive to exceed such legal requirements by working to fulfill sustainability. We prioritize the use of natural, renewable materials and actively reduce waste by recycling and reusing resources across all our operations. From thoughtful material sourcing to responsible waste management, we aim to lead by example and inspire environmentally conscious behavior throughout our company and partnerships. By respecting the planet and taking action today, we are investing in a cleaner, more sustainable tomorrow. We seek to partner with those suppliers that share our commitment to sustainability and environmental stewardship.

We encourage our suppliers to adopt environmentally friendly policies. In addition, we look for opportunities to support local suppliers whenever possible, striving to boost the economy in our communities and to minimize the negative environmental impact that can arise from our work activities.



#### Conflict of Interest

A conflict of interest occurs when our personal or family interests interfere—or appear to interfere with our ability to make sound business decisions on behalf of AMA Group. We need to avoid any situation that creates even the appearance of bias. Apparent conflicts of interest can be as damaging to AMA Group's reputation for honesty and integrity as an actual conflict of interest. It is important to note that merely having a conflict of interest may not be a violation of the Code, but failing to disclose that conflict is. If you feel that an actual or apparent conflict of interest exists, report it immediately using the Compliance Report Form attached to the Code. In addition, members of AMA Group management will be contacted yearly to disclose whether they are having a conflict of interest.

This section discusses several common situations where conflicts of interest can occur. If your situation is not covered, ask yourself whether you could be accused of putting your own interests

ahead of AMA Group's. If you are still in doubt, disclose the situation.

In doing business with family and friends a conflict of interest can arise if you, or your spouse, partner, relative or other member of your household, have a personal stake in a company that is an actual or potential AMA Group supplier, client, contractor or competitor. If your spouse, partner or relative, or a member of your household, works for a supplier, client or competitor, disclose the situation on the Compliance Report Form.

You must never use your position at AMA Group to improperly influence the bidding process or negotiation with a potential client or supplier in any way. If you are directly involved in supplier selection and have a potential conflict of interest, notify your manager immediately and remove yourself from the decision-making process.

#### Gifts and Entertainment

Business gifts and entertainment are common courtesies intended to help build strong working relationships with clients and suppliers. However, it is important to exercise caution when giving or receiving these courtesies, as they can create—or appear to create—conflicts of interest. Such exchanges are inappropriate if they create a sense of obligation, suggest bias, or are intended to influence a business decision.

"Gifts" include items of value such as travel, lodging, favors, services, and meals or entertainment when the host is not present. You may offer or accept gifts only if they meet all of the following criteria:

- Are not intended to influence a business decision
- Are nominal in value and do not exceed
   €100. Any gift exceeding this amount must
   be self-reported to your manager or the
   Legal Department. Gifts exceeding the limit

should be returned or donated to charity. Are infrequent

- Are in good taste
- Are unsolicited
- Are not cash

"Entertainment" refers to events where both the giver and recipient are present—for example, shared meals or sporting events. Entertainment may be offered or accepted only if it:

- Is occasional or infrequent
- Is intended to strengthen the business relationship, not to influence a business decision
- Is unsolicited
- Takes place in a setting appropriate for business discussions
- Is reasonable in nature

These rules apply to all of us year-round—including during the holiday season. There may be times when you have a prior personal relationship

with a client or supplier. In such cases, use sound business judgment to determine whether a gift or entertainment is appropriate. If you plan to give a gift or offer entertainment, be sure to consider the recipient's own gift policies to avoid putting them in an uncomfortable position.

If you are offered a gift or entertainment that is inappropriate, you should politely decline. If you're ever unsure or have concerns about what's acceptable, contact your manager, Chief Pepole Officer or Legal Department.

Please note: rules for giving gifts or entertainment to government employees are significantly more restrictive. If you interact with government officials at any level, be sure to review the "Anti-Corruption Laws" section of the Code and related policies.

#### **Asset Protection**

We also have obligations when using AMA Group's property. We are each accountable for the careful use of AMA Group property, which includes not only physical property, but also data, electronic media, computing and communications devices, as well as human resources. We must also take steps to protect AMA Group brand identity—or, how we look and sound to our audiences—by safeguarding reputation of our brands as well.

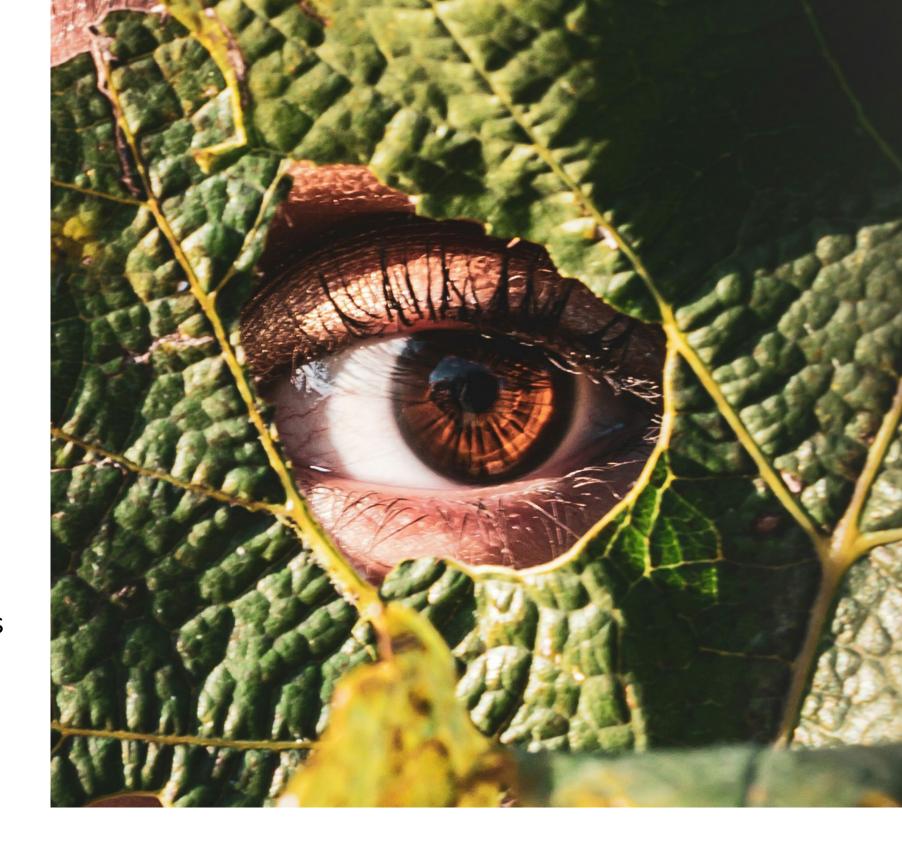
Each of us is responsible for the proper use and protection of AMA GROUP property. This includes not only physical assets but also data, electronic media, and all computing and communication devices. We must also safeguard AMA's Group and IPG's brand identity—how we present ourselves to the world—by protecting the names and branding of Interpublic and all its agencies.

#### **Physical Assets**

It's essential that we all work to protect AMA's Group physical property, including facilities, funds, equipment, inventory, and supplies, from theft, damage, loss, or misuse. Company property should not be removed from AMA Group premises without proper authorization and must never be used for inappropriate purposes.

#### Intellectual Property

We are proud of the work product we create including the intellectual property (IP) contained in such work product, which encompasses all patents, trademarks, service marks, copyrights, ideas, trade secrets, processes, inventions or improvements. AMA Group or its Agency/Business Unit retain exclusive ownership of all the work product and IP contained in such work product that you conceive in relation to or within the scope of your work with AMA Group or its Agency/Business Unit. To the extent permitted by law, from the moment of creation, you assign and



waive all rights, title and interest in any such work product and IP, in favor of AMA Group and/or its Business Units, and you must assist AMA Group and/or its Business Units in obtaining any rights to any such work product and IP. This obligation to assist continues even after your employment with AMA Group ends.

#### **Confidential Information**

We must safeguard AMA Group's and its clients' confidential and proprietary information. We are in a communication business, so it is especially important that we take this requirement very seriously. Such information, when properly protected, can give us a competitive advantage. We also have contractual obligations to safeguard our clients' information. A breach of this obligation can result in adverse consequences.

Confidential information that is disclosed prematurely or inappropriately could expose us to severe financial harm or legal liability. As discussed in the "Asset Protection" section of the Code, we may only reveal confidential information to authorized colleagues or outside parties that have signed a confidentiality or non-disclosure agreement (NDA) and have a business need to know it. We also expect you to honor confidentiality obligations that you may have as a result of your employment prior to AMA Group or

respective Agency within AMA Group.
When determining the classification of confidentiality of documents and information internal procedures of AMA Group are taken into account, as well as local law requirements and requirements of General Data Protection Regulation (GDPR).

### Acceptable use of Ama Group Systems

#### **Electronic Forums**

We may never use AMA Group's computer systems to communicate inappropriate, sexually explicit or offensive jokes or statements. In addition, we must never use them to send unauthorized solicitations or to conduct business for another organization. The communication of derogatory, discriminating or harassing comments or innuendo and threatening or abusive language is strictly prohibited.

We must also exercise extreme care when participating in Digital Spaces such as blogs, discussion boards, social media or any other publicly available online resources—as such communications may be identifiable with, and attributable to AMA Group. This can be accomplished by always thinking before making a public or private statement to ensure that such statements are civil, and do not include posting of personal information about others unless you have received their permission. This means, in part, that we must not make any statement,

publicly or privately, that could detrimentally affect the company's business. This includes any director, officer or other employee of AMA Group as well as our clients. Any statement that may negatively affect AMA Group's interests, or those of our clients or shareholders, should not be shared. Keep in mind that this policy is not meant to restrict you from making statements to fellow employees in the course of your daily work, nor is it meant to keep you from making private statements to persons other than clients or competitors of AMA Group, or members of the press or the financial community, that do not have a material adverse effect upon AMA Group. Additionally, this policy does not keep you from making good-faith statements where required by law, regulation or court order, or from reporting a potential violation of applicable law or regulation to a government or regulatory entity.

Electronic messages, both personal and business, are lasting and recoverable written records.

Remember, these messages can easily be copied and forwarded worldwide without your knowledge or consent. For this reason, compose work emails, instant messages and text messages with the utmost care.

To the extent permitted by law, you should not expect privacy when using AMA Group communications resources, including email and the Internet. AMA Group reserves the right to monitor these resources, where permitted by local law, to help ensure they are used responsibly and professionally. Any information or record produced using these resources may be subject to such review. Where allowed by local law, AMA Group also reserves the right to block offensive, illegal and non-business-related sites.



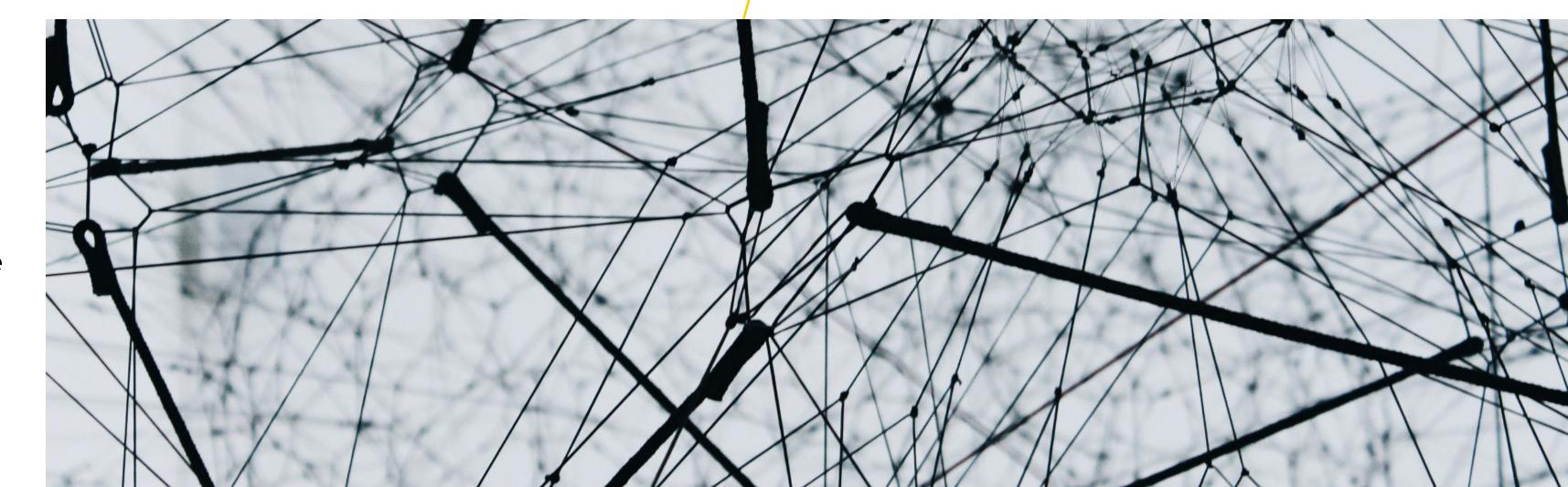
### Acceptable use of Ama Group Systems

#### **Data Security**

The appropriate exchange of information is critical to AMA Group's success. As such, we need to be particularly diligent in protecting sensitive and confidential information about AMA Group and our colleagues, clients, consultants, contractors, suppliers, other business partners, and individuals. The disclosure of such sensitive and confidential information outside AMA Group could seriously damage our reputation and success. Safeguarding this information is everyone's responsibility.

We must safeguard much of the information we handle on a daily basis to prevent loss, theft and damage at all times. This includes all AMA Group, client and third-party sensitive and confidential information, including business records, financial results, sales figures, as well as personal information of individuals. In addition, we must protect this information from unauthorized disclosure to others inside and outside AMA Group, including third parties and colleagues who do not have a business need to know.

AMA Group takes data security seriously and we have implemented administrative, technical and physical safeguard guides to help protect personal and business confidential information against loss and unauthorized access, acquisition, use, modification, destruction or disclosure. As part of these efforts, we must follow AMA Group guidelines on the use of company IT systems and resources, including computer systems, portable electronic devices, laptops and other storage devices.



### Acceptable use of Ama Group Systems

## Data Privacy and Personal Data

In case of collecting and processing of personal data, AMA Group is dedicated to keeping and respecting privacy of people whose data we process. Accordingly, AMA Group has complied with "General Data Protection Regulation (EU 2016/697)" as well as all provisions of local legislation which regulates collecting and processing of personal data.



## Treating Personal Information

- We respect privacy and personal choices.
- We collect and process personal data only on the basis of voluntary consent.
- All data collections we report to the competent authorities (Commissioner for Information of Public Importance and Personal Data Protection)
- We ensure that privacy and safety are present in everything we work with.
- We don't send you marketing notices unless you have asked for them. At any moment you can change your mind.
- We never offer or sell personal data to others.
- We are devoted to keeping personal data and making them safe. That means that we cooperate with only those partners that we can trust.
- We are dedicated to be open and transparent in terms of how we use personal data.
- We do not use personal data in any other way that we have not informed you about before.

 We respect everyone's rights and we always try to meet the demands to the extent possible, in accordance with our legal and business responsibilities.

Our colleagues, clients, consultants, contractors, suppliers, business partners, and prospective and former employees trust us to properly manage and safeguard the personal information they provide to AMA Group. We each have a duty to protect personal information in accordance with applicable privacy and data protection laws that are in place wherever we do business. We should only use such data for relevant and appropriate business purposes.

Data privacy and security are important to AMA Group. We are accountable for complying with our policies, procedures, and other privacy and security controls, and for taking reasonable and timely measures to correct instances of noncompliance, as appropriate.

# All about our Clients and Business Partners

## Fair Purchasing Practices

We must ensure that we make all purchasing decisions fairly, objectively and in the best interests of AMA Group. We work to ensure supplier variety, and do not allow our personal relationships to influence, or appear to influence, our business decisions.

## Ethical Sales Practices

Our commitment to integrity means we adhere to the following guidelines when dealing with clients:

- We engage in solutions that meet our clients' interests and needs, rather than those that only meet revenue or compensation goals.
- We communicate honestly and truthfully, and make terms of engagement clear, accurate and easy to find.
- We ensure the confidentiality, integrity and

accuracy of client records and transactions.

• We do not make promises or commitments that we cannot keep.

It is especially important that none of us ever engage in "commercial bribery." This means we cannot give or offer money or anything else of value to anyone with whom AMA Group does or might do business, if the purpose of the gift is to help us acquire or retain business, or to encourage that person to do something corrupt, deceptive or otherwise opposed to his or her responsibilities.



# All about our Clients and Business Partners

#### **Competition Laws**

We must all abide by competition laws, also known as "antitrust laws," which are designed to preserve free and open competition. These laws may vary by country, but their common goal is to promote a competitive marketplace that provides consumers with high-quality goods and services at fair prices. While competition laws are complex, they generally forbid discussing or entering into agreements about any activities with competitors that may restrain trade, such as price-fixing, bid-rigging, or dividing or allocating markets, territories or clients. If a competitor attempts to discuss any of the above topics with you, stop the conversation immediately and report the incident to AMA Group legal department. Be particularly cautious whenever you converse with representatives of our competitors.

Competition laws also prohibits entering into formal or informal agreements with suppliers, contractors or clients that may restrict competition. Such agreements include tying

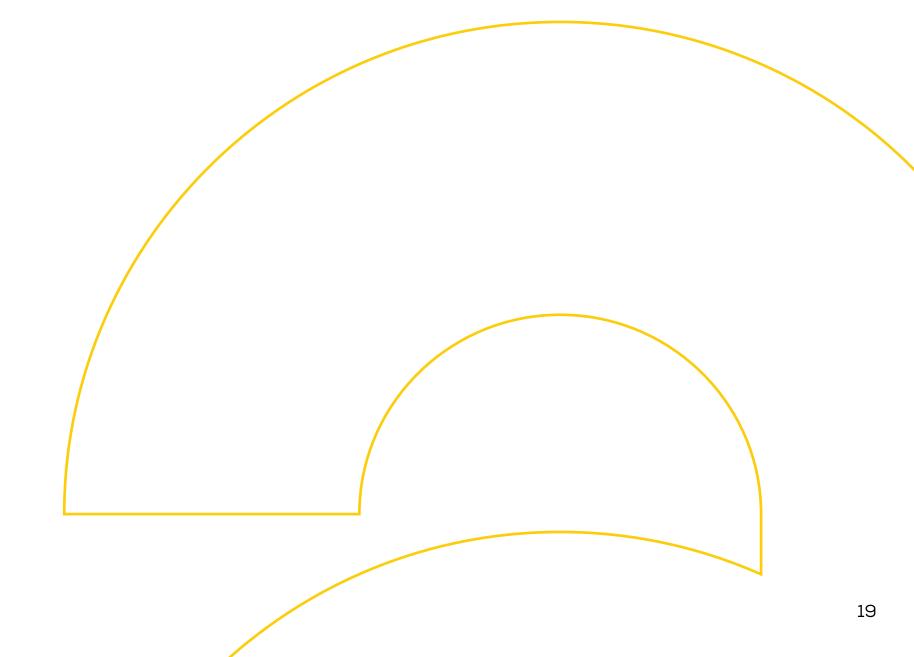
products, fixing resale prices or refusing to sell to particular clients or to buy from particular suppliers.

Please note that violating these laws may subject both the individuals involved and AMA Group to severe consequences. If you have any questions, consult AMA Group Legal Department before acting.

# Third-Party Information and Property

Our clients and other business partners trust us with their confidential and proprietary information, and we must safeguard it as diligently as we safeguard AMA Group's information. We are each responsible for protecting any third-party confidential and proprietary information we acquire through our work, and must not disclose this information

to any unauthorized persons. This obligation continues even after our employment with AMA Group ends. In addition, we must comply with the terms of all licensing agreements and laws governing the use of a third party's intellectual property. For more information about protection of confidential and propriety information, see the Asset Protection section of the Code.



### All about Integrity

#### **Anti-Corruption Laws**

Bribery harms not only AMA Group, but also the communities where we do business. All of our business dealings must comply with all applicable anti-corruption laws. We are committed to full compliance with all such laws.

For these reasons, AMA Group has adopted a zero-tolerance policy for bribery, regardless of where we are located, and regardless of with whom we are doing business. We may not authorize, offer or give anything of value with the intent to obtain or retain business or to otherwise improperly influence a government official, client, or other third party.

In addition, we cannot retain someone to do something on our behalf that we may not do ourselves. This includes finders, consultants, brokers, lobbyists, subcontractors, intermediaries, tax advisors, or other third parties. Prior to engaging any such third parties, we must conduct reasonable due diligence regarding such party's

ability and suitability for the services for which they are being engaged. In addition, if these third parties will interact with government officials on our behalf, they must sign a contract that includes strong provisions relating to anti-corruption compliance.

It is important to remember that engaging in bribery, directly or indirectly, can subject AMA Group and you to serious fines and criminal penalties, including possible jail time. If you become aware of any violation of our anticorruption policies, you are obligated to report it to your manager and AMA Group legal department.



### All about Integrity

# Anti-Money Laundering and Anti-Terrorist Financing

Money laundering is the process of converting illegal proceeds so that the funds are made to appear legitimate. Terrorist financing includes the financing of terrorists, terrorist acts and terrorist organizations. At AMA Group, we do not condone, support or facilitate such activities in any way. We comply with all anti-money laundering and antiterrorism laws worldwide. It is important for you to know all parties involved in your business activities and report any unusual activity. You should conduct business only with reputable clients and business partners involved in legitimate business activities with funds derived from legitimate sources. If you have any questions or concerns about money laundering or terrorist financing or need help conducting due diligence, contact the Internal Audit. You should also contact the Internal Audit to report suspicious activity that might be a violation of this policy or local law.

#### **Political Activities**

#### Personal Political Activities

We are all permitted to positively support our communities by participating in the political activities that interest us. However, we must be careful to uphold AMA Group's reputation by only participating in such activities on our own time and at our own expense.

We may not allow any campaign or candidate to use Interpublic funds or facilities, or assets. In addition, we should never use AMA Group name while taking part in these activities. We must never use our position of authority to make another employee feel compelled or pressured to participate in any way in any political event or cause, or for any political purpose. And remember, when using social media, you should be clear that your political views/activities are not affiliated with AMA Group.

#### Corporate Political Activities

Although personal political activity is welcome, we may not make political contributions by or in the name of AMA Group or any of its subsidiaries. "Political contributions" include AMA Group funds and anything of value, including loans, contributions or use of goods, facilities, or services (except services which are part of the regular business activities of your agency, provided on ordinary terms). These restrictions apply not only to direct contributions made to individual candidates, political committees, or political parties, but also to indirect contributions that would ultimately be used to support individual candidates, political committees, or political parties, such as tickets to a fundraising dinner or similar event.

#### Conclusion

It's impossible to describe and list every possible ethical scenario we might face. Instead, we rely on one another's good judgment to uphold a high standard of integrity for ourselves and our Company. We expect all of us to be guided by both the letter and the spirit of this Code. Sometimes, identifying the right thing to do isn't an easy call. If in doubt don't be afraid to ask questions of your manager, head of Legal or Ethics & Compliance at AMA Group.



### Contact and Report Information

#### **Ethics and Compliance**

E mail: coclegal@amagroup.net cochr@amagroup.net

Data Safety and Security

E mail: cocirm@amagroup.net



### Compliance Report Form:

Each employee of AMA Group or any of its subsidiaries is required to review carefully and abide by the terms of the Code of Conduct. This form may be used to report any conflicts of interest, and/or to seek clarification of any questions or issues that might arise.

The completed form should will be submitted to AMA Group Legal Department. Please attach additional pages if more space is needed.

1. Do you or any member of your family have any substantial financial interest in, or are you or any of your family employed by, any organization (client, vendor, etc.) that has a business relationship or other dealings with AMA Group or any of its subsidiaries? Yes/No

Use the following space to disclose any substantial financial or ownership interest or position (director, officer, employee, consultant, etc.) that you or any of your family members have with respect to any organization (client, vendor, etc.) that has a business relationship or other dealings with AMA Group or any of its subsidiaries

or affiliates, if you are in a position to award business or otherwise influence our business relationship with such organization.

2. Do you or any member of your family have a significant financial interest in or are you otherwise associated with a competitor of AMA Group or any of its subsidiaries? Yes/No

Please describe the financial interest or association with a competitor of AMA Group or any of its subsidiaries or affiliates. Also, please disclose if any member of your immediate family has a significant financial interest in or association with a company that competes directly with the AMA Group with whom you are employed.

3. Are you or any member of your immediate family employed by or affiliated with any governmental entity with whom we are likely to interact AND in a position to influence the government entity's decisions relating to our business? Yes/No

Please disclose here if you or any member of your family is employed by or affiliated with any

governmental entity with whom we are likely to interact AND are in a position to influence the government entity's decisions relating to our business.

4. Are there any other activities in which you or any of your immediate family members are engaged that could potentially conflict with the business interests of AMA Group or any of its subsidiaries? Yes/No

Use the below space to disclose any other activities in which you or any of your family members are engaged that could potentially conflict with the business interests of AMA Group or any of its subsidiaries or affiliates or that might otherwise violate the terms of the Code of Conduct.

#### Questions?

Use the following space to pose any questions regarding the Code of Conduct.

