



Supplier Code of Practice

October 2025

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1. Introduction

At Exertis Ztorm, we aim to develop successful long-term relationships with all our suppliers.

We will work with you constantly to ensure that your products are brought to market in the most effective manner possible and that buyers of your products receive a high standard of support.

We want to build this relationship on a sustainable basis – one that works for you and works for us in the long-term. So, it's important that while everything we do is commercially-focused, it is also ethical and legal. Taking this approach protects your business and reputation as much as our own. We are committed to this approach in every area of our business.

To help us to achieve this, we have developed this Code of Practice setting out the key ethical and legal standards that apply to the business we do together. Please ensure that you take suitable steps to meet the standards set out in this Code, including by communicating this Code to the relevant people within your business.

By each of us following the standards in this Code, we will develop a business relationship that is sustainable in the long-term. Any person who is dealing with us, at any level of seniority, should feel free to raise concerns about whether these standards are being met by Exertis.

If you have a concern, we want to know about it. To the extent we lawfully can, we will treat all notifications in confidence. Please contact us at our email address contactform@exertisztorm.com.

“Following the standards in this Code will allow us to develop a business relationship that is sustainable in the long-term”

2. About Us

Exertis Ztorm pushes the boundaries of digital distribution innovation, developing a world leading service platform used for video game and software distribution on a global scale. Trusted by the majority of video games and software publishers including Microsoft, SEGA, Take-Two, and Adobe, and by retailers based in more than 30 countries across the world.

Exertis Ztorm's solutions enable retailers to sell the broadest digital gaming catalogue available both online and in physical stores, and for publishers to have an efficient and uniform way of managing a global network of retailers.

Publishers are rapidly shifting from physical distribution of games and software into digital distribution and Exertis Ztorm is a market leader with exclusive Publisher & Retailer distribution agreements.

3. Employment

3.1. Principle

Exertis Ztorm is committed to respecting and upholding internationally-recognised human rights and labour standards. These include the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

We ask our third parties to adopt the same standards and apply them throughout their operations and supply chains as part of their commitment to ethical, responsible, and sustainable business conduct.

What this means

Specifically, you should ensure that your employees and other workers are:

- provided with a safe working environment;
- paid fairly and on time for the work they do;
- not subject to any form of duress by their employer, such as having to repay large loans or having their passport retained;
- not discriminated against because of their gender, disability, religion, age, ethnicity, marital status, sexual orientation or any other status protected by applicable law;
- not subjected to any form of slavery; including forced labour, compulsory labour or child labour;
- not under the legal minimum age of employment.

You should promptly advise us if you are not able to meet these standards at any point, or if any third party in your supply chain involved in the provision of products or services to us is able to meet these standards.

In many countries, national laws set standards that are at least as high as those set out in human rights standards. Where that is the case, national laws should be followed.

However, where national laws do not provide a suitable level of protection, human rights standards should be observed. If a conflict between national law and international human rights standards occurs, we expect you to respect national law while endeavouring to protect human rights.

4. Health & Safety

4.1. Principle

Ensuring the health and safety of everyone we deal with is fundamental to business performance and long-term business success. No task is so important that you cannot choose to do it safely.

What this means

- We will always support you when you choose to work safely.
- If anyone in your business believes safety is at risk of being compromised, they must feel able to intervene and stop the work.
- Our third parties, and their upstream suppliers, should comply with all applicable laws and regulations regarding occupational health and safety, and provide a clean, safe and healthy workplace, designed to prevent accidents, injury and illness during the course of work.
- Third parties working at an Exertis Ztorm premises must work in a way that (i) assures their own safety and the safety of others and (ii) is in compliance with applicable health and safety requirements including our policies and procedures.
- Third parties should provide regular and recorded health and safety training to all individuals working for them, including employees, contractors, and any new or reassigned workers. Any emergencies that may impact Exertis Ztorm activities must be reported promptly.
- You will facilitate reasonable HSE inspections by us. You will also provide us with accurate HSE performance information where we request it.
- We have the right to refuse any deliveries or services at our warehouses or other locations that we deem unsafe to offload, perform, or accept.

5. Environmental Protection

5.1. Principle

We expect you to comply with all laws and regulations that support the protection of the environment.

What this means

- Third parties are expected to conduct all activities in line with environmental laws and regulations. This includes responsible use of natural resources, appropriate licencing for operations, managing emissions, handling disposal of waste and spillages, and the safe transport of products. Measures should be taken to prevent environmental harm, including deforestation and unsustainable material extraction, with consideration for product types such as batteries, packaging, and electronic waste (on a non-exhaustive basis).
- Water use should be managed with care and efficiency. Where relevant, steps should be taken to identify water-related risks and promote conservation, while recognising that expectations may vary depending on local conditions and material impact.
- A proactive approach to environmental performance is encouraged, including the development of climate targets aligned with global frameworks such as the Paris Agreement. Third parties should aim to improve energy efficiency, reduce emissions, and consider initiatives such as increased renewable energy use or credible carbon offsetting, where appropriate to their operations.
- Hazardous substances should be managed in compliance with applicable laws such as REACH. Particular attention should be given to the identification, restriction, and substitution of persistent substances, including PFAS and other materials of concern. Third parties should maintain accurate chemical inventories and have procedures in place for safe handling, storage, and disposal.
- Third parties are also encouraged to manage the environmental impact of digital operations. This includes the use of energy-efficient IT systems, using green data centres, and minimising digital waste.
- All operations should align to Exertis's environmental policies.

6. Bribery & Corruption

6.1. Principle

You will not be involved in bribery or any other form of corrupt activity.

What this means

- Bribery may exist where a person does not act in the best interests of the organisation that they represent because of some personal benefit they have received or hope to receive from a third party.
- You will maintain and communicate suitable policies in your business that make clear that none of your employees or third parties that you utilise should offer, give or accept any bribe.
- Specifically, any gifts, hospitality, donations, sponsorship or other benefits that you offer or receive in the context of the work you do for Exertis must be modest and not designed to improperly influence the outcome of any decision.

7. Confidential Information

7.1. Principle

You will not share confidential information inappropriately or use confidential information that should not be in your possession.

What this means

While we always want to hear about developments in the marketplace, we do not want you to share with us confidential information that we are not permitted to receive. And, equally, you must not share with any third party any confidential information that you have about us.

If you inadvertently send us confidential information that we should not have received, you must notify us immediately. And, if you inadvertently share confidential information about Exertis with any third party, you must again immediately let us know.

8. Cyber Security & Information Protection

8.1. Principle

You will collect and use personal information carefully and in compliance with relevant cyber security, data protection, and privacy laws.

What this means

- We may collect information about our employees, third parties, or other individuals and you may process that data on our behalf when requested to do so. Where this is the case, you must always follow relevant data protection and privacy laws and ensure that all of your employees and any third parties you utilise who handle that information understand that it should be used securely and for legitimate reasons. You must maintain suitable IT and management controls to ensure personal information is properly used.
- You must let us know immediately if you have any incidents that occur in relation to information you are processing on our behalf, particularly if there is a data security breach.
- You must also maintain effective cyber security measures, consistent with industry standards and our IT Security Policy, to protect information systems and data against unauthorised access, disruption, or misuse. These measures should include suitable technical, organisational, and procedural controls proportionate to the nature of your operations.

9. Competition (Anti-Trust) Laws

9.1. Principle

You will take all steps reasonably necessary to ensure that you are fully compliant with applicable competition and anti-trust laws.

What this means

- You accept that Exertis Ztorm will always act independently in making its commercial decisions.
- As stated in section 5, you must not share confidential information about us with any of our competitors and you must not share with us confidential information that you have about our competitors.
- It is against the law for us to agree with you what price we will sell your products at or to have any agreement or arrangement that puts a floor on the prices we sell them at.
- The same also applies to our customers. It is against the law for us to tell them what price they can sell your products at or to require or incentivise them to keep their prices above a certain level.
- You will ensure that you provide suitable training on relevant competition laws to relevant employees within your business.

10. Tax Compliance

10.1. Principle

You (including your company, organisation and / or your employees) will not engage in or facilitate (by actions or omissions) any deliberate falsifying of taxes that are due.

What this means

- You will correctly declare all income and be transparent with tax authorities about your transactions.
- You will take reasonable and proportionate steps to prevent your employees, contractors or representatives from facilitating in tax evasion and ensure they do not behave in a way that permits or appears to permit any other fraudulent activity.
- You will not trade fraudulently nor participate in fraudulent business activities nor obtain services dishonestly.
- You will take reasonable and proportionate steps to continuously risk assess any third parties in your supply chain to ensure they do not behave in a way that permits or appears to permit fraudulent activity to occur.
- You will notify us immediately where you have concerns regarding any action taken by your employees, contractors, representatives or other third parties in your supply chain in relation to your dealings with Exertis , or where you suspect that another party in our supply chain may have engaged in and benefitted (directly or indirectly) from fraudulent activities (including but not limited to tax evasion).

11. Intellectual Property

11.1. Principle

You will not sell products or provide services that deliberately or clearly infringe the intellectual property rights of any third party.

What this means

- You will respect the intellectual property rights of third parties by only using trademarks, designs and technology that have been legitimately acquired and licensed.
- You must also ensure that any products or services you sell to Exertis do not infringe third-party rights, and that you hold the necessary rights and sublicences to provide them lawfully.

12. Product Safety & Quality

12.1. Principle

We respect the rights of the consumers of the products and service we sell to. Every product you sell us must be safe, comply with relevant product and quality standards and be accompanied by legally required product information, labelling and markings.

What this means

- You must ensure that any product you sell us is safe for its intended use and complies with all relevant safety and quality standards applicable in each market where it is made available for that product.
- This includes ensuring that products are appropriately marked and labelled in accordance with applicable regulations, including safety warnings, usage instructions, traceability information, and conformity markings (e.g. CE, UKCA, FCC) as required by local laws.
- You will provide or make available to us relevant product safety documentation, as may be required by law.
- You must also notify us immediately where you have any concerns that a product may be unsafe or not compliant with standards relevant to it.
- Where relevant, you will work to address satisfactorily customer concerns about the products you sell us.

13. Export Controls & Sanctions

13.1. Principle

You will strictly comply and without exception conduct your business in accordance with all applicable export controls, sanctions and embargoes laws and regulations.

What this means

- Some governments maintain restrictions on products (including their components, materials, designs and technology) and may prohibit or require licenses prior to supplying controlled products to certain recipients and users. They may also maintain restrictions on doing business with certain countries, industry sectors, organisations or individuals.
- You will maintain suitable controls to ensure that the products, whether hardware, software, information and services, you sell comply with applicable export controls and sanctions laws.
- You must advise us and provide the export control classification information as well as supporting documentation and/or copy of applicable authorisation or exemptions if any of the products you sell are classified as dual-use products or are otherwise subject to export controls restrictions.

14. Conflict Minerals

14.1. Principle

We will not sell products that contain restricted “conflict minerals”.

What this means

- The US and the EU have each passed laws restricting the use of minerals from conflict affected countries and regions.
- We rely on you to ensure that any products we buy from you do not contain conflict minerals and, in particular, comply with the requirements of US and EU laws on this subject.
- You must conduct and record appropriate and ongoing due diligence in your own supply chain to ensure that conflict minerals are not used or introduced. You must make evidence of your due diligence available on request by us, and you must let us know immediately of any breach that you become aware of.
- This due diligence should include tracing and verifying materials throughout your supply chain, ensuring that minerals are sourced responsibly from smelters or refiners that comply with recognised industry standards.
- You must make evidence of your due diligence available on request by us, and you must let us know immediately of any breach that you become aware of.

15. Managing Compliance

15.1. Principle

You will have in place appropriate internal policies and procedures to cover your legal and ethical obligations, including the areas covered in this Code of Practice. You will ensure that you keep adequate, accurate and secure records so you can demonstrate compliance.

What this means

- We expect you to have in place an appropriate set of internal controls to ensure that you meet the standards set out in this Code. These controls should be supported by clear leadership on ethics and compliance matters from senior people in your business.
- Keeping records of your internal controls, such as ongoing risk assessment due diligence, policy communications, training and other internal communications, is important because it allows you to prove the controls you had in place if there are problems in the future.
- In the same way that we engage with you about the subjects covered in this Code, it is your responsibility to communicate your policy on those subjects to your suppliers, representatives and other third parties involved in your business.
- We will take suitable steps where a third party does not follow the standards set out in this Code of Practice. This may include not placing any further orders and the termination of our agreement.

16. Sustainability Reporting

16.1. Principle

We expect our third parties to commit to transparent sustainability practices by regularly reporting their environmental and social impacts, in line with recognised frameworks.

What this means

- Third parties are expected to align with internationally recognised reporting standards, such as the Corporate Sustainability Reporting Directive (CSRD) or equivalent global frameworks.
- They should provide annual sustainability reports that detail key areas, including greenhouse gas emissions and reduction targets, water and resource usage, waste management, and recycling initiatives.
- These reports should also address social impacts, covering labour practices and diversity measures. Through this process, third parties must demonstrate ongoing improvements and a clear commitment to achieving net-zero emissions and fostering sustainable growth.

17. Whistleblower Protections

17.1. Principles

You must establish and maintain confidential, secure, and accessible mechanisms for reporting unethical practices or violations of this Code. It is essential that employees can raise concerns freely, without fear of retaliation or disadvantage.

What this means

- Third parties must implement whistleblower policies that align with the EU Whistleblower Protection Directive or equivalent frameworks.
- These policies should provide clear and accessible reporting mechanisms that ensure confidentiality and anonymity for individuals submitting concerns, regardless of their location or role within the organisation.
- Employees must have clear guidance on how to report violations, with assurance that no retaliation or disadvantage will occur for raising concerns in good faith.
- To further safeguard the process, third parties should designate whistleblower protection officers or engage independent third-party partners to manage and oversee reports impartially.