

MAXIS GBN Code of Business Conduct and Ethics



A message from MAXIS GBN's CEO

Dear All,

At MAXIS GBN (MAXIS), we always apply high standards of ethical behaviour to ensure that we act professionally with objectivity and impartiality. By behaving ethically and responsibly and by standing up for what is right, we demonstrate both to each other, and to our stakeholders that we care about them, and that we are worthy of their trust. This is vital for our long-term success.

This Code sets out the minimum standards for how we work with each other, our clients, and our business partners (e.g. clients, members, brokers, other third parties, and/or external consultants). It also demonstrates the conduct expected of every employee around the world. The Code is not intended to be a summary of all MAXIS policies, procedures, or laws that apply to our business, nor does it address all situations we may face.

Please read this Code carefully. If you have questions or concerns regarding any aspect of this Code, contact your line manager or consult with the MAXIS Compliance or Human Resources teams.

Thank you for your commitment to upholding the highest levels of ethics and integrity at MAXIS.

Mattieu Rouot
Chief Executive Officer

Our values

We strive to be the most trusted collaborative and innovative partner to all we work with by providing data-driven and sustainable solutions. This is outlined by our three core values:

- Accountability: we take ownership.
- Creativity: we craft solutions.
- Collaboration: we are a global team.

We are connected through trust and integrity in these standards, which go beyond geographic locations and job functions. This accountability reinforces our commitment to one another, our shareholders, our business partners, and the communities in which we conduct business. Our individual and collective decisions have the potential to significantly impact MAXIS' reputation, which is one of our most valuable assets.



Our commitment to Corporate Social Responsibility (CSR)

Acting responsibly, ethically, and sustainably is always a top priority for MAXIS. We are committed to CSR and believe that setting the highest standards in terms of ethics, business integrity, and sustainability is our key responsibility. This commitment extends beyond the expected compliance with applicable laws and regulations.

Our “MAXIS for Good” initiative documents how CSR underpins our everyday activities at MAXIS. This initiative is made up of seven core areas across three pillars: **Community, People, Conduct & Ethics, Clients & Solutions, Suppliers & Partners, MAXIS Network, and Environment.**

We value our place in the community and encourage employees to be involved in their local communities through a diverse range of initiatives and volunteering events at a local, national, or global level.



MAXIS also fully supports diversity and inclusion. We put employee engagement at the heart of our business, recognising that our people are the reason for our success and how we treat them affects the positive impact we aim to have on the outside world. Our approach relies on a workplace that empowers and engages employees, encourages learning and development, and supports their wellbeing.

Who does the Code apply to?

This Code applies to all MAXIS employees, as well as other personnel who have the status of employees (i.e. part-time, temporary, seconded, or contract employees), and must follow the requirements of this Code.

MAXIS employees must certify annually that they have read and understood the Code and agree to abide by its principles.

Accordingly, MAXIS seeks to conduct business with third parties who share our commitment to high ethical standards and operate in a responsible and ethical manner. We expect them to behave consistently with the provisions set out in this Code.

How does the Code fit with the laws and regulations?

MAXIS is committed to respecting applicable laws and regulations wherever it operates. In the event of a conflict between local laws and the requirements of this Code, MAXIS will comply with applicable laws while trying to identify appropriate ways to respect the commitments expressed in the Code.

What are the consequences of Code violations and misconduct?

Failure to abide by the principles set out in this Code, or any other misconduct, may result in disciplinary action which can include termination of employment, subject to local laws.

As MAXIS operates globally, violating these principles could subject individuals and/or MAXIS to civil or criminal penalties and/or sanctions. Those violations may also severely damage the reputation of MAXIS, its shareholders, and its employees.

MAXIS periodically assesses and monitors compliance with the Code, and to ensure the content of this Code remains appropriate and up to date, it will be reviewed by the MAXIS Compliance team and approved by MAXIS' CEO at least annually.

How to speak up: MAXIS' Whistleblowing Policy

At MAXIS, we expect high ethical standards and encourage any reporting of unethical or illegal behaviour. We offer a confidential way to answer questions and respond to concerns in relation to unethical or inappropriate behaviour observed during the workplace.

MAXIS is committed to safeguarding all those who defend our principles and ensures no retaliation is taken against them for raising a concern. Employees are expected to read our Whistleblowing Policy, which covers this information in further detail.

Who should we contact if we have a question?

Our Code serves as a general standard for conduct. It cannot be a substitute for personal integrity and cannot spell out the appropriate response to every type of situation that may arise. If you have any questions regarding the content of this Code, please reach out to your line manager or the MAXIS Compliance team.

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1. Conflicts of interest

A conflict of interest exists when an employee is involved in personal activities or relationships that make it difficult to perform their work objectively and effectively. This could be any situation which conflicts with the employee's ability to act in the best interest of MAXIS. These conflicting interests could lead to behaviours, actions and decisions which are unethical, improper, or not impartial.

At MAXIS, we encourage our employees to avoid any conflicts of interest in order to maintain our integrity, and the trust that our business partners and shareholders have in MAXIS. Where this may not be possible, employees must report actions that may involve a potential conflict of interest to the MAXIS Compliance team using the Conflict of Interests Disclosure Form. Additionally, employees must read the Conflicts of Interest Policy which provides guidance on how MAXIS acts to mitigate any (potential) conflicts of interests.

MAXIS expects our employees to:

- Disclose actual or potential conflicts honestly and promptly to their line manager and the Compliance team before acting and making any decision.
- Withdraw from decision-making processes if we have a conflict of interest, for instance in cases of personal relationships.
- Prior to making personal investments in companies that have, or could have, a business connection with MAXIS, disclosing the proposed investment to their line manager and the Compliance team. This is applicable for personal or a family member investment.
- Asking for the approval of their line manager and the Compliance team prior to starting outside business activities or accepting a directorship with an outside business.

An employee owns 5% of a private company but does not control it and is not part of management. MAXIS is organising a request for proposal process and the company in which the employee owns 5% is planning to participate in the bid. Does this create an issue and is any approval needed?

Employees are required to report cases where private companies in which they hold an interest have dealings with MAXIS or its shareholders on either a recurring or "one-off" basis. If a MAXIS employee owns a 5% interest in a company that proposes to participate in a request for proposal organized by MAXIS, the employee is required to disclose the situation (in writing) to their Compliance team and seek approval before proceeding. Even if approved, the employee cannot take any part in the bidding process or its preparation.

2. Prevention of bribery and corruption

MAXIS has a zero-tolerance policy to any form of bribery and corruption, including offering, promising, giving or accepting any bribes, or inducement which, in contravention of applicable law, results in personal gain or advantage to the recipient (or any person or body associated with the recipient), and which is intended to improperly influence a decision of the recipient. Any form of bribery and corruption is not tolerated and may lead to a disciplinary action such as termination of employment or business contract.

Gifts and hospitality can play a pivotal role in building and preserving strong business relationships, but these business courtesies, whether given or received by MAXIS employees must never improperly influence business decisions.

MAXIS expects our employees to:

- Read and comply with our Anti-Bribery & Corruption Policy.
- Do not accept, give, or promise improper payments. Use common sense and good judgment in determining what is acceptable to give and receive.
- Understand who you are working with by conducting adequate due diligence.
- Obtain prior approval for gifts and hospitality, charitable donations, and/or sponsorships above thresholds as defined in the Gift and Hospitality Policy.
- Never offer a gift/hospitality that affects or appears to affect the impartiality of the person who receives it.

If an employee is offered a gift that does not meet the criteria set forth in our Gifts and Hospitality Policy, you must politely decline the gift. If declining a gift would be offensive or hurt a business relationship, accept the gift on behalf of MAXIS and submit a Gifts and Hospitality Reporting Form to the Compliance team. The gift must be passed to the Compliance team who will determine its appropriate disposition.

Improper payments

This can be anything of value with the intent to influence a business decision.

Examples of 'things of value':

- Business Meals
- Gifts or hospitality
- Sponsorships or donations
- Travel and/or lodging
- Favourable contract terms
- Free services

From time to time, I receive invitations to sporting or cultural events from consultants that are used by MAXIS. Can I accept such invitations?

Before accepting any invitation regarding cultural or sporting events, you should contact the MAXIS Compliance team.

3. Prevention of money laundering, terrorism financing and international sanctions

MAXIS is committed to meeting its responsibilities to help prevent money laundering and terrorist financing. These responsibilities generally include identifying clients and business partners, monitoring activity and reporting suspicious transactions or unusual activity consistent with applicable laws.

Employees must read our Anti-Money Laundering and Sanctions Policies which set out how we aim to prevent and detect money laundering, terrorism financing, and international sanctions which employees are required to abide by.

MAXIS can be subject to significant penalties if we engage in a business transaction directly or indirectly with certain embargoed or sanctioned countries, restricted persons, entities or vessels, restricted goods and related services. Examples of common restricted goods: military gear or weapons, certain electronics, nuclear weapons (proliferation financing).

If a business transaction is related to sanctioned countries, restricted persons, restricted entities, or restricted goods or services, you must stop and contact the MAXIS Compliance team immediately.

The MAXIS Compliance team regularly updates the “**List of Countries under Sanctions**” document to provide further information on the countries and regions with the most extensive sanctions.

MAXIS expects our employees to:

- Understand and comply with the applicable regulations and policies stated above.
- Conduct business only after performing the required due diligence.
- Pay close attention to business partners that are on a prohibited list, or who refuse to give required identifying information, who wish to make payments in cash, or wish to engage in transactions involving foreign shell or offshore companies.
- Contact the Compliance team before proceeding further where warning signs of suspicious customers or activities is identified.

I work for MAXIS and we are considering expanding our business in new countries. I wonder if there are countries that we are not authorised to do business with?

The countries that are subject to the most severe and wide-ranging sanctions are currently listed under Appendix 1 of the List of Countries under Sanctions document. Any potential business involvement with sanctioned countries must immediately be referred to the Compliance team before taking any action.

4. Prevention of fraud and insider trading

Fraud

Fraud is defined as “a deliberate intent to acquire money or goods dishonestly through the falsification of records or documents. The deliberate changing of financial statements or other records by either a member of the public, someone who works or is a volunteer for MAXIS. The criminal act is the attempt to deceive, and attempted fraud is therefore treated as seriously as accomplished fraud.”

Fraud prevention and detection is the responsibility of all MAXIS employees in all jurisdictions.

Insider trading

In conducting MAXIS business, we often learn material, non-public or “inside” information about MAXIS, its business partners, and/or shareholders. It is our duty to safeguard this information from improper use and treat such information as “confidential”.

Insider trading and “tipping” are illegal and may result in civil and criminal penalties.

Inside information is any non-public information that could reasonably be expected to affect the price of a security (e.g. shares) or that could influence an investor’s decision to buy, sell, or hold a security.

Examples of inside information:

- Changes in senior management
- Possible mergers or acquisitions
- Financial results or forecasts
- Knowledge of important product or service developments

MAXIS expects our employees to:

- Report any suspicions or concerns about potential fraud, dishonest activity, or unethical behaviour immediately to the Compliance team.
- Follow expense approval procedures and provide accurate information to support expense claims.
- Do not use any inside information you receive in the course of your employment with MAXIS to buy or sell securities of any company including MAXIS, its shareholders, our clients, or business partners.
- Do not disclose any inside information to anyone who might use it to make an investment decision or make buying or selling recommendations to anyone based on inside information. This is known as “tipping.”

During a meeting, I was informed of confidential information which could have a negative impact on the shares owned by one of my friends. Can I inform them of this?

No, you cannot share this information with your friend. If you are aware of non-public information related to these shares, informing another person can be considered as insider trading which could in turn be construed as a violation of the law.

5. Engagement with social media

The use of online and social media platforms provides opportunities for MAXIS and our employees but also creates challenges. What is posted, written, or commented online is often available for a long time and the lines between what is public and private, or personal and professional, can become blurred.

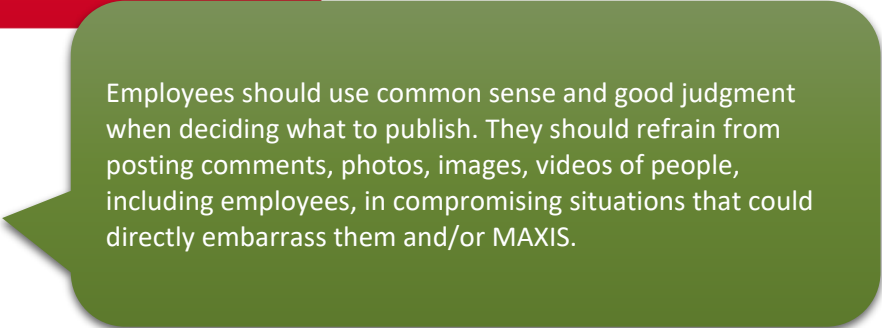
Social media platforms include social networking sites, blogs, message boards, chat rooms, online forums and any other type of site or service that permit users to share information with others.

Anything published online may have a far greater impact than intended. Employees are expected to read and abide by our “Social Media Guidelines” document, that ensures consistent and credible external communication, proper use of the brand and escalation of reputational risks. These requirements cover media relations on social media.

Furthermore, any expression of an employees’ political opinions and personal commitments must remain personal and separate from MAXIS. **Employees are formally prohibited to commit MAXIS to any political activism, meeting, or demonstration by mentioning the name of MAXIS, using visuals with the MAXIS logo or by using its letterhead, funds, or resources.**



During an offsite team building meeting, employees take personal photos of each other. One employee took some embarrassing photos of a fellow colleague. Should the employee post it on social media?



Employees should use common sense and good judgment when deciding what to publish. They should refrain from posting comments, photos, images, videos of people, including employees, in compromising situations that could directly embarrass them and/or MAXIS.

6. Protection of free competition

Competition laws vary from country to country, but the common core principle is to promote and maintain fair competition in the market. MAXIS believes that a competitive economy is in both its interest and that of the public, and as such, MAXIS is fully committed to complying with the letter and spirit of applicable competition laws wherever it does business (including but not limited to the Competition Act 1998 in the UK and applicable global competition laws).

We seek to excel while operating honestly and ethically, never through taking unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practices.

MAXIS takes a zero-tolerance approach to anti-competitive behaviour, and any breaches of applicable competition laws will be treated as a serious matter. Breaches may result in disciplinary action, reputational damage, fines, termination of business relationships, and/or criminal charges against MAXIS and/or its employees. As such, MAXIS has in place a robust Competition Law Policy which our employees must adhere to. Such Policy contains specific examples of anti-competitive behaviour which must always be avoided, as well as instructions on how employees should report any breaches. The MAXIS Legal team ensures that the Policy is reviewed annually, and that appropriate training is provided to employees as required.

MAXIS expects our employees to:

- Never directly or indirectly fix prices with competitors or agree market-sharing activities with competitors (such as dividing geographic areas).
- Never share MAXIS' confidential or proprietary information, including pricing, with our competitors.
- Not impose 'most favoured nation' clauses or enter into exclusive agreements with MAXIS Members that do not provide both parties with reasonable termination rights.
- Never prevent movement of employees between MAXIS and a competitor, or agree compensation amounts and other employment terms with competitors.
- Conduct business with business partners in a manner that demonstrates our commitment to fair competition.
- Provide truthful and accurate marketing information.
- Respect the principles of fairness and competitive bidding, confidentiality and transparency, when involved in the procurement of goods or services. Never collude with competitors regarding bids for a contract tender and don't agree floor/ceiling prices with competitors.
- Promptly report any suspected violation of Competition Law to the MAXIS Legal team in accordance with the Competition Law Policy.

Please refer to our Competition Law Policy for more information and guidance, including a Do's and Don'ts list.

During a dinner, a close friend who is currently working for a competitor starts to talk about pricing and client segmentation strategies, saying that we can both benefit from sharing information. What should I do?

You should avoid informal contacts with competitors where the content of discussions might violate antitrust or competition law. You should make it clear to your friend that you are not prepared to discuss such issues and change the subject.

7. Treating Customers Fairly and Consumer Duty

MAXIS competes in markets all over the world. We aim to do so in accordance with the law and to use fair and ethical sales, marketing, and other practices.

To uphold this commitment, we should give customers clear, fair, and not misleading information, and operate with integrity at all times. MAXIS have a duty to act with due care, skill, and diligence to ensure that we treat all customers fairly and provide quality services. If at any time you feel like you may have acted or been pressured to act unethically or dishonestly, you must raise it with the Compliance team.

MAXIS expects our employees to:

- Act in the best interest of the customers, serve fairly and professionally by being aware and supportive of MAXIS' commitments to customers which are drawn from the Consumer Duty principle introduced by the Financial Conduct Authority (FCA) along with the Treating Customers Fairly (TCF) outcomes.
- Read and understand the Consumer Duty and TCF Policy.
- Not misrepresent or conceal facts in order to gain a competitive advantage.
- Ensure that customers are provided with the information and means to express and resolve any disputes that may arise with MAXIS.

I am working on a health and wellness solution. I do not feel comfortable with the pricing strategy. It seems that the solution will be overpriced without delivering sufficient value to the customer.

Product development should respect all applicable policies and procedures. If you feel uncomfortable despite the fact that procedures have been respected, you should consult with your line manager and raise your concerns with the team involved.

8. Senior Managers & Certification Regime Conduct Rules

Enforced by the FCA in the UK, the Senior Managers and Certification Regime (SMCR) is a regulation related to governance, and requires regulated firms such as MAXIS, to take “reasonable steps” to ensure compliance and improve culture and accountability.

The Conduct Rules are a set of principles that apply to both an organisation’s regulated and unregulated financial services activities. They aim to ensure that a minimum standard of professional behaviour is consistently followed throughout organisations. **MAXIS expects all employees to follow best practices as the Conduct Rules are designed to drive positive cultural change.**

Some Conduct Rules apply to all employees, while others apply only to our Senior Managers. In short, **there are two sets of Conduct Rules**. The first set applies to all staff (including Senior Managers). The second set only applies to Senior Managers.

Individual Conduct Rules (apply to all employees)

1. You must act with integrity.
2. You must act with due skill, care, and diligence.
3. You must be open and cooperative with the FCA, the PRA and other regulators.
4. You must pay due regard to the interests of customers and treat them fairly.
5. You must observe proper standards of market conduct.
6. You must act to deliver good outcomes for retail customers.

Senior Manager Conduct Rules

1. You must take reasonable steps to ensure that the business of the firm for which you are responsible is controlled effectively.
2. You must take reasonable steps to ensure that the business of the firm for which you are responsible complies with the relevant requirements and standards of the regulatory system.
3. You must take reasonable steps to ensure that any delegation of your responsibilities is to an appropriate person and that you oversee the discharge of the delegated responsibility effectively.
4. You must disclose appropriately any information of which the FCA would reasonably expect notice.

I am an employee of MAXIS who is employed overseas. Do the Conduct Rules apply to me?

The Conduct Rules apply to work carried out in the UK, relating to both regulated and unregulated activities. They also apply to activities carried out by an employee of the firm from outside the UK, where the employee has contact with UK clients. Conversely, an employee of that UK firm based overseas who does not deal with UK clients will not have to comply with the Conduct Rules.

9. Management of confidential information

Employees must maintain the confidentiality of sensitive non-public information held by MAXIS or shared by our customers and must not disclose that information unless authorised by MAXIS to do so.

Under certain circumstances, you may be asked to sign a confidentiality agreement such as a non-disclosure agreement (NDA) because your role or specific projects may require you to be aware of confidential information about MAXIS or other companies. You may not discuss or pass along confidential information except on a need-to-know basis and in compliance with any applicable confidentiality agreements.

MAXIS employees may not use or disclose any proprietary information or confidential information that they had access to or obtained as a result of their employment at MAXIS. This information includes, but is not limited to client information, vendor information, pricing information, competitive data, and colleague information. Employees may not, for example, forward confidential information to your personal, non-MAXIS email address, computer or other device. You must return any confidential information before your termination of employment date.

MAXIS expects our employees to:

- Not discuss confidential information loudly or openly where others might be able to hear.
- Not discuss MAXIS information with third parties without authorisation and an NDA in place.
- Not discuss MAXIS information with clients or suppliers without proper approval and knowledge of the status of the relationship as confidential or non-confidential.
- Encrypt or password protect any email messages and attachments containing material non-public information.
- Use anonymised project names or codes to disguise confidential matters.

I walked past a coworker's desk this morning. She was in a meeting in the conference room, but highly confidential information about one of her clients was open on her desk. This isn't the first time she's done that. What should I do?

You should talk to her or your manager about it. Safeguarding confidential information is everybody's responsibility.

10. Protecting personal data

MAXIS builds and maintains the trust of employees and business partners by safeguarding their personal data. Our business partners trust us with their data to help them shape decisions for the better. We are contractually obliged to protect data, and we are subject to data protection laws and regulations worldwide.

Personal data can be characterised as any data relating to an identified or identifiable individual. Personal data, in electronic or non-electronic forms, can be employee, customer, or third-party data and includes information such as names, address, date of birth, payment card number etc.

Sensitive personal data, also known as special category data, consists of information, which is private in nature and, if disclosed unnecessarily, may lead to discrimination. This includes items such as health or genetic data, racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual orientation.

MAXIS' activities involve the collection of data that enables us to provide clients with the right services to meet their needs. Data allows us to enhance our customers' experience through tailor-made protection and simplified, efficient procedures. MAXIS is committed to meeting its obligations under all applicable laws and regulations, including the General Data Protection Regulations (GDPR), UK GDPR, and the Data Protection Act 2018 (DPA 18) to protect the personal and special category data of clients, colleagues, and other persons obtained when conducting business activities.

MAXIS expects our employees to:

- Collect, process and share personal data only for specified, legitimate and required purposes and only to the extent necessary.
- Read and adhere to the Data Privacy and Cyber Security policies and procedures.
- Securely dispose of paper or electronic information, according to our Data Retention Policy / Schedule.
- Consult with the MAXIS Compliance team and the Data Compliance Manager (DCM) before personal data is transferred across international borders.
- Double check before sending external emails to ensure you have listed the correct recipients.
- Report data breaches to the MAXIS Compliance team immediately, abiding by the principles set out in the Data Breach Policy and Procedure.
- Report phishing attempts and stay vigilant when clicking links or downloading attachments.
- Secure information in physical workspaces.
- Not share your MAXIS accounts or passwords.

I am working in the Reinsurance and Reporting team. A local insurer member sends me personal data that is not necessary for producing the captive reports. Should I collect this data?

No, you should not collect unnecessary personal data. Not collecting unnecessary data and deleting obsolete data reduces both cyber risk and data leakage risk.

My laptop has been stolen. What should I do?

You must immediately inform your line manager, the IT Director, and the Chief Risk and Compliance Officer.

11. *The use of Artificial Intelligence (AI) systems in the MAXIS workplace*

Artificial Intelligence (AI) is typically referred to as any automated algorithmic techniques that can be used to autonomously carry out functions without any human input. MAXIS recognises the growing role of AI in business operations and is committed to ensuring its ethical and responsible use. The following outlines our principles and expectations regarding the use of and interaction with AI technologies.

- **Human Oversight:** AI should not replace human decision-making in any processes or procedures. Human oversight must be present in all use cases of AI.
- **Data Privacy:** When using AI systems to process the personal data of any identifiable data subjects, this must be carried out in conjunction with all applicable data protection laws and regulations, and our AI Policy. Guidance from the Compliance team must be sought if procedures lead to an AI tool processing any personal data. Employees are expected to read the AI Policy, Data Privacy Policy and the Data Subjects Rights Policy for further information.
- **Accountability and transparency:** All employees must abide by the principles and standards set out in our AI Policy to ensure that documented processes are in place to minimise risks.
- **Ethical use:** You must not use an AI tool to input offensive, discriminatory or inappropriate content as a prompt. Additionally, generative prompts must not be used to impersonate, bully, or harass another person, or to generate explicit or offensive content.

MAXIS expects our employees to:

- Seek prior approval by the Compliance and IT teams for all AI systems before subsequent installation and use.
- Use their work email address for log-in purposes when using authorised AI applications.
- Be aware of, and abide by, the guidance issued by regulators, and laws such as the UK GDPR, in respect of generative AI use.
- Read and understand our AI Policy to understand the rules regarding the adoption of AI within the workplace.

12. *Our commitments to each other*

MAXIS is committed to promoting a culture of equality and diversity, recognising that people from different experiences and backgrounds bring valuable contributions to MAXIS, regardless of age, nationality, ethnic origin, gender, sexual orientation, gender identity or expression, religion, marital status or disability. An inclusive, diverse workforce fosters innovation and establishes a sense of belonging among employees, making them feel more connected and productive.

MAXIS seeks to provide a work environment that is free from bullying and harassment in which employees at all levels avoid behaviours that may create an atmosphere of hostility or intimidation. Non-financial misconduct can take the form of unwelcome sexual advances or remarks, inappropriate comments, slurs, jokes or displaying or storing written or graphic material that exploits, ridicules, insults, or shows hostility toward a specific group or an individual.

Serious non-financial misconduct may have implications not only under MAXIS policies and procedures, but also under applicable regulatory requirements, including the FCA Conduct Rules and assessments of fitness and propriety. All employees are expected to speak up about concerns and to contribute to a culture of respect, professionalism and accountability. Our Non-Harassment and Equal Opportunities Policies illustrate how conduct involving discrimination or harassment of others will not be tolerated and all allegations involving any misconduct are taken very seriously.

MAXIS expects our employees to:

- Be sensitive about how our words and actions might be perceived by others. Give respect and courtesy to colleagues, candidates, clients, business partners and anyone else with whom MAXIS has business dealings with.
- Stand up against discrimination, bullying, or harassment of any kind.
- Never make or tolerate inappropriate sexual remarks or advances.
- When in doubt, seek advice by consulting the MAXIS HR team.
- Promote and encourage a diverse and inclusive workplace.
- Report any inappropriate behaviours, insults, or other offensive comments about characteristics protected by the law to the MAXIS HR team.

I feel very uncomfortable because the head of my department is persistently asking me out for dinner. I am afraid to tell them to stop because I think it could backfire.

Such behaviour is inappropriate; you should report the situation immediately to the HR team.

13. *Human rights and modern slavery*

MAXIS fully support fundamental principles of human rights across our supply chain and business activities, including in dealings with suppliers and clients, as set forth in the UN's Universal Declaration of Human Rights, the core standards of the International Labour Organisation and the UN's Guiding Principles on Business and Human Rights.

MAXIS is committed to treating all colleagues fairly and equally. We comply with laws regarding labour and employment practices, including employee rights, forced labour and child labour.



MAXIS have zero tolerance to slavery including forced labour and human trafficking. MAXIS is committed to preventing slavery and human trafficking from taking place within its businesses or supply chains in accordance with the Modern Slavery Act 2015.

MAXIS employees who have any doubts regarding a possible breach of this requirement or who identify any form of slavery or human trafficking in the firms' businesses or supply chain during the performance of their individual daily activities must promptly inform their line manager and the MAXIS Compliance team.

MAXIS expects our employees to:

- Conduct reasonable due diligence to ensure we partner with and use ethical suppliers and vendors.

14. *Respect for health and safety*

MAXIS strives to provide a positive, safe and healthy work environment and pays close attention to health and safety conditions of our personnel in all aspects of their work.



We strive to create working conditions that promote work-life balance and employee wellbeing. We comply with all applicable health and safety laws, policies and requirements such as:

- Keeping our working area clean, healthy and free from hazards that can lead to accidents, emergencies, health issues, or safety risks.
- Avoiding any behaviour or actions that could put you or your colleagues at risk.
- Promptly addressing and reporting any safety or health concerns, risks or hazards.
- Train, educate and inform all employees about environmental issues that may affect their work.

MAXIS expects our employees to:

- Report any health and safety concerns to the Office Manager.
- Follow the health and safety guidelines, maintain a safe working environment, and prevent workplace injuries or accidents.
- Make sure that you are familiar with the evacuation plan for your office building and floor.

I am a new employee at MAXIS and work on the 1st floor, but I am not sure what the building evacuation procedure is.

Health and safety procedures should be part of the New Starter Onboarding Process. However, you can ask at any time for information about procedures regarding such things as fire evacuation, visitor access procedures, travel procedures, emergency points of contact, etc.

Key resources and contacts

MAXIS GBN

1st Floor, The Monument Building
11 Monument Street
London EC3R 8AF

MAXIS Compliance Team

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