



Code of conduct for third parties



THE POWER OF CONNECTION

bolttech.io

Introduction

At bolttech, we are dedicated to building a world-leading, technology-driven ecosystem for insurance and protection. We hold ourselves and our partners to the highest standards of ethics, integrity, and responsibility.

This Code of Conduct for Third Parties (the “Code”) outlines the expectations we have for all our vendors, business partners, subcontractors, and other third-party providers. We expect you to conduct business with honesty, transparency, and accountability, aligning with our core values.

By adhering to these principles, we can work together to bridge the global protection gap, making financial protection more accessible to underserved populations.

Scope

This Code applies to all third parties providing goods or services to bolttech. By working with us, you agree to uphold the spirit and principles of this Code, along with any applicable contractual provisions.

Non-compliance with these standards may result in the termination of our business relationship. We encourage you to promote these values within your own supply chains to help create a sustainable and ethical ecosystem.



Chapter 1

Business integrity

Acting with honesty and integrity means we follow all applicable laws and regulations and do what is fair and right when conducting our business, without putting personal interests above the company or our customers and partners.

We have **zero tolerance for bribery or corruption**. You are required to comply with all laws, rules, and regulations related to corruption, bribery, and other unethical business practices including, without limitation any applicable laws implementing the OECD Anti-Bribery Convention and the United Nations Convention Against Corruption.

We also do not permit the making of facilitation payments, which are unofficial payments made to speed up, obtain or secure an obligation that is already owed.

Please also ensure you have controls to **identify and disclose any potential conflicts of interest**. Do not offer or accept anything that could improperly influence business decisions. Any conflicts of interest must be reported using the contact information in your agreement with bolttech.

Additionally, you must respect bolttech's **intellectual property**, ensure your products and services do not infringe on others' rights, and prevent misuse of information including insider trading by safeguarding confidential information. You must maintain accurate and transparent records of your transactions in line with applicable accounting standards.



Chapter 2

Ethical business conduct

We do not tolerate dishonest or unethical behavior. You should always consider and do what is fair and ethical in all circumstances.

You must comply with anti-money laundering and counter-terrorism financing laws to the extent that those are applicable to you directly and/or applicable to bolttech when conducting business with you and have measures in place to detect and report suspicious activities.

You are also expected to comply with applicable local and international sanctions regimes, including without limitation the Specially Designated Nationals and Blocked Persons list ("SDN List") and the Sanctions Programs ("<https://ofac.treasury.gov/sanctions-programs-and-country-information>") issued by OFAC.

Chapter 3

Data privacy, data protection & information security

Any data you access while working with bolttech must be handled in compliance with applicable data protection laws and the terms set in your agreement with bolttech.

We expect our third parties to adhere to best practices in information security. This includes protecting the confidentiality, integrity, and availability of data, implementing robust access controls, encrypting sensitive information, and promptly reporting any security incidents, as well as regular audits and continuous monitoring activities to address vulnerabilities.



Chapter 4

Transparency to end-customers

We strive to provide accessible and transparent products and services. You must ensure that any information presented to end-customers or to other third parties on our behalf, including product pricing and terms, is clear, accurate, and honest. Misleading or deceptive practices are strictly prohibited. We expect you to always **act in the best interests of the customers**.

Chapter 5

Social and environmental responsibility

You must operate in a socially responsible way, complying with applicable laws including but not limited with regards to **child labor, forced labor, human trafficking, freedom of association**, and creating a harassment-free workplace.

We do not work with parties involved in human rights abuses and expect our partners and representatives to do the same. Please ensure you provide a safe and healthy work environment, free from discrimination, harassment, and violence.

We are also committed to **minimizing our environmental impact**, and we expect you to adhere to all relevant environmental laws and reduce the environmental footprint of your operations.



Chapter 6

Diversity and inclusion

We expect you to foster a culture of respect and equality, offering **equal employment opportunities** without discrimination. This includes fair treatment in hiring, training, promotions, and other employment practices, regardless of race, gender, age, nationality, religion, disability, or any other protected status.



Chapter 7

Monitoring, compliance & reporting Concerns

boltttech reserves the right to **audit your compliance with this Code**, with reasonable notice. You are expected to fully cooperate and take corrective actions where needed. We may also request self-assessments to ensure ongoing compliance.

This Code and its provisions do not affect or reduce boltttech's rights under the respective contracts with the relevant Third Party.

The provisions of the relevant contracts with the respective Third parties prevail in case of conflict and/or ambiguity between this Code of Conduct for Third Parties and the relevant contract.

If you have any concerns related to ethics or integrity or compliance with this Code, **you can report them in good faith** to the boltttech representative reported in your contracts with boltttech or write to group-compliance@boltttech.io. Reports to our inbox will be handled confidentially, subject to applicable laws, professional standards, and the necessity of conducting thorough investigations.