

Supplier Code of Conduct

Radancy

Introduction

TMP Worldwide Advertising & Communications, LLC dba Radancy (with its affiliates, "**Radancy**") is committed to the highest standards of integrity and social responsibility and Radancy expects all suppliers providing products and/or services to Radancy ("**Suppliers**") to make a similar commitment. This Supplier Code of Conduct (the "**Code**") describes Radancy's expectations of how its Suppliers conduct business. Suppliers must agree to act in accordance with the Code and comply with applicable laws and regulations within the geographies where they operate, including being open and cooperative with the regulators enforcing such laws. In instances where expectations outlined in the Code differ from local laws, Suppliers must follow the Code within the bounds of applicable local laws. The Code reflects Radancy's values and sets forth what is expected of its Suppliers.

Supplier Code of Conduct

ETHICS AND INTEGRITY

Radancy is committed to the highest ethical standards and compliance with all applicable laws, rules and regulations. Radancy emphasizes teamwork, dignity and mutual respect. Radancy requires Suppliers to adhere to the following standards:

Bribery and anti-corruption

Suppliers must never offer or promise any direct or indirect improper advantage to a third party, including arranging or accepting any bribe or kickback. In addition, Suppliers must fully comply with requirements of all applicable bribery and anti-corruption laws (e.g., U.S. Foreign Corrupt Practices Act, UK Bribery Act).

Conflicts of interest

Personal business relationships must never influence Suppliers' business decisions. Suppliers must report any relationships that could interfere with its ability to act with total objectivity. Any potential Supplier conflict of interest must be immediately disclosed to Radancy.

Gifts and entertainment

Suppliers must not offer, solicit or accept any gift to obtain improper advantages or influence for Supplier, Radancy (such as Radancy employees and their family members and associates) or any third party. Gifts include any benefit, fees, commissions, dividends, cash, gratuity, political contributions, services or any inducements.

Non-retaliation for reports of concern

Radancy expects Suppliers to have a policy and process for reporting workplace concerns. The policy and process should be transparent and understandable and should protect reporting and participating individuals from retaliation.

DATA PRIVACY AND SECURITY

Radancy requires its Suppliers to protect the privacy of individuals and the security of confidential assets and information.

Confidential assets and information

Suppliers must protect Radancy's and its customers' confidential assets and information. Suppliers must design and maintain processes to provide appropriate protections for this information.

Personal information and privacy

Radancy requires Suppliers to protect personal information in compliance with all applicable local laws. Personal information provided by or on behalf of Radancy may only be used, accessed and disclosed as permitted by the agreements between Radancy and Supplier.

INCLUSION AND DIVERSITY

Radancy fosters an inclusive culture and believes diversity should be celebrated and discrimination of any form should not be tolerated. Suppliers must comply with all applicable laws relating to discrimination in hiring, employment practices, harassment and retaliation.

Radancy expects Suppliers to operate workplaces free of discrimination, harassment, victimization and any other abuse on any grounds, including but not limited to age, disability, ethnic or social origin or background, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political convictions, religious beliefs, union affiliation or veteran status.

EMPLOYMENT AND WORKING CONDITIONS

Radancy supports the United Nations Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Radancy strives to adhere to the principles set forth in these standards and expects its Suppliers to do the same.

Modern slavery / human trafficking

Radancy does not tolerate slavery, forced labor or human trafficking in any form. This includes any form of physical punishment, confinement or threats of violence as a method of discipline or control. Radancy requires Suppliers to fully comply with the applicable legal requirements of slavery, forced labor and human trafficking laws (e.g., UK Modern Slavery Act 2015) and expects Suppliers to enact practices to ensure compliance with such laws.

Child Labor

Radancy does not tolerate child labor in any form. Suppliers must act in compliance with all laws regulating minimum working age for each position, including any laws pertaining to the employment, apprenticeships and internships of youths and students.

Human rights

Radancy does not tolerate human rights violations in any form. Radancy expects Suppliers to treat employees with dignity and respect and to enact practices to maintain a respectful and safe workplace. Radancy expects Suppliers to not tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behavior, power abuse, bullying or harassment of any kind.

Employment laws

Suppliers must comply with all applicable local wage and labor laws. Radancy expects Suppliers to provide employees with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work. All use of temporary, dispatch and outsourced labor shall be in accordance with local law.

WELLBEING, HEALTH AND SAFETY

Radancy expects Suppliers to implement sound health and safety practices across business operations and provide employees with a safe and healthy working environment. Suppliers must comply with all applicable health and safety laws and regulations. Radancy expects Suppliers to adopt practices to minimize health and safety risks, support accident prevention and ensure a safe workspace for all

workers.

ENVIRONMENT

Radancy is committed to reducing the impact of its operations on the natural environment and working with its Suppliers to do the same. Suppliers must comply with all applicable environmental laws and regulations. Radancy expects Suppliers to be good corporate citizens and to safeguard the environment and natural resources including measuring, managing and addressing energy usage and greenhouse gas (GHG) emissions. Where applicable, Radancy expects its Suppliers to measure, manage and reduce water and waste in its operations.

Compliance with the Code

VIOLATIONS

Suppliers are required to promptly report to Radancy any legal violations or violations of the Code or any other Radancy policy.

Suppliers must promptly forward to Radancy, if permitted by law, any subpoenas, regulatory requests, media inquiries or other third-party requests concerning Radancy.

To report a Radancy supplier please email legal@radancy.com (monitored during business days and hours). Radancy will keep the reported information confidential, provided it does not hinder any investigation and is permitted to do so by law.

RADANCY'S RIGHTS

Radancy reserves the following rights to ensure and enforce Suppliers' compliance with the Code.

Supplier selection

Radancy will evaluate Suppliers' compliance with the Code during the Suppliers' evaluation and selection process or from time to time.

Supplier assessment

During the Supplier certification process, Suppliers may be required to complete a self-assessment questionnaire on compliance with the Code. Suppliers may be asked to re-affirm compliance with the Code periodically.

Violations and termination

Supplier shall ensure that its subcontractors, if any, comply with the Code and Supplier acknowledges that it is responsible for any of its subcontractors' Code violations. In the event of non-compliance or violation of the Code, Radancy may give the Supplier a reasonable opportunity to respond with proposed corrective actions, unless the violation is severe or incurable or there is a violation of applicable law. Radancy may suspend or terminate its relationship with the Supplier and/or disclose the matter to the appropriate authorities if there is a violation of applicable law.

Order of Precedence; Changes to the Code

The Code does not supersede any applicable law or any terms in an agreement between Radancy and Supplier. To the extent there is any conflict between this Code and any applicable law or provision of any agreement, the applicable law or agreement controls. Radancy reserves the right to update or change the Code requirements immediately upon notice to the Supplier.