



Flo Code of Conduct

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Flo Code of Conduct

Flo Holding Pte. Ltd.
UEN/GST Reg No
202006024R

55B Amoy Street
Singapore 069881

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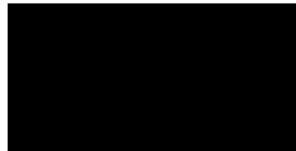
Introduction

At Flo, we want to make sustainable lifestyles accessible for everyone. We care deeply about what we can do to save the earth, and we want to maintain and build a transparent and responsible business. The Flo Code of Conduct (the "**Code**") is one of the ways we put Flo's values into practice. The Flo Code of Conduct is applicable to all employees of Flo Holding Pte Ltd and its wholly-owned subsidiaries.

Adhering to the Code is critical to maintaining trust and credibility with our customers, employees, and other stakeholders. We expect all of you to know and follow the Code. Adherence to the Code is a condition of employment.

So please do read the Code and Flo's values. It's impossible to spell out 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 you to be guided by both the letter and the spirit of this Code. And if you have a question or ever think that one of your fellow colleagues or the company as a whole may be falling short of our commitment, don't be silent. We want – and need – to hear from you.

Thank you for your support in implementing the Code.



Matthijs Guichelaar

Chief Executive Officer

Flo Holding Pte Ltd





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Your Right as an Employee

While we expect all employees of Flo Holding Pte Ltd and its wholly-owned subsidiaries to follow and adhere to the Code, we also recognise your rights as a Flo employee. For example, you have the right to speak freely or participate in discussions related to the terms of your employment (e.g. wages, hours, working conditions, etc.). Nothing in this Code or any Company Policy is intended to limit or interfere with your rights under the law.

Your Responsibility

As a Flo employee, we expect you to:

1. Understand and follow the Code, and any other policy that applies to your job.
2. Practice good judgements.
3. Ask for help. If the situation is unclear, seek guidance before taking action.
4. Speak Up.

Speak Up!

Suppose you see or hear of any possible misconduct or violations of the Code, other Flo policies, legal and regulatory requirements, or laws and regulations. In that case, you must speak up and report it.

If we have a compliance concern, please talk to your Line Manager. If you are uncomfortable doing so, you can contact:

- HR, or;
- Compliance Officer, or;
- Functional Heads, or;
- The Board of Management

using details available on Flo's internal website.

If you wish to remain anonymous, you may submit your report through the [Flo Ethics & Compliance: File a Report](#). You will be required to sign in to your Flo account to access this form, but your identity will not be captured in the submission process.

We take every report seriously and conduct a thorough investigation. You may choose to remain anonymous where permitted by law. If you provide your identity, we will share your information only with those who need to know in the investigation to ensure prompt enforcement of this Policy and determine disciplinary action.

No Retaliation

Flo does not tolerate retaliation against anyone reporting a good-faith concern or participating in a Code investigation. If you believe you are being retaliated against, please contact Flo Compliance Officer using details available on Flo's internal website.





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Behaviours

Support and Respect Each Other

Our reputation as a company that our members can trust is our most valuable asset, and it is up to all of us to make sure that we continually earn that trust. Our communications and other interactions with our users should increase their trust in us.

Flo has an unwavering commitment to prohibiting and effectively responding to harassment, discrimination, misconduct, abusive conduct, and retaliation. To that end, you are expected to do your utmost to create a supportive work environment where everyone has the opportunity to reach their fullest potential and be free from harassment, intimidation, bias, and unlawful discrimination.

Sustainability Approach

Sustainability is an integral part of our business and forms the foundation of our business strategy. Our commitment to switch as many people as we can to clean, renewable energy and make the earth a better place for generations to come goes much further. We consider our impact on people and the planet in everything we do. Therefore we continue to ask ourselves how we can make our work an even greater force for good, from our clean energy investments and energy reduction to waste management and our partnerships.

The following guiding principles further embed our commitment:

- We will always ensure 100% renewable electricity is sourced for our office.
- We find ways to consume energy more efficiently.
- We use only recycled and renewable materials (for example. use paper more efficiently and use recycled paper where possible).
- We do not source single-use plastics, and we ask and help employees avoid using them.
- We aim to reduce the amount of waste we create and recycle and reuse wherever possible.
- We source any materials and resources we need responsibly.

We are all expected to:

- Live Flo's commitment to sustainability in our daily business.
- Act as Flo sustainability ambassadors.





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Responsible Business

Safe and Healthy Workplace

We are committed to providing a healthy, safe and secure work environment. We take all reasonable and practical steps to provide a safe, secure, healthy and clean working environment.

Behaviour that poses a risk to the safety, health or security of all of us is prohibited. If you become aware of a risk to our workplace's safety, health, or security, you should report it to our Compliance Officer immediately. If it is life-threatening or an emergency, call your local police, fire, or other emergency responders first.

Please refer to our [Workplace Health and Safety Policy](#) for more details.

Drugs and Alcohol

Our position on substance abuse is simple: It is incompatible with the health and safety of our employees, and we don't permit it.

Consumption of alcohol is not banned at our offices, but use good judgment and never drink in a way that leads to impaired performance or inappropriate behaviour, endangers the safety of others, or violates the law. Illegal drugs in our offices or at sponsored events are strictly prohibited.

Suppose a manager has reasonable suspicion that an employee's use of drugs and/or alcohol may adversely affect the employee's job performance or the safety of the employee or others in the workplace. In that case, the manager may request alcohol and/or drug screening. Reasonable suspicion may be based on objective symptoms such as the employee's appearance, behaviour, or speech.

Fair Employment

Employment here is based solely on individual merit and qualifications related to professional competence.

We abide by all applicable local laws and employment regulations and ensure we adopt fair, responsible and progressive employment practices set out by these applicable laws.

We will operate in full compliance with applicable wage, work hours, overtime and benefits laws and offer employees opportunities to develop their skills and, where possible, provide advancement opportunities.

Anti-Harassment and Anti-Discrimination

Flo is committed to providing a safe workplace free of harassment or discrimination, including but not limited to race, ancestry, national origin, age, mental and physical disability, sex, gender, sexual orientation, gender identity, medical condition, and marital status. This policy applies to all interactions when you represent Flo, including interactions outside of the workplace and with external parties.

Suppose you believe you've been bullied, harassed, or discriminated against by anyone at Flo or by a Flo partner or vendor. In that case, we strongly encourage you to immediately report the incident to your manager, Human Resources or both.

Flo Human Rights Policy

To achieve our mission, respecting, upholding and protecting human rights is essential. We are committed to treating everyone fairly with dignity and respect.

We are guided by international human rights principles set out in the International Bill of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. We also conduct our business in line with the United Nations (UN) Guiding Principles on Business and Human Rights and The Ten Principles of the UN Global Compact.





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The scope of the Flo Human Rights Policy applies to all Flo employees and all business decisions that we take.

We are all expected to:

- Enable and foster human rights in the sphere of our influence.
- Speak up in case of a suspected human rights violation.
- Perform risk-based due diligence when working with business partners.

Prohibition of Child Labour and Modern Slavery

We do not tolerate child labour, forced labour, modern slavery, and human trafficking. We ensure that we are not complicit in human rights abuses in our operations and supply chains.

We are committed to complying with applicable laws and regulations, consistent with the United Nations (UN) Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, UN Convention on the Child's Rights, and the relevant standards under the International Labour Organization (ILO).

Anti Bribery and Anti Corruption

Flo does not tolerate bribery or corruption of any kind. The rule for us at Flo is simple – don't bribe anybody, anytime, for any reason.

You must follow the anti-bribery and anti-corruption policy wherever you do business and whoever you do business with. Consult with your reporting manager before making any decisions if you are unsure.

Anti Money Laundering

Money laundering is illegal and strictly prohibited by Flo. Money laundering is a process of concealing the origin of illicit funds by moving them through legitimate businesses. Below are some examples that may signal potential money laundering:

- Attempts to make large payments in cash.
- Payment to and from individuals or entities not related to the transaction.
- An unusual pattern of transactions that fall outside the normal process.

If you notice anything suspicious, speak up and report it immediately to your reporting manager or the Board of Management.

Competition and Trade Practices

Flo believes that everyone benefits from a competitive and innovative marketplace. Therefore, we follow the antitrust and fair competition laws.

We do not:

- Agree on or exchange information with competitors regarding prices, products, and services.
- Divide territories, markets, or consumers with competitors.
- Participate in unfair bidding.

Confidentiality

Certain kinds of company information, if leaked, can hurt our business, eliminate our competitive advantage and prove costly in other ways. Our responsibilities extend beyond not revealing Confidential Flo material – we must also:

- properly secure, label, and (when appropriate) dispose of Confidential material;





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- safeguard Confidential information that Flo receives from others under non-disclosure agreements;
- take steps to keep our trade secrets and other confidential intellectual property secrets.

Make sure that information classified as “Need to Know” or “Confidential” is handled according to our Data Security Policy. Be sure to protect Flo’s confidential information or any Flo subsidiary or affiliate. Don’t disclose any confidential information about any Flo company, including financial, partner, business, technical, or IP information, before obtaining appropriate sign-off from the Board of Management or Legal.

Ensure your external communications (including online and social media posts) do not disclose confidential, proprietary information or represent (or otherwise give the impression) that you are speaking on behalf of Flo unless you’re authorised to do so by the company. The same applies to communications with the press.

Just as you are careful not to disclose confidential Flo information, it’s equally important not to disclose any confidential information from our partners. Don’t accept confidential information from other companies without first having all parties sign an appropriate Non-disclosure Agreement approved by Legal.

We respect our competitors and want to compete with them fairly. But we don’t want their confidential information. The same goes for confidential information belonging to any former employers. If an opportunity arises to take advantage of a competitor’s or former employer’s confidential information, don’t do it.

Personal Data and Privacy

Always remember that we are asking users to trust us with their personal information. Preserving that trust requires that each of us respect and protect the privacy and security of that information.

Our security procedures strictly limit access to and use of users’ personal information and require that each of us take measures to protect user data from unauthorised access. Know your responsibilities under these procedures, and collect, use, and access user personal information only as authorised by our Security Policies, our Privacy Policies, and applicable data protection laws.

Our Privacy Policy outlines our standard operating procedures to safeguard personal information inline with all applicable laws.

Protect Flo’s Assets

We need to conserve company resources and protect company assets and information.

Intellectual Property

Flo’s intellectual property rights (our trademarks, logos, copyrights, trade secrets, “know-how”, and patents) are among our most valuable assets. Unauthorised use can lead to their loss or severe loss of value. You must respect all copyright and other intellectual property laws, including laws governing the fair use of copyrights, trademarks, and brands. You must never use Flo’s logos, marks, or other protected information or property for any business or commercial venture without pre-clearance from the Marketing Team.

A word about open source – Flo is committed to open-source software development. Consistent with our policy of respecting the valid intellectual property rights of others, we strictly comply with the license requirements under which open source software is distributed.

Company Equipment

Flo gives you the tools and equipment to do your jobs effectively but counts on you to be responsible and not wasteful with the Flo stuff we are given. Company funds, equipment, and other physical assets are not to be requisitioned for purely personal use.





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The Network

Our communication facilities (which include both our network and the hardware that uses it, like computers and mobile devices) are a critical aspect of our company's property, both physical and intellectual. Be sure to follow all security policies. If you have any reason to believe that our network security has been violated – for example, you lose your laptop or smartphone or think that your network password may have been compromised – please promptly report the incident to Flo Data Protection Officer using details available on Flo's internal website.

Employee Data

We collect and store personal information from employees. Access this data only in line with local law and internal policies, and be sure to handle employee data in a manner that is consistent with Data Protection Policies and other Flo policies.

Personal Integrity

Conflicts of Interest

When you are in a situation in which competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of Flo or our members, you may be faced with a conflict of interest. All of us should avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict.

When considering a course of action, ask yourself whether the action you're considering could create an incentive for you or appear to others to create an incentive for you, to benefit yourself, your friends or family, or an associated business at the expense of Flo. If the answer is "yes," the action you're considering is likely to create a conflict of interest situation, and you should avoid it.

Ensure Financial Integrity

Financial integrity and fiscal responsibility are core aspects of corporate professionalism. Each person at Flo – not just those in Finance – has a role in making sure that money is appropriately spent, our financial records are complete and accurate, and internal controls are honoured.

Spend money wisely. When you submit an expense for reimbursement or spend money on Flo's behalf, make sure that the cost is reasonable, directly related to company business, and supported by appropriate documentation. If you're uncertain about whether you should spend money or submit an expense for reimbursement, check with your manager.

Each time you enter into a business transaction on Flo's behalf, there should be documentation recording that agreement, approved by the Legal Department or Board of Management. If you are unsure whether you are authorised to enter such an agreement, ask your manager.

You are also expected to take precautions against fraudsters when making payments. The frequency and magnitude of payment fraud are increasing year on year. Attacks are also becoming more sophisticated. Refer to the Payment Fraud Prevention Guide to understand how you can apply best practices on payment fraud prevention to your work.

Gifts

Flo values our relationships with customers, suppliers, and other business partners. However, gifts should never be used as an exchange for any actions that might be viewed to influence any business decision. The rule of thumb is to give or accept gifts that are modest in value (\$100 and below) and decline extravagant gifts.

Below are some examples of acceptable gifts:

- A token item (a pen, t-shirt, or logo branded item)
- Food items within acceptable cash value, except alcoholic beverages





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- Business meals with customers, suppliers, or business partners
- Tickets for business events and conferences within acceptable cash value.

If you receive any gifts that exceed these limitations, you should inform and seek approval from the People team before accepting them. If the gifts are not approved, you must decline or return them. If it is impossible or inappropriate to refuse or return the gifts, inform and seek guidance from the People team on the appropriate next steps.

Gifts that are personal in nature are not allowed, e.g. holiday flight tickets for your family paid for by a business partner. Gifts that are cash or cash equivalents, such as gift cards and vouchers, are also not allowed. In addition, paying for a gift for business purposes without getting reimbursement from Flo does not remove the requirement to comply with the gift policy.

Social Media

Use social media wisely; remember that you represent Flo to the world. If you are engaging in an online conversation related to Flo, you have to make it clear in your posting that you are an employee of Flo, and the views are your own. Never disclose any confidential information about Flo, Flo's employees, customers, suppliers, and business partners.

Contacts

The most recent names and contact details of the Compliance Officers can be found on the Flo Wiki.

Compliance Officers

The Compliance Officer is committed to ensuring that the Code has consistently complied. The Compliance Officer also serves as a contact for employees, business partners, customers, and the general public on issues relating to implementing and complying with the Code.

You can reach the Compliance Officer using details available on Flo's internal website.

