

MIDIS Group

Partner Code of Conduct

Introduction

At MIDIS Group, we work collaboratively with our Partners to conduct business with integrity and transparency. The following guidelines set forth the framework of acceptable conduct MIDIS Group expects from its Partners.

These guidelines are based on MIDIS Group's commitment to integrity and sustainability as expressed in our internal Code of Conduct, which is mandatory for all our employees. All business transactions involving a MIDIS Group Entity must comply with this Partner Code of Conduct, all applicable laws and regulations, and relevant contractual requirements. MIDIS Group depends on its Partners to maintain a reputation as serious business professionals who act fairly, ethically, and correctly in all business activities.

Furthermore, MIDIS Group requires that Partners (1) implement effective business controls that prevent and detect unlawful conduct; (2) comply with contractual provisions requiring strict adherence to all applicable anti-corruption laws and other laws relevant to their business; (3) grant MIDIS Group audit rights to review the Partners' compliance with this Partner Code of conduct where MIDIS Group has reasonable grounds to suspect a violation of this Partner's Code of Conduct or where an actual violation has occurred; and (4) proactively report in good faith to MIDIS Group actual or potential violations of this Partner Code of Conduct of which they become aware.

Definition

The term "Partner", as used in this Partner Code of Conduct, includes all Technology, Solution, Service (Consulting, Implementation, System Integration, and Hosting), and Channel Partners (Value Added Reseller, Distributor, and other Reseller), as well as all other Partners collaborating with MIDIS Group or participating in any MIDIS Group Partner program.

The term "Partner" also includes the Partner's employees, temporary employees, and any party acting on behalf of the Partner.

I. Compliance with Laws

1- Anti-Corruption Laws

Partners must comply with all relevant anti-bribery, anti-kickback, and anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and those in effect in jurisdictions where Partner operate or purchase, market, sell, distribute, or deliver products or services procured from MIDIS Group.

Partners shall not make, authorize or offer any bribes, kickbacks, payments of money or anything of value which may be construed as a bribe or improper inducement, either directly or indirectly through a third party, to anyone, including officials, employees, or representatives of any government, public or international organization, or to any other third party in the public or private sector, in order to improperly obtain or retain business or otherwise gain an advantage. Partners must not use any third party, intermediary, consultant, agent, or other person to engage in conduct that would be prohibited if undertaken directly by the Partner.

Partners must maintain appropriate policies, procedures, or controls governing Business Amenities, including gifts, meals, entertainment, and hospitality, to ensure that such

expenditures offered to or received by Midis Group employees or third parties, including end users, are in the ordinary course of business, are given openly and transparently, and are not unlawful or contrary to ethical business principles. Partners must ensure that such policies, procedures, or controls are periodically reviewed and updated to promote ethical business practices and comply with relevant laws and regulations.

2- Anti-trust and Competition Laws

Partners must comply with all applicable anti-trust and competition laws. Generally, such laws prohibit agreements or actions that unreasonably restrain trade, are deceptive or misleading, or unreasonably reduce competition. Partners must not engage in price fixing, bid rigging, market or customer allocation, or other unlawful coordination with competitors.

Partners must not share with market participants MIDIS Group's internal matters, such as pricing and conditions of sale, costs, market information, organizational processes, or other confidential information from which other market participants could gain competitive advantage over MIDIS Group.

Partner may only use lawful means to gather information about products and plans of market participants and must not obtain, use, or disclose information that is identified or reasonably understood to be confidential.

3- Intellectual Property Laws

Partners must not infringe MIDIS Group and Suppliers' trademarks and other intellectual property rights. Intellectual property rights must be respected, and any transfer of technology and know-how must be conducted in a manner that protects such rights. MIDIS Group and Partner information must also be appropriately safeguarded.

Partners must not be engaged in the production, distribution, storage or sale of counterfeit products, including counterfeit versions of products sold or distributed by MIDIS Group.

4- Human Rights, labor laws and labor practices

Partners must respect internationally recognized human rights of individuals within its company and supply chain. This includes compliance with applicable health and safety regulations, laws protecting the rights of persons with disabilities, domestic and international labor laws, fair labor practices and human trafficking laws.

In particular, Partners must, without limitation, prohibit discrimination, the use of child labor, and forced labor.

5- Trade Compliance Laws and Regulations

Partners must comply with all applicable economic and financial sanctions, trade sanctions, and import and export control laws and regulations in the countries where it operation when selling, transferring, distributing, or otherwise providing MIDIS Group or its Suppliers' products, software, technology and services.

Partners must conduct appropriate screening of transactions to ensure customers, end users, service providers, intermediaries, and others involved in any sales of any goods or services are not designated on applicable restricted or denied party lists, including relevant European Union and the United States restricted party lists.

Partner must not sell, transfer, export, re-export, or otherwise provide products, software, technology, or services in violation of applicable restrictions relating to destination, end user, or end use, and must not participate in or facilitate any unauthorized diversion.

II. Business Conduct

1- Financial and Business records integrity

Accurate and reliable financial and business records are of critical importance in meeting MIDIS Group ' financial, legal, and business obligations. Partners must not have, make, maintain, or permit any false, misleading, incomplete, or inaccurate entries in books and records relating to transactions with or behalf of MIDIS Group.

Partners' business records must be retained in accordance with the applicable contractual requirements and all applicable laws and regulations.

Partners must maintain complete, accurate, and transparent books, records, and supporting documentation relating to transactions conducted with or on behalf of Midis Group.

2- Conflicts of interest

Any circumstance that compromises, or could reasonably appear to compromise, the Partner's objectivity constitutes a conflict of interest. Such conflicts may include personal, financial, or business relationships that interfere with the Partner's obligation to act in MIDIS Group's best interests.

When performing work related to MIDIS Group, Partners must uphold the highest standards of integrity, independence, and professional judgment. Partners must use reasonable care and diligence to avoid any situation, arrangement, or relationship that may create an actual, potential, or perceived conflict of interest, including circumstances in which personal interests, affiliations, or external commitments could influence decisions, recommendations, or actions.

Partners must promptly disclose to MIDIS Group any actual, potential, or perceived conflict of interest relating to its business relationship or transactions with MIDIS Group.

III. Safeguarding of MIDIS Group's resources

1- Confidential information

MIDIS Group's confidential information must be protected and used by the Partner only for legitimate business purposes related to its relationship with MIDIS Group. Partners must not use such information for personal or unauthorized gain or advantage and must not share it without appropriate authorization from MIDIS Group.

Partners must safeguard confidential information and must not transfer, publish, use or disclose it other than as necessary in the ordinary course of business or as directed or authorized by MIDIS Group. Partners must not reproduce copyrighted software, documentation, or other materials without appropriate permission

2- Data privacy

Partners must comply with all applicable privacy and data protection laws and regulations. Materials containing personal data, confidential information, or information otherwise protected by applicable privacy requirements must be stored securely and shared only with individuals who have a legitimate business need to know.

IV. Health and Safety

Partners must comply with all applicable occupational health and safety laws and regulations. Partners must provide a safe and healthy work environment and take appropriate measures to identify, prevent, and address potential health and safety hazards.

V. Environment

Partners must comply with all applicable environmental regulations and laws and strive to conduct its business operations in a manner that minimizes any adverse impact on the environment.

VI. Compliance Management System

Partners must maintain a compliance management system or appropriate compliance controls proportionate to the nature, size, and risk profile of its business and its relationship with MIDIS Group. The scope of such system or controls must address the requirements of this Partner Code of Conduct.

Partners must provide relevant information and evidence relating to its compliance management system or controls upon reasonable request by MIDIS Group, including where MIDIS Group has reasonable grounds to suspect violation of this Partner Code of Conduct or where an actual violation has occurred.

The compliance management system or controls must be designed to ensure: (1) compliance with applicable laws and regulations (2) appropriate documentation of the compliance with the requirements of this Partner Code of Conduct.

VII. Reporting concerns and raising questions

Partners should contact MIDIS Group if they have any questions about this Partner Code of Conduct.

Partners are also expected to report to MIDIS Group any suspected or actual violations of applicable laws or regulations or this Partner Code of Conduct which becomes aware through the [Midis Group Integrity Line](#).

Partners must not retaliate against any person who raises a concern in good faith or participates in an investigation.

Communications should be sent to the following email: compliance@midisgroup.com .