

Third Party Code of Conduct

VERSION	DATE	AUTHOR	DESCRIPTION
1	2022/05/30	Head of Legal	Document creation
2	2025/07/31	DPO & Compliance officer	Document review

CLASSIFICATION	External
ISSUER	DPO & Compliance officer
AUDIENCE	All third parties working with Malt Community and its affiliates (“Malt”) including: Malt’s corporate suppliers, Malt’s clients, and Malt’s marketplace users (thereafter “Third-Parties”)
VERSION	2
LAST UPDATE	2025/09/17
ABSTRACT	The Code outlines Malt’s guidelines, based on values, to uphold its audience to the highest level of responsibility and integrity.

Any violation of the Code of Conduct (“the Code”) is a serious offense and may be subject to termination of commercial relationships. Furthermore, the Code contains references to criminal acts such as bribery and corruption, that can result in severe fines and/or imprisonment.

We strive to make our policies understandable to all. If you require a version of this policy in a language other than English, please contact us at compliance@malt.com. We will endeavor to provide you with a translation or the necessary assistance in a reasonable timeframe. Please note that in the event of any discrepancy or conflict between the English version and any translated version, the English version shall prevail.



INTRODUCTION

Malt is a Marketplace that connects freelancers with companies, creating real opportunities for all. Our success isn't just about the product we offer; it's fundamentally about **how we work** – with each other, with our suppliers, freelancers, clients.

This Code of Conduct:

- Sets the rules about how we bring our core values to life every day. It ensures that as we innovate and move fast, we do so with integrity and a clear shared purpose.
- Commits the supplier to strictly observe and comply with all the fundamental principles expressed herein, in all its activities and sites worldwide.

Respect of this Code of Conduct by the Third-Parties will determine the onboarding and the continuing commercial relationship between the Third-Parties and Malt.

BUSINESS ETHICS

Suppliers shall conduct their business in an ethical manner, and act with integrity.

Act in compliance with laws and regulations

Malt is committed to abiding by the applicable laws and regulations that regulate private and public markets of any country where it is conducting business activities.

In all circumstances, all Malt suppliers must observe international, national and local regulations, as well as rules of professional ethics for their activities and Third Party Code of Conduct.

It is Malt supplier's duty to be knowledgeable of laws, regulations and rules applicable to their activities and, when in doubt, to consult the relevant services to obtain guidance.

Fight against corruption and influence peddling

Malt has zero tolerance regarding unethical practices including corruption, influence peddling or fraud. Third-Parties are bound to :

- Refrain from offering to Malt employees and/or Malt marketplace users any sum of money in cash, any gifts with a total value up to 70 euros; any hospitality invitations to social activities with a total value up to 150 euros.
- Undergo a risk based due diligence aiming at assessing any potential exposure to corruption and/or any other illicit/ inappropriate practices.

In order to efficiently fight against corruption and influence peddling, Malt set up a whistleblowing procedure that allows any stakeholder, internal or external, to report unethical or unlawful behaviors associated with corruption.

Prevent conflict of interest

Malt requires its Suppliers to undertake to do everything possible to prevent the occurrence of situations creating a real, apparent or potential conflict of interest in the context of their business relationship with Malt.

INFORMATION SECURITY, CONFIDENTIALITY AND PERSONAL DATA PROTECTION

Suppliers shall be committed to information security, confidentiality, and personal data protection.

By working with Malt, Third-Parties commit to protecting the confidentiality, integrity, and availability of our information assets and the privacy of personal data entrusted to us. For memory:

- Information security refers to the practice of protecting Malt information by mitigating information risks. It involves preventing unauthorized access, use, disclosure, disruption, modification, or destruction of information.
- Personal data protection refers to the legal and organizational framework designed to safeguard individuals' privacy rights regarding their personal information.
- Confidentiality entails that Malt information should not be disclosed or made available to unauthorized individuals, entities, or processes; such as Malt's employee data, clients data, freelancers data, but also Malt's strategies, financial status, or intellectual property.

Each individual is responsible for maintaining information security, confidentiality, and personal data protection.

- Third-Parties must respect the highest standards of protection for personal data in any and all processing of personal data implemented on the basis of the relationship with Malt as well as all applicable national and international laws and regulations relating to personal data protection.
- Third-Parties must implement adequate technical and organizational security measures to prevent any accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed, as well as require our authorization for the use of any subprocessor.

 Any suspected or actual information security incident, data breach, or privacy violation must be reported immediately to:

- security@malt.com
- dpo@malt.com

Prompt reporting is crucial for effective investigation and mitigation.

CORPORATE SOCIAL RESPONSIBILITY

Suppliers shall comply with human rights treaties and treat them with dignity and respect; and shall minimize adverse impacts on the environment.

Labor

Suppliers are expected to comply at least with international human rights treaties, without prejudice to more favorable national laws. In particular, the observance of ILO (International Labor Organization) fundamental conventions by suppliers is an essential requirement for Malt.

We have zero tolerance for:

- Child labor
- Forced labor
- Violence and harm (physical or psychological)
- Discrimination
- Sexual and/or moral harassment
- Unfair wages
- Disrespect of working hours

In addition, Suppliers must promote diversity, inclusion, and equal employment opportunities. Third-Parties must treat their employees equally, regardless of any characteristics other than their ability to do their jobs. Third-Parties must consider that qualifications, skill and experience are the basis for the recruitment, placement, training and advancement at all levels.

Health and safety

Suppliers shall protect workers from over exposure to chemical, biological and physical hazards, physically demanding tasks in the workplace.

Environment

Suppliers commit to managing its operations and activities in a manner that protects the natural environment, complies with environmental laws and regulations, and promotes sustainability. This includes efforts to minimize pollution, conserve resources (like energy and water), reduce waste, and mitigate any adverse environmental impacts from its business.

WHISTLEBLOWING POLICY – SPEAK UP!

Suppliers shall escalate through Malt’s helpline any potential breaches of the Supplier Code of Conduct. Suppliers are also expected to conduct any appropriate due diligence or investigation to gather and understand the relevant facts.

Third-Parties have a responsibility to report suspected violations of our Code of Conduct, company policies, or applicable laws and regulations. Timely reporting allows us to address issues promptly and effectively.

Third-Parties are a witness to a violation of this Code of Conduct or a suspected violation of this Code of Conduct, contact the compliance officer at compliance@malt.com and include within the subject line [Compliance request]. We will ensure secrecy and impartiality over the alert and all the processes associated with it.

Third-Parties can send an email with the following information:

- Your identity: First name, Last name, Job title, Company
- The identity of the person you think is the perpetrator of a breach of the law: First name, Last name, Job title, Company, if you are aware of this information.
- A description of the situation :
 - Time of incident:
 - Parties involved:
 - Description: objective facts, detailing what you witnessed

⚠ Under no circumstances would the compliance officer compromise the confidentiality of the alert, the identity, or share any confidential information to external persons.

⚠ No Legal or HR sanctions will be applied in case of non-concluding investigation. Only abusive alerts (defamation, bad faith, or misleading alerts) can be subject to sanctions.

If Third-Parties prefer to stay anonymous, Third-Parties can fill in an encrypted and confidential form to fill with our [dedicated hotline provider](#). This form will only be managed by the compliance officer. This form ensures an encrypted communication of the report and allows Third-Parties to issue an anonymous report. Third-Parties can issue an alert through this secured [link](#).