VENDOR CODE OF CONDUCT

Introduction

The Teads Holding Co. ("**Teads**") Vendor Code of Conduct ("**Code**") describes Teads and Teads' group companies (collectively, the "**Teads Group**") expectations of how its vendors conduct business. All vendors engaged in providing products and services to the Teads Group are expected to act in accordance with the Code, including aligning guidelines, policies and practices, and communicating and enforcing the Code provisions throughout their organization and across their supply chain, including to subcontractors.

Vendor Code of Conduct

Ethical Business Practices

The Teads Group is committed to conducting our business in accordance with the highest ethical standards and in compliance with all applicable laws, rules and regulations. We expect our vendors to share our principles and uphold our standards and for each to develop policies and programs as appropriate to ensure that all workers understand and adhere to these standards.

Anti-Bribery

The Teads Group does not tolerate corruption or bribery in any form and we expect our vendors to fully comply with requirements of all applicable anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. Vendors will not directly or indirectly give, offer, or accept anything of value to obtain or retain business or favored treatment, to influence actions or to obtain an improper advantage for the Teads Group itself, or any third party. This includes any benefit, fee, commission, dividend, gift, cash, gratuity, services, consideration or any inducements of any kind to any Teads Group representatives, officers, agents or employees of the Teads Group. Furthermore, vendors will ensure the same of any affiliates, retained agents, subcontractors, intermediaries or workers. This prohibition extends not only to public officials, candidates for office, and workers of state-owned enterprises, but also to workers or officers of counterparties, clients/customers, suppliers, any agent of the aforementioned parties, or any other person with whom the business does or anticipates doing business.

Teads is fully committed to the international fight against corruption and bribery as well as to compliance with applicable sanction regimes, antiboycott and trade restriction laws. Vendors must not engage in, support or tolerate any activity which infringes or circumvents applicable laws against corruption, bribery, money laundering or terror financing, applicable sanctions, antiboycott and trade restriction or which otherwise could be interpreted as an illegal activity. Additionally, Vendors must not engage with persons, countries or organizations listed on the sanctions lists issued by including but not limited to the European Union ("EU"), the United Nations ("UN"), the US Office of Foreign Assets Control ("OFAC"), the US Bureau of International Security and Non-

Proliferation (“US-ISN”), the US Department of State (“US-DOS”), the US Treasury (“US-TREAS”), and the United Kingdom’s (UK) HM Treasury in addition to all other locally-applicable and regionally-applicable lists, nor shall Vendors associate themselves with criminal activities.

Privacy and Data Protection

We expect our vendors to protect confidential information. Vendors must adopt and maintain processes to provide reasonable protections for personal, proprietary and confidential information, including information that they access, receive or process on behalf of the Teads Group. Vendors should recognize that unauthorized use or disclosure of such information may have personal, legal, reputational and financial consequences for the vendor, individuals whose personal information may be implicated, and for the Teads Group. In addition, vendors must comply with all applicable privacy / data protection and information security laws and regulations.

Grievance Mechanism

We expect our vendors to have a process through which workers can raise workplace concerns without fear of retaliation. This grievance mechanism should be transparent and understandable to workers, and should ensure the protection of whistleblowers.

Anti-tax evasion and anti-facilitation of tax evasion

The Teads Group will not tolerate unlawful tax evasion or the facilitation of unlawful tax evasion. Vendors must not directly or indirectly engage in, or facilitate the engagement by others in, the deliberate and fraudulent diversion of funds from a tax authority. We also expect vendors to ensure the same of their agents, subcontractors, intermediaries and workers by adopting, maintaining and implementing reasonable processes that prevent such conduct.

Labour and Human Rights

The Teads Group recognizes its responsibility to protect human rights. Examples of such rights are articulated in internationally recognized standards, including the Universal Declaration of Human Rights, and the International Labour Organization (ILO) Core Conventions.

The Teads Group does not tolerate slavery, forced labour, child labour or human trafficking in any form and the Teads Group will not knowingly work with vendors who engage in these practices or permit their subcontractors to engage in these practices. We expect our vendors to fully comply with requirements of applicable slavery, forced labour and human trafficking laws, including without limitation the UK Modern Slavery Act 2015. Our Modern Slavery Statement is available here.

All work must be performed under and in accordance with contracts that have been entered into voluntarily. Vendors must not use involuntary labour of any kind, including prison labour, debt bondage, or forced labour by governments. Vendors must not engage in practices associated with forced labour. These practices, identified by the International Labour Organization (ILO), include withholding of wages, retention of identity documents, and restriction of movement. Vendors should put into place measures that ensure workers are not exploited by third-party labour providers, such as recruiters or agencies. Such measures include caps on or elimination of recruitment fees; provision of contracts to all workers in their native language or other language which they are able to understand; elimination of deposits paid by workers to vendors or recruiters to secure jobs.

Additionally, vendors must not engage in or support human trafficking and are encouraged to implement due diligence measures to ensure that no human trafficking exists within their extended supply chains.

Vendor Diversity and Inclusion

The Teads Group believes that diversity is a social and economic imperative and looks to vendors to share this commitment in their operations and within their supply chain. Vendors are expected to take proactive steps to provide a full spectrum of businesses – based on the ownership structure (for example, women owned, locally owned), scale (for example, small or medium enterprise) or nature of the enterprise (for example, social enterprise) – with the opportunity to compete on a fair and equal basis for business.

Environmental Stewardship

Environmental stewardship is a key aspect of how the Teads Group operates our business. We encourage our vendors to adhere to similar environmental efforts as appropriate to their businesses and aligned with best practices locally and globally. This includes implementing processes to identify and manage risks and opportunities related to climate change and water.

We encourage our vendors to track, manage, and mitigate the environmental impact of their operations and strategies, including those of their suppliers. Where feasible, vendors should take steps to incorporate how they will mitigate the impact of climate change into their strategies and business resiliency plans, through establishing greenhouse gas (GHG) emission reduction targets, selecting low-GHG products and services, and other initiatives, where relevant.

Vendors are encouraged to take steps to conserve, reduce use of, and reuse water in their own operations. Vendors are also encouraged to manage water resources to ensure their operations do not prevent access to sufficient safe water for all users in surrounding communities, including those both up and downstream from their facilities.

Vendors are encouraged to take concrete steps to minimize or eliminate waste across their operations and those of their suppliers. Any waste, and in particular hazardous waste, must be managed in a responsible manner. Chemical and other materials posing a hazard if released to the environment should be identified and managed to ensure safe handling, movement, storage, recycling or reuse and disposal.

All materials used by vendors must comply with applicable rules, laws, and regulations regarding the prohibition or restriction of specific substances to ensure safe and responsible handling, storage, movement, reuse, recycling and disposal.

Management Systems

The Teads Group encourages our vendors to institute effective management systems that utilize the best available techniques and practices to adhere to this Code and continuously improve their performance. This should include a process for the identification and proactive mitigation of risks associated with compliance to this Code, as well as a process for ongoing monitoring and review of risk controls, and prompt and accurate reporting of all incidents.

Examples of management systems with a scope related to the content of this Code include: ISO 9001, ISO 14001, ISO 50001, SA8000, OHSAS 18001 and ISO22301.

Security

The Teads Group is committed to complying with the highest industry standards for IT and security. Vendors must acknowledge responsibility of guarding against unauthorized use or disclosure of Teads' information resources and agree to comply with industry standards and/or the security rules established by Teads.

Vendor's applications, databases, hosts, operating systems, or any other software used to facilitate the Services provided to Teads should be delivered according to best practices and current industry standards.

Vendors should provide awareness, education, and training for their employees and request contractors to do the same, with the appropriate handling of the company data and derived data.

Vendors should implement encryption standards for data transmission and storage, implement robust access controls to prevent unauthorized access to systems, and establish clear incident response procedures to address security breaches promptly.

Governance

This Code sets forth our expectations for current and future vendors. We expect all new and existing vendors to meet our minimum expectations and to aspire to make continuous improvements to their businesses as noted herein across ethical, human and labour rights, vendor diversity and inclusion and environmental areas.

Any facts or circumstances which are likely to lead to your inability to meet the requirements and expectations of this Code should be reported immediately to your Teads Group relationship manager in writing. Retaliation of any kind against an individual who reports concerns in good faith violates the Teads Group's principles and will not be tolerated.

We expect our vendors to join us in our commitment to transparency and disclosure. If requested, vendors are expected to provide details and data about their performance on the topics included in this Code to the business or to other entities.

If a vendor is found to be in violation of the requirements of this Code, we will expect that vendor to inform us immediately or as soon as is practicable and remedy any such violation in a timely and sensitive manner. Failure by a vendor to do so may lead to review or termination of our relationship.

The Teads Group is committed to continuously reviewing and updating this Code. Therefore, this Code is subject to modification from time to time. The contents of this Code are additional to and do not in any way affect or prejudice any of the Teads Group's rights and remedies under the relevant contracts with each vendor, if any.

The failure or omission by Teads to insist upon strict performance and compliance with any of the provisions of this Code at any time shall in no way constitute a waiver of its rights. In the event of any conflict or ambiguity between any provision of this Code and the provisions of any relevant contract with any vendor, the provisions of that contract will prevail.

Questions

If you have any questions in relation to this Policy or any other policy, please contact ethics@teads.com.