



November 6th, 2025

X Supplier Code of Conduct

X's ("X" or "we") Supplier Code of Conduct ("Supplier Code") applies to X suppliers and their subsidiaries, affiliates, and subcontractors ("Suppliers", each a "Supplier") providing goods or services to X, or for use in or with X products.

X exists to serve the public conversation by providing a safe place to talk. X lives by its principles of promoting healthy conversations, earning stakeholder trust, being straightforward and transparent in its business practices.

X's Suppliers are important business partners, supplying key goods or services, working together for joint growth, innovation and success. X expects all Suppliers to operate in line with the Supplier Code. We depend on Suppliers to be equally committed to conducting business with integrity and fairness. This joint commitment to integrity, transparency, accountability and ethical practice supports a trusted business relationship and fosters responsible growth.

X requires its Suppliers to be in full compliance with all applicable laws and regulations.

Compliance with Supplier Code

This Supplier Code outlines the conduct and behavior that X requires of its Suppliers worldwide. It establishes a common set of standards by which all X Suppliers must abide regarding ethics, protecting information, labor and human rights, health and safety, environmental protection and management practices. These standards apply on premises, off-site, and anywhere you are acting as a Supplier to X. Supplier shall ensure that any engaged subcontractors comply with the requirements of this Supplier Code, relevant X rules and all applicable local laws and regulations.

This Supplier Code does not cover every situation or scenario that might raise an ethical concern. It also does not address the specific detail of all potentially applicable local laws and legal requirements; but where local laws or regulations are more restrictive or create a higher standard, they take precedence. Suppliers are expected to exercise sound ethical judgment in all situations, and seek guidance where needed, including from X's respective relationship team.

Individuals working for Suppliers should read, understand and comply with the Supplier Code, uphold these standards in day to day activities, participate in any required training on the Supplier Code, and seek assistance from X if they are unsure how to resolve a concern, report any violations and cooperate in any investigation.



X expects the Supplier to have internal processes in place which support its compliance with this Supplier Code or its own equivalent codes and policies. X also expects that the Supplier has implemented a process to report and investigate any violations of its policies.

X may assess its Suppliers' compliance with the Supplier Code, and/or request the supplier to provide certification of compliance with the Supplier Code as deemed necessary.

Supplier Ethical Standards

This part of the Supplier Code sets out the ethical standards to which X will hold its Suppliers accountable.

Ethics

X expects the highest standards of ethical conduct in all of our endeavors. Supplier shall always be ethical in every aspect of its business, including relationships, practices, sourcing, and operations.

Business Integrity, Corruption, Bribery, Kickbacks and Improper Payments

Suppliers must not engage in corruption or other criminal conduct of any kind, including to obtain an unfair or improper advantage, whether on behalf of itself or X. This includes, but is not limited to, extortion, embezzlement, fraud, money laundering, tax evasion, the facilitation of grease payments or kickbacks and bribery.

Suppliers must not offer, promise, authorize or provide benefits or anything of value to induce any person, entity, or government official¹ to make a decision in the Supplier's or X's favor or to take an action in breach of their employment obligations or fiduciary duty. Equally, Suppliers must not request or agree to receive or accept a bribe.

Suppliers should abide by all applicable local / international anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act 2010, the U.K. Criminal Finances Act 2017, the U.K. Economic Crime and Corporate Transparency Act 2023 and equivalent laws in other jurisdictions in which X has operations or does business.

¹ The term "**Government Official**" is interpreted broadly and includes, regardless of rank or position any employee, director, officer, family member or even a close associate of: a) a foreign or domestic government or any department, agency, or instrumentality of a government; b) a state-owned or controlled entity, including, in many countries, telecom, health care, and educational institution employees; c) a public international organization, such as the Red Cross or World Bank; d) a foreign or domestic political party, including candidates for political office

, and members of royal families; e) as well as any person acting in an official capacity for or on behalf of such governmental bodies or public organizations, including entities hired to review and accept bids for a government agency; or f) an entity that is financed in large measure through public appropriations, is widely perceived to be performing government functions, or has its key officers and directors appointed by a government.



Gifts, Hospitality, Gratuities and Favors

X values transparency and the avoidance of conflicts of interest. While giving and receiving gifts may be intended to create marketing awareness and goodwill, they can create conflicts of interest or may appear to be intended to improperly influence the recipient.

In order to maintain the level of transparency we strive for without creating doubts about our intentions, gifts are generally discouraged (including to X employees) and should never be offered if they:

- a. are cash or a cash equivalent (including gift cards);
- b. they are of more than nominal value (e.g. over \$100); or
- c. they might create a conflict.

Meals and entertainment and other hospitality are appropriate only if there is a legitimate business purpose for the meeting, and the timing and value are not such that they would raise questions about the motivation behind it.

The offering of gifts, gratuities, hospitality or any other item of value on X's behalf is prohibited unless pre-agreed in writing with X. Without exception, Suppliers must obtain express and specific written preapproval from X for any proposed offer of items of value to government or public officials when Supplier is acting on X's behalf or otherwise providing goods or services to X.

If you are uncertain about whether the giving or receipt of gifts, hospitality or anything else of value when acting as an X Supplier is appropriate, please contact X before taking any further action.

Financial Integrity, Records and Accounting

Maintaining accurate and reliable financial and business records is of critical importance to ensuring transparency of business conduct as well as compliance with all applicable laws. X expects that all entries in Supplier's accounting books and records that relate in any way to your provision of goods and/or services to X must be true and accurate.

Whistleblower Protection and Anonymous Complaints

Suppliers shall provide an anonymous complaint mechanism for managers and workers to report workplace grievances. Suppliers shall protect whistleblower confidentiality and prohibit retaliation.

Responsible Sourcing

Where applicable, Suppliers shall have systems in place to carry out due diligence on their own supply chain, including traceability for the sources of raw materials to support legal and sustainable sourcing



Handling and Protection of Confidential and Proprietary Information

In the course of supplying goods and/or services to X, Suppliers may have access to Proprietary Information. Proprietary Information is information about X not known to the public that may have intrinsic value or that may provide X with a competitive advantage. It includes, for example, sales forecasts, business, product or marketing plans, computer programs, software and other inventions or developments (regardless of the stage of development), customer lists, prospects, financial information, business practices and intellectual property.

Throughout the supply relationship with X, Suppliers might also have access to Confidential Information. Confidential Information is information in various media forms that is not generally known by the public about X, its customers (including without limitation data that our customers upload into our service), employees or other parties with which X has a relationship. The same information can be both confidential and proprietary. Confidential Information includes, for example, financial information, restructuring or reorganization plans, personal information, legally privileged communications and materials, securities issuance, buyback or tender plans, business plans and projections, and the existence and terms of agreements with customers or counterparties.

Maintaining the confidentiality of this information is vital to X's competitive position in its industry and, ultimately, to its ability to achieve financial success and stability. Suppliers must protect any Proprietary and Confidential Information made known to it by safeguarding it, using it only for business needs and disclosing it only when authorized to do so and only to those who have a legitimate business need to know about it. Suppliers must not display, review or discuss Proprietary or Confidential Information in public places or in front of third parties. In addition, Suppliers must exercise care when sending or discussing Proprietary or Confidential Information on voicemail, electronic mail or message services.

Suppliers should be aware that the duty of confidentiality it owes X applies during and even after termination of the supply relationship with X. Suppliers may not use or disclose such information for your own benefit or for the benefit of other customers, including new or prospective customers.

X may pursue legal remedies for any unauthorized disclosures of Proprietary or Confidential Information.

Accurate Representation

All statements, in whatever form, made by Suppliers about X should be true and accurate, including with regard to the capabilities of X's services or the ability of X to provide a solution to a customer.



Disclosure of Information

Suppliers shall accurately record information regarding its business activities, labor, health and safety, and environmental practices and shall disclose such information, without falsification or misrepresentation, to all appropriate parties.

Protection of Intellectual Property

Suppliers shall respect all third party intellectual property rights and safeguard customer information. Suppliers shall manage technology and know-how in a manner that protects intellectual property rights.

Labor and Human Rights

X believes all of its employees as well as all workers throughout its supply chain deserve a fair and ethical workplace. Workers must be treated with the utmost dignity and respect, and Suppliers shall uphold the highest standards of human rights.

X's Suppliers are required to provide safe working conditions, treat workers with dignity and respect, act fairly and ethically, and use environmentally responsible practices wherever they make products or perform services for X.

Prevention of Involuntary Labor and Human Trafficking

Suppliers must act consistently with X's zero tolerance approach to all forms of modern slavery. Suppliers shall ensure that all work is voluntary. Suppliers shall not traffic persons or use any form of slave, forced, bonded, indentured, or prison labor. Involuntary labor includes any social or economic relationship marked by a loss of free will, where a person is forced or coerced into giving up the ability to sell his or her own labor power freely.

Suppliers must take reasonable steps to ensure that its operations and supply chains are free of modern slavery and shall ensure that any third-party recruitment agencies it uses are compliant with the provisions of this Supplier Code and all applicable laws and regulations.

Supplier is obliged to provide any information reasonably requested by X to verify any statements made by the Supplier in relation to modern slavery.



Health and Safety

Worker health, safety, and well-being is of paramount importance to X. Suppliers shall provide and maintain a safe work environment and integrate sound health and safety management practices into its business. Workers shall have the right to refuse unsafe work and to report unhealthy working conditions.

Environment

X is committed to protecting the environment, and environmental responsibility and sustainability is at the core of how we operate. Supplier support and collaboration is essential to help X reach our goals and integrate sustainability across our own supply chain. In order to aid in this work, Suppliers shall develop, implement, and maintain environmentally responsible business practices.

Supplier Management Commitments

X believes that sound management systems and commitments are key to enriching the social and environmental well-being of our supply chain. Suppliers shall implement or maintain, as applicable, a management system that facilitates compliance with this Supplier Code and the law, identifies and mitigates related operational risks, and facilitates continuous improvement.

Documentation and Records

Suppliers shall have processes to identify, understand, and implement applicable laws and regulations and requirements of this Supplier Code. Suppliers shall maintain documents and records to ensure regulatory compliance.

Use of Subcontractors

Where a Supplier is engaging subcontractors, the Supplier shall remain responsible for the performance of the subcontractor at all times whilst working for X.

Reporting Violations

X's efforts to ensure adherence to the requirements addressed in this Supplier Code mandate that Supplier bring to X's attention any material transaction, relationship, act, failure to act, occurrence, or practices that it believes, in good faith, is inconsistent with, in violation of, or reasonably could be expected to give rise to a violation of this Supplier Code.

Suppliers must immediately report to X in the event that Supplier becomes aware, suspects, receives notice of a complaint or concern regarding:

- a. a violation or suspected violation of the Supplier Code or applicable laws and/or



- governmental regulations;
- b. conduct which appears to be contrary to the Supplier Code; or
- c. X's financial reporting obligations or disclosures, accounting practices, internal accounting controls, or auditing,

Reports should be submitted to X at compliance@X.com or alternatively, notify X through X's Ethics Helpline at x.allvoices.co

When an alleged violation of the Supplier Code, applicable laws and/or government regulations is reported, X will take appropriate action in accordance with the compliance procedures. Suppliers are required to cooperate in X investigations of alleged misconduct or violations of the Supplier Code or of applicable laws or regulations.

Consequences of Violating the Supplier Code or Applicable Laws

X values honesty and integrity and expects all Suppliers to comply with the spirit as well as the letter of this Supplier Code.

Violation of the Supplier Code or any applicable law or regulation may jeopardize a Supplier's business relationship with X, up to and including immediate termination for cause of Supplier's relationship and agreement with X. X's Team shall be responsible for determining whether to terminate the relationship. In addition to terminating the Supplier relationship, X may bring any violations of law to the attention of appropriate law enforcement personnel.

X may also impose disciplinary action, as appropriate, upon:

- a. any supervisor who directs or approves the Supplier's improper actions, or is aware of those actions but does not act appropriately to correct or report them;
- b. other individuals who fail to report known non-compliant conduct; and
- c. employees who attempt to retaliate against a Supplier who reports an actual or potential violation of applicable laws or the Supplier Code.