

Third Party Code of Business Conduct and Ethics

1. Introduction

Revo Financial works towards achieving high standards of business conduct, working conditions and advancing social and environmental responsibility. We expect the same approach from those with whom we do business (“**Third Party**” or “**Third Parties**”). Accordingly, we expect all Third Parties to abide by the following guidance in this Third-Party Code of Business Conduct and Ethics (“**Code**”).

The Code applies globally and to anyone who does business with any Carousell Group business or subsidiary, including but not limited to Revo Financial, a Carousell Group company (“**Revo Financial**”). Third Parties should ensure their subcontractors acknowledge and implement equivalent standards of conduct. This Code spells out the minimum standards that we expect to see achieved over time. Revo Financial will monitor compliance through a systematic, risk-based approach and may take measures to ensure compliance and address suspected instances of non-compliance with this Code.

2. Relationship with applicable laws

In addition to complying with the provisions of this Code, the Third Party shall comply with all national laws and all laws applicable to the Third Party and its operations. Where the requirements of such applicable laws and the Code differ, or are in conflict, the Third Party shall comply with the highest standard consistent with applicable laws.

Third Parties are also expected to cooperate with regulatory authorities, including, but not limited to, inquiries, audits, reviews, or investigations related to the business the Third Party is conducting with Revo Financial.

3. Business Integrity

3.1. Competition

The Third Party shall always meet competitors in an honest and professional manner. The Third Party shall not cause or be part of any breach of applicable competition laws and regulations, such as illegal cooperation on pricing and illegal market sharing.

3.2. Bribery, Corruption and Fraud

- The Third Party shall comply with applicable laws and regulations concerning bribery, corruption and fraud.

- The Third Party shall not offer, give, ask for, accept or receive any form of bribe, facilitation payment or undue or improper advantage, favour or incentive to/from any public official, international organisation or any other third party (either in private or public sector), whether directly or through an intermediary.
- Third Parties are further prohibited from engaging in any other forms of bribery, corruption, extortion, or embezzlement.
- Third Parties shall maintain an effective anti-corruption programme designed to ensure compliance with applicable anti-corruption laws and regulations. The programme shall be proportionate to the risks faced by the Third Party and shall include procedures to monitor compliance and detect and address violations, including overseeing the conduct of their subcontractors.

3.3. Gifts and business courtesies

- Third Parties must not offer gifts or hospitality to Revo Financial employees that could influence decisions. Modest, infrequent gifts are acceptable, excluding cash and cash equivalent. Hospitality must have a legitimate business purpose and be reasonable. Gifts and hospitality are prohibited during contract negotiations, bidding, or awards.
- Third Parties shall not, directly or indirectly, offer or give any gifts or hospitality to any third party, including public officials, in order to obtain or retain business or a business advantage for Revo Financial.

3.4. Conflicts of Interest

- Third Parties will disclose all known family or close personal relationships with Revo Financial employees or directors who are involved in the Third Party's engagement with Revo Financial.
- Third Parties will not offer any other goods, services, business opportunities, commissions or advantageous financial arrangements that would personally benefit an Revo Financial employee.

3.5. Money Laundering

Third Parties shall be firmly opposed to all forms of money laundering and shall only conduct business with partners involved in legitimate business activities with funds derived from legitimate sources. Third Parties shall take reasonable steps to prevent and detect any illegal form of payments, and prevent its financial transactions from being used by others to launder money.

3.6. Sanctions

Third Parties shall take reasonable steps to ensure that no entity or person subject to United Nations¹ or other applicable sanctions laws and regulations is involved in or unlawfully benefits from the Third Party's operations, including its supply chain, and to prevent involvement in any transaction prohibited by applicable sanctions laws and regulations.

3.7. Fair Business, Advertising, and Competition

Third Parties shall comply with all applicable fair business, advertising, and competition laws, including fair trading and anti-trust and competition laws, and all other laws aimed at promoting free and open competition.

3.8. Personal Data Protection

- Third Parties will commit to protecting the reasonable privacy expectations or personal information of everyone they do business with, including suppliers, customers, consumers, and employees.
- The Third Party shall use due skill, care and diligence and implement adequate and documented security controls and take necessary precautions to protect any data against unauthorised or unlawful processing and against accidental loss, destruction, damage, alteration or disclosure. If the Third Party processes personal data the Third Party shall ensure the care and awareness which is required according to laws and regulations in order to safeguard the interests of the data subjects.

4. **Environmental Responsibility**

Revo Financial is committed to environmental responsibility. We seek to make a positive environmental impact through our actions, and we expect our Third Parties to share these ideas and goals. We actively seek and favour Third Parties that provide eco-efficient, sustainable products and services. We encourage our Third Parties to adopt the following strategic priorities:

- **Eco-Efficiency and Resource Reduction.** Third Parties should maximise the eco-efficiency of products and services across the life cycle, including sourcing, manufacturing, distribution, transportation, use and end-of-life. Third Parties shall minimise its environmental impact and continuously improve its environmental and climate performance and work towards, resource efficiency and sustainable waste management.

¹ For a list of persons and entities designated as subject to United Nations sanctions [see here](#).

- **Responsible Practices.** Third Parties should take a precautionary approach towards environmental and climate challenges, ensure that responsible practices for managing environmental impacts are in place, and encourage the development and diffusion of environmentally friendly technologies.
- **Reporting.** We may send periodic data requests which will support our environmental reporting needs, and we ask for all Third Parties' cooperation in our endeavor to improve our environment reporting and performance.
- Third Parties should comply with applicable laws and internationally recognised standards.
 - **Hazardous Substances.** Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.
 - **Wastewater and Solid Waste.** Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be characterised, monitored, controlled, and treated as required prior to discharge or disposal.
 - **Air Emissions.** Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled, and treated as required prior to discharge. Third Parties should manage energy consumption and utilize renewable energy sources when possible to support the reduction of greenhouse gas emissions.

5. Labour rights and working conditions

Revo Financial unequivocally provides equal employment opportunities, irrespective of gender, ethnicity, age, religion or disabilities. We maintain a strict non-discrimination policy and we will make reasonable accommodations to meet our obligations to accommodate disabilities and religious practices. We expect our Third Parties to adopt similar policies.

- **Forced Labour.** The Third Party shall not employ or use any form of forced or compulsory labour, and shall strictly prohibit any form of slavery or human trafficking.
- **Child Labour.**
 - The Third Party shall not employ or use child labour. A child means any person under 15 years of age, unless national laws and regulations stipulate a higher mandatory school leaving or minimum working age, in which case the higher age shall apply. "Child labour" means any work by a child, unless it is considered acceptable under the International Labour Organisation's Minimum Age Convention 1973 (No. 138).
 - The Third Party shall ensure that no child or any other person under the age of 18 performs any hazardous work, or work that is inconsistent with such person's personal development. In this Code 'hazardous work'

means, but is not limited to, work that exposes the child or other person under the age of 18 to physical, psychological or sexual abuse; work underground, underwater, at dangerous heights, in confined spaces; work with dangerous machinery, equipment and tools, or which involves the handling or transport of heavy loads; work in an unhealthy environment (including exposure to hazardous substances, agents or processes, temperatures, noise levels or vibrations potentially damaging to health); work under particularly difficult conditions such as work for long hours or at night or where the child or other person under the age of 18 is unreasonably confined to the premises of the Supplier.

- If the Third Party discovers a child employed, or that any child labour is used, by or on its behalf, the Third Party shall take appropriate steps to address the situation immediately and the best interests of the child shall be the primary consideration.
- **Non-Discrimination.** Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological, or verbal harassment or abuse. Third Parties will not engage in discrimination in hiring and employment practices such as promotions, rewards, and access to training.
- **Degrading treatment.** All employees shall be treated with respect and dignity. The Third Party shall not tolerate any degrading treatment towards employees, such as mental or sexual harassment, discriminatory gestures, language or physical contact that is sexual, coercive, threatening, abusive or exploitative.
- **Employment Conditions.** The Third Party shall at minimum comply with applicable laws and regulations.
- **Health and Safety.** Third Parties will provide a safe and healthy work environment to prevent accidents or injury arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities.

6. Artificial Intelligence and Automated Decision Making

Third Parties shall take reasonable steps to using and developing artificial intelligence (“AI”) in a manner that aligns with Revo Financial’s accountable AI principles, which include:

- **Reliability, Safety, and Security,** which involves rigorously testing AI technologies to prevent unauthorised access and malicious use, and employ the best practice for any confidential data that are used to train or operate AI systems and models;
- **Accountability and Lawfulness,** which involves ensuring AI systems function properly, and their design, development, testing and use all comply with regulatory frameworks;
- **Privacy by Design,** which involves ensuring AI systems are built with privacy at the forefront;

- **Transparency**, which involves providing relevant information and explanation to humans interacting with or using AI, when personal data is used.

Third Parties shall ensure they have an appropriate responsible AI governance framework in place.

7. Communication

7.1. External Communication

Third Parties will not knowingly publish false or otherwise inaccurate information either via press release, product or service advertisements, or any other means.

7.2. Reporting Ethics Issues or Other Concerns

Revo Financial employee conduct is addressed by the Revo Financial Code of Conduct, workplace policies, and employment agreements. If a Third Party believes a Revo Financial employee's conduct or actions may be improper or unethical, the Third Party is encouraged to report the concern to our Ethics office by emailing at ethicsofficesg@thecarousell.com.

7.3. Reporting Violations

- Third Parties will notify Revo Financial of any violations to this Code, any regulatory inquiries, audits reviews, or investigations related to the business the Third Party is conducting with Revo Financial.
- Such notice shall be provided as soon as reasonably possible upon Third Party's knowledge of such incident.
- Incidents should be reported to ethicsoffice@thecarousell.com.

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