



DE WELL – CODE OF CONDUCT

This Code of Conduct (“Code”) sets forth the principles and standards of ethical business conduct expected of all directors, officers, employees, contractors, and representatives of De Well (the “Company”). This Code is published as an appendix to the Company’s website and applies globally across all operations.

1. PURPOSE AND SCOPE

De Well is committed to conducting its business with integrity, transparency, and accountability.

2. COMPLIANCE WITH LAWS AND REGULATIONS

All personnel must comply with applicable laws and regulations.

3. ANTI-BRIBERY AND ANTI-CORRUPTION

Zero tolerance for bribery or corruption.

4. CONFLICTS OF INTEREST

Avoid and disclose conflicts of interest.

5. FAIR COMPETITION

Commitment to fair competition and antitrust compliance.

6. CONFIDENTIALITY AND DATA PROTECTION

Protect confidential and personal data.

Approved by Management – Version 3.0 – December 2025



7. RESPECTFUL WORKPLACE

No discrimination or harassment.

8. HEALTH, SAFETY, AND ENVIRONMENT

Commitment to safety and sustainability.

9. FINANCIAL INTEGRITY

Accurate and lawful financial reporting.

10. REPORTING MISCONDUCT

Encouragement of reporting without retaliation.

11. ENFORCEMENT

Violations may lead to disciplinary action.