

Group Code of Conduct Policy

Scope and responsibility

Marlowe Plc ('Marlowe') and its businesses are committed to conducting business with the highest standards of honesty, integrity, and transparency, in compliance with all relevant laws and regulations. All employees of the Group (whether full-time, temporary, casual, part-time or on fixed term contracts) and third parties including suppliers should be made aware of and act in accordance with this Code at all times.

This Code of Conduct has been approved by the Board of Directors of Marlowe PLC, and will be reviewed annually to ensure its effectiveness.

Introduction

Marlowe is firmly committed to conducting its business to the highest ethical standards. We have a responsibility to our employees and all our stakeholders to act with high standards of integrity and fair dealing. Accordingly this Code of Conduct serves as a framework to ensure we are always focused on maintaining the Group's high ethical and professional standards.

All employees and other stakeholders are expected to read and understand this Code, and embody its principles in their professional work for the Group. Employees should ensure that they undertake all relevant training as required to ensure their understanding and compliance. In addition, everyone working for the Group should ensure that they comply with the Group wide policies that supplement this Code, namely:

- 1) Marlowe Anti-Bribery and Corruption policy;
- 2) Marlowe Diversity and Inclusion policy;
- 3) Marlowe Supply Chain policy
- 4) Marlowe Environmental policy; and
- 5) Marlowe Modern Slavery Statement.

Marlowe will never penalise any employee for complying with the Code, even if any loss of business were to result from their compliance. Likewise, Marlowe commits to protect employees who report suspected infringements of this Code from retaliation, and will fully investigate any credible allegations.

Our Employees

Human Rights

Marlowe is committed to respecting human rights, in accordance with internationally recognised

principles including the United Nations' Universal Declaration of Human Rights and the International Labour Organisation's conventions on core labour standards. Accordingly, it commits to ensure the right to freedom of association and collective bargaining, the elimination of discrimination in employment and occupation, the abolition of forced and child labour, and the promotion of labour rights including the right to fair compensation and working hours.

Modern Slavery

Marlowe is committed to ensuring that slavery and human trafficking does not take place either in its business operations or supply chain, and to continually improving its practices for identifying and mitigating any related risks.

The Group implements various measures to identify, assess and mitigate potential abuses, including mandatory training for all employees, raising of awareness through employee handbooks and business-specific policies. Such policies are reviewed locally by each individual business to ensure they are at minimum in compliance with local labour laws and regulations.

Diversity and Inclusion

Marlowe recognises the benefits of increased diversity, and seeks to ensure that all employees are given equal opportunities for training, career development and promotion. Candidates for job vacancies are evaluated solely on their competency for the role, irrespective of any protected characteristic such as age, race, ethnicity, sexual orientation, gender, religion, disability, family responsibilities, or political opinion. All forms of unlawful discrimination are strictly prohibited, and any report made in good faith will be taken seriously in accordance with the Group's whistle-blower policy.

Health and Safety

Marlowe complies with all applicable health and safety regulations, and commits to provide a safe and healthy working environment. Accordingly, it requires all employees to comply with health and safety policies, procedures and instructions relevant to their work, and report all incidents, accidents or near misses. Managers should ensure that they understand and comply with local health and safety legislation.

All employees are prohibited from using or possessing alcohol, illegal drugs or other intoxicants, at any location where the employee undertakes work for the Group, and when commuting or travelling for work.

Business Integrity

Bribery and Corruption

Marlowe respects the laws and regulations of the UK and requires that its employees do the same. It has zero tolerance for any corrupt activities, including but not limited to bribery, conflicts of interest, fraud, gifts and hospitality, extortion, embezzlement, or kickbacks.

Accordingly, no Marlowe employee or other party may offer, promise or receive a bribe or any improper advantage, benefit or reward. Employees are required to comply with the principles in the Marlowe Anti-Bribery and Corruption policy, which details the Group's ethical standards and requirements.

Gifts and Hospitality

Marlowe recognises that the occasional exchange of business courtesies, such as reasonable and appropriate entertainment, hospitality and modest gifts, may be a legitimate means for developing good business relationships and promoting the Group's interests.

However, excessive gifts may improperly influence employees' objective business judgement. Employees should ensure that the receipt of gifts does not in any way impair their objectivity when working on behalf of Marlowe, nor offer gifts in order to inappropriately influence business partners or clients.

Our Anti-Bribery and Corruption Policy sets out the Group's standards and requirements in relation to gifts and hospitality.

Conflicts of Interest

Conflicts of interest, or the perception of a conflict of interest, can harm the reputation of the Group and its businesses, and may negatively impact the credibility of our business decisions. Conflicts of interest may arise when an employee's private interests come to interfere with their objective professional judgement.

Marlowe is committed to minimising conflicts of interest, and employees should avoid personal activities and interests which could conflict with their professional responsibilities at Marlowe. Employees should take care to declare any potential conflicts to the appropriate authority, and formally seek approval before undertaking work with another company.

Money Laundering

Marlowe is committed to preventing money laundering and complying with all applicable anti-money laundering laws and regulations wherever we do business. Marlowe and its employees may inadvertently commit offences by dealing in the proceeds of any person's crime, even if there is no intention to 'launder' such proceeds.

We take seriously the responsibility of ensuring our business units are not used for the purposes of money laundering and are committed to best practice in this area. Employees responsible for procurement must ensure that appropriate screening is undertaken to ensure the legitimacy of all third parties.

Competition and Anti-Trust

Antitrust laws are designed to prevent anti-competitive business practices and ensure fair competition. Accordingly, Marlowe does not and will never engage in anti-competitive activities, and rigorously complies with all relevant competition law. Employees should ensure that they avoid any form of anti-competitive activities with any of the Group's actual or potential competitors.

The exchange of commercially sensitive information with competitors is illegal. Employees who

represent the Group at events such as trade association meetings should be especially cautious that their interactions do not inadvertently breach the Group's ethical standards.

Attitude to Taxation

Marlowe is committed to paying all taxes that are required by all the jurisdictions in which it operates, and engages with all applicable tax authorities in an open and cooperative manner. The Group does not engage in aggressive tax planning, avoidance or evasion. All Marlowe businesses have adopted a policy in respect of the prevention of the facilitation of tax evasion, with guidance on undertaking risk assessments and training to employees in relevant roles.

The Group does not reside in countries considered as partially compliant or non-compliant according to the OECD tax transparency report, or in any countries blacklisted or grey listed by the EU, for the purposes of tax avoidance and harmful tax practices, per the latest lists released as at 18 February 2025.

Data Privacy

Marlowe is committed to handling all personal information with integrity, and in line with applicable data protection laws. The Group have a separate privacy statement that describes how we responsibly collect and use personal data pertaining to our customers, shareholders, employees and other relevant stakeholders.

All employees are responsible for protecting company property from loss by carelessness, misuse or waste. Employees should ensure that they take proper precautions to safeguard personal information, and immediately report any potential data breach or loss of company data. Personal and confidential information should only be used for its legitimate business purpose, and never be shared with external parties except with formal authorisation and when in the Group's legitimate business interests.

Responsible procurement

Marlowe expects its suppliers to conduct their business activities in alignment with the Group's ethical standards that are described in the Code, and in accordance with all relevant procurement policies that our businesses have implemented locally. The Group will only enter a relationship with Third Parties that comply with their legal requirements and that share Marlowe's ethical standards.

Community

Charitable Donations

Marlowe aims to act as a good corporate citizen wherever it operates, and supports local, regional, and national communities in appropriate ways. However, employees should not make donations on behalf of the Group without first seeking the written approval of the Marlowe executive committee. No donations shall be made with the expectation that the recipient purchase any Marlowe product or service.

Environmental

Marlowe recognises its social responsibility to protect the environment, and seeks to reduce the impact of our operations and products in compliance with applicable environmental legislation. The Group recognises that rising carbon emissions are driving climate change, and the urgent need for meaningful action. Accordingly we are committed to driving efficiencies within our operations and to reducing the consumption of resources, including energy, waste and water, and to reducing emissions from our operations.

Individual employees should ensure that where possible they act with due consideration of the environment, and seek to minimise their impact in accordance with the Group-wide Environmental Policy.

Political Donations

Marlowe does not make any political contributions or donations. While the Group encourages employees to participate in the political process if they choose, Marlowe is politically impartial and prohibits individuals from using any company resources, time, or branding for political purposes.

Speaking up

If an employee has any concerns or wishes to make a complaint or report a violation of this Policy or any Group or local policies, then they should report the matter as soon as possible in accordance with the Whistleblowing Policy.

Marlowe strongly supports a culture of speaking up and is committed to non-retaliation against those who make a report concerning actual or suspected breaches of this policy.

The policy has been approved by the board of directors of Marlowe PLC on 20th March 2025.