

CORPORATE & SOCIAL RESPONSIBILITY

netMEDIA's commitment to ethical conduct and strong corporate governance has helped us build a robust company with a recognized corporate social responsibility (CSR) program. Our leadership team believes in the importance of all facets of CSR.

Governance and Ethics

Governance & Ethics

We draw on the experience and expertise of employees around the company in developing our framework for ethical and responsible business conduct.

Our CSR programs guide the ethical, social, and environmental efforts of individual business units, while helping netMEDIA maintain a strong reputation and supporting a successful business strategy.

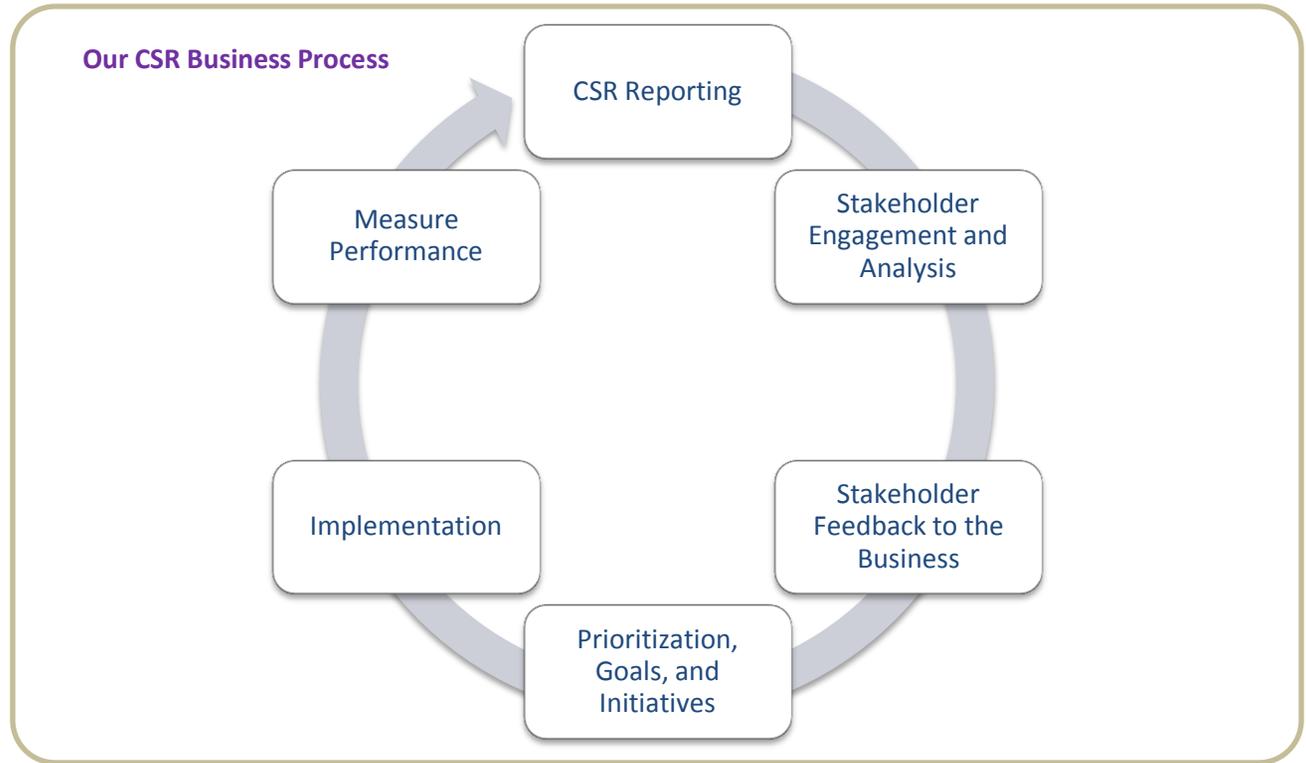
Ethical behavior makes our company more resilient. The overriding objective of our Code of Business Conduct and governance is that all netMEDIA employees live up to our high ethical standards in all their business activities.

We believe in the power of collaboration. We collaborate on management decisions across the company. netMEDIA’s corporate governance policies are designed to foster ethical conduct and help us comply with regulatory requirements and applicable laws for publicly listed companies.

netMEDIA values the input of external stakeholders in the development of our CSR strategy and initiatives, as well as the ongoing improvement of our CSR reporting. It helps us align our business more closely to society’s needs and helps us prioritize issues, while gaining valuable insight into external perspectives and building ongoing relationships with key influencers.

Ethics

Ethical business conduct is crucial to helping us attract and retain customers, business partners, and talented employees. The world is changing, and new products and services carry new ethical challenges. When we conduct business ethically, we reduce the likelihood



of civil and criminal penalties, as well as human rights breaches.

The overriding objective of our Code of Business Conduct and governance is that all netMEDIA employees live up to our high ethical standards in all their business activities.

The netMEDIA Code of Business Conduct defines our expectations for our employees’ ethical behavior. All employees must follow this Code, which provides information about our policies and procedures, guidelines for decision-making and real-life examples of potential work-related ethical dilemmas.

The Code requires:

- Honest and ethical conduct
- Full, accurate, and timely disclosures to government agencies and in other public communications where appropriate
- Protection of confidential and proprietary information belonging to netMEDIA, our customers, and our suppliers
- Compliance with applicable government laws, rules, and regulations
- Prompt reporting of violations

The netMEDIA Supplier Ethics Policy sets similar expectations for our business partners. Both require compliance with all applicable regional and national

laws and regulations. netMEDIA also raises awareness about business ethics among employees, business partners, and suppliers. It also offers ethics training for employees, helping them recognize ethics-related situations.

We encourage employees and other stakeholders to report concerns to us about suspected unethical behavior promptly. We make it a priority to investigate all concerns raised and take appropriate disciplinary action when warranted. Violations may result in disciplinary action, including termination of employment in certain cases.

Business partners include systems integrators, sales agents, and consultants who support sales. Whether they operate under a direct contract or an indirect agreement, we expect all partners to meet our high ethical standards.

Before inviting a potential partner company to enter into a direct contract with netMEDIA, we evaluate its credentials and reputation through a vetting process that includes corporate and executive background checks as well as a review of its current and previous business dealings.

Privacy

The growing popularity of cloud (Internet-based) computing is changing the way organizations and individuals share data. It is crucial to our business that we maintain the trust of our customers, partners, and employees as we build our offerings in this area.

People are understandably concerned about how their personal information is used and shared, and they want to feel confident that data communicated or stored online is secure. netMEDIA works regularly to enhance robust processes and systems that protect

customer and employee data and to raise awareness about the importance of data protection and privacy.

We implement best practices to keep our networks, systems, and information protected. Yearly, we analyze security trends, changing threats, and innovative ways to transform IT and business models for greater security, using the results to identify early warnings. For example, social media has rapidly become a key communication vehicle for businesses. But its use comes with threats such as malicious code, malicious advertising, regulatory and legal actions, and social engineering. For netMEDIA employees, we have developed a social media policy that establishes guidelines and answers frequently asked questions regarding what is expected of netMEDIA employees in terms of online conduct.

We have created guidelines for our engineers and product managers to make sure they understand the privacy and data protection needs of new applications. This helps the development team design features and functionality that make it easier for netMEDIA, customers, and users to comply with legal and business requirements to protect personal information. We value the insights and collaboration of peers in our work to protect customer security, and we share our experience with them as well.

Human Rights

netMEDIA regularly evaluate and address human rights issues within our business operations and in the communities in which we operate. We invest significant effort reviewing our activities and policies on an ongoing basis with the aim that they promote, and are consistent with, our initiatives regarding the improvement of human rights around the world. We engage with a number of stakeholders, including non-

governmental organizations and industry peers, on human rights issues.

For our employees, netMEDIA's Code of Conduct outlines the ethical principles that guide our day-to-day activities. Our employee policies and guidelines incorporate relevant laws and ethical principles, including those pertaining to freedom of association, non-discrimination, privacy, compulsory and child labor, immigration, and wages and hours.

netMEDIA aims to help build the capabilities of suppliers to deliver strong performance on all CSR issues, including human rights. We audit suppliers with the aim of uncovering any supplier human rights violations, and we likewise work with suppliers to improve their performance in various other CSR areas. netMEDIA is committed to partnering with suppliers that share the same values about human rights and expects suppliers to address any issues identified as a top priority.

netMEDIA's established CSR governance approach reflects our company culture, business strategy, and structures. We will continue to review and refine this approach to learn from and incorporate examples of best practices from other companies and organizations.

Our strong culture of ethics and the Code of Business Conduct that have helped netMEDIA to earn its reputation as a trusted company and valuable partner will continue to support responsible and sustainable business practices as we face new challenges. We will continue to use insights from customers and suppliers as well as other stakeholders to review and strengthen our governance practices to meet these challenges.