



# CODE OF CONDUCT

Software- und Organisations-Service GmbH  
10629 Berlin, Giesebrechtstr. 15, Germany

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## PRINCIPLES

This *Code of Conduct* describes the SOS GmbH business ethic in respect to responsible and lawful behavior toward employees, customers and third party business relations.

### 1. GENERAL REQUIREMENTS

- **Compliance with the Law**

We comply with applicable laws and regulations. The violation of laws, regulations and company policies can have severe consequences, such as criminal convictions, fines and damage to the reputation of the company. All SOS GmbH managers have to be familiar with the basic laws, regulations and the company's policies, due to their appointed positions, they have the responsibility to ensure compliance.

- **Freedom to speak without fear of retaliation**

We support the freedom of speech and ensure that employees can do so without the fear of retaliation. If issues about misconduct in the company are raised by employees in good-faith, it is not permitted to intimidate or retaliate against these persons. We believe in a work environment where employees can approach their managers openly if concerns have surfaced or if they want to voice their criticism in regard to some business issues or other conduct within the company. SOS GmbH encourages an open dialogue with their employees to address their concerns in a fair and impartial manner.

- **Trust and Respect**

We believe in a workplace that supports a mutually respectful and trusting manner that does not permit discrimination. Fair, dignified and respectful treatment in the workplace is important to us, each individual is entitled to this and beyond this we encourage to value and recognize each person's uniqueness'. We do not tolerate discrimination against employees because of race, ethnic origin, gender, sexual orientation or any other characteristic specified under applicable laws. Harassment or intimidation is prohibited.

- **Conflict of Interest**

We disclose potential or actual conflicts of interest at the earliest possible stage. If in the daily business a situation arises, that constitutes a conflict between the interest of the company and personal interests we instruct our employees to disclose such a conflict to the manager as to find a prompt solution that overcomes an possible conflict.

- **Protection and Use of Company Assets**

We deal with company property and resources responsibly. Company assets are used for their intended purpose and not for personal, illegal or any unauthorized purposes. The responsible use and handling of tangible or intangible assets includes products, work materials, IT equipment as well as intellectual property. Any form of fraud is prohibited, affected are company assets, but also third party-assets.

## 2. INTERACTIONS WITH BUSINESS PARTNERS AND THIRD PARTIES

- **Interactions with business partners**

We believe on acting with integrity when dealing with our business partners. Our business partners expect that they can rely on SOS GmbH as a partner that conforms to the law, and fulfill our contractual obligations with our business partners. We expect from our business partners to conduct their business with the same integrity and to obey the law.

Laws applicable to the regulation of trade, technology services, handling of specific products as well as payments have to be observed. Adequate procedures are used to ensure that transactions are not violating the laws and regulations for trade, or regulations for the prevention of terrorism financing.

- **Governmental relations**

We maintain proper and legally irreproachable relations with government regulators and agencies. We conduct ourselves in an honest and transparent way when dealing with government, regulatory agencies and officials representing the aforementioned.

- **Anti-corruption and anti-bribery**

We condemn all forms of corruption and bribery. At SOS GmbH we do not tolerate offering or accepting a bribe, including improper payments to or from any person e.g. office holders, clients, businesses partners or suppliers. Accepting improper payments or even accepting a promise for improper payments is prohibited.

Promotional or similar expenditures are excepted provided they are reasonable bona fide hospitality that are intended to maintain cordial relations and are directly related to a legitimate part of doing business. These advantages are only given or accepted if a legitimate business purpose is pursued and if the value of such expenditures does not exceed the limits of comparable / customary business practice. Any offers that could be construed as bribery in disguise, e.g. sponsorship or a charitable contribution are not acceptable.

- **Fair competition**

We promote fair competition and we comply with applicable laws. These laws apply to a wide range of activities and arrangements among competitors, both implied or express. These laws include the prohibition of fixing prices, allocating markets, using unfair methods of competition and similar.

- **Product safety**

We develop safe products and services for our customers. SOS GmbH is seeking long term business relationships with their customers and we are therefore committed to only deliver products and services that are safe and high-quality and make every attempt to deliver products and services free of defects or unsafe features that could lead to any damage of property.

### 3. HANDLING OF INFORMATION

- **Intellectual property protection**

We acknowledge intellectual property as an important asset and pledge to protect and respect all forms of protected content. This includes our brands, as well as the brands of our clients. We will safeguard the intellectual property of SOS GmbH and of our clients that is protected under relevant laws, including – but not limited to trademarks, service marks, patents, copyrights and trade secrets. Software used in connection with SOS GmbH's business must be properly licensed and is used only in accordance with the terms of the respective license.

- **Data privacy and protection**

We handle personal information responsibly. All collected, retained, used and transmitted personal data and information is handled in accordance with applicable law and policy. This is true for personal data of SOS GmbH employees, for customers and third parties. The personal data collected is solely used for its intended business purpose for which the data was obtained.

- **Financial integrity**

We conduct our business with integrity and transparency. Recordkeeping and financial reporting must be in accordance with the legal requirements, it must be accurate, complete and it has to reflect the conditions, operations and financial results of the business to which it relates. Financial accounts, documents, contracts or any other company information for that matter may not knowingly include incorrect or misleading entries. Any manipulation of documents is prohibited.

- **Statements regarding products and services**

We present our products and services with honesty, this means that we make truthful statements and do not knowingly misrepresent, promote or advertise our products and services. It violates our principles to use misleading or false information as this can harm our customers and therefore also our reputation.

- **Information technology use and security**

We are committed to the proper protection of the workplace information technology against internal and external threats. For the daily business we accept that appropriate security practices are used to ensure the safety of any sensitive data processed. We accept the obligation to take measures to protect our IT systems against misuse and we commit ourselves to prevent our IT Systems being used for improper or illegal activities.

- **Confidentiality**

We protect confidential information from unauthorized disclosure and use. Confidential information may include but is not limited to trade secrets, business plans, financial data, price and customer details, agreements with customers or suppliers. SOS GmbH does not disclose confidential information outside of the company, except on a need-to-know basis in order to perform the duties for which SOS GmbH has been commissioned or if any given information is publicly available. SOS GmbH signs Non Disclosure Agreements with customers and interested parties to confirm this commitment.

## 4. PEOPLE AND ENVIRONMENT

- **Human Rights, Fair Working Conditions, Health and Environment**

We believe that the respect for human rights and the protection of health and environment in the workplace is part of our corporate responsibility and an integral part of doing business. We respect the dignity and individual rights of employees and third parties with whom we are in a business relationship. We observe the right to freedom of associations and the right to collective bargaining in accordance with applicable laws and regulations. We condemn any form of exploitation or discrimination.

We uphold environmentally responsible procurement and use of natural resources in the production and distribution of our products and the performance of our services. For our employees we provide a healthy and safe workplace and we ensure that we comply with all legal requirements for the protection of fair working conditions, including working hours, privacy and compensation.