



CODE OF CONDUCT

OUR JOINT JOURNEY



DEAR COLLEAGUES

The Swiss IT Security Group (the 'SITS Group'), headquartered in Wettingen (Switzerland), including its subsidiaries, is a leading service company in Europe that focuses on IT security.

The reputation of any company is only as good as its employees' conduct. How we interact with one another and the values that are important to us shape the SITS Group's public image and have a decisive influence on our corporate success. This requires that 'certain something extra' from us all, namely the ethical and legally compliant behaviour of directors, managers, employees and business partners. Our corporate success is never more important than ethics and integrity.

This Code of Conduct forms the orientation framework for the corporate culture of the SITS Group. It clearly sets out what the SITS Group – as an employer – expects from us and is intended to be used as practical guidance. That is why it's so

important that we identify with this guidance and in this way constantly reinforce our corporate culture. Please contact your immediate line manager if anything is unclear. By keeping our common values in mind, we are aware of what we expect from each other, what kind of behaviour we encourage and what we will not tolerate under any circumstances.

Managers play a particularly important role here – they live and breathe the values and principles set out in this Code of Conduct and ensure that they are adhered to.

Wettingen, Switzerland, July 2022

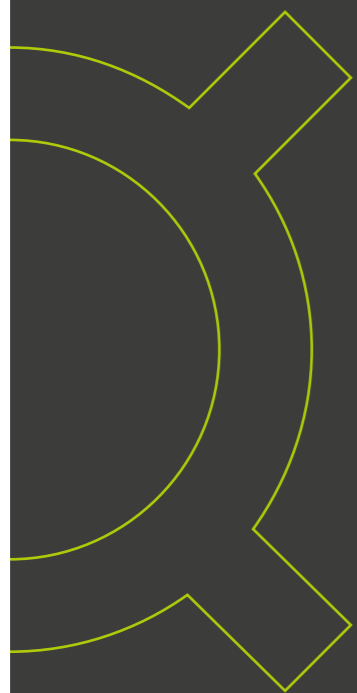
Jürgen Röttler
Chair of the Board of Directors

Christian Oversohl
CEO



CONTENTS

#01 – MISSION STATEMENT	06
#02 – SCOPE	08
#03 – DATA PROTECTION AND INFORMATION SECURITY	09
#04 – COMPLIANCE WITH LAW AND REGULATIONS	10
#05 – FIGHTING BRIBERY AND CORRUPTION	11
#06 – FAIR AND FREE COMPETITION	12
#07 – PREVENTION OF MONEY LAUNDERING	13
#08 – ENVIRONMENT	14
#09 – HUMAN RIGHTS	15
#10 – INTEGRITY	16
#11 – COMPANY ASSETS	18
#12 – CONFLICTS OF INTEREST	18
#13 – DIVERSITY, FAIRNESS AND COLLABORATION	20
#14 – SOCIAL MEDIA	22
#15 – COMPLIANCE WITH THE CODE OF CONDUCT & VIOLATIONS	23





#01

MISSION STATEMENT

OUR VISION

Our vision is a world in which all data is adequately protected. We manage this by using our expertise and passion to design customised solutions.

OUR MISSION

We are a group of companies that offers customised services motivated by our diversity, implemented with passion and consolidated by our expertise. We find the best solution and are always one step ahead.

OUR VALUES

- 01** We take responsibility. For our customers, partners, colleagues, employees and our environment.
- 02** We trust others. We return the trust placed in us by our customers, employees and partners.
- 03** We are reliable. We keep our word. When we take on a task, we successfully see it through to the end.
- 04** We are passionate about our work. For us, it's not just a job – it's our calling. We want to make the world a more secure place and are committed to achieving this with all our strength and passion.
- 05** We love security. The security of our customers and their data defines what we do. We find the best security solutions for our customers.



#02

SCOPE



This Code of Conduct is binding and must be adhered to by all executives, members, (external) consultants, interns, permanent and temporary employees, contractual partners, suppliers and other persons who provide services for the SITS Group, who are employed by the SITS Group, who advise, supply or otherwise work with the SITS Group and its various subsidiaries, including the

Executive Management and members of the Board of Directors and the Advisory Committee (collectively referred to as the 'representatives'), without any geographical restrictions.

This Code of Conduct should be read in conjunction with specific local rules and guidelines.



#03

DATA PROTECTION AND INFORMATION SECURITY

Confidential and personal information that we come into contact with when carrying out our business activities must always be protected conscientiously.

Confidential information and trade secrets are not made accessible to unauthorised individuals, either internally or externally, and this kind of information is not used for personal gain.

The SITS Group takes a variety of technical and organisational measures to ensure a high level of data protection.

We treat our customers', business partners' and employees' personal data in particular confidence. We consistently observe the principles of data protection by ensuring with reasonable assurance that all personal data is processed lawfully, fairly and transparently and is not stored for longer than required.

More detailed information on data protection regulations can be found in the Security Policy for the SITS Group.



#04

COMPLIANCE WITH LAWS AND REGULATIONS

When carrying out business activities, we align ourselves with and respect the rights and laws in the countries in which we operate.

We observe internal guidelines and standards that we have committed to voluntarily.

We run our business based on honesty, integrity and the quality of our services. We observe the fiscal legislation in the

countries in which we do business. When meeting fiscal obligations, we always act to the best of our knowledge and belief.

The SITS Group respects international law and always adheres to any applicable UN, EU, US and other European sanctions.

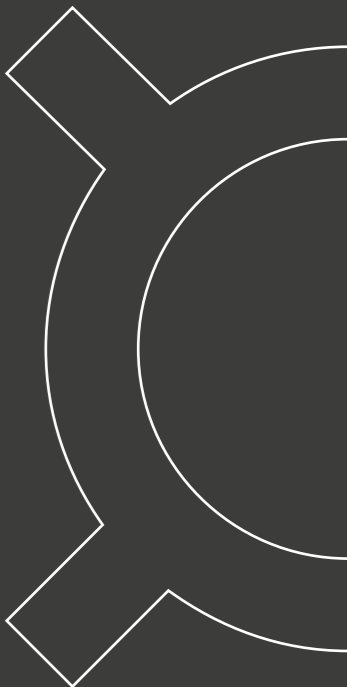


#05

FIGHTING BRIBERY AND CORRUPTION

The SITS Group and its representatives comply with all applicable anti-corruption laws, including the US Foreign Corrupt Practices Act and all applicable local laws where the SITS Group and its subsidiaries operate.

Business partners are not permitted to offer, promise, give (including bribery payments), demand or accept any bribes or other undue advantages, including excessive gifts and hospitality, in order to win, keep or award contracts.



#06

FAIR AND FREE COMPETITION

The SITS Group and its representatives comply with all applicable competition and antitrust laws.

Any measures that aim to restrict competition in a way that is not permitted and/or that breach legal provisions

must be avoided: agreements between businesses, decisions made by business associations and concerted practices that aim to prevent, restrict or distort competition are prohibited.



#07

PREVENTION OF MONEY LAUNDERING

The SITS Group fully meets its obligations to prevent money laundering.

Money laundering is often complicated and difficult to detect. All representatives must avoid and be very aware of unusual financial transactions.

This applies to cash transactions and indirect transactions processed through third parties which could give rise to suspicion of money laundering.

Any suspicious cases must be reported to your superior and / or SITS Group management.



#08

ENVIRONMENT

The SITS Group works in a way that respects the environment and adheres to all applicable environmental laws, regulations and standards.

The operation, procurement, manufacture and sale of products and the provision of services must be premised on protecting and preserving the environment to the greatest extent possible.



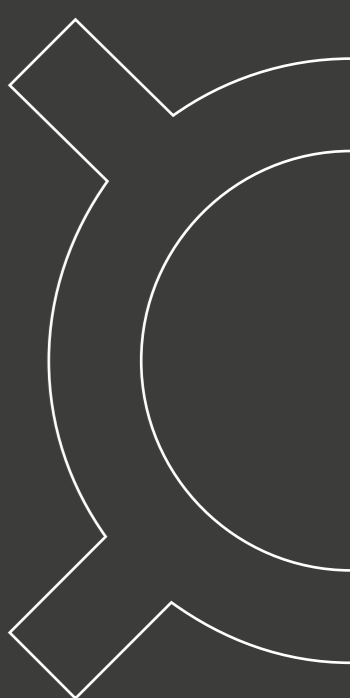
#09

HUMAN RIGHTS

The SITS Group supports and respects the protection of international human rights as set out in the United Nation's Universal Declaration of Human Rights and in the fundamental conventions of the International Labour Organization.

The SITS Group expressly rejects child and forced labour, work facilitated by human trafficking and illegal work.

It is important to us to offer fair working conditions, and health and safety at work are our top priority.



#10

INTEGRITY

We see integrity and honesty as a core element of our business activities, and this mindset influences how we behave towards our shareholders, employees and business partners.

When carrying out business activities, we always pay attention to adherence to the law and ethics, whether as individuals or as representatives of the company.

The SITS Group is committed to complying with the principles of proper accounting and reporting.

We ensure that all financial information is free from false or misleading information/statements. This is supported by our internal control systems.



#11

COMPANY ASSETS

Our company's assets form the foundation of our business activities. It is therefore essential to handle these assets in a responsible and resource-conserving manner and to protect them from damage and loss.

Handling the company's assets is only permitted while legitimately carrying out business activities. Protecting the company's intellectual property is also an important part of what we do, and it is a requirement for all employees.

#12

CONFLICTS OF INTEREST

Our business activities are based on objectivity, not personal interests. We therefore always strive to avoid any conflicts between personal interests and the company's interests.

Should conflicts of interest arise, they should be disclosed internally to your immediate line manager without delay.

If a conflict of interest cannot be avoided in individual cases, adequate measures will be taken to ensure that the conflict is not detrimental to the company. In particular, personal or financial interests in suppliers, competitors or other third parties that could impact the objectivity of our work should be disclosed in this context.



#13

DIVERSITY, FAIRNESS AND COLLABORATION



The diversity of our workforce can be seen at all levels of the organisation and in all divisions.

At the SITS Group, we want to achieve cultural and gender balance at all levels of the company; managers with different backgrounds are trained at all levels of our company.

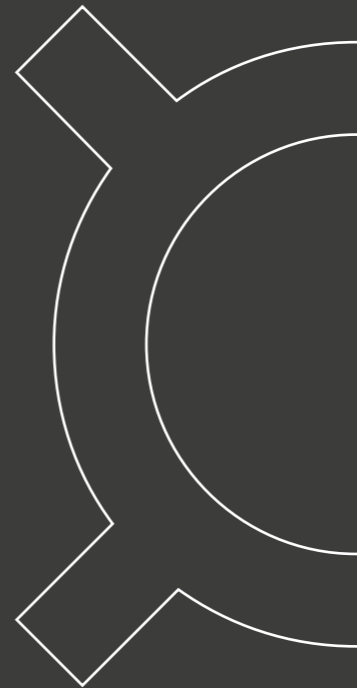
The SITS Group values contributions from people who have different skills and is committed to their inclusion in our workforce and their right to be treated fairly.

Discrimination or harassment on the grounds of ethnic origin, gender, religion, beliefs, age, sexual identity, disability or other personal characteristics

will not be tolerated under any circumstances. The principles of equal rights and equal opportunities must be applied.

We believe that all partners, employees and members of the Board of Directors and the Advisory Committee make up a team that jointly contributes to achieving set goals, thereby contributing to the Group's success.

Our cooperation is based on fairness, respect, trust and mutual support. We encourage initiative and creativity, where implementation is based on working together as a team. Common interests must always take precedence over personal self-interest.



#14

SOCIAL MEDIA

Social media enables open exchange among the public and it has a strong presence in today's society.

Any publication by employees on social networks (such as LinkedIn, Twitter, Facebook, etc.) contributes to the external image of the SITS Group and can have far-reaching consequences.

Employees are therefore required to take the impact of this into consideration and if they have an individual opinion, to make it clear that their personal opinion is being represented and not that of the company.



#15

COMPLIANCE WITH THE CODE OF CONDUCT & VIOLATIONS

Violations of this Code of Conduct may have serious consequences not only for the individuals concerned but also for the SITS Group.

Wilful misconduct will therefore not be tolerated and will be punished accordingly. Any violations or suspected violations must be immediately reported to your immediate line manager so that appropriate action can be taken.

If there are grounds to assume that the line manager themselves is involved in or is aware of breaches or incompatible actions, employees may contact the Executive Management team or the Board of Directors. Such reports will always be treated confidentially.

Violations of this Code of Conduct may, depending on the locally applicable legal regulations, lead to disciplinary action. Furthermore, corruption-related offences and anti-competitive agreements may also be prosecuted by the state.

This Code of Conduct cannot cover all topics and questions relating to compliance. Employees are therefore requested to contact their line managers at any time with questions, comments or uncertainties.



