
SOS International

Company Code of Conduct



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TABLE OF CONTENTS

1	Purpose.....	3
2	SCOPE.....	3
3	NON-COMPLIANCE	3
4	CORPORATE SOCIAL RESPONSIBILITY (CSR).....	3
4.1	HUMAN RIGHTS INCLUDING LABOUR RIGHTS	4
4.2	zero tolerance against harassment	4
4.3	ENVIRONMENT.....	4
4.4	ANTI-CORRUPTION.....	5
4.4.1	Donations and sponsorships.....	5
5	BUSINESS ETHICS.....	5
5.1	CORRECT INFORMATION, ACCOUNTING AND REPORTING	5
5.2	FAIR COMPETITION	6
5.3	CONFLICTS OF INTEREST	6
5.4	USE OF SUBSTANCES	6
5.5	COMMUNICATION	6
5.6	CONFIDENTIALITY	7
6	INFORMATION SECURITY	7
7	CONTACT INFORMATION.....	7



1 PURPOSE

To achieve our vision –

We want to be perceived as the most trusted assistance partner

– we must be committed to the highest ethical standards of business conduct.

Our Code of Conduct (the "Code") describes the compliance and ethical principles that guide our company, our employees and the interactions we have with our stakeholders. Our Code ensures that our values are reflected in our daily work and that we enhance the transparency of our activities for all stakeholder groups. Our Code reflects the business conduct that our customers will expect in the market that we operate in. It directs business practices as outlined by our corporate compliance programme and highlights potential areas of risk and conflict, prescribing guidelines of conduct for these areas.

In addition to this Code, SOS International will comply with applicable legislation and conventions.

2 SCOPE

The Code governs the business conduct of SOS International and all people employed in SOS International and its daughter companies (SOS International), as well as the Directors Board (hereinafter all referred to as "employees"). When SOS International engages with outside business partners such as vendors or other service providers, they must adhere to this Code or a supplier code of conduct based on the principles of this Code.

All employees are expected to adhere to and act according to the principles enclosed in this Code.

3 NON-COMPLIANCE

Non-compliance with this Code, company policies, laws, conventions and regulations and/or contractual obligations may not only have potential legal and regulatory consequences but may also compromise SOS International's reputation. Unethical or illegal acts can never be justified. Violation of the Code may result in disciplinary actions and further employment law consequences, e.g. in the form of warning, employment termination or summary dismissal.

Compliance concerns and suspected violation of our Code can be reported to GroupGRC@sos.eu.

4 CORPORATE SOCIAL RESPONSIBILITY (CSR)

As signatory and supporter of the UN Global Compact our Code includes principles regarding respect for the environment, anti-corruption and universally recognised principles on human rights, including labour rights.



4.1 HUMAN RIGHTS INCLUDING LABOUR RIGHTS

SOS International is committed to respect human rights as recognised by the applicable legislation, conventions and labour standards. Employees shall abstain from any involvement in breaching human rights and if relevant promote human rights when working in countries where respecting human rights is not self-evident. The following standards demand respect for all individuals and consideration of the interests of all of those affected by and involved in our business.

In all of our operations we:

- Condemn the use of forced labour and exploitative child labour
- Comply with applicable legislation, conventions, agreements and generally used industry standards on compensation and working hours
- Respect employees' lawful freedom of association and the right to collective bargaining
- Provide equal opportunity for all employees and we do not discriminate at any level of the organisation on the basis of race, skin colour, gender, age, religion, beliefs, national, ethnic and/or social origin, disability, sexual orientation, political views or any other legally protected characteristic
- Pay workers a fair wage and uphold work hours and paid holiday leave according to national legislation and industry standards generally used
- Provide a safe and healthy work environment. All employees shall have actual influence in matters concerning Environment, Health and Safety (EHS) and we encourage our employees to actively contribute to the development of the EHS culture in SOS International

4.2 ZERO TOLERANCE AGAINST HARASSMENT

A safe work environment is a human right, and SOS International has a zero tolerance towards any acts of bullying, violence, threats, corporal punishment, coercion, harassment or sexual harassment from internal as well as external parties. The latter includes sexual harassment in any form: physical, verbal or non-verbal. This zero-tolerance policy applies within SOS International premises or outside, including but not limited to business trips and social events.

4.3 ENVIRONMENT

SOS International is committed to enhancing sustainable development and our employees are expected to support and act according to our environmental strategy.

In all our operations, we strive to improve SOS International's carbon footprint by, e.g.:

- Buying eco-friendly equipment and products
- Reducing waste and the use of water
- Limiting travel for the purpose of meetings and prioritising usage of video conferences
- Promoting to our business partners, where relevant, the importance of considering the environment



- Considering the environmental impacts of our services and where relevant communicating them to our customers and business partners

4.4 ANTI-CORRUPTION

SOS International will not tolerate any form of, and will not engage in any form of, corruption or bribery for the purpose of influencing decision making in violation of law.

We expect the employees to:

- Comply with applicable legislation and conventions relating to anti-corruption as well as internationally recognised anti-corruption principles and standards
- Refrain from engaging in any form of bribery, corruption or extortion, including offering, promising or accepting bribery or facilitation payment with a view for fulfilling activities connected to SOS International's business – neither directly nor through a third party
- Refrain from offering, promising or receiving any gifts, donations or sponsorships in order to make the recipient buy SOS International's product or services
- To ensure that courtesies offered or provided by SOS International employees, such as gifts or entertainment, are properly reflected on our books and records
- As part of their work observe neutrality with regard to political parties and candidates for public office. Neither the names nor the assets of SOS International shall be used to promote the interests of political parties or candidates
- Know the identity of our customers as well as collaborators and abstain from deliberate or inadvertent involvement in money laundering which may be a reason for serious penalties for everyone involved. All financial transactions and payments must be authorised and recorded

4.4.1 Donations and sponsorships

We do not make any direct or indirect donations to political organisations, parties or individual politicians. We may occasionally grant donations and sponsorships to support a good cause and promote the knowledge of SOS International. Sponsoring and donations must not be used to circumvent the rules of this Code. All sponsorships are granted in a transparent manner and in accordance with our sponsorship policy.

5 BUSINESS ETHICS

Conducting fair business practices and maintaining respectful customer relations is an essential part of the way we do business. We do not tolerate any dishonest behaviour and seek to always act with dignity and integrity.

5.1 CORRECT INFORMATION, ACCOUNTING AND REPORTING

We make decisions based on information recorded at every level of SOS International. We must record all information honestly and accurately. This includes, but is not limited to,



expenses, revenues, case data and any other corporate information. All financial transactions and payments must be authorized and recorded.

SOS International business information will be communicated accurately and fully, both internally and externally. All accounting information must be correct, registered and reproduced in accordance with applicable legislation and conventions. Strict compliance with corporate accounting methods is required, as is cooperation with internal and external auditors.

Any intentional act that results in a material misstatement in financial statements will be treated as fraud.

5.2 FAIR COMPETITION

SOS International believes that customers and society as a whole benefit from fair, free and open markets. In accordance with our competition law policy, we do not make agreements with competitors to fix prices or otherwise restrain free trade.

5.3 CONFLICTS OF INTEREST

We have a responsibility to make decisions strictly on the basis of SOS International's best interests, without regard to personal concerns that could impair, or be perceived to impair, our business judgment.

The key to addressing conflicts of interest is full disclosure of information in a potential case. Often, just disclosing the potential conflict to SOS International is the only action required. In order to avoid any conflicts of interest all employees shall adhere to our conflicts of interest policy.

5.4 USE OF SUBSTANCES

Use of illegal drugs, alcohol abuse and the misuse of legal drugs create serious health and safety risks in the workplace. The possession, sale or use of illegal drugs or being under the influence of such drugs, on company time or property, or at company-sponsored events, is prohibited. Similarly, impairment from alcohol when conducting company business is also prohibited. It is important that cases regarding drug and alcohol abuse be brought to management's attention immediately.

5.5 COMMUNICATION

SOS International is committed to providing accurate and trustworthy information to the media and the public. To ensure consistent communication and compliance with SOS International's policies, employees are prohibited from making statements to the media regarding or on behalf of SOS International unless in accordance with SOS International's communication policy or approval has been granted by the manager of the communications department. If employees are contacted by the media they should kindly forward the request to the manager of the communications department.



5.6 CONFIDENTIALITY

Information is an important company asset which must be carefully protected. Handling information including the company, customers and personal data about end-users is part of our core business and all employees are obliged to keep confidential information secret.

- All employees are required to accept obligations of strict confidentiality during and after their employment with SOS International. This also includes substitutes, consultants, service personnel and visitors
- We take all reasonable precautions to ensure that we do not disclose confidential information, including confidential information belonging to our customers, to any third party without a valid business purpose and a legal basis
- Employees shall protect SOS International's intellectual property rights including trade secrets. Employees shall not unlawfully use or acquire trade secrets and other confidential and proprietary information of other companies

6 INFORMATION SECURITY

Information technology (IT) has become a strategic and competitive factor at SOS International while involving a large number of risks at the same time. This primarily includes impairment of data processing as a result of malicious programs (viruses), loss of data due to program errors or data disclosure and misuse (e.g. due to hackers). In order to ensure information security and proper safeguarding of personal data all employees shall adhere to our personal data policy and IT policies.

7 CONTACT INFORMATION

In terms of questions regarding this Code please contact:

GroupGRC@sos.eu

SOS International

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