

### signageOS

# **Code of Conduct**

version 2.0

**signageOS s.r.o.**, ID No.: 02772132, with its registered office at Jeseniova 2769/208, ZiZkov, 130 00 Prague 3, Czech Republic, Europen Union ("**signageOS**"), presents this Code of Conduct (the "**Code of Conduct**"), which represents our inherent values and respect to our employees, users, customers, affiliates as well as our business partners. If you are reading this document, please be assured that we respect all the values listed below and that we maintain the highest possible standard of ethical business conduct.

## 1. Our Core Values

- 1.1. We are an equal opportunity employer.
- 1.2. We are strictly against any physical, verbal, visual or any other form of bullying or harassment.
- 1.3. We are committed to safe and healthy work environment.
- 1.4. We are strictly against any form of substance abuse at the workplace.
- 1.5. We vigorously protect our intellectual property and respect intellectual property of third parties.

### 2. Who Is Bound by the Code of Conduct?

- 2.1. Anyone who represents or works for signageOS is obliged to comply with the Code of Conduct, learn its details and be committed to its compliance. The Code of Conduct must be respected in particular by our interns, employees, members of management, subsidiaries or any other signageOS affiliates.
- 2.2. Anyone who represents or works on behalf of signageOS with any third-party, must ensure that such party shall comply with our Code of Conduct. Failure to do so may result in termination of the relationship with signageOS.
- 2.3. Anyone who represents or works for signageOS shall be held liable for any non-compliance with the Code of Conduct. Such non-compliance may result in termination of the relationship with signageOS.

# 3. Legislation and Accountancy

- 3.1. We ensure our compliance with law on daily basis so that we do not negatively impact us, our affiliates or any other third party. We cooperate on this topic with legal and business experts and counsels in order mitigate any possible risks and maintain strong market position and business connections.
- 3.2. We take pride in timely, consistent and accurate accounting and financial reporting that faithfully reflects our business activities, and we comply with all policies, guidelines and applicable laws related to the preservation of all financial documents.
- 3.3. We never participate in inappropriate transactions and we execute documents that are complete and accurate and protect our financial assets.



3.4. We avoid any business conduct that would reduce signageOS value in the long-term.

## 4. Employment Practices

- 4.1. We consider human rights to be of the highest value and we respect and comply with them in any business, transaction or relationship we take part in.
- 4.2. We comply with all laws and applicable legislation and take positive action where required by law.
- 4.3. Our employment practices are based solely upon qualifications directly linked to person's professional competence.
- 4.4. Everyone should treat his/her co-workers with trust and respect at all times.
- 4.5. Any discrimination or harassment based on sex, gender, age, marital status, race, color, physical disability or medical condition is strictly prohibited and we shall take swift action should any of the above-mentioned arise. Any violation of our non-discrimination and non-harassment policy may result in termination of the relationship with signageOS.
- 4.6. We recognize hard work of our employees and provide them with competitive salary and work hours, in compliance with applicable laws.
- 4.7. We respect employee's right to associate freely and bargain collectively.
- 4.8. We respect employee's right to privacy to the maximum extent and we shall never disclose any personal information provided to us in respect to employment to any third party without a legal cause.
- 4.9. Any form of child or forced labor is not tolerated. Any violation may result in termination of the relationship with signageOS.

#### 5. Workplace and Environment

- 5.1. We ensure safety of our workplace and follow safety requirements imposed by law, decrees and guidelines in order to achieve the highest possible health and safety standard. We implement advanced procedures to ensure injury-free and safe workplace.
- 5.2. Everyone should take personal responsibility for the protection of health and safety of himself/herself and his/her co-workers. Safe workplace and protection of environment is responsibility of all of us.
- 5.3. We are strictly against any substance abuse which would endanger life and property of the personnel in signageOS premises and would lead to unwanted misconduct and violence.
- 5.4. Any possession, use, sell, or transfer of illegal drugs, or unauthorized alcohol on signageOS premises shall not be tolerated.
- 5.5. We shall take any steps necessary to investigate possible violations of substance abuse on signageOS premises.
- 5.6. Any violation of substance abuse policy may result in termination of the relationship with signageOS.
- 5.7. We evaluate all possible risks that may arise in connection with development of new product or service.
- 5.8. We operate with respect to the environment and green policies. We use procedures and practices in order to maintain the highest standard of environmental protection.



#### 6. Relationships with Suppliers

- 6.1. We expect our suppliers to adhere to the same level of standard as we do pursuant to this Code of Conduct.
- 6.2. Any relationship with our suppliers is always based on legal compliance and fair practices.
- 6.3. We do business with suppliers that comply with all applicable legislation relating to the employment, environment, health and safety as well as human rights.

## 7. Privacy and Security

- 7.1. We ensure compliance with applicable data protection and security legislation and regularly monitor possible cyber security threats, risks and vulnerabilities in order to mitigate them.
- 7.2. Our internal processes limit any access to and use of personal information. We aim to protect our devices, systems and networks and any other information or data in our possession.
- 7.3. We classify, label and store all information and documents in accordance with our security standards limiting their unauthorized use and access, in particular we (i) use strong passwords, (ii) evaluate online risks, (iii) secure physical copies, (iv) implement safe and verified cloud storage solutions, and (v) do not disclose our know-how or trade secrets.

### 8. Intellectual Property

- 8.1. We vigorously enforce and protect our intellectual property rights against any third-party that would use them without our approval or mutual agreement. At the same time, we respect intellectual property rights of third parties and wish to avoid any conflicts related to them.
- 8.2. Our intellectual property must be used for our sole benefit and not for any personal gain.
- 8.3. It is prohibited to disclose any information related to our intellectual property to any third party without prior internal approval.
- 8.4. Should any intern, employee, member of management, subsidiary or any other signageOS affiliate have question regarding the handling a protection of our intellectual property, it should consult the responsible person.

# 9. Conflict of Interest, Insider Trading and Competition

- 9.1. We protect our interests and any our intern, employee, member of management, subsidiary or any other signageOS affiliate has an obligation to ensure that nothing on its part interferes with any our interest and shall avoid disclosing any nonpublic information regarding signageOS, its products, services and intellectual property.
- 9.2. Any our intern, employee, member of management, subsidiary or any other signageOS affiliate has an obligation to disclose if any of its activities, its personal or financial status potentially interfere with our interests.
- 9.3. Any our intern, employee, member of management, subsidiary or any other signageOS affiliate has an obligation and is prohibited from acquiring gifts other than those of nominal value from our customers, suppliers and competitors and accepting any personal discounts or benefits that are intended only for his/her person and are not available to the general public or other signageOS personnel. Such gifts, personal discounts or benefits are



inappropriate and should be politely returned to the donor with a note that such conduct would be in violation of the Code of Conduct.

- 9.4. All our interns, employees, members of management, subsidiaries or any other signageOS affiliates have an obligation to avoid performing any activity as an expert or consultant on business matters within the scope of its relationship with signageOS and are prohibited to discuss any business matters with family and friends.
- 9.5. We comply with competition & antitrust laws and all obligations arising from them, in particular we shall never enter into agreements that could create the appearance of improper agreements or enter into agreements with our market competitor that would impact pricing, bidding, wages, customer or any other allocation of the market.
- 9.6. We shall not disclose any information regarding, in particular distribution methods, costs, profits or margins, production, sales capacity or volume, terms or conditions of sale, customers, sales territories, bids or prices with any our market competitor.

#### **10.** Anti-Money Laundering and Bribery

- 10.1. We ensure compliance with applicable anti-money laundering, corruption and terrorist financing laws and enter into business relations only with such customers and suppliers that are involved in legitimate business activities and respect fair market practices.
- 10.2. We perform due diligence processes on our customers and suppliers and perform activities to detect, investigate and report suspicious activities in order to mitigate any risks that may arise.
- 10.3. We distance ourselves from any form of bribery in all our business conduct. We ensure strong processes aimed at preventing and detecting bribery and never offer, promise or authorize a payment in order to obtain an improper business advantage. Such conduct is in violation of the Code of Conduct and may result in termination of the relationship with signageOS.
- 10.4. We perform due diligence procedures to carefully select our personnel. We are careful with any request to make a payment to any person or entity which is not related to the transaction or business being discussed and we are careful about exceedingly high commission rates and treat such attempts with caution.

This signageOS Code of Conduct version 2.0 enters into force and become effective as of 1<sup>st</sup> July 2020.