



CONNECTING SOFTWARE

Global Code of Conduct



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Dear Team, Customers and Partners, since more than 20 years we are a growing company and we had to write down what was a part of our corporate culture since the beginning. Now we have the second Code of conduct based mainly through our fast-growing global activities.

We want to be seen as a good partner and that is why we want to do always the first step to start real relation with all of our interacting humans, being within or outside our core companies. Please treat others as you want to be treated.



GUIDING PRINCIPLES

- **Compete Fairly**
- Follow the Code
- **Act with Integrity**
- **Respect our Partners**
- **Indorse Human Rights**
- Be Honorable in your Actions
- Obey the Law and Regulations
- Promote Safety in the Workplace
- Respect and be an Example to Others



Connecting Software offers a unique and powerful software integration platform Connect Bridge, as well as SaaS and on-premises products. We provide integration, synchronization and productivity solutions to a global customer base across sectors. We are an international team representing more than ten nationalities at offices in four countries.



Vision

Our international team is dedicated to meet norms, standards, and state of the art technologies.

We are a "Port of Trust" for our partners, customers, producers we are on the journey to become a global known player.

Mission

Leading in Security and Trust

Our mission is to ensure secure, trustworthy communication for every business and public entity.

As a recognized global provider, we commit to the highest standards of security and trust, making technology safe for all.



Speak up

To improve the work relations within Connecting Software, the management encourages all team members to bring forward all concerns, ideas and suggestions regarding work, work conditions and circumstances influencing work. Partners and Customers are also invited in helping us comply with these rules.

If you see something you are troubled about, speak up. This may include circumstances where other team members are acting improperly or not acting accordingly with the code. These matters will be confidentially discussed so that the necessary adjustments or improvements can be implemented. Individuals who report a suspicious circumstance should not be afraid of retaliation. In Connecting Software, we do not tolerate retaliation against the one who speak up in good faith, with the aim or improving the workplace.

Furthermore, be aware that if the management does not know about certain troubles, there is no chance to solve them.

Who should follow these policies

These rules should be followed by all team members, meaning all individuals who work for Connecting Software

INFORMATION AND PROPERTY

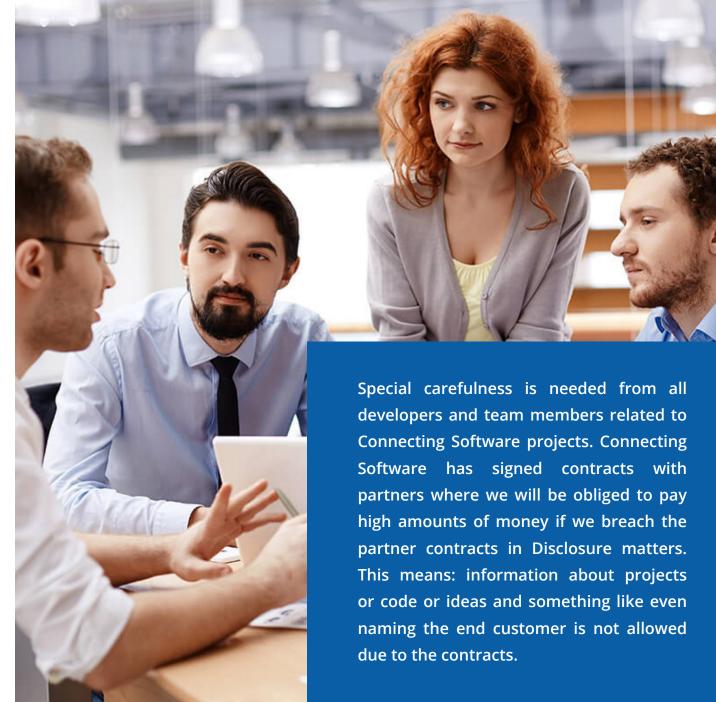


Non-disclosure and Confidentiality

The protection of confidential business information, product and trade secrets is vital to the interests and success of Connecting Software.

Such confidential information includes, but is not limited to, the following examples:

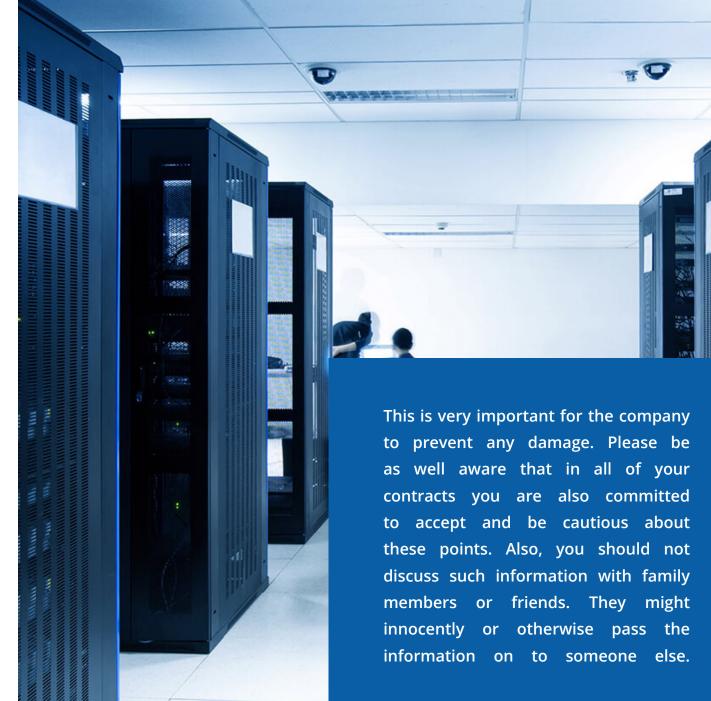
- Financial information
- Personnel/ Payroll records
- Remuneration details
- Marketing strategies
- Pending projects and proposals
- Sensible information on running projects
- Software in object or source code form





What do you have to consider and think about:

- Do not name projects or customers in your CV's and on Linked In, Facebook or Xing or other social medias
- Do not take code from customers to your home or upload it anywhere into the internet
- Do not gather information about our Competitors, Partners, Customers and Vendors by using deception, stealing or other illegal and unprincipled means, and with the aim of using that information against them
- Be sure that all your protective data is only stored on encrypted Disks, Storage etc., delete always after, for example, using a Memory Stick to transfer data on the stick
- If you have a SSD drive private or from the company - and Encryption is not installed, contact the IT Administration. It is not allowed to store data from Partners or Source Codes in non-encrypted SSD's (private or owed be the company)



WORK ENVIRONMENT IN CONNECTING SOFTWARE

Health, Safety and Labour Conditions

Connecting Software strives to maintain a healthy, safe and productive work environment which is free from discrimination and harassment, whether based on race, colour, religion, gender, gender identity or expression, sexual orientation, national origin, genetics, disability, age, or any other factors that are unrelated to our business interests. Connecting Software will not tolerate sexual advances, actions or comments, racial or religious slurs or jokes, or any other comments or conduct that create or encourages an offensive or intimidating work environment.

Other prohibited conduct, because of its adverse impact on the work environment, includes:

- Threats or violent behaviour;
- Possession of weapons of any type Use of recording devices, including cell phone cameras and web cameras, except as authorized by management
- Use, distribution, sale or possession of illegal drugs or any other controlled substance, except for approved medical purposes
- Being under the influence of illegal drugs, controlled substances used for non-medical purposes, or alcoholic beverages in the workplace
- Consumption of alcoholic beverages on Connecting Software premises is only allowed, with prior management approval

Non-discrimination

Decisions regarding employment at Connecting Software are based on qualifications, abilities and performance.

In order to provide equal employment and advancement opportunities to all individuals, Connecting Software does not allow discrimination in employment opportunities or practices because of race, colour, religion, sex, national origin, age or disability.

Team members with questions or concerns about discrimination in the workplace are encouraged to bring these issues to the attention of Connecting Software management. Team members can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in unlawful discrimination will be subject to disciplinary action.

Harassment

Connecting Software is committed to provide an environment free of discrimination or harassment at work.

Actions, words, jokes or comments based on an individual's sex, race, ethnicity, age, religion or sexual orientation will not be tolerated.

If you believe you have been a victim of harassment, or know of another team member who has, report it immediately. Team members can raise concerns without fear of reprisal. The matter will be handled in a quick and confidential manner.

WORKING WITH ORGANIZATIONS OUTSIDE OF CONNECTING SOFTWARE

Connecting Software operates around the world and respects the laws wherever we do business, we cherish fair business practices and healthy competition, and expect that all team members do too. Partners, Customers, Vendors or others we do business with are important for us to succeed, keep in mind to always deal fairly, ethically, and in accordance with the law, also when communicating with others do it in a truthful and accurate way.

Conflicts of Interests: Anti-Corruption and Anti-bribery

Connecting Software seek to promote transparent, ethical and productive relationships with the ones we do business with. We value and support anti-bribery and anti-corruption laws, and expect our team members to do so, and always avoid conflict of interest when exchanging business courtesies. We strictly prohibit bribes, kickbacks, illegal and facilitating payments, and other exchange of items of value that may improperly influence or recompense Partners, Customers, Vendors or others we do business with. When receiving or giving gifts, hospitality or anything of value be aware if they lack transparency and in doing so might be consider a bribe or illegal.

It is important for you to consider that engaging in bribery, or appearing to do so, will not only harm you but will also expose the company to criminal liability. You must never offer, pay or cover for a bribe, if you are aware that a bribe is in action please contact the management team immediately. Illegal and facilitating payments are also actions you should never be a part of, this may include payments made without records or with inaccurate records, and payments made with the exclusive aim of speeding up a process by avoiding mandatory steps implement by the law.

CORRUPTION: dishonest or illegal behaviour especially by powerful people / inducement to wrong by improper or unlawful means (such as bribery)

Corruption, In Merriam-Webster's collegiate dictionary. Retrieved from www.merriam-webster.com/dictionary/ corruption **BRIBE:** to influence the judgement or conduct of (someone) with or as if with offers of money or favour: to induce or influence by or as if by bribery.

Bribe, In Merriam-Webster's collegiate dictionary. Retrieved from www.merriam-webster.com/dictionary/bribe



Gifts and Hospitality

If you are offered gifts, travels, event tickets, meals or other favour from Partners, Customers or Vendors, do not accept them if you think it might affect, or appear to others that it affects, your ability to make unbiases business decisions. Keep in mind the following:

- Do not ask for gifts or rewards from Partners, Customers or Vendors, in trade for getting them something;
- You should not accept gifts, including cash gifts and gift cards;
- Do not accept travels or leisure events tickets (Sports, Concerts), in case it is an event with relation to our line of business please consult with the management team;
- When refusing gifts, always be polite and explain our Company rules that prevent us from accepting certain gifts;
- When considering giving a Partners, Customers or Vendors a gift or reward, take into account if this meets the business interest of Connecting Software.

Anti-Money Laundering

Money laundering is the act of disguising the source or true nature of money obtained through illegal means. The laundering is done with the intention of making it seem that the proceeds have come from a legitimate source. Money laundering is in contradiction of the law and in Connecting Software we prohibit such actions. We make sure that our business transactions are always legitim in order to not violate anti-money laundering laws. Always be attentive for unusual transactions when dealing with Partners, Customers or Vendors, especially if it is a new one.



Rule to Remember:

When faced with a difficult decision Pause, Think, Ask, Consider

ACT!

Connecting Software is committed to maintaining the highest standards of ethical, legal, and professional conduct. Our Whistleblower Policy provides a framework for employees, contractors, and stakeholders to come forward with credible information on illegal practices or violations of adopted policies of the company without fear of retaliation.

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