

SOS International **Code of Conduct**



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I. Message from the CEO

Actions speak louder than words

At SOS International we have a strong purpose: We help people. Three small words in themselves but with a huge impact when combined. Helping people is – in essence – about embodying empathy, integrity and accountability. It involves building strong relationships with colleagues, customers, and end-users. It involves promoting inclusivity and fairness. In short, it involves a commitment to ethical behaviour.

Our Code of Conduct serves as a guide for every member of the SOS International family, outlining the ethical principles, values, and actions that we not only value but also expect from each other in our daily interactions and decision-making. It underlines a commitment to not only ensure compliance with laws and regulations but also to fostering a culture that knows right from wrong.

Thus, our Code of Conduct serves as a guiding tool when in doubt, emphasising the importance of actions that demonstrate what kind of organisation SOS International is. It encourages all employees to take responsibility for their behaviour, both individually and collectively, ensuring that we all actively participate in creating a unified SOS International defined by the highest standards, a strong culture, and healthy values.

At SOS International we let our actions speak.

Best regards,

Jan Sigurður Christensen
CEO, SOS International



2. Purpose and Scope of SOS International's Code of Conduct

Purpose

SOS International’s Code of Conduct (the "Code") describes the ethical principles that guide our company, our employees, and the interactions we have with our stakeholders.

The Code ensures that SOS International’s purpose and values are reflected in our daily work and that we aim to enhance transparency in everything we do. This Code reflects the business conduct that our customers, suppliers, and the people we help every day can expect from us.

The Code builds upon international recognised standards and conventions such as the UN Global Compact, UN Guiding Principles on Business and Human Rights, OECD Guidelines on Responsible Business Conduct, and ILO Conventions.

Scope

The Code governs the business conduct of SOS International, all people employed at SOS International and its subsidiaries, as well as the Board of Directors (hereinafter all referred to as “employees”). SOS International’s suppliers must adhere to the Supplier Code of Conduct or a similar code of conduct, which is based on the principles of this Code.

All employees are expected to understand, comply with, and act according to the Code. SOS International’s managers are ambassadors of the Code. They are responsible for promoting the Code, setting the ethical standards in their teams, and making sure that the Code is reflected in the daily work.

Each paragraph of the Code describes the ethical commitments of SOS International followed by a ‘Remember’ section that provides guidance on how employees are expected to behave and make decisions on ethical matters. The paragraphs end with a list of relevant company policies that employees are expected to know, which provide more detailed guidance.



3. SOS International's values

From the far corners of the world, to just around the corner, we're there. And we have been since 1961. Whether the car breaks down on the road or a bone breaks abroad, we're there.

We provide acute medical, travel and roadside assistance all over the world, night and day, all year round. As the most trusted emergency partner in the Nordics, we're there with our knowledge, technology and years of experience.

That's why three key values define what we're all about and what we aspire to at SOS International:

We care. We share. We dare.

We Care

We have caring hearts. We are all about caring for our colleagues, our company and the people we help every day. You can see it in the way we collaborate, support one another and ensure everyone feels included. We are always here for each other, our customers and for the ones we help.

We Share

We trust in each other. So, we actively share ideas, swap insights, combine our strengths – and keep our promises. If one of us does not have the answer, you can be sure someone else will. Individually, we can achieve a lot. Together, we can accomplish even more.

We Dare

We dare to challenge each other and business-as-usual thinking. Focused on achieving results, we are proactive and find new ways to work smarter. Whenever you meet us, you will experience our dedication to delivering outstanding quality and value.

4. Human Rights and Labour Rights

SOS International is committed to respecting human and labour rights as recognised by applicable legislation, conventions and labour standards. We condemn the use of forced labour, exploitative child labour and human trafficking. SOS International provides a physically and psychologically safe working environment where all employees have actual influence on matters concerning their health, safety and working environment. We ensure that our employees receive a fair living wage, maintain reasonable work hours and provide paid holiday leave.

Employees must never be involved in breaching human and labour rights and must promote the same rights when engaging with business partners, especially in countries where respecting human rights is not self-evident.

Policies

Corporate Recruitment Policy
Equality Policy
Duty of Care Policy



As part of SOS International
please remember to:

- Contribute to the development of the Environment, Health and Safety (EHS) culture at SOS International.
- Respect your colleagues' lawful freedom of association, including the choice not to associate, and the right to collective bargaining.
- Respect local legislation on the employees' working hours limits.
- Respect the privacy of your colleagues.

5. Diversity, Equity and Inclusion

In SOS International we are committed to promoting a work culture that respects all employees, customers, business partners and end-users.

We value diversity, promote equity, and ensure inclusion for all. We provide equal opportunities for all employees, and we do not discriminate based on race, colour, sex, gender identity, age, religion, beliefs, nationality, ethnic or social origin, disability, sexual orientation, political views, or any other legally protected characteristic at any level of the organisation.

We treat customers, business partners and end-users with the same respect as we do with our colleagues, reflecting our purpose of helping people.

Policies

Corporate Recruitment Policy
Equality Policy



As part of SOS International please remember to:

- Embrace the diversity of your colleagues.
- Treat all colleagues, business partners and end-users equally.
- Be aware of your potential biases.

At SOS International, we embrace diversity, promote equity, and ensure inclusion for all. We respect and value every individual, providing equal opportunities and treating everyone with respect, reflecting our core purpose of helping people.

5. Diversity, Equity and Inclusion



6. Zero-Tolerance of Harassment and Substances

A safe work environment is a human right, and SOS International has zero tolerance towards any acts of bullying, violence, threats, corporal punishment, coercion, online-trolling or harassment from internal as well as external parties. This also includes sexual harassment in any form; physical or psychological, as well as verbal or non-verbal.

Also, SOS International has zero tolerance towards the possession, sale or use of illegal drugs or towards being under the influence of drugs. This zero-tolerance of harassment and illegal drugs applies within SOS International's premises and outside, including but not limited to during business trips and social events.

Working under the influence of alcohol is prohibited, whilst alcohol may be consumed during social events arranged by SOS International.



As part of SOS International please remember to:

- Be mindful of your words and actions and respect personal boundaries.
- Refrain from engaging in behaviour that could be perceived as discriminatory or harassing.
- Refrain from consuming or possessing illegal drugs, as it is strictly prohibited.
- Consume alcohol responsibly during social events arranged by SOS International and when representing SOS International.

7. Environment

SOS International is committed to enhancing its sustainable development with a focus on environmental considerations as well as the social and governance aspects. Therefore, environmental sustainability is integrated into our decision-making processes, and we analyse our impacts, risks and opportunities to prevent and mitigate negative impacts, whilst identifying value creating opportunities. This way, we deliver value for our business, customers and end-users, as well as the society we are a part of.

When it comes to the environment, SOS International is dependent on its global network of suppliers. Therefore, environmental considerations are also taken into account when purchasing goods and services, alongside considerations of market price and expected quality.

Policies

Environmental Strategy
Sustainability Policy, Mobility
Division
Travel Policy
Company Car Policy
Supplier Code of Conduct



As part of SOS International
please remember to:

- Actively engage in initiatives to enhance SOS International’s environmental performance.
- Limit travel for the purpose of meetings and prioritise video conferences.
- Reduce and sort waste and be mindful of the use of water and electricity.
- Promote and re-enforce to our suppliers, where relevant, the importance of considering the environment.
- Consider the environmental impacts of our services and where relevant communicate them to our customers and business partners.

8. Information Security

SOS International relies on information technology (IT) as a key strategic and competitive factor, but it also exposes us to various risks. These include possible disruptions of data processing such as malicious software containing viruses, data loss due to software errors or data breaches, and abuse of data by hackers. These disruptions can put SOS International’s reputation and financial stability at stake.

We are therefore committed to continuously implementing appropriate measures to ensure confidentiality, integrity and availability of our data processing systems.

Policies

Information Security Policy

Data Ethics Policy

Personal Data Policy



As part of SOS International please remember to:

- Do not click on links or attachments in emails from unknown or suspicious sources.
- Look for signs of phishing emails and make sure to verify the authenticity of the email.
- Always report if you have received something suspicious – you might not be the only one.
- Always use strong and unique passwords, change them regularly, and never share them with anyone.

9. Protection of Personal Data

We support the right to privacy, and the protection of personal data and the individuals’ right to their data are important parts of this right.

We take responsibility for the personal data processed by SOS International, and all employees must adhere to relevant policies, ensuring proper safeguarding of personal data, including sensitive data, as well as a continuous mitigation of information security risks. These efforts are supported by our certifications in international information security and privacy standards.

Policies

Personal Data Policy
Data Ethics Policy

Information Security Policy



As part of SOS International please remember to:

- Treat personal data with respect.
- You should only collect and store personal data that is necessary for the case or the work task.
- Only share personal data with colleagues who need to know it.
- Make sure that personal data is deleted when no longer needed.

At SOS International, we are committed to sustainable development by integrating environmental, social, and governance considerations into our decision-making. We analyse impacts and opportunities to create value for our business, customers, end-users, and society.



10. 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.

Policies

Competition Law Policy



As part of SOS International please remember to:

- Speak up if you become aware of any competition law infringements, either by SOS International or any of our customers, competitors, or other suppliers.
- Refrain from sharing commercially sensitive information about SOS International’s business activities with potential competitors.
- Exercise caution when talking about competition and prices.

11. Anti-corruption, Financial Crime and Anti-Bribery

SOS International is dedicated to maintaining high standards of integrity and transparency throughout its operations.

We expect our employees to act with honesty and integrity and never engage in any corruptive action, whether this be bribery or any kind of fraud. We will not tolerate nor engage in any form of direct or indirect corruption or bribery for the purpose of influencing decision making in violation of law. This implies gifts or anything of high financial value that is offered, promised or requested in order to gain improper advantage.

Policies

- Sanctions Policy
- Sponsorship and Donations Policy
- Gifts & Representation Policy



As part of SOS International please remember to:

- Refrain from offering, promising, requesting, or accepting bribes or facilitation payments in connection with SOS International’s business activities.
- If you receive or intend to give gifts consult the Gifts & Representation Policy.
- Ensure that courtesies offered or provided, such as gifts or entertainment, are properly reflected in our books and records.
- Maintain neutrality regarding political parties and candidates for public office. Neither the names nor the assets of SOS International should be used to promote the interests of political parties or candidates.
- Properly authorise and document all financial transactions and payments. You may not maintain “off-the-books” accounts or unrecorded transactions. False or misleading documentation is strictly prohibited, as well as destruction of records to conceal corrupt acts.

12. Conflicts of Interest

We have a responsibility to make decisions strictly based on 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. Disclosing the potential conflict will often be the only action required.

Policies

Conflicts of Interest Policy



As part of SOS International please remember to:

- Refrain from handling cases or claims involving family, relatives, friends, or acquaintances.
- Ensure that the selection of suppliers and other business partners is always based on objective criteria, such as price, quality, legal, and compliance requirements, and is never influenced by personal relationships.
- Prioritise the interests of both the customer and SOS International, ensuring that no customer is disadvantaged over another.

13. Confidentiality

Information is an important company asset which must be carefully protected. SOS International takes responsibility of handling data seriously. In this context, data refers to both personal data as well as other business relevant information, including aggregated and statistical data.

Handling information containing company data, the data of our customers as well as personal data of the end-users is part of our core business. All employees are obliged to keep privileged information confidential.

We take all reasonable precautions to ensure that we do not disclose confidential information to any third party without a valid business purpose and a legal basis.

Policies

Data Ethics Policy
Personal Data Policy



As part of SOS International please remember to:

- Respect obligations of strict confidentiality during and after your employment at SOS International. This also includes substitutes, consultants, service personnel and visitors.
- Protect SOS International’s intellectual property rights, including trade secrets.
- You may not unlawfully use or acquire trade secrets and other confidential and proprietary information of other companies.

At SOS International, we are dedicated to protecting personal data and upholding privacy rights. We adhere to policies and international standards, safeguarding sensitive information and mitigating security risks.

9. Protection of Personal Data



I 4. Communication

SOS International is committed to providing ethical, accurate and trustworthy information, both internally and externally. Through our communication, we wish to be credible and professional thereby maintaining and strengthening the reputation and positive public image of SOS International.

Our communication reflects SOS International’s purpose and values, and we use our communication platforms, including social media, responsibly, preventing the spread of misleading information that could give a false impression of our efforts within e.g. sustainability (“greenwashing”). Furthermore, our communication respects the confidentiality of sensitive information and adhere to all relevant laws, regulations and policies, including those related to data protection. Our communication promotes the desired corporate culture, including ethical, inclusive and socially responsible behaviour among SOS International's employees, in alignment with SOS International’s

Policies

Communication Policy

purpose, values and policies.



As part of SOS International please remember to:

- Act as an ambassador for SOS International on social media channels while also being mindful of posting content on social media accounts that could harm SOS International's reputation.
- Ensure that any content shared on SOS International’s official social media accounts aligns with our values and communication policy guidelines.
- If contacted by the press about matters regarding SOS International, contact Marketing and Communication before making any statements.

15. Education and Training

To ensure that all employees are well-informed about the ethical principles and behaviour we value and expect in our daily interactions and decision-making, we provide employees with relevant training and education.

This enables everyone to understand and promote the culture and ethical behaviour we are committed to fostering in SOS International.



As part of SOS International please remember to:

- Take responsibility for your own learning and training related to the Code.
- Apply what you learn in training to your daily work, interactions and decision-making.
- Adhere to deadlines preventing delays in gaining necessary education and training.

16. Non-Compliance

Any violation of this Code, company policies, laws and regulations, conventions or contractual obligations may not only have potential legal and regulatory consequences but may also compromise SOS International's reputation.

Not complying with the Code may result in disciplinary actions and further employment law consequences, e.g., in the form of a warning, employment termination, or summary dismissal. Compliance concerns and suspected violation of the Code must be reported to your immediate manager, People & Culture or alternatively via the whistleblowing scheme.



As part of SOS International please remember to:

- Report any instances of non-compliance to your immediate manager, People & Culture, or through SOS International's whistleblowing scheme.
- Raise concerns about wrongdoing within SOS International without fear - employees who report in good faith are protected from retaliation, mistreatment, or harassment.
- Adhere to the Code - refusing to break it will not result in negative job consequences.

17. Whistleblowing Scheme

All employees are encouraged to speak up and report if they experience or suspect unethical behaviour in violation of this Code or violations of applicable laws or regulations.

To encourage this, SOS International has several ways of reporting concerns locally. In addition, we have a whistleblowing scheme for reporting misconduct and violations of wrongdoings within SOS International.

Policies

-Whistleblowing Policy



As part of SOS International please remember to:

- Report concerns about illegal actions, policy or legal violations, and unethical behaviour.
- Use the whistleblowing scheme only for reporting suspicious or irregular wrongdoing within SOS International, not for employment complaints.
- All reported concerns should be made in good faith and with no malicious intentions.

At SOS International, we encourage one another to speak up and report any instances or suspicions of unethical behaviour that violate this Code or any relevant laws or regulations.

17. Whistleblowing Scheme





We help people