

CODE OF CONDUCT



Solutions30

Solutions for New Technologies

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Dear Colleagues,

Almost every day, new technologies claiming to make our life easier and more comfortable become a part of our daily lives. Since the outset of this rapid digitalization, the Solutions 30 Group ('Solutions 30') has focused on bridging the gap between the development of technologies and putting these to work. We aim to deliver the implementation of technologies for our clients, in the most efficient, effective and sustainable, manner, being their specialist to complete this task. That is our mission, ambition and responsibility.

We can only achieve this, if we manage our business responsibly and if our clients and partners know that they can trust us. That in return depends on people doing the right things, and making the right decisions, on a large and small scale, every day in every action.

This Code of Conduct is binding for all of us and translates our core values into practical guidelines, advising you on making responsible decisions, even in difficult situations. Please read carefully and make this Code of Conduct yours to act accordingly and widespread our core values of integrity. To help you through this path, you will find numerous understandable examples, questions and answers, as well as links to further information and expertise. In difficult or unclear situations, please use the questionnaire and do not hesitate to contact for advice anyone on list of relevant contact persons located in Chapter 6. 'Support'.

We, as executives of Solutions 30 will commit to this Code of Conduct and we will ensure that all our colleagues take ownership of it and comprehend what behavior is required and expected from them as representants of our Group.

It should also be duly noted and understood that this Code of Conduct and the values it embodies, is not limited in its applicability to full-time employees of Solutions 30. It is our expectation and obligation to ensure that all parties engaged with Solutions 30, including suppliers and subcontractors, comply with the rules, expectations and behaviors outlined in this Code of Conduct.

We should all feel confident in voicing our opinions and concerns by challenging behavior which we feel is inconsistent with the principles of our Code of Conduct.

We therefore appeal to all of you: Let us work together to ensure that Solutions 30 Group stands for excellent products and services, sustainable growth as well as integrity and fairness as a responsible employer.



2. Our responsibility for compliance

> Solutions for New Technologies <

We are innovative and deliver field services for our clients in the most efficient and cost-effective ways, while remaining sustainable and compliant.

In order to achieve our goals, it is of crucial importance that all employees - from board members and managers to each individual member - conduct themselves honestly, fairly and ethically in accordance with the principles outlined in our Code of Conduct.

This is the only way to ensure that the entire Solutions 30 Group acts with integrity and thereby fulfills its economic and social responsibilities.

The Code of Conduct lays the foundation to foster a corporate culture that is both effective and efficient in terms of sustainable growth.

The information contained in this Code of Conduct is divided into three main sections:

- Our responsibility as a member of society
- Our responsibility as a business partner
- Our responsibility in the workplace

The points described therein are binding for everyone in the Solutions 30 Group, including our partners and should serve as a guideline for our day-to-day business. They are supplemented by internal guidelines, relevant laws, legal regulations and provisions set out in employment contracts.

Failure to observe the Code of Conduct can result in considerable damage, not only to our company, but also to us as employees, our business partners and other stakeholders. Moreover, it may also damage the reputation of Solutions 30 on a micro and macro level, making it difficult to regain trust in the long-term.

It is therefore up to each and every one of us, to familiarize ourselves with this Code of Conduct, to integrate the Code of Conduct into our own behavior, and to bear the Code of Conduct in mind when making any decision.



3. Our responsibility as a member of society

3.1 Human rights

We recognize every person's innate humanity and treat everyone with dignity and respect. Therefore, Solutions 30 expressly respects the internationally recognized human rights and bases its actions on the United Nations Guiding Principles on Business and Human Rights. This includes the rejection of all forms of discrimination, child labor and forced labor. Furthermore, we promote fair working conditions, freedom of association as well as fair wages and compensation. This commitment extends to ensuring health and safety in our work environment for everyone.

We expect everyone with whom we conduct business with to observe these standards. Therefore, we carefully select third party business partners based on objectively defined criteria.



Please find our **Solutions 30 Group Human Rights Policy** with more detailed information, by clicking on the policy.

Example:

You are responsible for the implementation of a new project for a big client. You receive information that a subcontractor's technician is made to work in inhumane conditions with respect to expose safety and health risk.

➔ Take the necessary steps and inform the units responsible about the safety and health circumstances for sustainability in supplier relations. Solutions 30 must evaluate business relations with its business partners closely and, if necessary, break them off.

3.2 Equal opportunity and equal treatment

In accordance with Solutions 30's corporate principles, equal opportunities and equal treatment is a key objective. It is in the company's best interest to promote the individuality of each person, diversity and to create a company culture that



is characterized by tolerance and fairness. Differentiation or discrimination based on ethnic or national affiliation, race, skin color, gender, language, religion, political or other convictions will not be tolerated in any form.

The background for this non-discriminatory orientation and open approach is to achieve and promote the maximum productivity, creativity and efficiency of all employees and thereby to increase overall competitiveness.

3.3 Sustainability and environmental protection

Environmental protection is one of the most important concerns in our society. It presents a great challenge in politics, businesses and our daily lives.

It is up to each staff member, within their functions, to support these efforts and commitments, by respecting the applicable regulations, as well as Group procedures concerning the protection and conservation of the environment. We as Solutions 30 contribute by focus on environmentally friendly and advanced technologies. In order to facilitate its environmental approach, Solutions 30 has appointed a Corporate Social Responsibility Team, which has developed an Environmental Policy and aligns best practices across our country organizations.



Please find our **Solutions 30 Group Human Resources, Health and Safety and Environmental Policies** with more detailed information by clicking on the policy

3.4 Donations, sponsorships and charity

For Solutions 30, success goes hand in hand with taking on social responsibility. We do not only view this as a commitment but have adopted a systematic view on sustainability, using the UN Sustainable Development Goals (SDGs) as our guiding framework.

By making donations on a voluntary basis, we aim to contribute to the advancement of society and create recognizable benefits, in addition to fulfilling the Sustainable Development Goals as part of our daily actions.

We do not pursue any economic self-interest with our donations, i.e. donations are made on a voluntary basis and nothing is demanded or expected in return. It is therefore of pivotal importance, that any contribution is awarded with the sole aim of having maximum value and impact, in the transformation towards a sustainable world.

Sponsorship and donations are therefore exclusively awarded with this intention, with Solutions 30 being recognized as part of the overall effort to create a just, equitable and inclusive model of sustainable development for everyone.

It should also be duly noted that donations or sponsorships are only permitted within the framework of the respective legal system and in accordance with the current internal regulations of Solutions 30 supplementing this Code of Conduct.

4. Our responsibility as a business partner

4.1 Conflicts of interest

When employees' personal own financial interests influence their business decisions or appear to, this is characterized as conflict of interest. It is the responsibility of Solutions 30 and each individual to avoid situations with the risk of a conflict of interest and to act in the best interest of the company. If a conflict of interest does arise, it must be reported immediately to the relevant manager and the local legal department, where applicable.

Examples may include:

- Close family members or friend work in significant positions at a subcontractor
- Board of directors/supervisory board of another company/business is a partner of Solutions 30
- Certain secondary employments
- Participation in competitor's companies

4.2 Gifts, hospitality and invitations

In general, gifts, hospitality and invitations are anything of a personal nature that is offered by or to someone external to Solutions 30.

It should be noted that gifts should always be of minimal value and do not contravene any internal or statutory rules. Furthermore, hospitality expenses should be made directly to the hotels, transport companies or other vendors

providing services, and not to the clients, official or Solutions 30 staff member. Additionally, it is important that all offers must be fully transparent.

Our internal guidelines on handling gifts, hospitality and invitations sets out what benefits are appropriate and the steps that must be taken when accepting and granting benefits.

There are times when it is possible to accept or offer gifts or hospitality:

- Travel expenses directly related to business purposes, for example a visit to an office
- Meals within a reasonable scope, for example a working lunch or dinner
- Attendance of functions, in an official representative capacity
- Incidental gifts of minimal value, for example promotional items such as pens, calendars, T-shirts or phone chargers

Gifts, hospitality or other benefits should:

- Never compromise, in any way, the integrity of the person concerned or the company
- Not be made, at a time or in a way, that could influence or could be perceived to influence a decision



Please find our **Solutions 30 Anti-Corruption Policy** with more detailed information by clicking on the policy

4.3 Prohibition of corruption

Corruption is a major challenge in business and distorts our decisions, those of our business partners and the market.

Solutions 30 must comply with the antibribery and corruption laws and regulations of every country in which it operates, which collectively prohibit any form of corruption, bribery or influence peddling. These anti-corruption laws — such as the French “Sapin 2” law or the UK Bribery Act — are generally broad in their scope and application. They make it illegal for anyone to offer, promise, give, solicit or receive – directly or indirectly – money or “anything of value” to or from a public official or someone in the private sector in order to obtain or retain business or secure some other “improper advantage”.

Our anti-corruption policy is adopted not only to comply with national and international laws combating corruption but also to conduct business ethically and in accordance with the standards defined by this Code of Conduct.

Practices that violate these principles will not be tolerated and breaches of this policy can lead to disciplinary and other actions up to and including termination of employment or agreement, if applicable.

Example:

You receive information about a new tender of a business partner. In response to this information, you decide to invite the responsible manager and his wife to a wellness hotel for three days - at your expense.

4.4 Dealings with political office

At Solutions 30, it is important for us to conduct our business in an open and transparent manner.

Therefore, all contacts with office holders/mandate holders and other political persons are strictly in accordance with all applicable laws and legislation concerning the avoidance of conflicts of interest and corruption.

For us, this means that neither insider trading nor bribery is tolerated and that we act independently and fairly in accordance with our corporate principle.

Example:

The use of personal contacts with a public authority to win the tender for a major contract or advance the receipt of a permit.

➡ If you receive governmental requests that do not fall within your routine responsibilities, you should immediately contact your supervisor and the Global Legal Function. The Group Head of Legal will coordinate all responses to such government requests.

4.5 Prohibition of money laundering and terrorism financing

At Solutions 30, we take a clear position against money laundering and terrorist financing and ensure compliance with all applicable legal provisions against money laundering and terrorist financing.

Example:

One of your business partners suddenly asks you to return an "inadvertently made transfer" to another account. You check the account information of the transfer destination and discover that the bank is located in the Cayman Islands.

They do not have any further information about this incident, and you do not receive a reply to any queries.

4.6 Fair and free competition

We take a clear position against distortions of competition, price fixing and general violations of fair and free competition. We act strictly in accordance with all applicable laws concerning antitrust matters and competition law and support their enforcement. For the benefit and in the best interest of all market players, we are committed to conducting all our business based on a fair and free market economy and thereby prevent any violations and infractions.

Examples of violations of antitrust and competition law may include:

- Price fixing
- Collusion in tenders
- Allocation of subcontractors, to gain an unfair competitive advantage



4.7 Prohibition of insider trading



Insider trading refers to buying or selling publicly listed shares or other financial instruments with the benefit of inside (internal) information. Insider information can be concrete non-public information that, if made public, would be likely to have a significant effect on share price or other financial instruments.

Insider trading damages our integrity, lowers shareholder and business partner trust in Solutions 30 and compromises the integrity of the financial market. Therefore, we clearly position ourselves against any actions that are linked to insider trading and act in accordance with the applicable laws.



Legislation in Europe, particularly the Directive on Criminal Sanctions for Market Abuse (Market Abuse Directive) prohibits the use or disclosure of inside information in the trading of shares, other securities or other financial instruments.

Based on this, Solutions 30 insists that all employees comply with the applicable laws on insider trading and keep confidential information within the company and do not share it with anyone, Staff members who fall under applicable insider trading regulations must under all circumstances adhere to Solutions 30 insider dealing policy when carrying out share transactions, for example abiding to the reporting of such transactions.

5. Our responsibility in the workplace

5.1 Occupational safety and healthcare

The safety of our employees is of pivotal importance to us and we are committed to our responsibility. We do not compromise on safety practices, behaviors or conditions. No job is worth putting someone's health or life in danger.

Therefore, one of our key priorities is to engage in health promotion and preventive measures throughout our processes, to mitigate risks and promote health, security and wellbeing. This in return guarantees a high level of satisfaction across our entire value chain.



Please find our [Solutions 30 Health and Safety Policy](#) with more detailed information by clicking on the policy

5.2 Data protection

In addition to compliance with all legal requirements and regulations, it is of particular importance to us to handle the confidential and personal data of our employees, partners and clients with due care. We consider this to be the basis of a trusting relationship, that we want to foster and develop further. We collect, gather, use and store personal data of employees, former employees, clients, suppliers and other affected parties strictly in accordance with all legal provisions.

Especially in our business in which we increasingly use data and advanced information technologies, it is more important than ever to ensure our stakeholders trust how we treat their personal information. Therefore, we process personal data only to the extent necessary and handle it in a confidential and discreet manner.

In case of any doubt, just consider how you would feel if the personal data were your own.

Example:

You have organized a seminar with external technicians and receive personal data from the participants in the context of this session. A colleague asks you to pass the addresses on.

➡ Do not pass this data on without consulting the respective Data Protection Officer. Generally, data may be only used for the purpose for which it was communicated.

5.3 Security and protection of information, know-how and intellectual property

Due to our business model, we have access to confidential business information of our business partners, which consists of operational and technical know-how, strategic plans, patents and other intellectual property. This sensitive information is treated by us as agreed upon and in a confidential manner. In this way, we enable our business partners to cooperate in a manner that complies with data protection requirements.

The risk-based approach guides every Solutions 30 information systems or processes in accordance with the risk management policy.

Example:

You are involved in the installation of the equipment of a new 5G base station are given access to the technical plans of the station.

➡ You are prohibited from sharing, photographing or saving the information on these plans on unsecured or external storage media.

5.4 IT security

Digitalization is present in almost every business area and especially in our business units. For this reason, we take the greatest care to protect our information technology (IT) and electronic data processing (EDP) and respect the intellectual property of others. Solutions 30 IT security approach is based on a set of security guidelines and standards to ensure security by design and security by default objectives.

In addition to compliance with existing legal regulations, special protection against malware, phishing, hacking and any other malicious activity, is particularly important to us. Such activities are classified as risks that partially threaten the existence of the company and are therefore a central component of our security policy.

Each of the companies that are part of our Group are required to behave attentively and diligently within our general IT-environment.

Examples may include:

- Do not use foreign or unchecked external storage media (USB sticks)
- Take special care with e-mails in particular attachments from external organizations/ senders

- No downloading of foreign software, without explicit consent and instruction from the respective department

5.5 Handling of company assets

Generally, assets can be financial, physical or intangible. We regard it as fundamental to our values that all of us handle company property, as well as property belonging to any of our clients, business partners or other third parties with due care and respect. Just as we would all expect our personal property to be treated responsibly by others, so should we invariably handle company assets with care and respect. Additionally, it should be considered that company assets may not be used for non-business purposes.

5.6 Social media

Employees must be vigilant and careful in using social media. Even when they express in their own name, they must make sure they do it in a way that won't harm Solutions 30's image and reputation.

6. Support | FAQ

How can rule infringements be reported?

Whenever you know or suspect that you or others have infringed the Code of Conduct, you and any other employee can inform or contact the (Local) HR manager or legal or compliance department, if applicable.

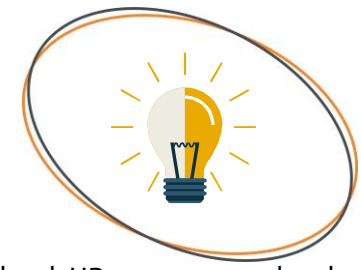
If you do not want to release your identity, you can always **confidentially** report infractions by submitting [a whistleblower report on https://solutions30.integrityline.com](https://solutions30.integrityline.com).

In the event of concrete indications, investigations are initiated immediately to clarify the facts and appropriate countermeasures are taken.

Do the behavioral guidelines specified in the Code of Conduct also apply to our business partners?

The principles and guidelines specified in our Code of Conduct apply both to all employees within our organization and to all external employees of companies with which we maintain business relationships.

Further details are available in our [Business Partner Code of Conduct](#).



Are reports treated in confidence?

The information is examined by the local HR manager or legal or compliance department, if applicable.

The fundamental principle is that all information is treated confidentially. Even if the complainant's identity is known, it is kept secret. Upon request, the complainant is provided with information concerning the treatment of his or her complaint, unless internal data must be provided for this purpose.

Will I face negative consequences if I report conduct violations that others or myself have committed?

In order to learn from our mistakes and use them as opportunities, we first have to acknowledge them.

Employees who report their reasonable suspicion of a violation or potential violation of our Code of Conduct will be protected against any form of retaliation. Whether or not the employee's suspicion turns out to be valid is irrelevant.

Any employee who retaliates against a fellow employee who has reported a suspected violation, may be subject to disciplinary action himself.

Retaliation includes, for example, pressuring or threatening an employee to discourage him or her from reporting a suspected violation.

Questionnaire | Self-Test

In case you are unsure about your decision, use the self-test below and ask yourself the following questions:

1 Have I considered all relevant concerns in my decision and weighed them correctly?

Is my decision consistent with this Code, the law and Solutions 30's policies?

2

3 Will my decision still feel right when my company has to justify it publicly?

Am I ready to take responsibility for this decision?

4

5 Would I accept my own decision as a person concerned?

Do I stand by my decision when it is revealed?

6

The most important thing is to evaluate the decision carefully and include all relevant considerations. If you cannot answer yes to all of the above questions, your concerns are most likely justified, and your decision is not in accordance with our Code of Conduct!

You will find the designated contact channels to express your concerns and doubts on the next page.

Whistleblowing System & Contact

In case that you are aware of a violation or suspect that a violation has been or may be committed against our Code of Conduct, you have the opportunity to report confidentially to our Whistleblowing System.

We have implemented a Whistleblowing System at Solutions 30 in order to protect our company from reputational and financial damage resulting from violations of laws and policies, as well as to protect individuals reporting on such cases from unjustified retaliation and discrimination. The Whistleblowing System creates an accessible platform for all our employees, external partners and further stakeholders to report suspected or material violations of our Code of Conduct, Solutions 30 policies or laws.

All reports are supposed to be made to the best of knowledge and belief.

However, if an employee decides to report wrong or unfounded accusations on purpose or carelessly, the full consequences must be borne without exception.

To access the Whistleblowing System, you can use the channels that are mentioned below.

Contact details for the Whistleblowing System:

<https://solutions30.integrityline.com>

Luxembourg, June 2022

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