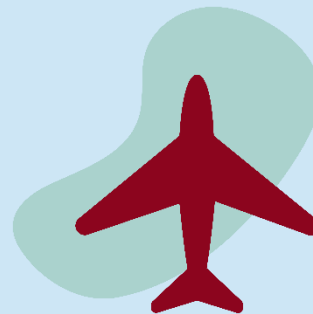
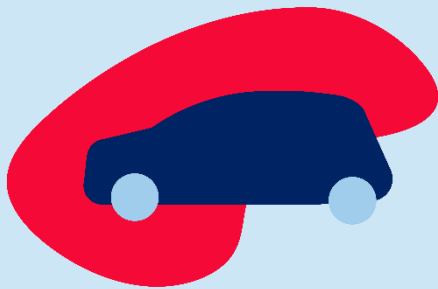


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# SOS International

## Data Ethics Policy

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Document Responsible (Title/Position)	Document Owner (Title/Position)	Approval date
Head of Compliance & Governance	CFO	May 2024

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## 1 INTRODUCTION

This policy outlines the data ethics principles for the handling of data at SOS International in general. Ethics is about moral values and SOS International wants to ensure that we preserve the trust we receive from customers, end-users, employees, and other stakeholders.

In the pursuit of meeting our ambition of being the Nordic market leader in our field, SOS International continuously prioritizes optimal end-user journeys, strong partnerships with our customers and suppliers, operational excellence and engaged employees. Taking advantage of digitalisation and data is a key component in living up to this ambition and going forward customers and end-users will demand that SOS International uses data to continuously improve our services.

SOS International is strongly committed to handling data in an ethical manner to ensure that individuals and business relations are not harmed, and that privileged information is kept confidential.

As such, SOS International takes the responsibility of handling data seriously. In this context, data refer to both personal data as well as other business relevant information, including aggregated and statistical data.

This policy is a continuation of our focus on protecting personal data and information security as already underlined by our various policies and internal instructions with associated actions and initiatives. Our ISO 27001 (information security) and ISO 27701 (privacy management) certifications are assurance of our continuous efforts to safely handle data within our business.

## 2 PURPOSE

The purpose of this policy is to describe the data ethics principles which form the foundation for working with data collection and handling at SOS International.

## 3 SCOPE

The policy applies to the SOS International Group. The policy is aimed at the handling of customer, end-user, employee, and other stakeholder data and at any technologies, systems or processes used in or under the influence of SOS International. The data ethics principles are viewed as more extensive than the existing information security and personal data rules and regulations as well as internal policies with which SOS International already complies.

*"Data ethics is to be understood overall as the ethical dimension of the relationship between technology, citizens basic rights, legal rights and basic societal values which the technological development cause to consider. The term covers ethical issues in connection with the usage of data."*

*Source: The Danish Data Ethics Council*

## 4 DATA ETHICS PRINCIPLES

The following five principles define SOS International's ethical handling of customer, end-user, employee, and other stakeholder data:

### 1. Purpose of data handling

SOS International collects and handles data to provide a sound and efficient customer and end-user experience or other similar and clearly defined purposes. SOS International only handles the necessary amount of data needed to fulfil the relevant purpose. Data is handled to create value for our customers and end-users and to ensure they have access to the right solutions and offers. Any data handling at SOS International should always comply with the relevant purpose.

### 2. Integrity

SOS International wants to safeguard the customers, end-users, employees, and other stakeholders, affected by our solutions and internal processes, and to ensure that economical profit or other material benefit may never override the fundamental rights and safety of the individual. Thus, the individual's right to self-determination should be observed and SOS International is committed to safeguard the confidentiality of any data at SOS International's disposal.

### 3. Trust

SOS International wants to be a trusted partner to our customers, end-users, employees, and other stakeholders. As such, it is essential for SOS International to continue to build long-term relationships and to continue to ensure that what is said, is what is done. It is imperative that customers, end-users, employees, and other stakeholders see SOS International as a trustworthy party in connection with data handling as well as in all other aspects. Handling of data at SOS International should be transparent and explainable.

### 4. Respect

For SOS International, respect for customer, end-user, employee, and other stakeholder data is a fundamental ethical value and at the heart of our decisions about data. In circumstances where privacy must be balanced in relation to other reasonable concerns, privacy should be given preference. It is imperative that any data handling business unit or department in SOS International acts with respect and accountability to reduce the risks for the individual.

### 5. Equality

SOS International is conscious of how the handling of customer, end-user, employee, and other stakeholder data can both reduce and reinforce conscious and unconscious bias leading to discrimination or stigmatisation, for example due to financial, social or health related conditions. Therefore, we strive to be diligent in actively addressing potential issues in this regard and will proactively work towards reducing and avoiding bias. Special awareness must be given when using new technologies such as artificial intelligence.

## **5 RESPONSIBILITY AND GOVERNANCE**

The CFO of SOS International is the owner of the policy and Group Finance is responsible for preparing and updating the policy. The data ethics policy shall be reviewed and adopted by the Board of Directors of SOS International annually. This data ethics policy was adopted for the first time at the board meeting on 17 March 2022.

The managers and employees will be trained in the policy as part of the regular compliance training program and other specific information activities.

Progress with and reporting on the work with data ethics at SOS International is handled by Group Compliance & Governance.