

SOS International

Supplier Code of Conduct

The purpose of this Supplier Code of Conduct is to set clear expectations for suppliers regarding ethical business practices, respect for human and labour rights, environmental responsibility, and anti-corruption, in alignment with SOS International's commitment to sustainable development.

Document responsible:
Head of Legal & Sustainability

Document Owner:
CFO

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1 OBJECTIVES AND CONTEXT

The objective of this Supplier Code of Conduct (the “Code”) is to ensure that all suppliers operate in accordance with internationally recognized standards on human and labour rights, environmental management, and anti-corruption, thereby supporting SOS International’s commitment to sustainability and ethical business conduct.

2 REQUIREMENTS AND OBLIGATIONS

This Code is made to ensure responsible business ethics among SOS International’s suppliers in accordance with applicable local, national, and international laws and regulations, while also demonstrating SOS International’s commitment to sustainability and ethical business conduct towards our customers and other stakeholders.

3 PURPOSE

SOS International is committed to economic, environmental and socially sustainable development. This forms the basis of our approach to corporate social responsibility and our way of conducting our business with high integrity and ethical standards.

This Code is inspired by the ten general principles contained in the UN Global Compact. It includes respect for the environment, anti-corruption and universally recognised principles on human rights, including labour rights. SOS International wants to uphold this Code and the related instructions in a spirit of constructive dialogue and in partnership with our suppliers for the mutual benefit of both parties.

4 SCOPE

This Code governs the business relationship between SOS International and our suppliers regarding the theme’s corporate social responsibility and business ethics.

As a condition for doing business with SOS International, we require our suppliers to comply with the Code and its Appendices. In addition, suppliers shall ensure that their sub-contractors also comply with the provisions of the Code and its Appendices.

The provisions in this Code are minimum requirements to suppliers. In addition to meeting the minimum requirements in this Code, suppliers must comply with all applicable local laws and regulations. If there are differences between the provisions of the Code and applicable laws or regulations, suppliers shall adhere to the higher requirements.

5 MONITORING AND NON-COMPLIANCE

The supplier shall at SOS International’s request provide sufficient information for SOS International to ensure that the supplier is compliant with the Code and its Appendices. Such information may be disclosed to SOS International’s customers if relevant.

If this Code or its Appendices is not complied with, the supplier shall inform SOS International immediately and prepare an action plan to remedy the non-compliance.

SOS International reserves the right to consider any non-compliance by suppliers or sub-suppliers a material breach of the agreement between SOS International and the supplier.

6 HUMAN RIGHTS INCLUDING LABOUR RIGHTS

Suppliers are expected to support the protection of internationally recognised human rights, including labour rights, as stated in the UN International Bill of Human Rights and the UN International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.

As a minimum, SOS International expects our suppliers to:

- Condemn the use of forced labour and exploitative child labour

- Comply with applicable laws, agreements and industry standards on compensation and working hours
- Respect employees' lawful freedom of association and the right to collective bargaining
- Provide equal opportunity for all employees and not discriminate at any level of the organisation based on ethnicity, gender, age, religious beliefs, social origin, disability, sexual orientation, gender identity or any other legally protected characteristic
- Provide a safe and healthy work environment

7 ENVIRONMENT AND CLIMATE

Suppliers must manage all significant potential and actual impacts on the environment and climate.

As a minimum, SOS International expects our suppliers to:

- Identify aspects of the supplier's activities, products and services that have or may have significant impact on the environment
- Ensure legal compliance with applicable law or regulation relevant to the environmental impacts of the supplier's activities, products and services
- Establish environmental objectives and targets relevant to the law and significant environmental affairs, and develop action plans to achieve the stated objectives and targets
- Ensure that activities related to the environment are conducted under specified conditions and continually monitored
- Ensure that any person performing tasks which have the potential to cause significant environmental impact is competent and has the proper education, training and experience to overcome the potential risk

8 ANTI-CORRUPTION

SOS International will not tolerate any form of, and will not engage in any form of, corruption or bribery. Suppliers are required to work systematically and continually against corruption or other improper business practices.

As a minimum, SOS International requires our suppliers to:

- Comply with applicable laws and regulations relating to financial crimes, anti-corruption and refrain from engaging in any form of bribery, corruption or extortion
- Abstain from deliberate or inadvertent involvement in money laundering
- Establish and have in place adequate policies and processes to counter corrupt practices
- Refrain from offering disproportionate donations, funding, excessive gifts and extravagant entertainment and similar improper advantages to government officials, SOS International employees, agents, representatives of other business partners etc. Courtesies must be properly reflected as such in the supplier's books or records
- Generally, refrain from offering, promising or making facilitation payments
- Refrain from using the name or assets of SOS International to promote the interests of political parties or candidates
- Avoid conflict of interests and always make decisions without regard to personal concerns that could impair, or be perceived to impair, the supplier's business judgment. Disclose conflict of interests if they occur

9 BUSINESS ETHICS

Suppliers are expected to adopt fair and respectful business practices towards all of its business relations.

As a minimum, SOS International expects our suppliers to:

- Provide and record all information honestly and accurately, including but not limited to expenses, revenues, data and any other corporate information. Compliance with applicable accounting methods is required, as is cooperation with internal and external auditors
- Safeguard any confidential information and personal data. Respect and protect the individual's right to privacy by adhering to the agreement with SOS International and the Code of Conduct for the processing of Personal Data (please refer to Appendix 1)
- Abstain from fixing prices or otherwise restraining trade
- Refrain from using illegal drugs, abuse alcohol or misuse legal drugs when conducting business with or on behalf of SOS International
- Make no public statements on behalf of SOS International. Always forward any requests from the media regarding SOS International to our Communications Department

10 CONTACT INFORMATION

Questions and observations including required reporting relating to this Code shall be directed to SOS International at:

Groupsustainability@sos.eu

SOS International A/S
Arne Jacobsens Allé 7
2300 København S
Denmark

APPENDIX 1: CODE OF CONDUCT FOR PROCESSING OF PERSONAL DATA AT SUPPLIER

We process personal data with due care

In SOS International information security and data protection comprise some of the most important parameters for the success of our business. In SOS International we are committed to always protect customer and end-user privacy. These efforts are supported by our certifications in international information security standards.

The delivery of our services often involves transfer and processing of personal data, which is why we hold data security and privacy to the highest standards by ensuring proper safeguarding of personal data, including sensitive information. Compliant processing of personal is also what we expect from our suppliers – regardless of whether you are a data controller or data processor in relation to personal data. When SOS International relies on a supplier to process personal data on our behalf, there will always be a written data processing agreement in place with our data processors. However, SOS International also assumes that its suppliers that act as independent data controllers undertake to protect personal data and process it in accordance with applicable laws and regulations.

This Code of Conduct for Processing of Personal Data at the Supplier (hereafter “Code of Conduct for Data Protection”) supplements any agreement, including data processing agreement between the supplier and SOS International. In addition to meeting the requirements in this Code of Conduct for Data Protection, the supplier shall comply with all applicable privacy and data protection laws. Should any differences exist between the provisions of the Code of Conduct for Data Protection and applicable laws, the supplier shall adhere to the higher requirements.

Scope

The provisions in the Code of Conduct for Data Protection establish minimum requirements to the suppliers that SOS International has chosen as its trusted partners, from whom SOS International assumes accountability for the compliant processing of personal data.

The Code of Conduct for Data Protection applies to the supplier’s employees and any sub-suppliers, such as consultants, advisors, and temporary employees with access to personal data, as well as any kind of data processing, including all kinds of automatic data processing, manual filing systems and other forms of systematic manual processing of personal data.

Principles

Any information related to an identified or identifiable person must be collected and processed in accordance with applicable data protection legislation and other applicable laws and regulations, as well as the principles as set out in this Code of Conduct for Data Protection.

SOS International requires its suppliers to comply with the principles relating to processing of personal data as set out in data protection legislation, including the principles of lawful, fair and transparent data processing, respecting the purpose limitation, as well as the principles of data minimisation, accuracy of data, storage limitation, confidentiality, security and integrity, as well as limitation on access. In addition, SOS International requires its suppliers to ensure that all relevant information security requirements must be in place with each supplier that has access to or can impact SOS International’s information, including implementing appropriate technical and organisational security measures to protect information.

Below is an exemplary list of requirements that SOS International assumes its suppliers to comply with. The list is illustrative and not exhaustive – it gives an indication of the requirements and measures that SOS International assumes that its suppliers undertake and comply with. SOS International assumes that its suppliers:

- Process personal data only for the defined purposes in a clear and transparent manner.
- Never process more personal data than necessary.

- Process personal data only to the extent that it is necessary for the performance of the supplier's obligations or as otherwise required according to mandatory applicable law.
- Ensure, as far as possible, that the personal data processed is accurate and kept up to date. Misinformation and deficient information compose a risk to data-subjects.
- Whenever disclosing personal data, the supplier ensures the existence of a legal basis for disclosure. Personal data may only be disclosed on a need-to-know basis. Transfers may only be made to the extent necessary to fulfil the purposes for which the personal data is being processed.
- Personal identification numbers should only be disclosed when necessary for securing a precise identification of the data subject or when it is a requirement from a public authority.
- Keep personal data in a form which only permits the identification of data-subjects for as long as is necessary for the purposes of processing the personal data, keeping in mind the applicable statutory record-keeping period. Personal data must be subsequently anonymised or deleted.
- Ensure confidential and secure data processing, including proper access management.
- Respect the rights of the data subjects for example by informing data-subject about the processing, providing access to personal data, deleting or rectifying inaccurate or incomplete personal data when requested by the data-subject.
- Implement appropriate technical and organisational security measures to protect personal data against accidental or unlawful destruction, loss or alteration, and against unauthorised disclosure or abuse. This includes, among others, granting access rights only to authorized personnel and protecting systems containing personal data with adequate password, keeping a log on all authorisations, transfers and other processing, ensuring that no private hard- or software is used to process personal data, and ensuring that firewall and anti-virus programs are in place.
- Follow general advice and rulings from the relevant data protection authorities.

Governance

To ensure compliance, the supplier shall have appropriate policies and procedures in place, which shall consider the category of personal data in question (e.g. regular, sensitive, etc.) as well as all the different systems where processing takes place.

Furthermore, procedures should be in place in the event of a suspected or actual material incident (e.g. a cyber-attack or security breach) in order to promptly report them through appropriate channels.

All employees and any sub-suppliers shall be informed of and trained in the matters mentioned in this Code of Conduct for Data Protection. Only trained employees and sub-suppliers shall have access to personal data received from SOS International.

Contact Information:

If you have any questions in relation to this Code of Conduct for Data Protection, please contact SOS International at:

Dataprotectionofficer@sos.eu

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