



LEGAL & COMPLIANCE

BSO Business Partner Code of Conduct

I. Applicability & Scope

BSO Network (“BSO”) is committed to honesty and integrity with respect to its entire business conduct towards partners, customers, suppliers, competitors and other stakeholders (“BSO Business Partner”). BSO recognizes that legal requirements vary in a global market. BSO expects all of its Business Partners to act with the same fairness, honesty and responsibility and dedication in all aspects of their business. This Business Partner Code of Conduct highlights important standards that are consistent with BSO’s values and which BSO expect each Business Partner including, but not limited to suppliers, customers, resellers, service providers and others, to observe and strictly adhere to.

II. Compliance with Laws & Regulations

BSO is committed to adhering and complying with all applicable laws and regulations. Thus, The Business Partner will comply with all applicable laws, rules and regulations in the countries in which it operates and will maintain suitable measures to ensure compliance with such laws, rules and legal regulations.

Competition and antitrust laws

BSO engage in open and fair procurement practices where Business Partners are selected on a competitive basis and establish a mutually beneficial relationship based on close cooperation and open communications, thus BSO Business Partner:

- Shall comply with applicable competition and antitrust laws and regulations. This means, among other things, to not engage in price fixing, market sharing, bid rigging or customer allocation.
- Should never propose or enter into any agreement with a competitor to fix margins, prices or contractual

terms, or to divide up the market in any way.

Anti-bribery and corruption laws

BSO is fully committed to instilling a strong anti-corruption culture and is fully dedicated to compliance with all anti-bribery and anti-corruption legislation, thus BSO's Business Partner:

- Should comply with all applicable anti-bribery and corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act.
- Should not offer, provide, authorize or receive bribes, kickbacks or other improper payments for any reason.

Anti-Money Laundering and Fair Dealing

At BSO we expect our Business Partners to comply with all applicable statutes governing the prevention of money laundering and not to participate in any money laundering activity. Business Partners should prevent and monitor for possible money laundering, terrorist financing or activity violating any applicable sanctions or export-based restrictions. Business Partners should ensure they are conducting business only with reputable business partners, for legitimate business purposes, with funds derived from legitimate sources.

Data Protection and Privacy

BSO is strongly committed to protecting privacy and complying with data protection laws. AT BSO personal and non-personal information is collected in accordance with the highest privacy and data protection standards adopted worldwide. BSO always has a robust and effective data protection program in place which complies with existing law and abides by the data protection principles.

BSO Business Partners shall comply with all applicable data protection laws in collecting, processing, storing or otherwise handling personal data of any individuals, including, without limitation, their own employees and employees of their customers, suppliers and business partners.

Business Partners shall respect individuals in a manner consistent with the rights to privacy and data protection. They shall at all times use information about people appropriately for necessary business purposes and protect it from misuse in order to

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prevent harm to individuals such as discrimination, stigmatization or other damage to reputation and personal dignity, impact on physical integrity, fraud, financial loss or identity theft.

Audit

While Business Partners are expected to self-monitor and demonstrate their compliance with this Code as well as all laws and regulations, BSO may audit Business Partners to confirm compliance.

Business Partners are expected to cooperate with BSO's periodic requests for documents and/or information made in connection with BSO's partner onboarding and due diligence processes. To ensure that our partners adhere to BSO's policies, Business Partners may be asked to provide certain information identifying the company structure, the potential existence of conflicts of interest, and compliance with all applicable laws. Business Partners are obligated to provide truthful and accurate responses to such requests for information. BSO reserves the right to request additional information at any time. BSO may

terminate their business relationship with the Business Partner for failure to satisfy the obligation of providing

truthful and accurate responses to such information requests.

III. Ethical Business Practices

At BSO, our business practices are based on honesty, integrity and compliance with the law. BSO is committed to dealing fairly and honestly with all our Business Partners, regardless of where they are located or the type of products or services they provide.

Conflicts of interests

Business Partners must disclose any interest which they may have (or might be seen to have) in the outcome of any decision in which they are asked to participate. Business Partners must also disclose any interest that could otherwise prejudice any service they are asked to perform. Business Partners must consider potential conflicts of interest at the earliest stage possible and declare any interest as soon as they realize it is necessary to do so. A Business Partners must not participate in any decision or perform any other service until the potential conflict is resolved.

BSO Business Partners are expected to adopt and enforce policies which effectively prohibit discrimination and harassment, as well as provide a workplace free of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuses of workers

Non-Discrimination

BSO does not tolerate, and Business Partners shall not engage in, any form of discrimination, harassment or demeaning behavior against any individual or group on the basis of race, color, religion, sex, sexual orientation, gender identification, national origin or ancestry, citizenship, age, marital or family status, military or veteran status, physical or mental illness or disability, pregnancy or any other basis prohibited by applicable law.

IV. BSO Property

BSO respects the intellectual property rights of others and expects other companies to respect BSO's intellectual property rights. An important element of such protection is maintaining the confidentiality and proprietary of BSO's information.

Confidentiality Information

It is the Business Partner's responsibility to ensure that any confidential business information ("Confidential Information") gained by virtue of the business activities with BSO is held in strict confidence and not improperly used or disclosed to third parties.

Business Partners must not disclose or make any other use of Confidential Information to which they have access other than for a proper purpose of performing its obligations under the contract with BSO or as required by law.

Business Partners must keep BSO's Confidential Information safe and secure and use the same standard of care used to safeguard its own information of a confidential nature but which shall at all times be no less than a reasonable standard of care, and taking all reasonable steps to prevent any unauthorized disclosure of such Confidential Information.

Business Partners must only process BSO's Confidential Information to the required extent to perform its obligations under the agreement with BSO.

Business Partners must take appropriate steps to ensure that confidential papers and information are stored securely. Partners must promptly notify BSO of any breach in confidentiality of which they become aware.

Intellectual property

BSO's Business Partners may only use BSO's intellectual property, such as trade secret information, copyrights, patents and trademarks, in a manner permitted under their contract with BSO and may not misappropriate or infringe the intellectual property rights of others. BSO's Business Partners must not misuse any trade secrets or proprietary or confidential information of BSO or of others for their own purposes or disclose such information to unauthorized third parties. BSO business partners must notify BSO if they become aware of any unauthorized use of the BSO brands, trademarks or logos by a third party

BSO Business Partners and other stakeholders may report suspected violations (anonymously and confidentially) by sending an email to Contact.legal@bso.co