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ETHICS HANDBOOK

Sense8 Digital Technology Ethics Handbook

This handbook outlines the ethical principles that all employees of Sense8 Digital Technology must adhere to. It is important that we operate with integrity and in compliance with all laws and regulations, as well as with our own ethical standards. Failure to comply with these standards may result in disciplinary action, up to and including termination of employment.

Ethical Principles:

- **Honesty and Integrity** - We must be truthful and transparent in all of our dealings, and we must avoid conflicts of interest.
- **Respect** - We must treat all employees, customers, and stakeholders with respect and dignity.
- **Fairness** - We must make decisions based on fairness and without prejudice, and we must treat all employees equally.
- **Responsibility** - We must take responsibility for our actions and their consequences, and we must always strive to do the right thing.
- **Compliance** - We must comply with all laws and regulations, as well as with our own ethical standards.
- **Confidentiality** - We must respect the confidentiality of information entrusted to us by our customers, colleagues, and stakeholders.
- **Social Responsibility** - We must be aware of the impact of our actions on society and the environment, and we must strive to be good corporate citizens.

Reporting Violations

- If you become aware of any violation of our ethical principles, you should report it to your manager, the HR department, or the company's Ethics Officer. You can do so anonymously if you prefer. The company has a zero-tolerance policy for retaliation against anyone who reports a violation in good faith.
- At Sense8 Digital Technology, we believe that ethical behavior is essential to our success as a business. We are committed to upholding these principles and to creating a culture of integrity throughout the organization. By working together to maintain high ethical standards, we can build a company that we can all be proud to be a part of.
- Before you dive into any of the specific topics, please take a moment to think about what this
- Handbook represents: first and foremost, it serves as a compass to point you in the right ethical direction. It also identifies fundamental principles and rules you shall work by, and it serves as a basis for the interpretation of all other internal regulations of Sense8 Digital Technology.
- Simply put, our life working for or on behalf of Sense8 involves a lot of „musts”: we must comply with legal regulations, international treaties and authority decisions; we must observe rules of ethics, morals and fair commercial conduct. This Handbook strives to help you with these „musts”.
- However, its list of rules and principles is not exhaustive. Should anything not be expressly regulated, exercise good judgement and always act in a way that promotes the good name and reputation of Sense8.
- Last but certainly not least, there is one more
- „must”: if you suspect any violation of the Handbook or the Code of Ethics, keeping quiet about it is a violation too. If you have an ethical concern, you need to raise your voice. We tolerate no retaliation whatsoever against anyone who reports a concern in good faith. However, knowingly false or vexatious submissions shall not be tolerated either.
- Whistleblowing in good faith helps uncover breaches and supports a constructive working environment based on mutual respect. The Integrity team treats all incoming reports confidentially and investigates them in an objective, fair and impartial manner. If an internal investigation substantiates a breach, sanctions potentially affecting employment may be imposed.
- All contracting partners of Sense8 are provided with a boiler plate of our ethical principles. We strive to make the rules therein a part of our contractual relationships.

WE AVOID CONFLICTS OF INTEREST

We shall always act in the best interest of Sense8. The decisions we make at work shall be objective and free from any personal considerations.

- This may sound trivial, but it can be challenging to keep your personal life away from the things you do at work. Your investment in another company, your family relationships or your friendship with a supplier may all influence your decisions at work: if this happens, your focus is no longer on Sense8 only and you may no longer be acting objectively.
- Some conflicts are easy to see: if you hire your spouse into your team or you award a contract to your brother's company, you will certainly be partial, even if you believe you can remain objective. Such actions shall be avoided.
- Other situations are trickier because you need to consider how they appear to others, even if you
- haven't done anything wrong. If your best friend works at our competitor and you know you never discuss confidential company topics, people may still doubt it.
- Similarly, if your father's company has become a Sense8 supplier, colleagues may not believe that you had nothing to do with the decision.
- You may feel unsure at times: a fancy dinner invitation from a supplier could make you wonder if they will expect something in return.
- In such situations, being transparent is the key to building trust and to demonstrating objectivity.

How to do the right thing: Be transparent

Always report your interests according to policy and transparently share the info with your superior and other relevant colleagues.

Be objective

Whenever you have a personal interest that may influence your judgment, take a step back and let others decide. Also avoid participating in decisions when you think you can be objective, but others may reasonably believe that you are biased.

Be responsible

When at work, always keep Sense8's best interest at heart. Do not hold external duties or positions that could impact your ability, performance and responsibility to look after what is best for Sense8.

Be alert

In case of any questions, concerns or doubts related to any of your personal interests, always consult with your supervisor and Integrity.

Q&A

So does this mean I cannot recommend a friend for a position at Sense8 or to be our supplier?

You certainly can, just make sure you're not influencing the selection. And then let the People Department do the work.

If you recommend a supplier, reach out to the contract owner, disclose openly your relationship to the potential supplier and make sure you stay out of the selection process.

May I work together with a supplier where my brother is a manager?

You may definitely not participate in the selection process. You may work with them if it cannot be avoided, but only others may evaluate the performance of the supplier.

You also need to let your colleagues know about your relationship

WE REJECT CORRUPTION

Sense8's success is built on our quality services and our passionate and engaged employees, not on unethical activities.

Corruption is the abuse of entrusted power for private gain. It is illegal and it is unethical.

Corruption erodes trust, undermines the rule of law, distorts markets and is a key element in economic underperformance. Corruption may happen in the public sector, in business and even between private individuals, but mostly it is done in the shadows.

How to do the right thing: **Learn** what the signs of bribery could be

Corruption can take many forms and some of them are not easy to recognize. If you're in a situation where you ask yourself any of these questions, treat them as a red flag: Why am I being offered this gift? Am I the only one to receive this? Am I a decision maker or someone who can influence a decision? Why is this supplier reluctant to undergo a screening? Why is there a middleman in a proposed transaction? Why am I negotiating with one company of a group but asked to sign a contract with another? Once you identify a red flag, contact the Integrity team for support.

Never commit or even attempt bribery

Do not offer, give, request or accept bribes, kickbacks, facilitation payments, any form of cash or undue benefit

Avoid excessive gifts or fancy events

Do not use donations and sponsorship to illegally influence decision makers

Only make payments based on valid transactions and for legitimate purposes, maintain proper business records

Be alert with public officials

There are many public entities we need to work together with and we always respect their independence and reject illegal influence. We also need to be extra cautious because even standard business courtesies can be considered as a bribe or an improper advantage, so always consult the Integrity Team beforehand.

WE ARE HERE TO WIN BUT WE COMPETE FAIRLY

Undistorted competition is a cornerstone of the economy and is the interest of the society, as it fosters innovation and development. There are laws in every country to ensure that competition is not restricted through agreements between competitors, unilateral restrictive behaviour from a dominant company or by mergers between undertakings.

Agreeing on prices or market allocation are clear violations of competition law. But there are several other unintentional or informal acts that can be understood as a restriction of the competition. It is therefore crucial to fully understand both the concepts and the detailed regulations of competition law. And here we really need to walk the talk: whenever a potentially anti-competitive act is encountered,

[speaking up is not only the right thing to do, it is a legal obligation.](#)

WE ACT WITH INTEGRITY. ALL OF US.

When we say integrity and an ethical way of working is the joint responsibility of everyone, we do mean everyone who works for, with or on behalf of Sense8.

Sense8 employees do make up the company. Yet we are also engaged in a multitude of relationships with suppliers and business partners: we need to be able to trust one another that we share a commitment to providing high quality services and acting with integrity. We shall never fall in with the wrong crowd or be the wrong crowd ourselves. We therefore select our business partners with due care, based upon the quality of their services, track record and reputation. We also need to ensure that they operate legitimately and do not appear on sanctions lists. Once selected we strive to work with them so that they are proud of being associated with Sense8.

COMPANY ASSETS HANDLE WITH CARE

- From the computers and company phones we work on, the desks we sit at, the information we exchange, the ideas we turn into products all the way to our world class network, all are valuable company assets. We use them every day to create value for our customers, hence they need to be safeguarded.
- Think about handling money in private life: most people are likely to physically protect their money from theft, but do they care as much about spending it responsibly? Similarly, our company obviously uses physical protection, but we all need to exercise maximum caution and responsibility so that our assets are also safeguarded from misuse or waste.
- While confidential information needs to be secured primarily from unauthorized access or alteration, other valuable intangible assets also need protection. It heavily impacts the brand perception how trademarks and copyrighted materials are used. A future product and service, or a long term strategic decision is one of the best kept secrets in every company until they are launched and go public. Such Intellectual Properties are vital assets that need at least the same level but different type of protection than our core network or other critical physical assets.
- Transactions recorded in error or with a misleading description, missing documents, inconsistent or false reports that do not reflect our business performance - all these influence our compliance with laws on financial accounting and will result in decreasing public trust in our Company. All of us are responsible for maintaining accurate records and presenting our true performance.

INFORMATION CARRIES VALUE. WE PROTECT IT.

Never has information been so available, valuable and shareable. The way we keep and communicate it can make the difference between information being a major asset or a serious threat.

From the personal details of our customers through our financial figures all the way to our upcoming tariffs or campaigns, we work with a wealth of information every day that many outside Sense8 would love to know too.

Remember that access to information is also a responsibility: if you know it, you need to protect it. Internally this means that you apply proper security classification, store information in a secure manner and share it with authorized colleagues only on a need-to-know basis. Externally, you leave any disclosure and direct any media enquiry to our dedicated Corporate Communications team.

PERSONAL DATA REMAINS PERSONAL

Have you ever thought about how much personal data is generated through the simplest daily routines, such as making a phone call or ordering dinner online? And have you ever wondered about the potential consequences if such data ends up in the wrong hands?

If you want to check your phone bill details, you reasonably expect to receive your call records from Sense8. But you also expect that nobody spies on whom you texted last night. Similarly when a gluten free pizza arrives at your doorstep, it means you have already provided your address, food preference and allergies online.

Since all such information flows through our network, we understand our enormous responsibility to protect your personal data and your private life. Besides thoroughly complying with the privacy regulations we work for maintaining trust in Sense8 through the technology we use and the employees who process valuable personal data.



We believe that a tolerant and inclusive environment makes a better place to work.

We welcome the differences in skills, experiences, views and opinions because they enrich our teams. At the same time we are united in our commitment to our success through cooperation, continuous improvement and through living our corporate values.

We recruit, employ, compensate and reward based on performance and contribution to our goals. We provide equal opportunities and do not discriminate based on race, colour, gender, sexual orientation, age, disability, language, religion, employee representation, political or other opinions, national or social origin, property, birth or other status.

All employees have the right for freedom of association and to support a political party or any organization in the private life, but these have to be separated from the employment with Sense8. We do not allow forced or illegal labour, harassment, bullying, physical or mental abuse, intimidation or degrading treatment. Beyond compliance with all applicable labour legislation we believe in and strive for an employment experience that is mutually respectful, constructive and rewarding.

WE
RESPECT
EACH
OTHER

