

Argus Interception GmbH	Business Partner Code of Conduct	
	AIXXXXHAB	

Business Partner Code of Conduct

Table of contents

Preamble	3
1 Purpose and objective.....	3
2 Adherence to the law and understanding of compliance.....	3
3 Integrity in business transactions	3
4 Conflicts of interest	4
5 Fair competition.....	4
6 International business activities and export control.....	4
7 Human rights, working conditions and environmental standards.....	4
8 Data protection, confidentiality and information protection	4
9 Reporting misconduct and whistleblower system.....	5
10 Dealing with deviations	5
11 Concluding remarks.....	5

Argus Interception GmbH	Business Partner Code of Conduct	
	AIXXXXHAB	

Preamble

Argus Interception GmbH ('Argus Interception') works with business partners who share a similar understanding of integrity, adherence to the law and responsible conduct.

As a company operating in the field of security and defence, Argus Interception is subject to specific legal, regulatory and ethical requirements. Against this backdrop, we expect our business partners to recognise these fundamental values and to have them anchored in their organisation through appropriate internal regulations, policies or procedures.

This Business Partner Code of Conduct sets out the **basic understanding and expectations of Argus Interception** for collaborations that are compliant with the rules and based on trust.

Please note: for the sake of readability, no gender-specific distinctions have been made. All references to people apply equally to all genders.

1 Purpose and objective

This Business Partner Code of Conduct is intended to provide transparency and guidance. It does **not form part of any contract**, does **not give rise to any separate obligations** and is **not intended to be signed**. However, Argus Interception expects business partners to respect the principles set out herein and implement them appropriately within their own area of responsibility.

2 Adherence to the law and understanding of compliance

Argus Interception expects its business partners to comply with all applicable national and international laws, regulations and official requirements.

This includes, in particular, regulations surrounding:

- Export controls, sanctions and embargoes
- Prevention of corruption and money laundering
- Competition and antitrust law
- Data protection and information security
- Labour, social and environmental law

3 Integrity in business transactions

Corruption prevention

Argus Interception has a **zero-tolerance attitude** towards corruption. Business partners are expected to have internal regulations in place to prevent improper granting of benefits, acceptance of benefits or other forms of corruption.

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Argus Interception GmbH	Business Partner Code of Conduct	
	AIXXXHAB	

4 Conflicts of interest

Business partners should put in place appropriate organisational measures to identify, disclose and deal appropriately with actual or potential conflicts of interest.

5 Fair competition

Fair, transparent and legally compliant competitive behaviour is required.

6 International business activities and export control

Due to the security-related activities of Argus Interception, business partners are expected to:

- Be familiar with the relevant export control, sanction and embargo regulations
- Have appropriate processes in place to prevent unauthorised disclosure
- Not conduct business with sanctioned individuals, organisations or countries

7 Human rights, working conditions and environmental standards

Argus Interception expects business partners to respect internationally recognised human rights and fundamental labour and social standards.

These include in particular:

- The rejection of child and forced labour
- Respectful and non-discriminatory treatment
- Appropriate health and safety measures
- A responsible approach to the environment and resources

8 Data protection, confidentiality and information protection

Business partners should have implemented appropriate technical and organisational measures to protect personal, confidential and security-related information. Confidential information in connection with Argus Interception must be used for the intended purpose and protected against unauthorised access.

Argus Interception GmbH	Business Partner Code of Conduct	
	AIXXXHAB	

9 Reporting misconduct and whistleblower system

Argus Interception promotes transparency and responsible action, including its dealings with business partners.

Business partners and their employees may report actual or suspected violations of rules or laws, **provided that they concern Argus Interception or the business relationship with Argus Interception.**

To this end, Argus Interception maintains an independent whistleblower scheme. Reports can be made confidentially and, if desired, anonymously.

Internal reporting office (operated externally):

EY GmbH & Co. KG Wirtschaftsprüfungsgesellschaft

Andreas Frank

Friedrichstrasse 140, 10117 Berlin

+49 160 939 19631

argus.interception.whistleblowing@de.ey.com

Use of the whistleblower scheme is voluntary. Alternatively, business partners can also use their own internal reporting channels. However, Argus Interception expects that any relevant issues relating to the collaboration to be made transparent.

10 Dealing with deviations

Should significant deviations from the principles set out in this document become apparent in the course of the collaboration, Argus Interception reserves the right to assess this within the scope of the business relationship and to respond appropriately.

11 Concluding remarks

This Business Partner Code of Conduct reflects the self-image and expectations of Argus Interception. It serves as a guiding framework for long-term, trusting and rule-compliant collaboration.