

Argus Interception GmbH	Code of Conduct	
	AIXXXHAB	

Code of Conduct

Argus Interception GmbH	Code of Conduct	
	AIXXXXHAB	

Table of contents

Preamble	3
1 Purpose and scope.....	3
2 Basic principles of our actions	3
3 Responsibility towards people, society and the environment.....	4
4 Protection of information and corporate values	4
5 Integrity in business transactions	4
6 International business activities and export control.....	5
7 Whistleblower system and zero tolerance	5
8 Implementation, training and consequences.....	5

Argus Interception GmbH	Code of Conduct	
	AIXXXXHAB	

Preamble

Argus Interception GmbH (hereinafter referred to as 'Argus Interception' or 'we') is committed to acting lawfully, responsibly and with integrity as an indispensable foundation of its business activities. As a company operating in the field of security and defence, we bear a special responsibility towards our employees, customers, business partners, government agencies and society as a whole. Compliance with legal, regulatory and ethical requirements is not only an obligation for us, but an integral part of our corporate culture. This Code of Conduct sets out the binding principles by which Argus Interception operates. It serves as a guiding framework for responsible conduct and supplements our internal guidelines, in particular the Compliance Handbook, the internal export control system (ICP) and other specialist guidelines.

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 scope

This Code of Conduct applies to all employees, managers, governing bodies and external third parties insofar as they act on behalf of or on the instructions of Argus Interception.

It is based in particular on:

- The applicable national and international laws
- Regulations governing export control, sanctions and foreign trade
- Regulations governing employment, data protection and competition law
- Recognised international standards on human rights, integrity and compliance

Compliance with this Code of Conduct is mandatory.

2 Basic principles of our actions

Argus Interception acts at all times:

- **In accordance with the law**
- With **integrity** and **transparency**
- **In a responsible** and **accountable** manner
- With respect for **human rights** and **fundamental ethical values**

Violations of the law, rule violations or unethical behaviour will not be tolerated.

Argus Interception GmbH	Code of Conduct	
	AIXXXHAB	

3 Responsibility towards people, society and the environment

Human rights, equal treatment and respect

Argus Interception respects internationally recognised human rights and upholds the dignity of every individual. Discrimination, harassment or unfair treatment on the grounds of personal characteristics will not be tolerated.

Occupational health and safety

The health and safety of our employees is our top priority. Occupational health and safety regulations must be strictly observed. Hazards must be reported immediately.

Protection of the environment and resources

Argus Interception is committed to acting in an environmentally conscious and resource-conserving manner, in compliance with all relevant environmental regulations and standards.

4 Protection of information and corporate values

Data protection and information security

Personal, confidential and security-related information is processed exclusively in accordance with the applicable data protection laws, in particular the GDPR, as well as internal guidelines.

Company data must be protected against unauthorised access, loss, manipulation or misuse.

Confidentiality

Business and trade secrets must be treated as confidential and may only be used or disclosed within the scope of the relevant authorisation – including after the end of the employment or contractual relationship.

5 Integrity in business

transactions

Corruption prevention

Argus Interception has a zero-tolerance policy towards bribery, the granting of benefits, the acceptance of benefits and other forms of corruption.

Business decisions are made exclusively on an objective basis and never out of personal interest.

Conflicts of interest

Private interests must not influence business decisions. Actual or potential conflicts of interest must be disclosed immediately.

Fair competition

Argus Interception complies with all regulations related to competition law. Anti-competitive agreements, market manipulation and the exchange of sensitive competitive information are prohibited.

Version: A00	Argus Interception GmbH The distribution and reproduction of this document, as well as the use and disclosure of its contents, are prohibited unless expressly permitted. Any breach of these provisions shall give rise to a claim for damages. All rights reserved in the event of patent, utility model or design registration.	Page 4 of 5
--------------	---	-------------

Argus Interception GmbH	Code of Conduct AIXXXXHAB	
-------------------------	------------------------------	---

6 International business activities and export control

International trade in products, software, technologies and technical information is subject to strict legal requirements.

Argus Interception complies with all applicable export control, sanction and embargo regulations. Any supply, transfer or technical support is provided exclusively in accordance with the approved internal export control system (ICP) and the relevant legal regulations.

7 Whistleblower system and zero

tolerance

Zero-tolerance policy

Argus Interception pursues a **zero-tolerance policy** towards all violations of laws, this Code of Conduct or internal guidelines.

Whistleblowers and protection against reprisals

Argus Interception promotes an open and trusting corporate culture. Reports of actual or suspected violations can be made confidentially and, if desired, anonymously.

Whistleblowers who make a report in good faith or cooperate with investigations are protected from discrimination or reprisals.

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

External reporting office

Federal Office of Justice
Externe Meldestelle des Bundes
53094 Bonn
+49 228 99 410-6644
hinweisgeberstelle@bfj.bund.de
[Online reporting](#)

8 Implementation, training and consequences

Argus Interception shall ensure that this Code of Conduct is understood and complied with through appropriate training, communication and controls.

Violations may result in consequences under employment, civil or criminal law. Further regulations are set out in the applicable internal guidelines.

Version: A00	Argus Interception GmbH The distribution and reproduction of this document, as well as the use and disclosure of its contents, are prohibited unless expressly permitted. Any breach of these provisions shall give rise to a claim for damages. All rights reserved in the event of patent, utility model or design registration.	Page 5 of 5
--------------	--	-------------