

Code of Conduct

Code of Conduct of CIS - Certification & Information Security Services GmbH

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Prologue

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All gender-specific expressions always apply equally to both genders. For reasons of readability, we refrain from using the double form of address.

1 Foreword

CIS - Certification & Information Security Services GmbH (CIS) regards its Code of Conduct (CoC) as part of its Corporate Social Responsibility (CSR). This Code of Conduct is a response to the risks to which a modern company is exposed and forms the basis for all business actions and decisions within the company. It is the basis for morally, ethically and legally impeccable conduct for all employees as well as business partners and suppliers and provides clear guidance as to which behaviours are desirable and which should be avoided. Accordingly, ethically correct behaviour with integrity is expected and, in particular, also positively exemplified by managers in accordance with the CoC.

A special feature of the CIS is certainly the close interlocking with the "network partners" as the most important partners of the organization. The creation of a corresponding climate of trust and a corresponding corporate culture is therefore indispensable.

In terms of content, CIS focuses on the following topics:

- Corporate policy and corporate values as a fundamental guideline for action and for promoting the compliance culture
- Compliance with fundamental behavioural requirements (human rights, handling, anti-money laundering and anti-terrorism)
- Customer orientation and fair competition
- Risk management as a compliance tool
- Compliance with all applicable laws and regulations
- Anti-corruption regulations
- Principles in dealing with business partners and employees (conflicts of interest, secondary employment)
- Handling of information and company facilities
- Environmental protection
- Occupational health and safety

The management of CIS fully supports the statements made in the CoC and actively supports its employees and network partners in the above-mentioned key topics by means of exemplary conduct.

2 Introduction

2.1 RESPONSIBILITY

The CoC is to be worked through by all employees and network partners of CIS on their own responsibility. Each employee and network partner is responsible for compliance with and implementation of the Code of Conduct.

Each CIS process owner is also responsible for compliance with the legal provisions applicable to his or her process. Representatives are appointed for special areas.

2.2 SCOPE OF APPLICATION - LANGUAGE - ONGOING ADAPTATION

- The provisions of this CoC apply to all employees, all divisions as well as to all network partners of CIS (this includes auditors, trainers, technical experts and external partners).
- The use of the term "WE" refers to all employees as well as network partners of CIS.
- The CoC has been drawn up in German and will be translated into other languages as required. The CoC is updated on an ad hoc basis.
- All general statements referring to persons, e.g. employee, manager, etc. are always to be understood in both masculine and feminine terms (e.g. employee and female employee).

2.3 REPORTING MISCONDUCT AND COMPLIANCE VIOLATIONS

If we - the employees and network partners of CIS - identify misconduct, violations of provisions of the CoC, of other internal policies and regulations or of legal requirements, we are prepared to report these incidents immediately.

The following options are available for this purpose:

- Every employee can make a report to his or her direct manager or, if applicable, to a company employee representative.
- Information to the management of CIS
- Information to the owner representatives of CIS
- Reports of possible violations can also be made at any time at office@cis-cert.com. This option is also available to business partners and external parties.

In order to create an awareness to point out misconduct, violations as well as, in particular, cases of corruption, CIS creates a culture that is free of fear of unjustified consequences.

Compliance violations should first and foremost be reported openly, i.e. by mentioning the name of the whistle-blower. All reports received are carefully investigated and treated confidentially if requested. To promote open and trustful communication, it is expressly stated that employees who report identified violations of laws, the Code of Conduct or other internal guidelines and regulations will in no way suffer negative conse-

quences of any kind. This also applies to other persons who contribute important information to the investigation of such misconduct.

In addition, there is the possibility of confidential and anonymous reporting. Where necessary, appropriate measures will be taken to protect confidentiality or anonymity. This option applies equally to employees and network partners.

3 Vision and Highest Principles of Action

3.1 VISION

Through our services, audits and assessments, we make a positive contribution to ensuring that in the increasingly complex world of business and ICT, our customers can offer highly available services without interruption, even in the event of damage, and that information and data are provided in secure environments where and when they are needed and are protected against data loss and misuse. Our trainings increase the awareness and expertise of participants in the areas of information security, data protection and IT service management.

3.2 MISSION

CIS is the leading Austrian service provider for business and society in the field of certification of management systems as well as further training and certification of persons. CIS is accredited as a certification body for both service areas mentioned above by the Austrian Ministry of Economics. The certification of management systems is carried out exclusively using international standards (the most important of which are ISO 27001, ISO 27018, ISO 27019, ISO 27701, ISO 20000, ISO 22301) and standards accepted on the market (e.g. TISAX for the automotive industry, inspections in accordance with the NIS Act for critical infrastructures, etc.). In the field of certification of persons, recognized normative documents are applied as a basis.

We consider that the following premises characterize the value of certification:

- The application of internationally recognized rules of technology, such as ISO standards, etc.
- Accreditation by a competent accreditation body and
- the basic values described below.

The broad international anchoring with a well-founded range of services and the active participation in various committees provides CIS with international recognition and makes an important Austrian contribution to the development of international standards and to the further development of the subject areas of integrated management systems and information security.

The independence of CIS is essentially ensured by its success on the market. Profits generated are reinvested in a structured innovation process and thus in the future viability, competitiveness and high quality of the services offered.

Together with our partner Quality Austria, CIS forms the central national network node for customers, knowledge developers, knowledge carriers, consultants and technical experts in the following service areas:

- Certification, assessment, appraisal, validation
- Training and personal certification
- Knowledge transfer

3.3 CORPORATE POLICY AND CORE VALUES

We stand for practical management systems

- Our services include system and personal certification and
- as well as a wide range of training and continuing education.
- We provide our core services in the areas of information security, data protection, business continuity management and IT service management, and cover a wide range of other industry standards.
- It is our conviction that knowledge transfer and certification of the competence of individual organizations and people working in organizations is essential for the implementation and maintenance of a management system and has a lasting effect on continuous improvement.

We are responsible, independent, objective and internationally recognized

- As an economically autonomous and independent company, we work for the benefit of the site and reinvest the profits generated.
- As an internationally accredited certification body, we are committed to objectivity and impartiality.
- We provide our services to CIS customers uninfluenced by and independent of consulting organizations, competing companies or other influential interest groups.
- We, all persons acting in the name of CIS, are bound by appropriate agreements to treat sensitive facts, information and documents strictly confidentially.

We create value for our customers

- Our services contribute to increasing the security of our customers' data and information worldwide.
- We regularly communicate the benefits and effectiveness of management systems in publications.

- Within the framework of the CIS Symposium and other international congresses, we continuously present current trends and developments.

We are experts from practice

- We speak the language of our customers.
- We, the employees, auditors, trainers, assessors and technical experts, come from practice ourselves and bring specific expert knowledge, industry experience and knowledge of standards directly as added value within the certification process.
- We ensure the high level of competence of our experts through professional training and regular continuing education.

We work with passion and appreciation

- We work closely together as managers, employees and service partners.
- Strong cohesion, helpfulness, mutual appreciation and trusting relationships characterize us as a modern service company.
- Enthusiasm and passion for the subject as well as a high degree of identification with the task at hand characterize our corporate culture.

We shape networks

- Thanks to the international CIS partner network, we provide high-quality services worldwide.
- Together with our partner Quality Austria, we actively shape national and international networks such as associations, cluster organizations, educational institutions and the media.
- Through our participation in national and international standardization, we enable our customers to gain a knowledge advantage with constant know-how transfer.

4 Basic Behavioural Requirements

4.1 HUMAN RIGHTS

Based on the European Convention on Human Rights and the UN Charter, human rights are regarded as fundamental values that must be observed by all employees and network partners of CIS. These principles also apply to the behaviour towards external business partners and suppliers. We do not cooperate in international competition with any organizations that do not oppose human trafficking, any form of child labour and support the principles of human rights.

4.2 RESPECTFUL AND NON-DISCRIMINATORY TREATMENT

- We respect the personal dignity, privacy and personal rights of each individual. We work with people of different ethnic origins, cultures, religions, ages, and regardless

of disability, skin colour, sexual identity, ideology, political views and gender in accordance with our corporate principles.

- In CIS, a transparent, honest and respectful communication culture is practiced, encompassing all hierarchical levels and across company boundaries to customers and business partners.
- We accept neither discrimination nor humiliation; no sexual harassment of any kind, no mobbing or other personal attacks on individuals, for any reason whatsoever. Any harassment in the workplace will not be tolerated and must be reported immediately.
- These principles apply to our internal cooperation as well as to our behaviour towards external partners.
- We are open and honest and stand by our responsibilities. We are reliable partners and only make promises that we can keep.

4.3 COMBATING MONEY LAUNDERING AND TERRORISM

- Money laundering refers to the process of concealing the origin of funds from criminal activities such as terrorism, drug trafficking, or bribery by infiltrating the legal financial and economic circuit through questionable sources of funds. This process serves to create the appearance of legality and conceal the true origin or identity of the owner of the funds.
- We do not support money laundering, in any form whatsoever.
- It is the declared goal of CIS to maintain business relationships only with reputable customers and business partners whose business activities are in compliance with legal regulations and whose financial resources are of legitimate origin.

5 Corporate Principles

5.1 CUSTOMER ORIENTATION AND FAIR COMPETITION

Our ownership structure (majority owner is the independent company "Quality Austria - Trainings, Zertifizierungs und Begutachtungs GmbH") ensures that the services (according to 3.2) of CIS are open to all organizations of all industries.

The revenues of CIS according to the CIS Tariffs and Fees or Prices are the basis for financial independence and fairness.

In addition to ISO/IEC 17021, ISO/IEC 17024 and ISO/IEC 17065, we are guided by the terms and regulations of the IAF (www.iaf.nu) and the Accreditation Body Federal Ministry for Digitization and Economic Affairs (www.bmdw.gv.at).

For the application of sectorial (industry-specific) regulations, the corresponding standards and guides apply. If necessary, additional internal specifications are made.

5.2 THE CIS CERTIFICATE

In our actions, we strive to ensure the lasting value of the acquired certificate for the certificate holder - both personal and corporate certificates - permanently within the scope of validity.

5.3 INFORMATION ABOUT CHANGES IN THE REQUIREMENTS FOR THE CERTIFICATION

We are committed to informing our clients about changes in certification requirements that affect them. The information is provided through different information channels:

- Homepage: www.cis-cert.com
- Newsletter: CIS-Newsletter
- CIS Symposium (annual)
- Special industry- or topic-specific information events as required
- Via the lead auditor in charge
- If required, via personal e-mails/serial letters

5.4 RISK MANAGEMENT

For us, systematic risk management - i.e. the structured identification, assessment and handling of risks of all kinds - is an essential and integral part of our daily business activities.

5.5 COMPLIANCE WITH LAWS AND OTHER INTERNAL AND EXTERNAL REQUIREMENTS

All business actions and decisions are made only on the basis of applicable laws and other external and internal regulations.

Integrity and compliance begin at the top of the organization. Each manager is responsible for ensuring that no violations of legal regulations or this CoC occur in his or her areas of responsibility that could have been prevented or made more difficult by appropriate supervision.

We keep abreast of the latest legislation and applicable regulations important for the business of CIS through regular information, newsletters and relevant literature.

6 Preventing and Dealing with Corruption

6.1 DEFINITION OF CORRUPTION

- 6.2 There is no standard definition of corruption, even though there are countless attempts at definitions in the literature and various non-scientific texts. The word corruption, on the other hand, is a clearly traceable derivative of the Latin "corrumpere. This means as much as spoiled, undermined and ruined. The negative connotation of the word is already clear from this derivation.

In order to be able to give a clear instruction for action in the fight against corruption, a CIS definition is presented here, despite the different definitions, which is composed of the definition of Transparency International and the definition in ISO 37001:2016 Management Systems for Combating Corruption as well as the examples in the definition of the United Nations:

Corruption is the abuse of entrusted power for private benefit and advantage. Examples of corruption include bribery, extortion, influence peddling, nepotism, fraud, kickbacks and embezzlement. Specifically, corruption is the offering, promising, granting, accepting or demanding of an undue advantage of any value (financial or non-financial). This advantage may be given directly or indirectly, in violation of applicable law, as an inducement or reward to a person in connection with the performance or omission of that person's duties...

6.3 GENERAL PRINCIPLES FOR THE PREVENTION OF CORRUPTION

As an accredited certification body, we are committed to ensuring the highest levels of professionalism, fairness, honesty and transparency in the provision of our services, and to preventing the receipt or offering of corruption in any form or direction and avoiding all such conflicts of interest. This is reflected in every aspect of our activities and at all levels of the organization.

Corruption may include, but is not limited to:

- A payment
- An advantage created
- A gift offered or already received, with the aim of influencing or in return for a decision or outcome
 - such as a certification decision or the
 - the result of audits and assessments.
- Our principles of action to prevent corruption are designed to comply with all laws, rules and regulations regarding bribery and corruption. CIS ensures through its rules and regulations that no bribes or corrupt payments are made, offered, solicited or received.

- All employees who accept or offer hospitality or gifts in the performance of their duties must ensure that they do not compromise ethical and legal responsibility or sound business judgment. Any offer, promise, gratuity or gift - especially when dealing with public officials and elected representatives - must comply with applicable laws and CIS requirements and must avoid any appearance of dishonesty or impropriety.
- If there is any doubt about the appropriateness of hospitality and gifts, we will clarify this with the direct superior.
- Cultural aspects in the countries or regions in which CIS operates may differ. What is considered normal and acceptable in one place may be considered unacceptable in another. CIS therefore recognizes that in certain situations and/or countries, refusal of a gift could be considered offensive. In such cases, provided that nationally applicable laws are complied with, a judgment must be made as to whether a gift or invitation is appropriate and can be justified, and whether no benefit or consideration is expected from it. In the above circumstances, such customs must not exceed customary and reasonable hospitality (given or received), and the promotional or ceremonial gifts offered or given must be of nominal value.
- We follow this Code of Conduct in all areas of CIS (including auditors, technical experts, observers and trainers) who work either directly or on behalf of CIS. This Code of Conduct also applies to all CIS activities carried out by CIS partner offices, subsidiaries or persons in connection with the services.
- Political contributions, charitable donations and sponsoring
- As a responsible member of society, CIS facilitates sponsorship through donations in cash and in kind for education and science, art and culture and for social and humanitarian projects. Sponsorship agreements that provide CIS with advertising opportunities, as well as contributions to industry associations or membership fees to organizations that serve business interests, are not considered donations.
- Donations that are not permitted include
 - Donations to individuals and for-profit organizations,
 - Donations to private accounts,
 - Donations to organizations whose objectives are incompatible with the company's principles
 - Donations to political parties or so-called "apron organizations".
- Donations may not be promised, offered or made in order to gain unlawful business advantages for CIS or to pursue an improper purpose.
- Sponsorship of events organized by individuals or organizations whose objectives are incompatible with the corporate principles of CIS, or events which damage the reputation of CIS, is generally not permitted.

6.4 TRANSPARENCY

We are committed to the greatest possible transparency in all decisions relevant to the company, in communications, proper accounting and in the allocation of donations and sponsorship, in order to prevent any influence by corrupt individuals.

7 Principles in Dealing with Business Partners and Third Parties

We expect our business partners and suppliers to comply with all legal requirements and to share the CIS value principles:

- Compliance with all applicable laws,
- The renunciation of corruption
- The observance of human rights,
- Compliance with the laws against child labour
- Accepting responsibility for the health and safety of their employees as well as network partners,
- Compliance with relevant national laws and international standards on environmental protection, and
- The requirement that these values are also implemented/adhered to in all supply chains.

8 Handling of Information and Company Facilities

8.1 CONFIDENTIALITY AND SECRECY

- We undertake to maintain complete secrecy and confidentiality for internal, confidential or proprietary information of CIS and, in particular, similar information of our customers and partners - this usually also applies beyond the end of the employment relationship or the business relationship as a network partner since the disclosure of confidential information, regardless of when it occurs, may be detrimental to the business of CIS or its customers.
- In addition, we protect non-public information from or about suppliers, customers, employees, agents, consultants and other third parties also in accordance with legal and contractual requirements.

By confidential or privileged information, we mean in particular:

- Details of the organization and facilities of our company. Details of prices, sales, profits, markets, customers and other business matters,
- Figures of internal reporting
- Customer property, including intellectual property (trade secrets, patents, licenses, software, etc.).
- In any case, all information the disclosure of which to third parties, in particular to competitor companies or the public, could result in disadvantages for the company is considered confidential.

8.2 DATA PROTECTION AND DATA SECURITY

- We comply with all requirements of the General Data Protection Regulation (GDPR) and the Austrian Data Protection Act (DSG 2018). In addition, the current editions of the internal guidelines on information security and data protection apply. In this context, we also pay particular attention to section 6 DSG iZm personal data.
- We undertake to comply with data secrecy. We and our contractors shall keep personal data from data processing entrusted to us or to which we have access exclusively on the basis of their professional employment secret, without prejudice to other statutory confidentiality obligations, unless there is a legally permissible reason for transferring the personal data entrusted to us or to which we have access (data secrecy).
- We ensure that all CIS processors who process personal data on behalf of CIS do so on the basis of a processor agreement pursuant to Art. 28 DSGVO.

8.3 HANDLING OF COMPANY EQUIPMENT

CIS has numerous facilities and equipment on its premises, such as telephones, copiers, computers, software, Internet/intranet, machines and other work equipment such as e-mail and answering systems. We will use these exclusively for company purposes and not for personal benefit.

Exceptions and, if necessary, cost coverage by CIS can be arranged with the direct manager, provided that the use of the equipment...

- is not related to illegal activities,
- does not create a conflict of interest or the appearance of such a conflict,
- does not result in significant additional costs, disruption of CIS's business or other negative impact on the Company, e.g., due to a conflict of interest with respect to the professional duties of the respective employee or other employees.
- No employee or network partner shall make recordings, visual and audio documents or reproductions of data and information of CIS and its customers on the premises of CIS without specifically required authorization, unless this is directly related to the professional activity.

9 Environment & Sustainability

- We are committed to the sustainable prevention of environmental pollution and strive for improvement.
- We promote the integration of environmental considerations into our customers' existing management systems and thus increase the importance of the environment in the organizations.
- We take ecological criteria into account in procurement.

10 Health and Safety

- Occupational health and safety is a high priority for all employees of CIS and all network partners in connection with the agreed provision of services.
- Managers declare themselves responsible for the prevention of injuries and health risks within their sphere of influence. Every superior is visibly committed to more safety and health protection and fulfils his or her duty of care for his or her employees.
- Everyone is responsible for his or her personal safety and health in his or her own area and at work.
- We do not consume alcohol and other drugs in the workplace and will not illegally deal in drugs or medication.



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