

Code of Conduct

1 Scope

The purpose of this Code of Conduct is to provide guidelines on appropriate business conduct within Netcompany-NC-IN, to help prevent any conflict of interest or other inappropriate activity, to help maintain the rules and regulations, and to foster a spirit of honesty and integrity not only among employees themselves but also in relation to stakeholders, business partners and all other third parties. The standards described in the Code of Conduct apply to all employees of Netcompany-Intrasoft and must be complied at all times.

2 Related Documents

| Id | Reference | Title |
|----|---|--|
| R1 | NC-IN_Acceptable_Use_of_Information_Systems | Netcompany-Intrasoft S.A. Acceptable Use of Information Systems Policy |
| R2 | WORK REGULATION NC-IN GREEK BRANCH | Netcompany-Intrasoft S.A. Greek Branch Work Regulation |
| R3 | WorkRegulation_NC-IN_BE | Netcompany-Intrasoft S.A. Belgium Work Regulation |
| R4 | NC-IN_IS_Policies_PLC | Netcompany-Intrasoft S.A. Information Security Policies |

Information Security Policy Compliance

Netcompany-Intrasoft commits towards protecting the Company's information and systems, ensuring data confidentiality, integrity, availability, authenticity, reliability and accountability.

Netcompany-Intrasoft's Information Security Management System is certified according to the ISO/IEC 27001 Standard and all employees are obliged to abide by the Corporate Information Security Policies and the Acceptable Use of Information Systems Policy. Violation of these policies may cause disciplinary actions or other measures, in accordance with the applicable legislation and work regulation per Company site.

Any indication of data breach or any observed Security Policy incompliance must be immediately reported to the Information Security Officer and/or to the Data Protection Officer.

Information and Technology Resources

Netcompany-Intrasoft provides to all employees the Information and Technology Resources required to conduct all authorized business activities. Unauthorised use of those resources (e.g., workstations, laptops, portal, Internet, mobile devices, IT systems, email) is not permitted whereas their use for personal purposes must be kept to an absolutely minimum, provided it does not influence productivity and does not hamper the business of the Company.

Inappropriate use of the Company's resources, including but not limited to hacking, downloading/testing/using pirate software, providing private services, cryptomining, sending inappropriate e-mails, accessing websites that advocate hate, violence, contain sexually explicit material or promote illegal activities is strictly forbidden and would lead to disciplinary actions or even legal actions against any illegal breach of conduct.

Intellectual Property

Netcompany-Intrasoft's intellectual property is a valuable Company asset that all employees are obliged to protect and not disclose to unauthorised persons. Additionally, any intellectual property created by the employees as a result of their work within the Company, including research, analysis, development (including all means used during the whole SDLC), software, source code, documents, templates, publications and any other materials relating to their work will exclusively belong to the Company which is entitled to be registered as the owner of the patent or the intellectual property.

Upon termination of the working relationship, the employee must handover all documents, designs, files and other data and material related to his/her work, as they constitute Corporate assets and knowhow property of the Company.

Protection and Use of Company Assets and Resources

Netcompany-Intrasoft's assets and resources are critical to the Company's operations, performance, profitability and business continuity. All employees should diligently protect the Company's assets and ensure their efficient use for legitimate business purposes only. Unlawful, unauthorized, improper or careless use is strictly prohibited

and could lead to disciplinary actions or even legal actions against any illegal breach of conduct.

Anti-bribery

Employees must strictly observe the laws, rules and regulations of any country where Netcompany-Intrasoft operates that govern the acquisition of goods and services by any business partner.

Employees are prohibited for offering, promising, authorizing, directing, paying, making, or receiving any bribes, kickbacks or payments of money or anything of value (directly or indirectly) to improperly obtain business or any advantage of Netcompany-Intrasoft or directly their selves.

The above prohibition is applicable to:

- Government and public sector, including without limitation public healthcare entities, European Institutions, international organizations and their employees or officials
- Political parties or candidates for political office
- Business entities partially or wholly owned or controlled by government interests (often referred to as state-owned enterprises) and their employees or officials
- Privately-held commercial companies and their employees
- Any other third party

Working with Suppliers

Netcompany-Intrasoft works fairly and honestly with its suppliers. This means that our relationships with them are based on price, quality, responsiveness, service, references and reputation. Purchase agreements should be documented and should clearly identify the services or products to be provided, the unit price, the method and terms of payment, and the applicable rate or fee. The amount of payment must be commensurate with the services or products provided. Employees should not accept gifts, gratuities, travel or hospitality from a supplier. Dinners and luncheons that provide a continuity of business discussions are allowed as a time saving expediency. Gifts of inconsequential value such as calendars, pens, note pads, appointment books,

bottle of wines, and other low value gifts may be accepted in circumstances where such minor gifts are customary.

Working with Clients

Our business success depends upon our ability to foster lasting customer relationships. Netcompany-Intrasoft is committed to dealing with clients fairly, responsibly, honestly and with integrity. Employees should keep the following specific guidelines in mind when dealing with customers: (i) information supplying to clients should be current and accurate; (ii) should not deliberately misrepresent information to clients; and (iii) customer entertainment should not exceed reasonable business practice.

Working with Competitors

Netcompany-Intrasoft is committed to free and open competition in the marketplace. Employees should avoid actions that could reasonably be construed as being anti-competitive, monopolistic or otherwise contrary to laws governing competitive practices in the marketplace, including antitrust laws. No employee should obtain or give competitive information by unethical, unlawful or illegal means. Employees must refrain from using any confidential information belonging to any former employers. Further, it is improper to make false or deceptive statements concerning a competitor company. If employees are required to make a public statement on behalf of Netcompany-Intrasoft, they must ensure that it is based on current, accurate data, and they should refrain from commenting on another Company's business reputation or financial or legal situation.

If a competitor raises a prohibited subject, even lightly or with apparent innocence, employees should object, stop the conversation immediately and inform the competitor that they will not discuss these matters. If necessary, employees should leave the meeting and immediately report the incident to Netcompany-Intrasoft's Legal Department.

Working with Organizations outside of Netcompany-Intrasoft

Other organizations have multiple relationships with Netcompany-Intrasoft. An Netcompany-Intrasoft Business Partner may be both a client and a competitor. Another organization may be an Netcompany-Intrasoft supplier and client at the same time. A few organizations may even be suppliers, competitors, business partners and clients. No matter what the context, you need to understand each relationship involved in your daily work, and act in accordance with company's guidelines.

Preventing money laundering

Money laundering involves processing the proceeds of crime in an attempt to disguise their illegal origin. Money laundering is a criminal act and is completely opposed to our values. This means that Employees must not participate in any activity aimed at laundering money. In addition, they must not provide assistance to any person or organization trying to benefit from the proceeds of a criminal act or illegal activity.

Conflict of Interest

Employees should avoid any involvement of their personal interests with the interests of the Company in dealing with suppliers, customers and any third party that maintains or seeks to develop business relationships with the Company or any affiliate.

Employees may not undertake unfair competitive activities or participate to such activities.

Integrity

In performing their duties, employees of Netcompany-Intrasoft are to act with the utmost integrity. Every Company employee and member of management must act with integrity and respect the rights of clients, suppliers, partners and competitors. The General Managers of Netcompany-Intrasoft, Directors and employees who are involved in the management of Netcompany-Intrasoft must give notice to the Company of any legal proceedings that are commenced against them. In addition, the GMs, Directors and employees of Netcompany-Intrasoft must inform the Company immediately if they are charged with a criminal offence and provide any further information requested by the Company.

Employee Dress code

Regardless of the employee's interaction with clients, suppliers or other third parties, each employee projects the reputation of the organization. Part of this impression depends on each employee's choice of dress. Netcompany-Intrasoft has chosen to offer a casual dress environment for employees. Employees are expected to use good

judgment and to show courtesy to their co-workers by dressing in a manner that is presentable and appropriate. At all times employees are asked to be aware that regardless of their interaction with clients, suppliers or other third parties, Netcompany-Intrasoft is still a place of business.

Should employees be asked to attend business meetings with clients, either in Company's premises or otherwise, they should dress in appropriate business attire.

Violence Prevention

The safety and security of all employees is of vital importance for Netcompany-Intrasoft. In order to maintain a safe work environment, Netcompany-Intrasoft will not tolerate violence or threats of violence in, or related to, the workplace. Employees who experience, witness or otherwise become aware of a violent or potentially violent situation that occurs on Netcompany-Intrasoft's premises must immediately report the situation to their Responsible Manager or the Human Resources Department.

Health and Safety

Netcompany-Intrasoft is committed not only to complying with all relevant health and safety laws, but also to conducting business in a manner that protects the safety of its employees. All employees are required to comply with all applicable health and safety laws, regulations and policies relevant to their jobs. If you have a concern about unsafe conditions or tasks that present a risk of injury to you or anyone else, please report these concerns immediately to your Responsible Manager or the Human Resources Department.

Respect Laws around the World

Netcompany-Intrasoft operates around the globe and respects the laws wherever do business. This helps the Company to build trust with governments, strengthen the communities where our employees live and work, and contribute to a fair society where we enjoy the protection of these same laws.

Employees of Netcompany-Intrasoft should:

- follow the laws and regulations of all the places where the company operates.
- be honest and transparent in the discussions with government representatives and officials.

- respond truthfully, appropriately, and promptly to government inquiries and requests for information.
- comply with global trade controls and economic sanctions that prohibit from doing business with certain countries, governments, entities, and individuals.
- comply with laws that govern how our technology may be distributed and used internationally.

Respect and Promote Human Rights / Equal Employment Opportunities and Harassment Policies / Foster Diversity and Inclusion

Netcompany-Intrasoft is committed to the policy of equal employment opportunities for all employees and candidates in accordance with the appropriate employment laws. Netcompany-Intrasoft is against child labour. The procedures for hiring and evaluating candidates and employees are based on their respective qualifications, skills and performance. Additionally, both as a matter of law and common decency, employees of Netcompany-Intrasoft are entitled to pursue his or her employment free of unlawful discrimination and harassment with regards to sex, race, color, nationality, ancestry, citizenship, sexual orientation, religion, age, physical or mental disability, medical condition or marital status. Accordingly, unlawful discrimination or harassment of any employee by a co-worker or by a member of management will not be tolerated. Reporting discrimination and harassment is necessary for Netcompany-Intrasoft to maintain a respectful and egalitarian work environment and will not result in any retaliation against employees.

Confidential Information

Employees should maintain the confidentiality of information, business plans, source code or any other items, documents or things relating to the activities of the Company or other affiliates, except where required by the Company or the Law itself.

Each employee should address to the responsible person of Netcompany-Intrasoft any question he/she may be asked by a public person or by the media for the provision of information about Netcompany-Intrasoft, its affiliates, customers, suppliers or competitors.

Reporting a Breach of the Code of Conduct

When there is a breach of the Code of Conduct, including a conflict of interest or violation of the law, employees must report it immediately to the Human Resources Department. Charges may be made by name or anonymously. Confidentiality is maintained in all cases and the employee is protected. Netcompany-Intrasoft is

committed to examining every instance where there is a breach of the Code and which constitutes a violation of its principles.

Employees' Responsibilities

Employees are expected to uphold these rules, Netcompany-Intrasoft policies, and the law.

This means that employees must:

- Read, understand, and comply with these rules, and the policies, laws, and regulations that apply to your job.
- Speak up when they see possible violations of the rules, company's policies, and legal and regulatory requirements.
- Be truthful, and cooperate fully in any internal audits.
- Complete training on the rules, and attest that they understand and commit to comply with the rules.

Failing to read or attest to the rules does not excuse NETCOMPANY-INTRASOFT employees from these responsibilities.

