

Code of Conduct

SQUAD



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Purpose and Applicability

At SQUAD, we are committed to fostering an inclusive, respectful, and professional working environment. Our Code of Conduct serves as a guide to help each of us make the right decisions and act in ways that reflect our commitment to these values.

THIS CODE IS DESIGNED TO:

- Set clear expectations for ethical behavior and integrity in all business interactions
- Guide how to navigate complex situations such as conflicts of interest, confidentiality, and the proper use of company resources
- Demonstrate our commitment to upholding the highest standards of professionalism to build and maintain trust with our clients, partners, and each other.

APPLICABILITY:

The Code of Conduct applies to all individuals working for or representing SQUAD, including employees, managers, contractors, partners, and any third parties affiliated with the company. It governs behavior not only within our offices but also during business activities outside of the office, including client engagements, conferences, social events tied to work, and interactions in digital environments.

All team members are expected to clearly understand and follow the standards in this Code. Failure to comply with Code of Conduct standards can lead to severe consequences, including legal liability, disciplinary actions, or/and termination of employment.



Core Values and Principles

SQUAD is built on these values, which guide all actions and decisions:

OWNERSHIP

We take responsibility for everything we say and do. We treat our company as our own business



DRIVE FOR RESULT

We focus on results. We deliver in a timely manner with high performance standards



FLEXIBILITY & ADAPTABILITY

Changes are inevitable and we embrace them. We adapt to changes and move forward stronger



TRUST

We do what we say, we rely on each other, and treat people respectfully



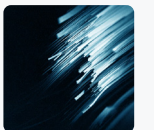
PRODUCT OBSESSION

We are relentless in our mission to make the world a safer place. We are obsessed with smart security products



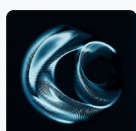
TEAMWORK

We act as one team, we grow, learn, and succeed together. We share feedback and treat each other with dignity



DATA SECURITY

We safeguard data with unwavering commitment, delivering trusted and secure solutions at every level



In addition to our core values, SQUAD is committed to upholding the following principles that form the ethical foundation of our Code of Conduct:

INTEGRITY

Act with honesty and transparency

RESPECT

Treat everyone with dignity, civility, and consideration

INCLUSION

Foster a workplace where everyone feels valued and included

ACCOUNTABILITY

Own your actions, comply with laws, protect company assets, confidential information, and intellectual property

Leaders and Managers **Set the Tone**

Leaders and managers shape our culture by setting high standards and leading by example. They are expected to act with integrity, showing professionalism in all interactions. By keeping the culture of open dialogue, they help team members feel comfortable asking questions and raising concerns. Leaders are also responsible for spotting and addressing misconduct quickly. Additionally, they support continuous learning to keep ethics and compliance at the core of our company's values.

Professionalism and Respect

Harassment-Free Workplace and Anti-Discrimination

SQUAD maintains a zero-tolerance policy against harassment, bullying, or intimidation. All forms of discrimination, whether based on race, gender, age, religion, nationality, disability, sexual orientation, or any other legally protected characteristic, are strictly prohibited. You can find more detailed information in the Anti-Harassment Policy.

SQUAD is committed to providing equal opportunities and fostering diversity. We are dedicated to creating an inclusive environment, including online interactions, where employees feel safe and are free from any form of abusive behavior, whether sexual, verbal, physical, or digital.

We encourage employees to report any concerns through the appropriate channels, without fear of retaliation. See the Chapter [Reporting Violations](#) – of this Code.

HARASSMENT THROUGH WORK MESSAGING

Situation: Jennifer frequently sends Steven personal, uncomfortable jokes via the company’s messaging platform. Steven feels harassed but is unsure if this digital communication qualifies as harassment.

Question: Should Steven report these messages to HRBP* even though they happen online?

Guidance: Harassment can occur via digital communication. Steven should report this behavior to the Line Manager and/or HR Department (HRBP or Director of HR & Recruiting), as SQUAD ensures a harassment-free environment in all forms of communication, including online platforms.

* here and further in the text HR Business Partners are referred to as HRBPs



Professional Communication

All communications, whether verbal, written, or digital, internal within the SQUAD team or external with clients/partners should maintain a professional tone. All kinds of communication (letters, messages, meetings, feedback exchange, etc.) should promote clarity and mutual respect regardless of the platform used (internal or external). For information about effective feedback exchange please see Feedback Handbook on our internal educational platform LEARN.

Inappropriate language, personal attacks, verbal or physical abuse, hostility, aggressive behavior, or any form of unprofessional behavior is not tolerated. Everyone is expected to contribute to an environment of trust and collaboration.

INAPPROPRIATE SOCIAL MEDIA INTERACTION

Situation: David, a Software Developer at SQUAD, publicly criticizes a colleague’s work in a LinkedIn comment, questioning their competence and making sarcastic remarks. The post is visible to other professionals and clients, potentially damaging both the colleague’s and SQUAD’s reputations.

Question: How should David have provided feedback, if necessary?

Guidance: According to the Code of Conduct, all communications, including on social media, must reflect professionalism and mutual respect. If David had constructive feedback, he should have communicated it privately and respectfully, following internal channels. Destructive criticism, especially on a professional platform, is unacceptable and can harm workplace relationships and the company’s reputation.

Brand Communication

When discussing topics related to the SQUAD, all team members should ensure that their statements reflect the company’s values and avoid any language that may negatively impact the brand.

Only authorized representatives may officially communicate on behalf of the SQUAD. If a team member receives a media inquiry or an external request for information, they should direct the request to the Employer Branding Department at pr@squad.tech for further handling.

Health and Safety Workplace

SQUAD is committed to ensuring a clean, safe and healthy work environment. We maintain a strict alcohol-, drug-, and weapon-free workplace. Any behavior that jeopardizes the well-being or safety of others is unacceptable. Each team member has responsibility for maintaining a safe and healthy workplace by following safety and health rules and practices and reporting accidents, injuries and unsafe conditions, procedures, or behaviors.

WORKING UNDER THE INFLUENCE

Situation: Tom, a Hardware Engineer at SQUAD, attends a personal party with friends one evening. He consumes several alcoholic drinks at the event. The next day, he comes to work hungover and unable to perform his duties safely, especially when handling equipment.

Question: Is it acceptable for Tom to come to work in this condition after a personal event?

Guidance: SQUAD has a strict alcohol-free workplace policy. Regardless of whether alcohol was consumed at a work or personal event, coming to work under the influence jeopardizes safety and is a violation of company policy. Tom should be reminded of this and further action may be taken if the behavior persists.



Conflict of Interest

Team members must avoid any situation where their personal interests could conflict with the company’s business interests. In cases where a conflict of interest might occur, it is the team member’s responsibility to immediately disclose the matter to their Line Manager or the HRBP for evaluation.

THE FOLLOWING ARE EXAMPLES OF SITUATIONS THAT COULD CONSTITUTE A CONFLICT OF INTEREST:

Financial Interests

Owning, investing in, or having a financial interest in a company that competes with or does business with SQUAD, including suppliers, contractors, or customers.

Outside of SQUAD Employment

Holding a second job or engaging in business activities that compete with or interfere with team member’s role at SQUAD or company business interests, including work that involves clients, competitors, or business partners of the company. If team members wish to engage in another business alongside their work with SQUAD, they must disclose the role to their Line Manager and HRBP before accepting it.



OUTSIDE OF SQUAD EMPLOYMENT

Situation: Cecelia, a software developer at SQUAD, is considering taking a part-time job at a tech startup. The company doesn’t directly compete with SQUAD, but it operates in a similar business and works with some of the same technologies. Cecelia’s role at SQUAD gives her access to restricted information and industry insights.

Question: Should Cecelia accept the part-time job without informing SQUAD since there’s no direct competition?

Guidance: Cecelia must disclose the part-time job to her Line Manager or HRBP before accepting it. Even if there is no direct competition, working in a similar field could lead to a conflict of interest, particularly if there is a risk of sharing restricted information or using company resources. The company will assess whether the role could impact Cecelia’s work at SQUAD and advise accordingly.

Relationships

Engaging in business transactions or making decisions that could benefit a family member, friend, or close associate, such as hiring or awarding contracts to a relative or having a personal relationship with a supplier or client that could bias decisions. You can find more information in SQUAD’s Work Relationship with Relatives Policy.

Gifts and Favors

Accepting gifts, entertainment, or other personal benefits from third parties (such as clients, suppliers, or partners) that could influence, or appear to influence, business decisions. More information is in the [Anti-Corruption and Bribery](#) chapter of this Code.

Favoritism, Nepotism, or Unethical Manipulation of Authority

Any behavior that undermines fairness, integrity, or mutual trust within the company, such as favoritism, nepotism, or unethical manipulation of authority, is also considered corrupt and unacceptable and constitutes a conflict of interest.

Favoritism is giving special treatment based on personal bias rather than merit. Nepotism refers to granting advantages or job opportunities to family members or close friends, regardless of their qualifications or suitability for the role. Unethical manipulation of authority is using one’s position to influence outcomes for personal gain. All such practices are creating unfair and damaging workplace conditions and are strictly prohibited within SQUAD.

FAVORITISM IN THE HIRING PROCESS

Situation: Amina is the Lead Software Developer at SQUAD. Amina’s close friend is applying for a job at SQUAD, and she is involved in the hiring process. Amina believes her friend is highly qualified for the role, but also knows that Amina’s involvement could be seen as biased.

Question: Can Amina be involved in the hiring process since she can assess the candidate’s qualifications objectively?

Guidance: No, Amina should disclose the personal relationship to the hiring manager or HRBP and step down from the hiring process. Even if Amina can assess her friend objectively, the situation could create the appearance of favoritism. Another unbiased team member should take over Amina’s responsibilities in the hiring process to ensure transparency and fairness.

Anti-Corruption and Bribery

We have a zero-tolerance policy regarding any form of bribery or corrupt activity, whether at the business or personal level. This includes offering, giving, receiving, or soliciting **anything of value*** to improperly influence the actions of individuals or entities, including third-party affiliates (vendors, contractors), state, clients, other team members of SQUAD.

THIS INCLUDES, BUT IS NOT LIMITED TO:

- Cash or cash equivalents
- Gifts, entertainment, hospitality, excessive or frequent meals
- Travel or accommodation expenses
- Job offers, particularly to relatives of decision-makers
- Business or investment opportunities
- Donations or contributions to political or charitable organizations.

*The term **“anything of value”** goes beyond cash. It includes any form of benefit or advantage that may influence decision-making. Even if the item or favor seems minor, offering or accepting it can still be considered bribery if intended to improperly influence a decision.

Our anti-bribery rules also apply internally. Team members must not offer or accept favors or benefits in exchange for promotions, compensation increases, project assignments, or any preferential treatment. Any attempt to influence internal decisions through unethical means will be treated as a serious violation of this Code.

BRIBERY FOR PROMOTION

Situation: Sarah, a Senior Developer at SQUAD, is up for a promotion to a lead position. During the evaluation process, she learns that her manager is favorably inclined towards another candidate who has been networking closely with him. To influence her manager’s decision, Sarah decides to invite the manager with his family to a restaurant at her own expense, hoping that this gesture will create a favorable impression and influence the promotion outcome in her favor.

Question: What should Sarah do to navigate her aspirations for promotion?

Guidance: The Code of Conduct clearly states that offering any benefits to influence promotion decisions is prohibited. Sarah should refrain from making any offers that could compromise the integrity of the promotion process. Instead, she should focus on demonstrating her qualifications and performance through her work. If she feels that favoritism is affecting the process, she should consider discussing her concerns with HRBP or another trusted leader to ensure transparency.

BRIBERY WITH A VENDOR

Situation: Mark, a Procurement Officer at SQUAD, is responsible for selecting a vendor to supply software tools. A vendor representative offers him a discount for a brand-new laptop he wants to buy as a thank-you for choosing their company for the contract. Mark is tempted by the offer but knows that accepting it could be considered bribery, violating SQUAD’s anti-corruption rules of the Code of Conduct.

Question: How should Mark handle the vendor’s offer of the laptop?

Guidance: The Code of Conduct prohibits accepting anything of value that could influence business decisions. Mark should decline the offer and report it to maintain integrity and uphold SQUAD’s commitment to ethical business practices.

Business Dealings with Government Officials

When dealing with government officials, it is prohibited to offer or provide anything of value* to influence permits, taxes, or regulatory decisions. All interactions with the state must comply with legal and ethical standards.

SQUAD’s corporate social responsibility (CSR) projects are designed solely to benefit communities and are not considered bribery or corrupt practices under this Code. While CSR initiatives may involve government collaboration, they are conducted transparently and in full compliance with legal standards, without any intent to influence regulatory or governmental decisions.



Information Security and Data Privacy

SQUAD is dedicated to safeguarding the information of our clients, partners, and team members. Each team member is expected to protect company, client, team member, and partner information, including but not limited to business strategies, financial data, customer information, personal data, intellectual property, and any other non-public information. This obligation applies at all times and extends after termination from SQUAD.

TO ENSURE INFORMATION SECURITY AND DATA PRIVACY, TEAM MEMBERS MUST ADHERE TO THE FOLLOWING:

- SQUAD requirements regarding non-disclosure and the signed Non-Disclosure Agreement (NDA)
- SQUAD information security and data privacy requirements and policies
- following SQUAD's policy for responsible and ethical AI use
- maintaining confidentiality both externally and internally, sharing information on a need-to-know basis. Team members must handle sensitive information from various clients with the utmost care, ensuring that data is protected and not shared inappropriately between projects or with unauthorized individuals, even with colleagues, unless they are directly involved
- undergoing mandatory information security and data privacy training in a timely manner
- timely reporting any loss of a corporate device or a personal device that has access to corporate/client services or data
- timely reporting any phishing attempts
- not interfering with the operation of information security services installed on corporate devices
- cooperation and provision of all information during the investigation of information security incidents and data leaks
- using only authorized cloud services for storing and exchanging information
- not using corporate devices for personal pet projects or providing services to third-party companies or individuals.

CLIENT INFORMATION

Situation: Stefan, QA at SQUAD, is working on a confidential client project, and a colleague Laila from another department asks him for specific details about the project's timeline and scope. She is not part of the project team but is curious about its progress.

Question: Should Stefan share the project details with his colleague since they work for the same company, but on different projects?

Guidance: No, Stefan should not share any information with colleague who is not directly involved in the project. Even within the company, confidential information should only be shared on a need-to-know basis. Politely inform colleague that the project is confidential, and refer them to the project manager if further clarification is needed.

SHARING SENSITIVE INFORMATION ON SOCIAL MEDIA

Situation: Mia, a Software Developer at SQUAD, notices that her colleague has shared screenshots of text messages, internal learning materials, and project details on their personal social media account. These materials contain confidential information that is not meant for public viewing.

Question: Should Mia report this incident, even though it involves her colleague's personal account?

Guidance: Yes. Sharing confidential information on any social media account is a violation of SQUAD's policies and poses a significant risk to the company. Mia should report this incident immediately by following the official procedure outlined in this document.



Safe Environment and Use of Company Resources

SQUAD team members are entrusted with company resources, including technology, equipment, software, communication systems, and intellectual property, and are expected to use them responsibly and strictly for authorized business purposes. Misuse or improper handling of company resources such as excessive personal use, unauthorized installations, or illegal activities is strictly prohibited. Team members are responsible for safeguarding these resources against damage, theft, or loss and should promptly report any misuse or malfunction.

Respect for the work environment is also essential. All team members are encouraged to follow safety **standards**, report hazards, and actively contribute to a clean and organized workspace to prevent accidents, injuries, and potential risks.

If valuable equipment (such as a laptop, phone, or other items provided for use/testing by the company) is stolen or suspected to be lost, team members should promptly inform the Physical Security Department. For further guidance, please refer to Theft or Loss of Equipment Incidents Policy.

STOLEN COMPUTER

Situation: Muhammad, QA Manager at SQUAD, lost his company-issued laptop while out of the office. The laptop contains sensitive company information and access to company systems. This raises concerns about data security and the misuse of company resources.

Question: What steps should Muhammad take immediately after discovering the laptop has been stolen?

Guidance: Muhammad should immediately report the theft to the Physical Security department to ensure necessary security measures are put in place, such as locking access to the device and securing data. He should also notify Line Manager and HRBP and file a report with local authorities to document the incident. This proactive approach helps prevent unauthorized access and protects company resources.



Reporting Violations and Non-Retaliation

To uphold the company’s values and principles of this Code, all team members are strongly encouraged to report any suspected violations of this Code of Conduct or other policies. Whether it’s unethical behavior, non-compliance with laws, or inappropriate conduct, raising concerns allows SQUAD to address and correct issues that may compromise the work environment.

When reporting a concern, team members are expected to provide truthful and complete information including names, dates, events, and any supporting evidence. This helps ensure that the investigation is thorough and accurate.

SQUAD offers several channels for reporting concerns to make it as easy and comfortable as possible for the team members.

Note: For concerns specifically related to harassment or discrimination, please refer to the detailed procedures in SQUAD’s Anti-Harassment Policy and Complaint Procedure. Both policies share a unified reporting and investigation framework.

Reporting Channels

DIRECT REPORTING:

- **Line Manager:** the first point of contact for raising concerns, unless the issue involves the manager in question. The Line Manager should submit the complaint in writing to HRBP and/or Director: HR & Recruiting as soon as possible.
- **HR Department:** directly to your HR Business Partner (HRBP) or the Director of HR & Recruiting.
- **C-Level Managers:** If your complaint concerns the HR department or you believe HR may be biased in handling the issue, you may report directly to a member of the C-level executive team.

ANONYMOUS REPORTING:

- **SQUAD Anonymous Complaint Form:** If you prefer to remain anonymous, you may use [SQUAD’s anonymous complaint form](#). If your complaint lacks sufficient information, we may not be able to proceed with it effectively.



What Happens When You Report

1. **Receipt of the complaint:** Upon receiving a report of a potential violation, HRBP or Director: HR & Recruiting will promptly acknowledge and document the complaint. To ensure confidentiality, only those directly involved in the review will be informed of the details.
2. **Investigation by the investigation team:** the Director HR & Recruiting will notify C-level managers and together they will assign an Investigation Team that might include representatives of different functions depending on the nature of the complaint (HRBP, legal, IT, finance, physical security etc). The team will be composed in a way that avoids any conflicts of interest or biases that could compromise the integrity of the investigation. The investigation team will conduct a thorough, unbiased investigation to assess the complaint. During this process, the representatives of the Investigation team may speak with the individual who filed the complaint, any witnesses, and the individual(s) involved in the alleged violation.
3. **Conclusion:** Once the investigation is complete, the Investigation team will compile a report outlining the findings and recommendations. C-level managers will review the findings to determine if a violation occurred and consider the appropriate next steps.
4. **Actions:** If the investigation confirms a violation, corrective actions will be taken. This may include training, reassignment, or disciplinary measures up to and including termination. Even if no violation is found, preventive actions might be recommended to strengthen workplace integrity and foster a respectful work environment. The Director HR & Recruiting and/or HRBP together with a representative of the Investigation team (if necessary) will meet with the complainant and the respondent separately and notify them of the findings of the investigation. If disciplinary action is to be taken, the respondent will be informed of the nature of the discipline and how it will be executed.

All reports will be treated confidentially to the extent possible. Information will only be shared with those directly involved in the investigation or necessary for resolving the issue.



Non-Retaliation

SQUAD upholds a zero-tolerance policy against retaliation. Retaliation is any action that penalizes an individual for raising a concern, reporting violations or participating in an investigation.

Retaliation can take many forms. Examples include, but are not limited to:

- **Adverse Employment Actions:** This may include demotion, termination, salary reductions, or changes to job responsibilities that negatively impact the team member.
- **Hostile Behavior:** Intimidation, bullying, or harassment aimed at discouraging someone from reporting or participating in an investigation.
- **Negative Work Environment:** Deliberately excluding someone from meetings, discussions, or professional opportunities or creating an atmosphere that is hostile or discriminatory toward individuals who report violations.

SQUAD’s Commitment Against Retaliation

- **Protection for Reporters:** Team members who raise concerns in good faith will be fully protected from retaliation, even if their claims are not proven.
- **Accountability:** Any individual found to be engaging in retaliatory actions will be held accountable and will face disciplinary measures, which may include termination.



REPORTING MISUSE OF RESOURCES

Situation: Freja, a Team Lead, notices that a colleague is frequently using company resources, such as software licenses, for personal projects. Concerned about the ethical implications, she reports the misuse to HRBP. A few weeks later, her manager begins to exclude her from important meetings, and her colleagues stop sharing information with her. Freja feels that she’s being targeted for raising a concern.

Question: What should Freja do in this situation, and how should SQUAD handle it?

Guidance: Retaliation against any team member for reporting unethical behavior is strictly forbidden. Freja should report this retaliatory behavior immediately. SQUAD will investigate the situation confidentially and ensure that Freja’s role and participation in the company are protected. Retaliation will result in disciplinary action for those responsible.

Training and Awareness

At SQUAD, continuous training is key to maintaining an inclusive, respectful, and secure work environment. All employees must complete the following mandatory courses via our educational platform, **LEARN**:

- **Anti-Harassment Training:** Covers recognizing, reporting, and preventing harassment in the workplace.
- **Information Security and Confidentiality Trainings:** Focus on safeguarding sensitive data and identifying security threats.

Additionally, SQUAD offers **voluntary** training and workshops, including sessions on DEIB and leadership. These programs are designed to deepen employees' understanding of critical issues.

Compliance: Compulsory courses and tests completion is tracked, and managers are expected to ensure that deadlines are met by their teams. Failure to complete mandatory training on time may result in corrective action.

Our training programs are regularly updated, ensuring they reflect best practices and legal requirements. Team members are encouraged to share feedback for continuous improvement.

