



Code of Conduct

Last updated October 2nd, 2020

The Intermino Code of Conduct is how we put our values into practice while respecting the Law and doing business in an ethical and transparent way.

We all have a personal responsibility to incorporate and to encourage other Intermino colleagues to incorporate the principles of the Code and values into our work.

Our Ethics and Compliance Team is composed of two independent attorneys at law, who have been contracted by Intermino to be our independent advisors. You can contact them both at any time by sending an e-mail to ethicsandcompliance@intermino.com. They are bound by the principles of professional secrecy and the duty to report criminal conduct.

Who Must Follow Our Code?

We expect all of our employees and executives to know and follow the Code. Failure to do so can result in disciplinary action, including termination of employment.

Moreover, while the Code is specifically written for Intermino employees and executives, we expect our contractors, consultants, and others who may be temporarily assigned to perform work or services for Intermino to follow the Code in connection with their work for us.

What If I Have a Code-Related Question or Concern?

If you have a question or concern, you can contact your manager, your Human Resources representative, or Ethics & Compliance. You can also submit a question or raise a concern of a suspected violation of our Code or any other Intermino policy through Ethics & Compliance. Finally, if you believe a violation of law has occurred, you can and should always raise that through Ethics & Compliance or with a government agency such as the police.

Am I Safe To Report Violations?

Intermino prohibits retaliation against any worker here at Intermino who reports or participates in an investigation of a possible violation of our Code, policies, or the law. If you believe you are being retaliated against, please contact Ethics & Compliance.

1. Privacy, Security and Freedom of Expression

We are asking clients and partners to trust us with their personal information. Preserving that trust requires that each of us respect and protect the privacy and security of that information. Our security procedures strictly limit access to and use of users' personal information, and require that each of us take measures to protect user data from unauthorized access.

Contact Ethics & Compliance if you have questions on implementing these measures in connection with what you do at Intermino.

2. Responsiveness

Part of being useful and honest is being responsive: We recognize relevant user feedback when we see it, and we do something about it. We take pride in responding to communications from our users, whether questions, problems, or compliments. If something is broken, fix it.

3. Taking Action

Any time you feel our clients or partners aren't being well-served let someone in the company know about it.

4. Equal Opportunity Employment

Employment here is based solely upon individual merit and qualifications directly related to professional competence. We strictly prohibit unlawful discrimination or harassment on the basis of race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law. We also make all reasonable accommodations to meet our obligations under laws protecting the rights of the disabled.

5. Harassment, Discrimination and Bullying

Intermino prohibits discrimination, harassment and bullying in any form – verbal, physical, or visual. If you believe you've been bullied or harassed by anyone at Intermino, or by a Intermino partner or vendor, we strongly encourage you to immediately report the incident to your supervisor, Human Resources or both.

Similarly, supervisors and managers who learn of any such incident should immediately report it to Human Resources. HR will promptly and thoroughly investigate any complaints and take appropriate action.

6. Drugs and Alcohol

Our position on substance abuse is simple: It is incompatible with the health and safety of our employees and we don't permit it. Consumption of alcohol is not banned at our offices, but use good judgment and never drink in a way that leads to impaired performance or inappropriate behavior, endangers the safety of others, or violates the law.

Illegal drugs in our offices or at sponsored events are strictly prohibited. If a manager has reasonable suspicion to believe that an employee's use of drugs and/or alcohol may adversely affect the employee's job performance or the safety of the employee or others in the workplace, the manager may request an alcohol and/or drug screening. A reasonable suspicion may be based on objective symptoms such as the employee's appearance, behavior, or speech.

7. Safe Workplace

We are committed to a violence-free work environment, and we will not tolerate any level of violence or the threat of violence in the workplace. Under no circumstances should anyone bring a weapon to work. If you become aware of a violation of this policy, you should report it to Human Resources immediately. In case of potential immediate violence, contact the police immediately.

8. Avoiding Conflicts of Interest

When you are in a situation in which competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of Intermino or our users, you may be faced with a conflict of interest.

All of us should avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict. When considering a course of action, ask yourself whether the action you're considering could create an incentive for you, or appear to others to create an incentive for you, to benefit yourself, your friends or family, or an associated business at the expense of Intermino. If the answer is "yes," the action you're considering is likely to create a conflict of interest situation, and you should avoid it.

All Intermino collaborators have to follow the mandatory training on Ethics and Integrity for Salesforce Partners, available on Salesforce Trailhead as part of their HR onboarding.

9. Personal Investments

Avoid making personal investments in companies that are Intermino competitors or business partners when the investment might cause, or appear to cause, you to act in a way that could harm Intermino.

When determining whether a personal investment creates a conflict of interest, consider the relationship between the business of the outside company, Intermino's business, and what you do at Intermino, including whether the company has a business relationship with Intermino that you can influence, and the extent to which the company competes with Intermino.

Investments in venture capital or other similar funds that invest in a broad cross-section of companies that may include Intermino competitors or business partners generally do not create conflicts of interest. However, a conflict of interest may exist if you control the fund's investment activity.

10. Outside Employment, Advisory Roles, Board Seats, and Starting Your Own Business

Avoid accepting employment, advisory positions, or board seats with Intermino competitors or business partners when your judgment could be, or could appear to be, influenced in a way that could harm Intermino. Additionally, because board seats come with fiduciary obligations that can make them particularly tricky from a conflict of interest perspective, you should notify your manager before accepting a board seat with any outside company. Finally, do not start your own business if it will compete with Intermino.

11. Business Opportunities Found Through Work

Business opportunities discovered through your work here belong first to Intermino, except as otherwise agreed to by Intermino.

12. Accepting Gifts, Entertainment, and Other Courtesies

Accepting gifts, entertainment, and other business courtesies from a Intermino competitor or business partner can easily create the appearance of a conflict of interest, especially if the value of the item is significant.

Generally, acceptance of inexpensive "token" non-cash gifts is permissible. In addition, infrequent and moderate business meals and entertainment with clients and infrequent invitations to attend local sporting events and celebratory meals with clients can be

appropriate aspects of many Intermino business relationships, provided that they aren't excessive and don't create the appearance of impropriety.

13. Use of Intermino Products and Services

Avoiding potential conflicts of interest also means that you should not use Intermino products, services, internal tools, or information in a way that improperly benefits you or someone you know or creates the appearance that you have an unfair advantage over users outside of Intermino.

If you find yourself subject to a conflict of interest regarding the use of Intermino's products, services, tools, or information, discuss the situation with your manager, Legal, or Ethics & Compliance.

14. Confidential Information

Make sure that information that is classified as "Need to Know" or "Confidential" is handled in accordance with those Guidelines. At times, a particular project or negotiation may require you to disclose Need to Know or Confidential information to an outside party: Disclosure of that information should be on an "only as needed" basis and only under a non-disclosure agreement. In addition, Intermino policy may require a prior security assessment of the outside party that is to receive the confidential information. Be sure to conduct the appropriate due diligence and have the appropriate agreement in place before you disclose the information.

Finally, some of us will find possibly ourselves having family or other personal relationships with people employed by our competitors or business partners. As in most cases, common sense applies. Don't tell your significant other or family members anything confidential, and don't solicit confidential information from them about their company.

15. Intermino Partners

Just as you are careful not to disclose confidential Intermino information, it's equally important not to disclose any confidential information from our partners. Don't accept confidential information from other companies without first having all parties sign an appropriate Non-disclosure Agreement approved by Legal. Even after the agreement is signed, try only to accept as much information as you need to accomplish your business objectives.

16. Competitors/Former Employers

We respect our competitors and want to compete with them fairly. But we don't want their confidential information. The same goes for confidential information belonging to potential former employers. If an opportunity arises to take advantage of a competitor's or former employer's confidential information, don't do it. Should you happen to come into possession of a competitor's confidential information, contact Legal immediately.

17. Intermino's Intellectual Property

Intermino's intellectual property rights (our trademarks, logos, copyrights, trade secrets, "know-how", and contracts) are among our most valuable assets. Unauthorized use can lead to their loss or serious loss of value. You must respect all copyright and other intellectual property laws, including laws governing the fair use of copyrights, trademarks, and brands. You must never use Intermino's (or its affiliated entities') logos, marks, or other protected information or property for any business or commercial venture without pre-clearance from your manager.

Likewise, respect the intellectual property rights of others. Inappropriate use of others' intellectual property may expose Intermino and you to criminal and civil fines and penalties.

18. Company Equipment

Intermino gives us the tools and equipment we need to do our jobs effectively, but counts on us to be responsible and not wasteful with the Intermino stuff we are given. Company funds, equipment, and other physical assets are not to be requisitioned for purely personal use. Not sure if a certain use of company assets is okay? Please ask your manager or Human Resources.

19. The Network

If you have any reason to believe that our network security has been violated – for example, you lose your laptop or smart phone or think that your network password may have been compromised – please promptly report the incident to your manager.

20. Physical Security

Always secure your laptop, important equipment, and your personal belongings, even while on Intermino's premises. Don't tamper with or disable security and safety devices. Watch people who "tailgate" behind you through our doors.

21. Use of Intermino's Equipment and Facilities

Anything you do using Intermino's corporate electronic facilities (e.g., our computers, mobile devices, network, etc.) or store on our premises (e.g., letters, memos, and other documents) might be disclosed to people inside and outside the company. For example, Intermino may be required by law (e.g., in response to a subpoena or warrant) to monitor, access, and disclose the contents of corporate email, voicemail, computer files, and other materials on our electronic facilities or on our premises.

22. Employee Data

We collect and store personal information from employees. Access this data only in line with local law and Intermino internal policies, and be sure to handle employee data in a manner that is respectful of the Law. In case of questions, contact Ethics and Compliance.

23. Spending Intermino's Money

If you submit an expense for reimbursement or spend money on Intermino's behalf, make sure that the cost is reasonable, directly related to company business, and supported by appropriate documentation. Always record the business purpose (e.g., if you take someone out to dinner on Intermino, always record in our expense reimbursement tool the full names and titles of the people who attended as well as the reason for the dinner) and comply with other submission requirements. If you're uncertain about whether you should spend money or submit an expense for reimbursement, check with your manager. Managers are responsible for all money spent and expenses incurred by their direct reports, and should carefully review such spend and expenses before approving.

24. Signing a Contract

Each time you enter into a business transaction on Intermino's behalf, there should be documentation recording that agreement, approved by the Legal Department. Signing a contract on behalf of Intermino is a very big deal. Always check with your manager.

25. Recording Transactions

If your job involves the financial recording of our transactions, immediately report to Finance any transactions that you think are not being recorded correctly.

26. Reporting Financial or Accounting Irregularities

You should never, ever interfere in any way with the auditing of Intermino's financial records. Similarly, you should never falsify any record or account, including time reports, expense accounts, and any other Intermino records.

If you suspect or observe any of the conduct mentioned above or, for that matter, any irregularities relating to financial integrity or fiscal responsibility, no matter how small, immediately report them to Ethics & Compliance.

27. Hiring Suppliers

As Intermino grows, we enter into more and more deals with suppliers of equipment and services. We should always strive for the best possible deal for Intermino. This almost always requires that you solicit competing bids to make sure that you're getting the best offer. While price is very important, it isn't the only factor worth considering. Quality, service, reliability, and the terms and conditions of the proposed deal may also affect the final decision.

28. Retaining Records

It's important that we keep records for an appropriate length of time. Our Retention Policy suggests minimum record retention periods for certain types of records, which is generally 5 years or more if required by Law.

In addition, if asked by Legal to retain records relevant to a litigation, audit, or investigation, do so until Legal tells you retention is no longer necessary. If you have any questions regarding the correct length of time to retain a record, contact your manager.

29. Trade Controls

Although Intermino is based in Serbia where we respect local laws, our clients and partners are mainly based in the European Union and the United States of America.

US, EU and international trade laws control where Intermino can send or receive its products and/or services. These laws are complex, and apply to:

- imports and exports from or into the US and the EU
- imports and exports of products from or into other countries
- exports of services or providing services to non-US or EU persons
- exports of technical data, especially when the technical data is of US or EU origin

What constitutes an "import" or "export" under the law is pretty broad.

The bottom line is: If you are in any way involved in sending or making available Intermino products, services, software, equipment, or any form of technical data from one country to another, work with your manager to be absolutely sure that the transaction stays well within the bounds of applicable laws. If you or your manager are not sure, please contact Ethics & Compliance.

30. Competition Laws

Most countries have laws – known as “antitrust,” “competition,” or “unfair competition” laws – designed to promote free and fair competition. Generally speaking, these laws prohibit :

- 1) arrangements with competitors that restrain trade in some way,
- 2) abuse of intellectual property rights, and
- 3) use of market power to unfairly disadvantage competitors.

Certain conduct is absolutely prohibited under these laws, and could result in your imprisonment, not to mention severe penalties for Intermino. Examples of prohibited conduct include:

- agreeing with competitors about prices
- agreeing with competitors to rig bids or to allocate customers or markets
- agreeing with competitors to boycott a supplier or customer

Other activities can also be illegal, unfair, or create the appearance of impropriety. Such activities include:

- sharing competitively sensitive information (e.g., prices, costs, market distribution, etc.) with competitors
- entering into a business arrangement or pursuing a strategy with the sole purpose of harming a competitor
- using Intermino’s size or strength to gain an unfair competitive advantage

Although the spirit of these laws is straightforward, their application to particular situations can be quite complex.

Intermino is committed to competing fair and square, so please contact Ethics & Compliance if you have any questions about the antitrust laws and how they apply to you. Any personnel found to have violated Intermino’s Antitrust Policies will, subject to local laws, be disciplined, up to and including termination of employment. If you suspect that anyone at the company is violating the competition laws, notify Ethics & Compliance immediately.

31. Insider Trading Laws

As we said earlier, internally we share information, including non-public information, about Intermino's business operations pretty freely. In addition, you may overhear a hallway conversation or come across a memo at a copy machine, either of which might involve confidential information. To use this non-public information to buy or sell stock, or to pass it along to others so that they may do so, could constitute insider trading. Insider trading not only violates this Code, it violates the law. Don't do it.

32. Anti-bribery Laws

Like all businesses, Intermino is subject to lots of laws, in Serbia, EU, both US and non-US, that prohibit bribery in virtually every kind of commercial setting. The rule for us at Intermino is simple – don't bribe anybody, anytime, for any reason.

33. Non-government relationships

You should be careful when you give gifts and pay for meals, entertainment, or other business courtesies on behalf of Intermino. We want to avoid the possibility that the gift, entertainment, or other business courtesy could be perceived as a bribe, so it's always best to provide such business courtesies infrequently and, when we do, to keep their value moderate. Contact Ethics & Compliance if you have any questions.

34. Dealing with government officials

Offering gifts, entertainment, or other business courtesies that could be perceived as bribes becomes especially problematic if you're dealing with a government official. "Government officials" include any government employee; candidate for public office; or employee of government-owned or -controlled companies, public international organizations, or political parties.

Several laws around the world, including the US Foreign Corrupt Practices Act and the UK Bribery Act, specifically prohibit offering or giving anything of value to government officials to influence official action or to secure an improper advantage. This not only includes traditional gifts, but also things like meals, travel, political or charitable contributions, and job offers for government officials' relatives. Never give gifts to thank government officials for doing their jobs.

Conclusion

We rely on one another's good judgment to uphold a high standard of integrity for ourselves and our company. We expect all colleagues to be guided by both the letter and the spirit of this Code. If you aren't sure, don't be afraid to ask questions of your manager, Legal or Ethics & Compliance.