



Code of Conduct
Our behavior creates trust

Table of contents

List of abbreviations	3
Preface of the CEO	4
Trust from the public, society, and communities	5
Communities and their relevance for the DCSO	6
DCSO in public and social discourse	7
Corporate Responsibility: Sustainable business and fair trading	7
Lobbying and rules governing lobbying	7
Trust of our business partners	8
Compliance with laws	9
Avoiding conflicts of interest	9
Handling of information	12
Protection of company property and correct use of company assets	14
Trust between each other	15
Assumption of acting in good faith	16
Consideration, mutual support, and equal contribution	16
Initiative and responsibility	17
Courage and a culture of error	17
Sense of reality and reliability	17
Customer proximity and entrepreneurial thinking	18
Promoting diversity, individuality, and inclusion	18
Prevention of discrimination	19
Bibliography	20



List of abbreviations

FDGO Freiheitliche demokratische Grundordnung

GG Grundgesetz für die Bundesrepublik Deutschland

OECD Organisation für wirtschaftliche Zusammenarbeit und Entwicklung



Preface of the CEO

Dear Colleagues,

Since DCSO was founded in 2015, we have earned the trust of our shareholders, our business partners and society with our competence, reliability, perseverance, and innovation. Maintaining and continuously justifying this trust in our company is our top priority. An essential prerequisite for this is that each and every one of us behaves in a compliant, righteous and sincere manner in order to protect DCSO, us as employees, but also society and the environment from harm.

DCSO supports and promotes diversity. As diverse as we ourselves, our backgrounds, our roles and our responsibilities may be, we are united by the common values based on which we perform our tasks, make decisions, work together and interact with our stakeholders. With our attitude and our actions, we all bear responsibility and contribute to the long-term positive development of our company.

The Code of Conduct defines the ethical and legal principles to which we are committed and from which our principles of behavior are derived. It serves as a guide for behaving with integrity and responsibility. It provides guidance and advice for our daily actions. It helps to identify and respond appropriately to inappropriate behavior.

We believe that law-abidingness, probity, and honesty are indispensable foundations for the long-term success of DCSO. Therefore, we would like to ask you: Use the Code of Conduct in your daily work as a practical guide for your actions and let us work together to ensure that DCSO continues to stand for both excellent products and services as well as integrity and fairness.



Dr. Andreas Rohr
Managing Director (CEO)



Dominic Coxinho
Managing Director (CEO)





Trust from the public, society, and communities

We as DCSO are part of the European public and society. We are committed to the values and goals of the European Union. Our mission is to protect the European economy and society from the damage and impact of organized cybercrime and state-directed industrial espionage. Our expertise is in cyber security, or the detection of and defense against attacks in cyber space. To fulfill our mission, we apply this expertise in our day-to-day work.

Until now, cyber security has been understood primarily as a technical-organizational issue. However, the socio-political dimension of cyber security is becoming increasingly important, and our objective is to combine all these aspects of the field in our work. This systemic approach is not only unique – we also believe that only holistic approaches such as this can lead to valid assessments of the field. Therefore, we also see ourselves as a think tank and opinion leader, acting with impartiality amidst the tensions that can exist between business, society, and politics.

Our self-image, our mission and our expertise give rise to a responsibility of which we are acutely aware in our day-to-day work and that we actively embrace. Meeting this responsibility is how trust in us as people and in our company grows.



Communities and their relevance for the DCSO

The special importance of communities for us is already reflected in our vision, “Shaping community-driven cyber defense”. Through communities, not only we ourselves, but also our members, customers, and partners can achieve far more than each and every individual can on their own. We aim to leverage and create synergies by engaging with existing communities as well as establishing our own communities as the core of DCSO. This coordinated “bringing together” of different people, organizations and companies enables and encourages efficiency and exchange without being primarily concerned with our own advantage.

Our communities are safe spaces built on a framework of respectful and trusting interaction with one another, within which discourse and diversity of opinion should always find a place. In this way, we can make our own contribution to promoting cultural change in cyber security. Central to these communities are the spirits of “sharing as default” and “sharing is caring” – if you share something with others, you care.

Our mission is to protect the European economy and society from damage caused by organized cyber-crime and state-sponsored economic espionage.



DCSO in public and social discourse

Our voice carries weight, in public, in society, and especially within our communities and with our customers. As experts, we act responsibly, lead by example, and are guided by DCSO's value principles. In doing this, we get an echo of trust back.

Corporate Responsibility: Sustainable business and fair trading

For us as a company, corporate responsibility means acting in a sustainable way that creates value; standing up for the observance of employee and human rights, promoting the protection of the environment, supporting ethical conduct, and demanding this from ourselves as well as from our suppliers. This is not about establishing a rigid compliance framework – that is, a set of regulations and standards – to which we must conform. Rather, our sense of corporate responsibility should guide our activities as a company.

As a company, we are committed to addressing climate change

By implementing targeted energy-saving measures, including the use of renewable energy and energy-efficient systems, we actively contribute to combating its effects. Our goal is to create a lasting positive impact on the environment and contribute to a sustainable future.



Lobbying and rules governing lobbying

The DCSO understands “lobbying” as a process by which to make its expert role available to society. We perceive lobbying as the democratic mediation of interests oriented to the common good. We want to make our expertise available at the request of social actors and actively offer it within the context of legislative, norm-building, and standardization processes.

We apply defined rules for this passive and active influencing of social decisions, which are based on the OECD's Recommendation on Principles of Transparency and Integrity⁽¹⁾. We maintain an internal DCSO transparency register to make lobbying internally and externally transparent. Our lobbying is either carried out exclusively by ourselves, or by associations and federations that also commit to and comply with these rules.





Trust of our business partners

Integrity, transparency, and fairness are crucial for establishing credibility and trust in business interactions. DCSO attaches particular importance to consistently implementing and clearly communicating its requisite legal framework, internal company guidelines, and corporate values. This includes the selling of our products and services exclusively through our authorized distribution channels. DCSO's responsibility as a business partner gives rise to the following principles for our Code of Conduct.



Compliance with laws

We take compliance with the law very seriously. This includes an understanding of the fields of action relevant to our business that are governed by legislation, notable examples including the following:

- Intellectual property laws
- Data protection laws
- Laws against unfair competition
- Anti-corruption laws
- Other sanctions

Compliance with the law is reflected primarily, but not exclusively, in our obligation to comply with contracts with our business partners. Nevertheless, we take into account any changes in framework conditions. Each and every one of us is encouraged to contact the Compliance Officer in the event of questions regarding compliance with rights and laws that affect their activities at DSCO.



Avoiding conflicts of interest

We avoid contexts and situations that could create the appearance of an actual or perceived conflict of interest in our actions. Any contexts that could involve a conflict of interest should be discussed in advance with the Compliance Officer.

Laws and internal guidelines

We prioritize the implementation of laws and internal guidelines. To ensure employees can report potential violations anonymously, we have established an external whistleblower system in compliance with Section 12 (1) HinSchG. This system allows employees to confidentially and anonymously contact a whistleblower expert if they suspect a compliance violation.





Against bribery and corruption

Any form of bribery, corruption and money laundering is prohibited at DCSO. We are committed to complying with relevant anti-corruption laws and standards, such as:

- the Law on Combating Corruption⁽²⁾
- the United Nations Convention against Corruption⁽³⁾
- the Convention against Bribery of Foreign Public Officials in International Business Transactions of the OECD⁽⁴⁾

Bribery also includes gifts and other benefits that are either offered, promised, granted, or accepted in order to influence business decisions. It makes no difference whether the giving or accepting takes place directly or indirectly.

Dealing with gifts and invitations

We avoid any form of gratuity such as gifts, hospitality, invitations, or other benefits to or from business partners or public officials that are intended to influence business decisions or otherwise encourage them to violate our obligations and act in violation of the law. The same applies if we attempt in this way to influence a business relationship in an improper manner or to jeopardize the professional independence of business partners.

This does not include gifts and invitations that are within the scope of customary business hospitality, convention, and courtesy. The acceptance of reasonable low-value and token gifts, as well as invitations to reasonable business meals and events, is permitted.





Fair competition

We pay attention to fair competition and conduct in our business in accordance with competition (anti-trust) law. Neutrality in the provision of our services and in the selection of our contractual partners is a top priority. To this end, we ensure that we make decisions within the framework of our business relationships exclusively on the basis of objective criteria and not on the basis of personal interests.

Social and political engagement

Social and political engagement should lead to a stronger community and is a prerequisite for a functioning political system. In every form of political or social engagement, we move on the ground of the “Grundgesetz” (GG) and the “Freiheitlich demokratischen Grundordnung” (FDGO) and should make it clear at all times that our views and actions are our own and not those of the DCSO.

Prevention of money laundering

We recognize the danger posed by the introduction of incriminated funds into the economic cycle. For this reason, we comply with the relevant legal obligations for the prevention of money laundering and terrorist financing⁽⁵⁾.



Handling of information

When dealing with information, whether in spoken or written form, we are bound by certain rules, compliance with which is essential. We comply with all contractual obligations and legal requirements without exception and also follow our self-imposed rules, such as this Code of Conduct.

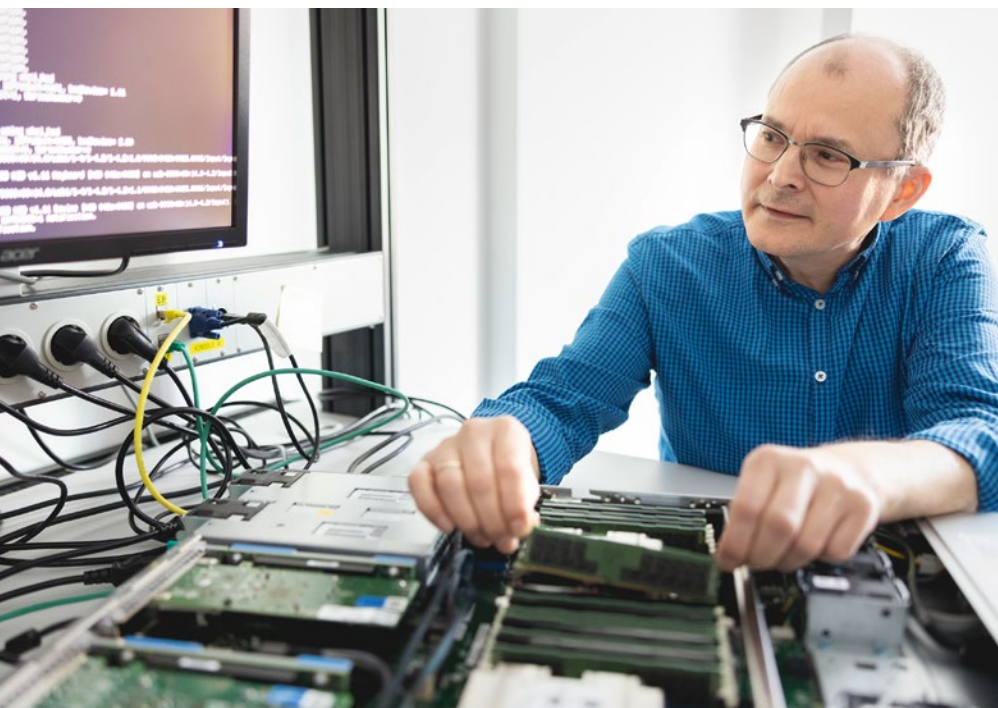


Protection of confidential information

We handle the confidential information and business secrets of our business partners in a legally compliant manner. In order to maintain confidentiality, we conclude appropriate confidentiality or non-disclosure agreements with our business partners and comply with them. At the same time, we avoid discussing this information outside the DCSO context or with colleagues who do not need this information in their work context.

Actively design and realize data protection and information security

We are only successful when our business partners can rely on our protection of their privacy and our legally compliant handling of their personal data in accordance with data protection requirements and information security specifications. When handling the personal data of our business partners, we should take into account both the current state of best practices and current threat situations in information security.



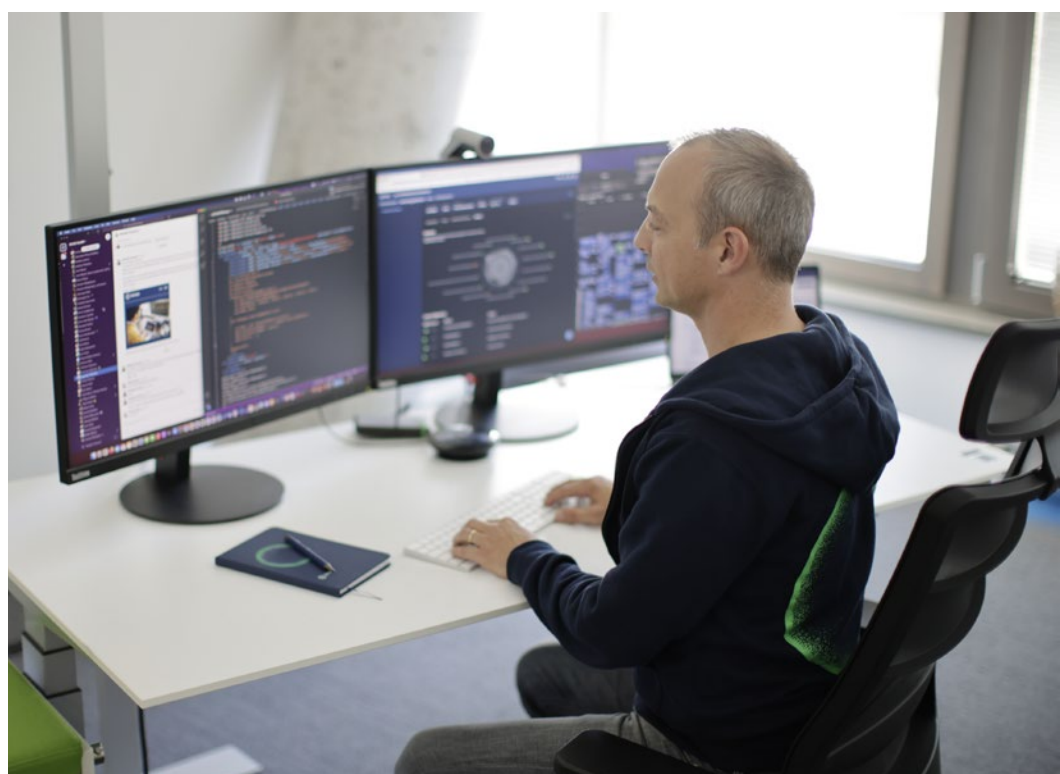


Digital ethics

Advances in digitalization and the day-to-day need to handle large volumes of data call for self-restraint in our actions. For this reason, we should provide our services in the use of technologies and know-how not only in accordance with what is technologically feasible, but also in accordance with modern digital ethics.

Protection of insider information

We protect the insider information of our business partners. Therefore, we refrain from any behavior that could lead to non-publicly disclosed information of our business partners being used as a basis for trading in shares or securities.



Protection of company property and correct use of company assets

Intellectual property such as brands, patents, copyrights, and trade secrets are intangible assets. Although we cannot see, touch, or physically measure them, they are important to us and our business partners. DCSO may be able to replace lost or damaged equipment, but it cannot replace business information that has been compromised.

For this reason, should actively strive to protect intellectual property and proprietary information. Our technologies, intellectual property, and confidential operational information are resources that we safeguard from unauthorized access and use or disclosure. At the same time, we respect the confidentiality and intellectual property rights of others and do not use the confidential information of others without their permission.





Trust between each other

In addition to individual expertise and personal commitment, constructive cooperation both within and across teams is an indispensable prerequisite for the sustainable positive development of DCSO. Our company is built on the trust-based cooperation and mutual support of all employees, and above all on the foundation of trusting relationships between people.

Each and every one of us makes a significant contribution to creating a culture of cooperation characterized by mutual respect, trust, and helpfulness.

To achieve and ensure this, we are guided by the following principles in our daily interactions.



Assumption of acting in good faith

We trust that all DCSO employees perform their duties to the best of their knowledge and belief. Each and every one of us brings his or her comprehensive expertise to DCSO with a high degree of conscientiousness. This results in a trusting basis on which we meet each other every day and want to work together – according to the quote by Norman L. Kerth:

“Regardless of what we discover, we understand and truly believe that everyone did the best job they could, given what they knew at the time, their skills and abilities, the resources available, and the situation at hand.”⁽⁶⁾

Consideration, mutual support, and equal contribution

Each and every one of us contributes to DCSO’s value creation, regardless of our title or role in the company. At all levels and hierarchies, we foster a work environment characterized by respect and tolerance. We place great value on the willingness to help and be helped, recognizing the dignity of each individual, and treating each other as equals.





Initiative and responsibility

We trust that each and every one of us will take responsibility and show initiative. Thinking and acting on our own responsibility is therefore just as

important as cooperation and exchange. By learning with and from each other, we create new perspectives and approaches and thereby shape a DCSO for all.

Courage and a culture of error

We foster a work environment where it is possible to make mistakes, own up to them, and learn from them. We do not view mistakes as evidence of imperfection, but rather as an opportunity to grow and become better acquainted with our strengths and weaknesses. We have the courage to take risks consciously and in a controlled manner. To do this, we need a positive error culture characterized by respect and tolerance.

We do not consider mistakes as evidence of imperfection, but as an occasion to grow and to get to know our strengths and weaknesses better.

Sense of reality and reliability

Credibility in our actions confirms the trust placed in us by our business partners. That is why we want to set ourselves realistic goals and reliably keep our

promises. We achieve this by avoiding unnecessary complexities in all processes, recognizing any shortage of resources, and setting priorities in good time.



Customer proximity and entrepreneurial thinking

The goal that determines the success of DCSO is a close long-term relationship with our customers. A high level of customer orientation leads to greater customer satisfaction and ultimately to greater success for the company. For this reason, we always stri-

ve to act in accordance with the expectations and wishes of our customers. In doing so, we make sure that we put the needs of our customers and the success of DCSO above our team goals and our personal benefits.

Promoting diversity, individuality, and inclusion

We promote diversity in all aspects and an open and collaborative work culture where we value uniqueness and diversity. Our employees reflect the vibrant diversity of our world. We value each other not in spite of, but because of our individual backgrounds, identities, talents, perspectives, and experiences. Each and every one of us is respected, regardless of ethnicity, skin color, religion, diversity of opinion, gender identity, sexual orientation, education, or age.

Our employees reflect the vibrant diversity of our world.





Prevention of discrimination

We fundamentally reject discrimination. Discrimination in the legal sense is the unequal treatment of a person on the basis of one or more legally protected categories of discrimination without an objective reason justifying this unequal treatment. The disadvantage can be expressed, for example, through a person's behavior⁽⁷⁾.

Each and every one of us at DCSO has the right to a safe, fair, and respectful work environment that promotes equal opportunity and prohibits discriminatory behavior. In a positive, inclusive workplace, we can all benefit from our colleagues taking full advantage of their skills, creativity, and talents. First and foremost, this also includes challenging actions that are not compatible with our Code of Conduct.



Bibliography

- (1) Organisation für wirtschaftliche Zusammenarbeit und Entwicklung (OECD): Klare Regeln für Lobbyarbeit. <https://www.oecd.org/ueber-uns/erfolge/klare-regeln-fuer-lobbyarbeit.htm>
- (2) Bundesgerichtshof: Das Gesetz zur Bekämpfung der Korruption. <https://www.bundesgerichtshof.de/DE/Bibliothek/GesMat/WP18/K/Korruption.html?nn=10772256>
- (3) Vereint Nationen: Das Übereinkommen der Vereinten Nationen gegen Korruption. <https://www.un.org/Depts/german/uebereinkommen/ar58004-uebgb.pdf>
- (4) Organisation für wirtschaftliche Zusammenarbeit und Entwicklung (OECD): Die Konvention gegen die Bestechung ausländischer Amtsträger im internationalen Geschäftsverkehr. <https://www.oecd.org/berlin/themen/konvention-gegen-die-bestechung-auslaendischer-amtstraeger.htm>
- (5) Das Bundesministerium der Finanzen: Strategien gegen Geldwäsche und Finanzierungsmaßnahmen. https://www.bundesfinanzministerium.de/Content/DE/Downloads/Broschueren_Bestellservice/2020-01-17-strategie-geldwaesche-terrorismusfinanzierung.pdf?__blob=publicationFile&v=7
- (6) Norman L. Kerth (2001): Project Retrospectives: A Handbook for Team Reviews. New York: Dorset House Publishing.
- (7) Antidiskriminierungsstelle des Bundes: Diskriminierung. https://www.antidiskriminierungsstelle.de/DE/Home/home_node.html
- (8) Der Vertrag von Lissabon: <https://www.europarl.europa.eu/about-parliament/de/powers-and-procedures/the-lisbon-treaty>



DCSO Deutsche Cyber-
Sicherheitsorganisation GmbH

EUREF-Campus 22
10829 Berlin, Germany

+49 (0) 30 726 219-0
info@dcso.de
www.dcsso.de

