



MACLOCKS  
BY COMPULOCKS

# Code of Conduct

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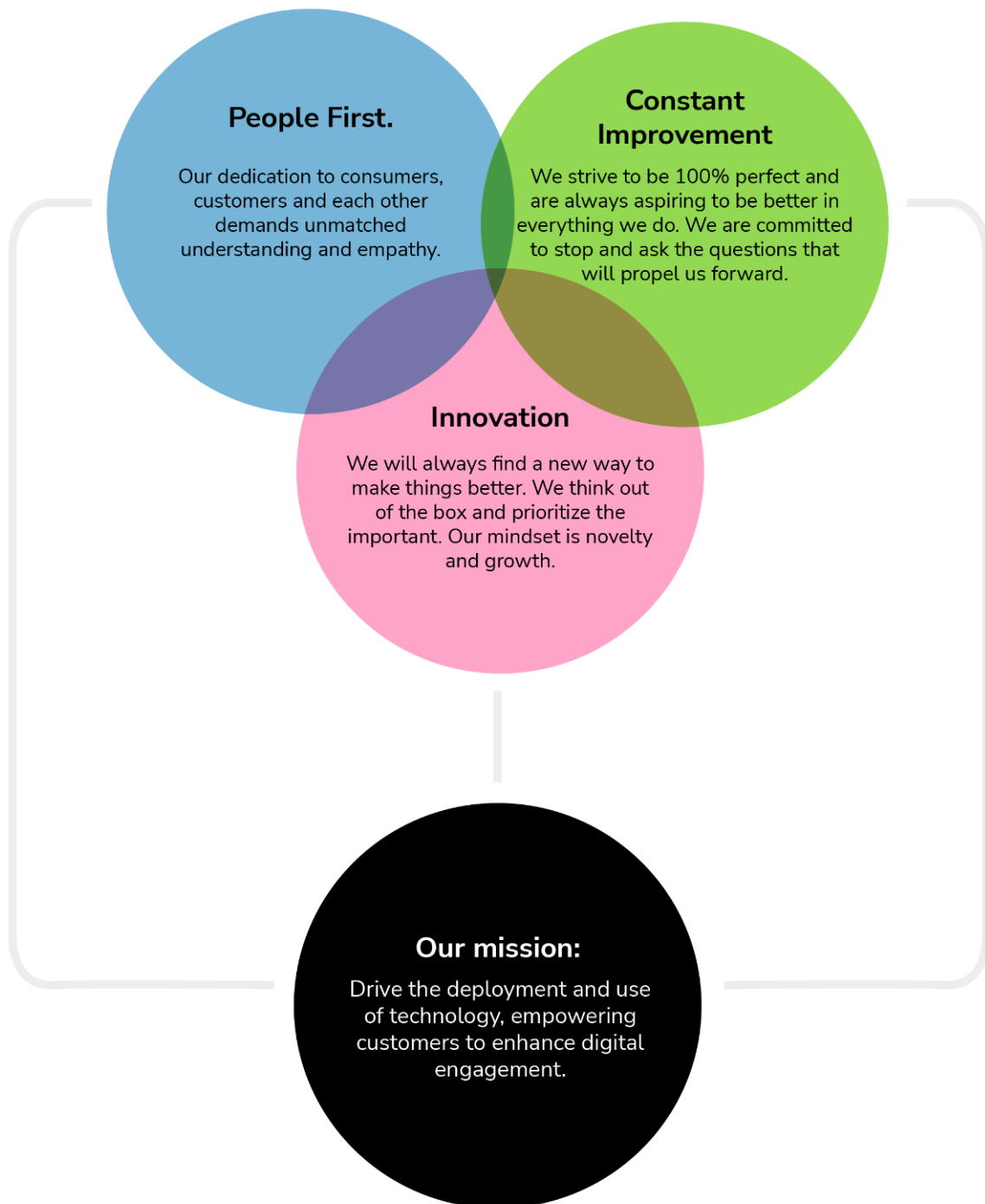
# Introduction

Compulocks' (Self Positioning ltd and its subsidiaries, doing business as "Compulocks") Ethics code is meant to be a guideline for proper conduct in the business environment, meant to protect all parties and clarify the obligatory behavior in the workspaces. Compulocks is committed to ethical, fair, and moral conduct in every operating aspect of its organization.

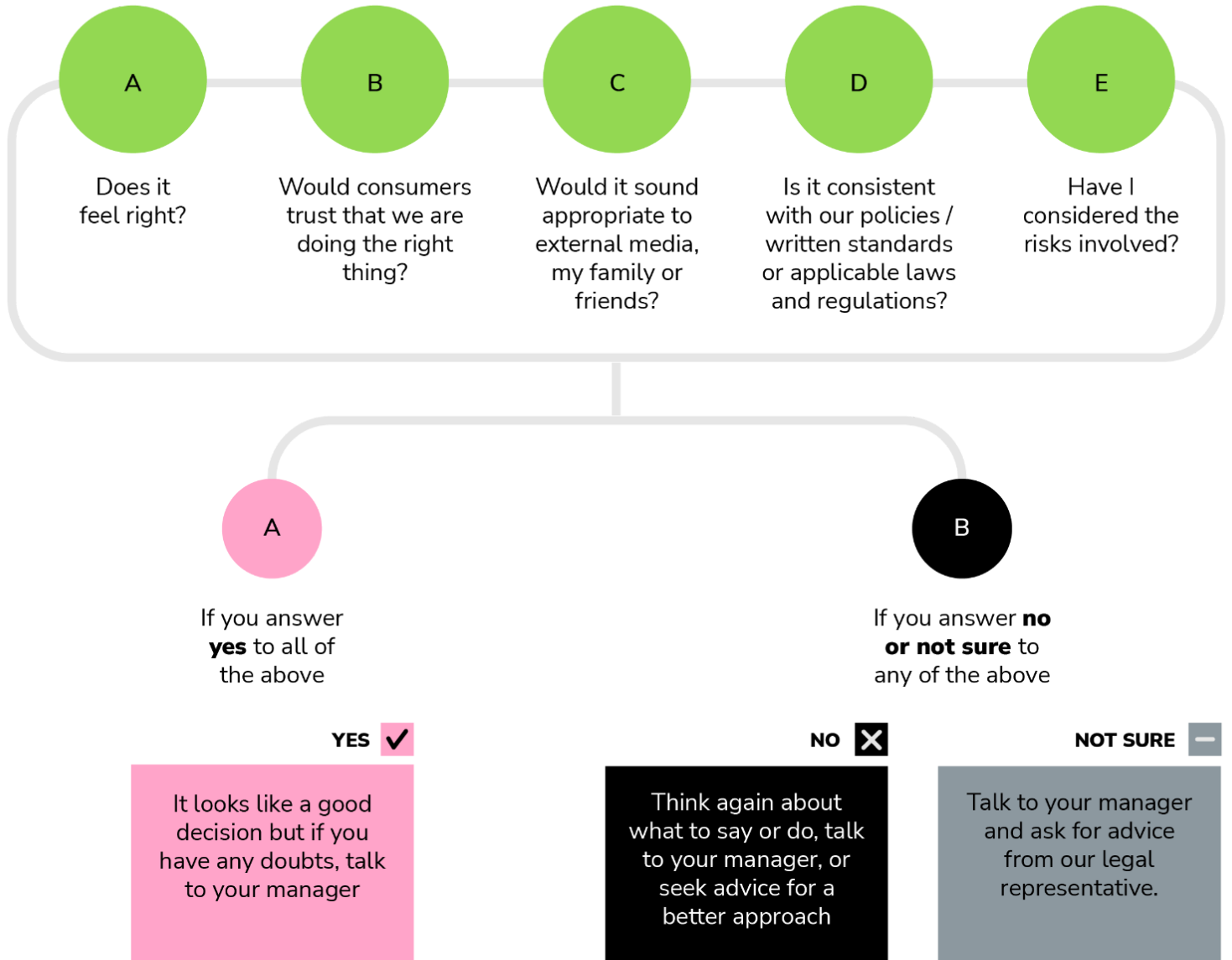
A company's code of conduct (the "code") is a set of guidelines developed for the company's employees, partners and associates. It is meant to protect the company while also informing the Compulocks team of the company's expectations.

The code applies to all compulocks' employees (direct employees, Compulocks' subsidiaries employees, and associated service providers).

# Our Mission & Culture



# Making a decision?





# Workspace Conduct

## Safety and health

Compulocks is committed first to make sure the workspace is fitting and safe to all Compulocks team and is adamant about taking measures to create the best work environment, physically and personally. Compulocks will make sure to fix any hazard or equipment issues that can cause harm. Compulocks team members will make sure to report any problems they notice – from security issues, any unsafe materials or objects, or any hazard that might cause damage to people or property.

## How do we treat one another?

Compulocks is committed to hiring, promoting and compensating employees based on their qualifications and demonstrated ability to perform job responsibilities and to prevent any form of harassment. All Compulocks team, officers and directors should treat one another with courtesy, dignity and respect. As an Equal Opportunity Employer, Compulocks treats all employees fairly, without regard to age, race, national origin, religion, gender, color, condition of pregnancy, marital status, disability, veteran status and sexual orientation.

Compulocks has a zero-tolerance policy regarding harassment, which includes threats, intimidation, assaults, and similar conduct. Any threats or safety concerns should be reported promptly to the employee's supervisor or manager.

**\*If you encounter or witness any conduct that causes discomfort, you have the option to reach out to an impartial attorney for inquiries and support:**

[mors@bas-law.co.il](mailto:mors@bas-law.co.il)

## Compulocks Assets

Compulocks' assets are to be used only for the legitimate business purposes of the company. This includes both tangible and intangible assets, for example, computers, monitors, office equipment, copy machines etc, as well as intellectual property such as pending patent information, trade secrets or other confidential or proprietary information. All electronic media and communication systems, including the Company's electronic mail (e-mail) system, intranet, internet access and voice mail are Company assets and are to be used for appropriate business purposes only. Compulocks' employees are responsible for ensuring that appropriate measures are taken to assure that Company assets are properly protected.



## Workwear

Compulocks' employees are expected to always maintain a professional appearance while on company premises or representing the company in any capacity. Appropriate attire includes clean and well-maintained clothing that is suitable for the job duties being performed. Clothing should not be revealing, offensive, or distracting to others in the workplace.



# Business Practices

## Conflict of Interests

We all must avoid conflicts of interest. A conflict of interest exists when a personal interest or activity interferes or appears to interfere with the duties that you perform at, or owe to, Compulocks. A conflict of interest may unconsciously influence even the most ethical person and the mere appearance of a conflict may cause a partner's acts or integrity to be questioned. Any potential conflict of this sort will be disclosed immediately to the employee's direct manager.

**\*If you encounter or witness any conduct that is inconsistent with the code, you have the option to reach out to an impartial attorney for inquiries and support:**  
[mors@bas-law.co.il](mailto:mors@bas-law.co.il)

## **Gifts and Benefits**

Gifts are a business courtesy in the form of an item of value, provided to a business associate. In certain circumstances, it may be appropriate to exchange limited non-monetary business courtesies. However, it is Compulocks' policy to avoid using business courtesies to unduly influence the decisions of its customers or suppliers. Compulocks' employees are expected to make unbiased decisions that are not influenced by the receipt of a business courtesy, and will report every gift received from a third party, and advise with their director about gifts received or granted.

## **Fair Dealing**

Relationships of Compulocks' employees with partners will be based on mutual respect and shared goals. Employees should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

## **Sustainability**

Compulocks is committed to conducting its business in compliance with all applicable environmental and workplace laws, regulations and permits in a manner that has the highest regard for the safety and well-being of its employees, customers and the general public. Therefore, Compulocks expects all employees to follow the letter and the spirit of all applicable laws and regulations relating to environmental protection and workplace health and safety.

Compulocks considers reducing its carbon footprint as an important goal. We explore new eco-friendly materials and monitor manufacturing processes for products and for packaging. We aspire to become more and more sustainable with time, and believe that every step towards a greener future is a step in the right direction.

## **Compliance with Labor Law**

Prohibition of Forced Labor:

The company strictly prohibits the use or contribution to slavery, servitude, forced or compulsory labor and human trafficking in any form, as well as child labor:

- Employ no workers under the age of 14
- Employ no workers under the age of 18 for hazardous work, set by the International Labor Organization convention.

## **Giving back to the community**

Compulocks recognizes that its commitment extends beyond just providing products and services. We strive to give back and make a meaningful difference in our community, and support various non profits throughout the year. These contributions to those in need are not only financial but include resources like time and manpower towards projects and initiatives to better the lives of the people around us. By being actively involved in community events and partnerships, we aim to foster an organizational culture of responsibility and empathy, and inspire others to make a positive impact.



# **Our Responsibilities**

## **Confidential Information**

Compulocks' employees will be responsible regarding inside information about the company and will not discuss it outside of the organization or inside it, with irrelevant personnel. Papers, documents and other material with sensitive content will not leave the office and if they must will be kept safely.

Every member of Compulocks' team is obligated to protect the Company's confidential information as well as that of its customers, suppliers, shareholders, fellow colleagues and third parties who disclosed information to the Company in confidence.

The obligation above stands even if you are no longer part of Compulocks.

## **Intellectual Property**

As a member of Compulocks' team, the things you create for Compulocks belong to Compulocks. This includes inventions, discoveries, ideas, improvements, software programs, artwork and works of authorship. This work product is Compulocks' property if it is created or developed, in whole or in part, on company time, as part of your duties or through the use of company resources or information. Partners must promptly disclose to Compulocks, in writing, any such work product and cooperate with Compulocks' efforts to obtain its protection.

## **GDPR Compliance**

As a company, we take data privacy seriously and are committed to complying with the General Data Protection Regulation (GDPR). Our code of conduct emphasizes the importance of protecting personal data and outlines the procedures that we follow to ensure GDPR compliance. If we become aware of any breaches or incidents that compromise the security of personal data, we follow the necessary procedures to report and address them promptly. By following GDPR regulations and having a robust code of conduct in place, we aim to build trust with our customers, clients, and other stakeholders and demonstrate our commitment to protecting their personal data.

## **Record Management**

Corporate integrity is at the foundation of the Code. All Compulocks' employees are expected to record and report information accurately and honestly, whether that information is submitted to Compulocks or to external organizations or individuals.

Records should be maintained to comply with applicable statutory, regulatory or contractual requirements, as well as pursuant to prudent business practices.

Compulocks prohibits all its team members from altering, destroying, concealing, covering up, or making a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence an investigation by appropriate governmental authority or bankruptcy proceeding, or in relation to or contemplation of any such matter, or with the intent to impair the object's integrity or availability for use in an official proceeding, otherwise obstructing, influencing or impeding any official proceeding or any attempts to do so.

## **Compliance with Governmental Laws, Rules and Regulations**

Compulocks is committed to full compliance with the laws, rules and regulations of the countries in which it operates. Employees must comply with all applicable laws, rules and regulations when performing their duties.

## **Copyright Laws**

Copyright laws protect most computer software. Compulocks' policy is to uphold these laws and regulations concerning the use and copying of computer software. Therefore, unauthorized duplication of software, regardless of whether it is owned by the Compulocks or not, is strictly prohibited. This prohibition applies even if the duplication is for business purposes, of limited duration, or considered an accepted local practice.

“Alone we can do so little  
together we can do so much”

Helen Keller

