



Business Conduct Principles

Effective June 1, 2020

Introduction

As the world's leading cloud-to-cloud backup company, we recognize our responsibility to make our employees, customers, partners and vendors successful. We also understand that part of that success depends on our ability to manage our business ethically, transparently, and responsibly. That is why we have adopted this set of values that we call our Business Conduct Principles.

We comply with the laws and regulations that apply in the jurisdictions where we operate. These Business Conduct Principles, in addition to our internal policies, communicate our values and expectations. The Principles outlined below reflect the core values we uphold in our own policies, and we expect our employees, partners and vendors to follow the spirit and intent of these guiding Principles.

Reporting Questionable Behavior

If you are not sure how to handle something, or if you think there is a problem, speak up! We support the reporting of any conduct, including conduct of any OwnBackup employee, that the reporter believes in good faith to be an actual, apparent, or potential violation of these Principles. Reports will be investigated in a respectful, professional manner as promptly and confidentially as possible. If you have questions or want to raise a concern, get in touch with one of these resources:

- The Legal Department at legal@ownbackup.com
- Our Insperity Whistleblower Reporting Hotline at +1 -844-677-3030.

Our Workplace

We only use voluntary labor. We do not use forced or involuntary labor of any type (e.g. forced, bonded, indentured or involuntary prison labor), or any form of human trafficking. This includes transporting, harboring, recruiting, transferring or receiving any person by means of threat, force, coercion, abduction or fraud for the purpose of exploitation. All employees, including interns, are free to leave work at any time or terminate their employment without reprisal. Employees are not be required to surrender any government issued identification, passports, or work permits as a condition of employment. There are no unreasonable restrictions on employees' freedom of movement in our workplace in addition to unreasonable restrictions on entering or exiting company-provided facilities.

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We do not use child labor. “Child” is any person employed under the minimum age for employment in the relevant country. We support the use of legitimate workplace apprenticeship programs which comply with all the laws and regulations applicable to such apprenticeship programs. Employees under the age of 18 do not perform work that is likely to jeopardize their health, safety or well-being.

OwnBackup believes every human life has equal value and should be treated with dignity and respect. We strive to uphold the basic human rights of every individual across all business transactions. We treat all our employees with dignity and respect and do not use corporal punishment, threats of violence or other forms of physical or psychological coercion, harassment, abuse or intimidation.

Wages, Benefits and Working Hours

We comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits.

We offer our employees opportunities to develop their skills and capabilities.

We do not exceed prevailing local work hours and we appropriately compensate overtime. We do not force our employees to work more than the allowable time required to work without their consent. All employees are provided with clear and understandable written information about their employment conditions with respect to wages, benefits, location of work, living conditions, housing and associated costs, including any costs charged to employee before they enter employment and as needed throughout their term of employment.

Freedom of Association, Collective Bargaining and Workers Councils

We respect the legal rights of our employees to associate freely, bargain collectively, join or not join trade unions, seek representation and join workers’ councils in accordance with local laws, without fear of reprisal, intimidation, or harassment.

Non-Discrimination and Respect at Work

We affirm the principle of equal employment. We do not discriminate in hiring and employment practices on the grounds of race, color, religion, sex, national origin or ancestry, age, medical condition or disability, veteran status, marital status, pregnancy, sexual orientation, transgender status, gender identity or expression.

When recruiting, developing and promoting our employees, our decisions will be based solely on performance, merit, competence and potential.



We prohibit harassment in any form and practice and promote a work environment free from harassment.

Protection of the Environment

We recognize the importance of the environment around us. We conduct business and operate in a manner that is protective of the environment.

At a minimum, we comply with all applicable environmental laws, regulations and standards, such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting.

Health and Safety at Work

We provide our employees with a safe and healthy workplace in compliance with all applicable laws and regulations.

Consistent with these obligations, we have effective programs that encompass occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation and ergonomics.

We are a drug and weapons free workplace.

Doing Business Ethically and within the Law

We observe the highest ethical principles in performing work. We are familiar and strictly comply with all laws and regulations on bribery, corruption, and prohibited business practices, including but not limited to the US Foreign Corrupt Practices Act and the UK Bribery Act. We have not and will not corruptly offer, promise, or make or agree to make any payments or gifts, of money or anything of value, directly or indirectly to anyone for the purpose of influencing decisions. We comply with all applicable import controls, export controls, and other global trade laws and regulations worldwide.

Doing Business Fairly

Our employees comply with all applicable fair business, advertising and competition laws, including fair trading and antitrust laws. We perform all business dealings transparently and these dealings will be accurately reflected in our business books and records.

Protecting Intellectual Property

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As an owner of intellectual property, our employees respect intellectual property rights of customers, partners and competitors. We only use content, trademarks, information technology and software that we developed ourselves, we acquired or licensed or we otherwise have the right to use; such use of that IP is only in accordance with the associated licenses or terms of use or where we otherwise have the legal right to use.

We maintain the confidentiality of our trade secrets and proprietary information. To protect our physical and intellectual property, we follow our physical and information security rules.

Respecting Privacy

Our employees commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. We comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.