

Vound Software – Code of Conduct and Sustainability Policy

Updated: August 2025 | Approved by: Vound Software

Forward

Vound Software creates forensic tools used by police, legal professionals, and analysts worldwide. Our mission is to deliver technology that supports lawful, ethical investigations in the pursuit of facts.

We believe our products are overwhelmingly used with integrity. It is regrettable that we must explicitly affirm what should be self-evident: human rights must always be upheld. Yet the times require us to make this commitment explicit.

This policy affirms our dedication to ensuring that our software is never used to violate human dignity, and to working only with those who share these values.

1. Introduction

Vound Software is committed to acting ethically, responsibly, and sustainably across our operations and value chain. This includes the way we develop software, the way we do business, and with whom we choose to license and partner.

Our policy is intended to align with the **United Nations Guiding Principles on Business and Human Rights (UNGPs)**, the **Universal Declaration of Human Rights (UDHR)**, the **ILO Declaration on Fundamental Principles and Rights at Work**, and relevant anti-corruption and environmental standards.

We expect all customers, partners, distributors, and suppliers to appropriately educate themselves and comply with applicable laws, meet contractual obligations, and uphold the principles outlined in this Policy. When faced with difficult choices, the expectation is to act with integrity and in a manner consistent with these principles.

2. Scope

This Policy applies to:

- All Vound Software employees, customers, contractors, consultants, partners, distributors, and suppliers.
- All geographic regions where Vound Software operates or our products are used.
- All uses of Vound Software products by the end user, whether on-premises, cloud-based, or otherwise delivered.

Our partners are expected to ensure their employees and contractors receive appropriate training on applicable laws,

regulations, and ethical standards, including those described in this Policy. Our partners must ensure that Vound's software is never sold by them to any entity that would knowingly breach any of the sections in this document.

3. Governance

The Vound Software **Ethics & Compliance Committee** oversees the development, implementation, and monitoring of this Policy. The Committee will:

- Review and update the Policy at least every two years, or sooner if legal or operational changes require.
- Monitor compliance and investigate credible allegations of breach.
- Report significant findings to senior leadership and, where appropriate, to external authorities.

4. Our Core Commitments

We are committed to:

- Upholding human rights and promoting fair labor practices.
- Preventing the misuse of our products for activities that violate human rights or due process.
- Supporting lawful and ethical investigations.
- Conducting business with zero tolerance for bribery, corruption, or fraudulent practices.
- Minimizing environmental impact through responsible practices.



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Sales Contacts

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5. Human Rights and Labor Standards

Vound Software expects all partners and suppliers to:

- **Prohibit forced labor, child labor, human trafficking, and modern slavery** in all forms.
- **Respect working hours, wages, and benefits** consistent with local law or ILO standards (whichever is higher).
- **Avoid discrimination** based on personal characteristics such as race, gender, religion, or orientation.
- **Maintain a safe and healthy working environment** that proactively prevents injury and illness.
- **Respect freedom of association and collective bargaining** in line with applicable laws.

6. Environmental Responsibility

Vound Software recognizes the responsibility to minimize environmental impact. We expect partners to:

- Comply with all environmental laws and regulations.
- Use resources efficiently and reduce waste, emissions, and energy consumption.
- Implement safe handling and disposal of hazardous materials.
- Where possible, participate in circular economy practices such as recycling, reuse, and sustainable sourcing.

7. Anti-Corruption and Fair Practices

Vound Software maintains a **zero-tolerance** approach to bribery, corruption, extortion, and fraud.

Partners must:

- Comply with the **UN Convention Against Corruption** and all relevant anti-bribery laws.
- Avoid offering or accepting anything of value to improperly influence a decision.
- Conduct business in a manner that is fair, transparent, and in compliance with antitrust and competition laws.

8. Conflict of Interest

All parties must avoid actual or perceived conflicts of interest in their dealings with Vound Software.

- Any potential conflict must be disclosed promptly.
- Personal relationships or financial interests must not influence professional judgment or decision-making.

9. Economic Sanctions

Partners must comply with all applicable **export control and sanctions laws** including, but not limited to, those imposed by:

- The United Nations
- The European Union
- The United States (OFAC)
- The United Kingdom (OFSI)
- Australia (DFAT)
- Other relevant jurisdictions

Prohibited activities include:

- Using Vound Software products in sanctioned countries or for sanctioned entities or persons.
- Selling, transferring, or diverting products in violation of sanctions laws.

10. Reporting and Whistleblowing

- Suspected violations of this Policy must be reported promptly to Vound Software via compliance-reporting@vound-software.com
- Reports may be made anonymously where permitted by law.
- Retaliation against whistleblowers is strictly prohibited.

11. Management Systems

Partners are expected to maintain effective governance, risk management, and compliance systems that ensure adherence to this Policy. These should include:

- Documented policies and procedures.
- Clear assignment of responsibilities.
- Regular compliance audits and risk assessments.

12. Our Right to Act

Vound will investigate credible reports and take appropriate corrective actions, which may include license termination, contract cancellation, or reporting to authorities.

Without limitation, Vound Software reserves the right to:

- Suspend or terminate business relationships where breaches of this Policy occur.
- Require corrective action plans from partners found in violation.
- Report serious violations to regulatory or law enforcement authorities.

13. Continuous Improvement

This Policy is a living document. Vound Software commits to reviewing our standards regularly in light of changing laws, technologies, and societal expectations, and to working collaboratively with our partners toward continuous ethical improvement.