

Personnel Code of Conduct

Introduction

The TotalView is committed to the highest standards of professional ethics and regulatory compliance. We gain trust because we treat others with integrity, respect, and justice. We must demonstrate these values daily and in all our activities.

Field of application

This policy applies to all employees who perform services for TotalView in the facilities of TotalView or acting as representatives or agents of TotalView regarding customers TotalView ("staff").

Policy

All personnel must comply with the provisions set out in this Code of Conduct. Staff must also comply with all laws, regulations and government regulations applicable to TotalView in their area.

TotalView Ethics, Legal Compliance and Policies

Staff must comply with the highest standards of professional conduct and must not engage in fraudulent practices or conduct. In addition to the Personnel Code of Conduct, staff must also comply with all TotalView staff policies.

Equal opportunities

Prohibited unlawfully discriminate in the workplace. When conducting business activities for TotalView, staff should not discriminate against others on the basis of gender, color, race, nationality, ethnic origin, religion, age, marital status, sexual orientation, individual identification and expression of gender, disability, pregnancy, recognized war veteran status, protected genetic information and political beliefs or any trait protected by law.

Workplace

Harassment in the workplace is prohibited. When conducting business activities for TotalView, staff should not engage in conduct characterized by disrespect, hostility, violence, intimidation, threats or harassment.

Sexual harassment can take many forms. No form of sexual harassment is acceptable. These include any behavior toward a senior employee or co-worker that involves unwanted sexual intercourse, sexual pleas, physical display or exposure of computer images, photographs, cartoons or other drawings, or other verbal or behavioral behavior of a sexual nature.

Personnel must comply with environmental, health, safety and security policies and procedures and address or report any threats to the environment, health, safety or security. We do not tolerate violence in the workplace. Violence in the workplace includes acts or threats of physical violence and any conduct that is serious, offensive or

intimidating to such an extent as to cause reasonable fear or concern for one's safety or the safety of one's family or property.

Fight against corruption

Staff should not engage in bribery, kickbacks or practices that promote corruption. Staff must comply with all ethical standards and applicable laws in each country in which TotalView operates.

Anti-corruption: Staff should not propose or bribe or offer kickbacks or gifts to win or maintain a business or to influence a business decision. Personnel are prohibited from offering, promising or providing money or anything of value, directly or indirectly, through agents or third parties, to representatives of commercial entities or government officials for the purpose of obtaining or maintaining business or securing a business advantage in any country.

Facility Payments: Unless required, staff may not offer or make facilitation payments to government officials, either directly or indirectly, on a routine basis. Coercion is considered to exist when a contract employee (staff) fears for his or her physical integrity or possible imprisonment if he or she refuses to pay for a facility and there is no safe alternative to comply with the requirement. The coercion exemption only applies to one-off payments, usually of small value. Recurring facility payments or high value facility payments are not permitted. Payment of facility payments must be reported to TotalView Legal within 24 hours of implementation.

Business gifts and entertainment

Staff are not allowed to offer or accept gifts and entertainment (gifts, meals, services, entertainment or anything of value). In doing so, it creates the impression of inappropriate or unfair influence. This restriction refers to gifts and entertainment provided or received by TotalView representatives or existing or potential customers, network partners, suppliers or other business partners and competitors.

Finding fee

The staff is not allowed to take on commission or fee arrangements than those provided written contracts with commercial distributors, sales representatives, agents or consultants *in good faith*. All supply or fee agreements must be pre-approved by TotalView Legal.

Conflict of interests

When conducting business activities for TotalView, staff must always make decisions in the best interests of TotalView and **in accordance with the contract it has entered into with the employer**. As for transactions involving the TotalView, the staff are not allowed to obtain any personal gain or benefit, apart from the remuneration the employer will pay s.

Staff should not be involved in:

- Any activity could be a conflict of interest related to TotalView
- Any activity could be interpreted as a conflict of wider interests associated with the TotalView

Cooperation with third parties

Third parties are defined as TotalView 's competitors, network partners, suppliers and other partners and customers.

Staff may not cooperate with third parties during their work assigned to TotalView, as long as this is stipulated in the contract concluded with the employer. TotalView 's contract with the supplier must set out the rules governing relations with third parties (such as network partners, competitors and customers not specified in the contract).

Collaboration with family or friends

During their work for TotalView, staff must disclose to TotalView all cases in which they may work with family members, friends, or other individuals with whom they have a close personal relationship.

Use of TotalView resources

The use of TotalView assets, resources or equipment, including the Company's computers and IT systems, should be for the sole purpose of TotalView 's business purposes and in accordance with all its policies and guidelines. Staff are not allowed to use TotalView resources in violation of the law and must not allow others, including friends and family, to use TotalView resources. Personnel should avoid any use that could cause loss or damage, such as the introduction of viruses or breaches of the security of TotalView computer systems. Theft or unauthorized possession or use of TotalView resources is prohibited.

TotalView resources may not be used to create, transmit, store, copy or view messages, images or material relating to:

- Personal gain
- Sales prompts
- Chain of letters
- Threatening, pornographic, blatantly sexual, harassing, derogatory or otherwise offensive content

The TotalView may, as permitted by applicable law, to access and control all resources that can be used by staff, including computers, servers and systems, telephones, voice and e-mail systems, cabinets, closets, drawers, vehicles and other equipment owned by TotalView. For security, surveillance and other purposes, TotalView may check the persons and assets on its premises at any time without notice, as permitted by applicable local law.

Staff should not have any privacy expectations for any messages or files created, transmitted or stored through TotalView systems. The TotalView is the owner of all business email and voicemail messages and other non-personal data of any kind stored or transmitted by the equipment TotalView. As permitted by applicable local law, TotalView may access or retrieve such data at any time.

Confidentiality

Staff should be aware of and comply with all agreed terms of confidentiality. Unless a separate confidentiality agreement is signed, staff should consider that all information made available to them during the conduct of TotalView business is confidential. These include information that TotalView may have received from its suppliers, customers or business partners. Confidential information may only be used or disclosed if there are good business reasons.

Staff must understand and abide by TotalView 's policies on the use of social media, including user forums, blogs, chat rooms and bulletin boards, and should never discuss copyrighted material. TotalView, trade secrets and other company confidential information on social media.

Confidential information of third parties

- Former Employers: Staff must comply with all applicable restrictions on the disclosure or use of confidential information of existing or former employers. This information, in any material or readable form, must not be transferred to TotalView 's premises without the prior written consent of those former employers.
- Competitors: Staff are not permitted to request, accept, use or disclose confidential information of TotalView Competitors.
- Other third parties: Staff may not disclose confidential information to customers, partners or suppliers, including unpublished invoicing information.
- Under no circumstances should staff urge anyone to breach any obligation of confidentiality.

Archives

All business-created files for TotalView must be complete and accurate, and must be maintained, protected and discarded in accordance with TotalView policy. All payments made on behalf of TotalView must be fully documented. Staff are not permitted to issue cover letters, enter into supplementary agreements or establish a secret or unregistered account or fund for any purpose. Files include emails and other communications, and staff should avoid using excessive, derogatory language and other expressions that may be misinterpreted.

Gray market

Staff must exercise due diligence to avoid situations that could lead to the launch of TotalView products on the gray market. "Gray market" means the distribution of products through unofficial, unauthorized or non-authorized TotalView distribution channels. Staff should report directly to their employer any suspicion of activity related to the gray market.

Compliance with the rules of international trade

Personnel must understand and follow TotalView International Trade policies and procedures and ensure that TotalView products, services and technology are not exported, imported or transported in violation of applicable law.

Unfair stock market exploitation of confidential information

Employees may, in some cases, have access to substantial information about TotalView 's unreleased business activities that an average investor would consider important in deciding whether to buy, sell or hold its securities. The movement of shares, or the provocation of movement of shares, according to essential, unpublished information, regardless of the size or location of the transaction, is a violation of securities law. Those who break these laws can face severe civil and criminal sanctions.

Work in other countries

When operating for TotalView outside of their country of residence, staff must comply with immigration laws and obtain the necessary permits (including work permits and visas) in each country in which they do business or do business.

Discussions with the press or the media

Staff are not authorized to speak to the media on behalf of TotalView. All communication with investors, analysts and the media on the business of TotalView must first be approved by the Department of investor relations and corporate communications of TotalView to the appropriate experts in communications issues TotalView. If you are contacted by a media representative, refer him directly to the Public Relations Department of TotalView: info at totalview.gr.

Privacy

Staff must adhere to TotalView privacy policies and data protection practices when conducting business for TotalView, and when using offline systems, processes, products and services involving the use, storage or transfer of personally identifiable data. from customers, partners, TotalView employees and others. Personal information includes data relating to an individual who can be identified or identified from such data.

Prohibition of posting

Staff is not permitted to occupy TotalView employees during their working hours on matters not related to their professional relationship with TotalView. Staff may not distribute print or other material on TotalView workspaces, attempt to promote or

distribute material for reasons unrelated to their professional relationship with TotalView, including charitable purposes.

Collaboration in investigations and audits

The staff must cooperate in all TotalView internal investigations and audits, tell the whole truth and provide all relevant documents that will be requested during an investigation or audit. Personnel may not destroy or modify records, and should not discuss internal investigations with any other person, inside or outside TotalView, unless authorized to do so by internal auditors or when communicating with government agencies in accordance with local legislation.

Additional principles

This Personnel Code of Conduct must be read and observed in conjunction with the applicable Code of Conduct and the relevant policies (if any) of the staff employer. In addition, the requirements described above do not cover all cases. Any conduct that may cast doubt on TotalView 's commitment to the highest standards of professional conduct and compliance is prohibited.

Personnel who have questions about this Personnel Code of Conduct should contact their employer, a member of TotalView management.

Report violations

Staff are required to report any alleged misconduct immediately, including irregular behavior by employees, customers, contractors, associates and suppliers. Staff should always act honestly, in good faith and with respect when reporting issues related to this Personnel Code of Conduct or otherwise using this Code.

Staff should report to a member of TotalView management. TotalView will not tolerate retaliation against anyone who raises an issue without malice and in good faith.