

# Code of Conduct VR Owl Group B.V.

**VR Owl Group B.V.**

**Last updated in May 2024**

## 1.0 Introduction

This Code of Conduct has been written and published to showcase how VR Owl Group deals with certain guidelines and principles with regards to dealing with each other and clients. VR Owl group has collected information on guidelines, practical agreements and regulations set by them. This document is re-read, reconsidered and reviewed at least once a year to keep it in line with current rules and legislation. If changes are made and a new version of this Code of Conduct is created, we will upload a new version.

## 2.0 Organisation

VR Owl and VR Expert together form VR Owl Group B.V ('the employer'). VR Owl as a creative agency producing innovative VR/AR applications, VR Expert as a hardware reseller focusing on selling and renting VR/AR hardware.

The start of VR Owl Group began in 2015 as an initiative of some friends. Initially under the name of VR Owl, the first employees focused on producing their own designed cardboard designs when they were still used for VR solutions on phones. They saw a gap in the market as it was in high demand but few parties could produce it.

Early on, VR Owl focused on making creative VR/AR applications.

During Covid, in 2020, VR Expert's webshop was established to focus specifically on selling VR/AR hardware in addition to creative software development. Although a 'consumer webshop' also existed for a while, we now mainly focus on the business market.

Since 2020, VR Expert has also had a German entity with an office near Cologne where employees focus on sales, operations and marketing for the German market.

To create transparency and clarity about the different teams within VR Owl Group, and to make it easier to get to know colleagues, VR Owl and VR Expert organisational charts can be found in our HR system.

### 2.1 Core values

All employees are expected to contribute to maintaining and strengthening the image of VR Expert / VR Owl. In manners, in the performance of duties, representation, but also towards each other.

To this end, VR Owl Group B.V adheres to the following core values:

- **Integrity**: It is important to us that we keep promises and commitments, stand by what we say and act honestly and respectfully. To our customers and to each other.
- **Commitment**: We have big ambitions and this requires a joint commitment to our growth and the success of the organisation. How and what you commit to can have a big impact on our development as a company. We're happy to give you the freedom and ability to take opportunities that contribute to our growth.
- **Innovation**: The world of VR/AR does not stand still. As an organisation, we have been able to spot opportunities in the market by continuing to think innovatively and also apply innovation and change when we see what is not working well. We also want to challenge you to keep seeking innovation in your work, your team, your processes and the way you do things.
- **Assertiveness**: We like open and honest communication and encourage you to communicate in this way. We would rather have you asking questions if you are not sure about something or tell us that you need clarification on how to proceed, than ambiguity. This way, we know better how to rely on or expect from each other and how we can help or support each other.

## 2.2 Mission

VR Owl Group would like to be the most well-known player in Europe in the field of VR and AR. Our goal is to keep growing and provide different industries with our products, services and knowledge.

## 3.0 ISO Certification at VR Owl Group

### 3.1 ISO Certification

VR Owl Group B.V has customers and clients with big claims on protecting personal data. As an organisation, this is why we have been working to achieve our ISO certification as a trusted partner and to properly set up and record how we handle company and client data. ISO is the international organisation dedicated to establishing, managing and improving standards for all kinds of organisations, processes and inspections. The abbreviation ISO stands for "International Standardisation Organisation". ISO certification is a tool to continuously improve our organisation and demonstrate our reliability.

### 3.2 ISO Policy

VR Owl Group B.V., following its process around ISO certification, has established a policy on quality management and information security management, with the aim of: ensuring that all access to customer data is always secure and that all services and products covered by the scope meet the required quality standards. All this to reduce the risk of damage or loss of business and customer data and ensure agreed service levels and product quality. And thus prevent the risk of loss of customer trust, employee trust and/or shareholder trust.

### 3.3 Security officer and quality manager

Our security officer is Gydo Nieraeth, he is directly responsible for managing and maintaining information security such as, for example, securing our networks and information systems in addition to ensuring that only authorised users have access to information and information systems.

Our quality manager is Merijn van den Broek, who is responsible for managing and maintaining quality management.

### 3.4 What ISO means for our employees

Employees of VR Owl Group are aware of ISO certification and aware of the processes it entails. Employee is aware of how to handle sensitive company and customer data, what data they have access to and what they show to other colleagues. Employee doesn't leave sensitive information open and alert the security officer or quality manager if they come across anything that does not fit into the policy around this process.

As regular reviews and audits of this policy take place, changes may be rolled out that employees involved in implementing the policy are updated or trained on.

## 4.0 Code of conduct

### 4.1 Confidentiality

1. The employee shall, both during and after the employment, maintain strict confidentiality regarding all confidential business information that has come to his knowledge within the framework of the employment, both that of the employer and that of other companies belonging to the group to which the employer belongs and that of customers and relations of the employer in the broadest sense of the word. Confidential business information includes all know-how data, documents, designs or notes that have not been disclosed to the public.

2. Without written permission from the employer, the employee is prohibited from keeping the aforementioned data in his private possession, copying them or making the documents and/or copies thereof available for inspection by third parties. The employee shall immediately hand over all documents and copies as referred to above to the employer at the first request of the employer and at the end of the employment contract.
3. In case of breach of one or more of the obligations in this article, the employee shall owe an immediately payable fine or damages claimed by the employer. The fine is for the employer's benefit.

#### **4.2 Dealing with external relations**

If employee receives an invitation from a relation, they should always discuss with their manager whether the invitation can be accepted before accepting it. If the invitation can be positively accepted, you should realise that you are doing so as a representative of the employer. In such cases, you should therefore behave appropriately at all times.

#### **4.3 Donations and corporate gifts**

Employee may not demand, request or accept compensation, rewards, gifts or promises from third parties unless the employer has given its express prior consent. If employee violates the aforementioned rule, the employer may issue a warning and demand the gift.

#### **4.4 Company property**

1. All company property, of whatever nature, made available to employees is and remains the property of VR Owl Group B.V. These company property must therefore be surrendered to VR Owl Group B.V upon termination of the employment contract, no later than the last working day. Common company property surrendered within VR Owl Group B.V is a laptop, mobile devices and possibly VR Hardware.
2. Company property of VR Owl Group B.V is always used with care and caution. Without prior permission, VR Owl Group B.V's company property may not be used for private purposes.

#### **4.5 Software and PC use**

1. Employee may use the computer(s) provided by the employer and the software installed on them only for business purposes at VR Owl Group B.V. If employee uses a VR Owl Group B.V computer for an unauthorised purpose, they will be liable for any resulting damage to the computer and/or software and/or otherwise.
2. Downloading and installation of software is allowed only after permission has been granted by the manager in charge.
3. The employer is free to periodically check the employee's compliance with the present rules of conduct.

#### **4.6 E-mail**

The e-mail system may only be used for business purposes and it is therefore not allowed to use the e-mail system to, for example: send threatening, insulting, sexually oriented or discriminatory messages send chain letters send messages containing confidential (company) information or from which such information can be derived

#### **4.7 Internet**

The internet at work may only be used for business purposes and is therefore not allowed to visit, for example, websites containing pornographic, racist, discriminatory, offensive, offensive and/or illegal material.

#### **4.8 Laptop and mobile phone**

Mobile devices issued by VR Owl Group B.V are for business purposes only. Employer reserves the right to monitor device usage and check mobile phone invoices to confirm proper usage.

#### **4.9 Social media**

1. Employee must be aware of the consequences for VR Owl Group B.V. and its business relations of inappropriate, incorrect, insulting, threatening or poorly formulated statements in social media. Employee will therefore not make statements in social media that put the employer and/or its business relations in a negative light.
2. Employee may only communicate in social media on behalf of VR Owl Group B.V if they have been explicitly authorised to do so. If employee is asked by third parties to make statements on behalf of VR Owl Group B.V, they must obtain prior permission from their supervisor.
3. Employee sees to it that they only provide correct information and make correct comments in social media.
4. Employee is only allowed to create a company profile, group, or network if they have explicit permission from their manager.
5. Employee should - unless explicitly instructed to do so - refrain from:
  - providing personal and business information on colleagues, partners, customers and other business relations
  - making statements about strategies
  - providing financial information on VR Owl Group B.V. and participations
  - providing information on employer's products or services
  - making statements about competing companies, their products or services
6. The employee limits his statements in social media on behalf of his employer to information already disclosed in company publications and press releases.
7. The employee shall refrain from using logos, articles, videos, images, trademarks, etc. of the employer unless he has permission from human resources.

#### **4.10 Intellectual property**

The intellectual property rights and/or similar rights, including copyrights and industrial property rights arising from the employee's work and/or inventions, performed and made during the existence of the employment contract concerning virtual reality and its ecosystem, shall be and remain the property of the employer, unless expressly agreed otherwise in writing. All records and/or copies thereof obtained from the employer's company or its customers or clients shall be and remain the property of the employer.

#### **4.11 Office security**

1. VR Owl Group B.V uses cameras in its premises to secure its products. Given the value of the hardware present, cameras are deployed by way of burglary prevention. The privacy of our employees is taken into account as much as possible.
2. Besides the use of cameras, an alarm system managed by an external partner is also used. Images from the security cameras are kept by them for 4 weeks.
3. The use of random and targeted checks, including on the use, storage and processing of data, is subject to the AVG. Complaints about camera use and/or other controls within VR Owl Group B.V. can be submitted to the direct manager or to the Personal Data Authority.
4. Employer keeps a register of processing activities with regards to camera use.

#### **4.12 Tags for office access**

Tags are assigned personally to a select group of people. If an employee is given a tag to access, and lock the office, they are not allowed to lend it to third parties, including their colleagues.

#### **4.13 Theft**

If employee, in any way, steals, takes away property of VR Owl Group B.V or colleagues without permission and/or commits fraud in any form, VR Owl Group B.V will report this to the police and employee will be dismissed with immediate effect.

#### **4.14 Alcohol-smoking and drug policy**

1. Possessing, dealing, handing out and/or using drugs and alcoholic drinks during work, as well as being under their influence, is strictly prohibited.
2. Employees with a leased car are prohibited from driving it, both privately and during working hours, under the influence of alcohol or drugs (narcotics). Incidentally, employer also advises all other employees never to drive under the influence of alcohol or drugs (narcotics).
3. There is a total ban on smoking in VR Owl Group B.V.'s premises for all employees, temporary workers, trainees, visitors and others. Smoking is only permitted outside in designated areas. This smoking policy also applies to smoking e-cigarettes and other smoke-like products.
4. Violation of these rules can lead to suspension or dismissal and, for serious offences, even instant dismissal.

#### **4.15 Inappropriate behaviour**

1. Within VR Owl Group B.V, aggression, (sexual) harassment, discrimination, bullying and other undesirable behaviour at any level is not accepted. Strict measures will be taken against an employee guilty of undesirable behaviour, including (immediate) termination of the employment contract. This regulation aims to prevent and combat arbitrariness and/or careless treatment within our company. Employees who unexpectedly do encounter this type of undesirable behaviour are urged to report it to HR.
2. To this end, VR Owl Group B.V has an active policy on preventing and combating any aggression, violence, discrimination and (sexual) harassment at work.
3. Unwanted behaviour includes, among others, improper treatment, sexual harassment, aggression and discrimination because of appearance, race, age, religion, nationality, position or sexual orientation.
4. If employee identifies any form of undesirable behaviour, they can report it to their manager or the internal - (HR responsible) or external confidential advisor (Company doctor). Through investigation and consultation with those involved, an attempt will be made to find a solution to the reported problem.
5. This confidant will be charged with the initial reception of persons with complaints about aggression, violence, discrimination, (sexual) harassment and other undesirable behaviour.

#### **4.16 Working conditions: safety, health, welfare**

- Employer shall, also by virtue of the provisions of the law to that effect, continuously strive to ensure safety and promote health and welfare by maintaining and improving working conditions in the company.
- To prevent situations that endanger safety or health, and to promote general welfare, you are required to exercise due caution and care in your work.
- Among other things, this requires you to follow safety regulations at all times.
- If an employee, run a risk on the basis of the risk inventory and evaluation, or if they indicate to themselves that they run a health risk, they will be placed under medical supervision. For this, the assistance of the Occupational Health and Safety Service will be sought. In addition, you will be given the opportunity to attend the company doctor's surgery.

- Major and minor accidents, environmental damage and major material damage as well as unsafe situations/actions must be reported to a supervisor at all times. Incidents are then recorded and analysed to prevent repetition of similar occurrences in the future.
- Everyone performing work for employer is obliged:
  - follow instructions, which are in the interest of safety, health and the environment, by supervisors and/or the Health and Safety Coordinator
  - use personal protective equipment properly in places where it is technically necessary or indicated by signs and/or specific instructions
  - keep personal protective equipment neat and properly stored when not in use
  - use machinery, tools and equipment properly, keep safeguards intact and not use them if identified defects endanger safety
  - use machines only after reading and understanding the user manual and safety instructions
  - avoid safety, health and environmental risks to themselves and others
  - report accidents and incidents (fire, environmental and property damage) immediately.
  - report near accidents and unsafe situations and/or acts immediately and take necessary action to prevent worse
  - comply with applicable smoking bans, including on the premises of clients, suppliers and others
  - comply with applicable traffic and parking regulations, including on the premises of clients, suppliers and others
  - separate waste and dispose of it responsibly according to applicable rules and regulations
  - from everyone's social responsibility to prevent or reduce environmental pollution, especially soil pollution.
  - participate in safety information meetings of the employer and, in consultation with the manager, also of clients and third parties
  - ensure a clean and orderly workplace.