



CODE OF CONDUCT  
COMPANY

# CODE of BUSINESS ETHICS

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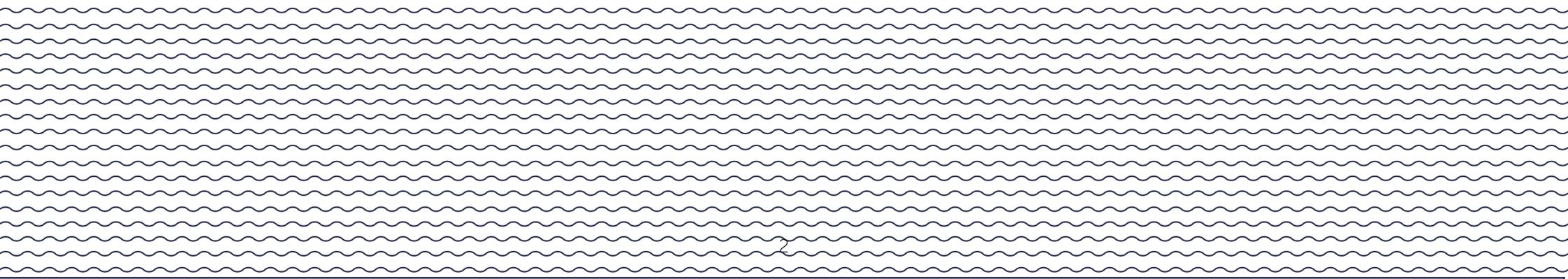
OUR VISION  
AND VALUES

OUR PEOPLE

OUR BUSINESS

OUR WORLD

LIVING  
THE CODE





# OUR PEOPLE



## OUR PEOPLE

### 1. A fair and respectful workplace

Our success is based on our personnel: professional experts who are committed to working with the highest integrity towards each other and our partners in all daily situations. We believe that by creating an inclusive, equal and fair work community, we strive for a sense of relevance of all members of that community. This is the basis for a positive employee experience.

#### 1. We support safety and well-being

We see that our employees have a safe working environment that supports their well-being. In such an environment everyone can work to the best of their ability. We are all responsible for promoting safety and well-being at work.

#### 2. We value diversity

At *Company*, diversity means the unique features of every individual:

personality, way of life, work experience, ethnicity, religion, gender, sexual orientation, age, nationality, skills and other such features. We strive for promoting diversity of the work force when recruiting, developing and engaging our personnel, and we want to ensure an inclusive working environment where our unique features are valued as strengths.

#### 3. We do not discriminate, and we always treat people with respect

We all must maintain a working environment in which people are treated with respect and appreciation. We do not discriminate or treat our employees or job seekers unfairly in relation to recruiting, hiring, education, promotions, salaries, compensations or other employment conditions. We have zero tolerance for sexual and other harassment and bullying. We do not use, or support the use, of child or forced labor.

## How to promote a **diverse, inclusive and equal** company culture?

- Be conscious of the language you use
- Don't physically or verbally bully, intimidate or humiliate others
- Humor is not the same for everyone – don't tell stories or jokes that could be seen as inappropriate, offensive or sexually explicit
- Don't distribute or display offensive material
- Avoid making remarks about a person's appearance – body or clothing
- Become aware of your own biases and work on them
- Promptly report any inappropriate or unacceptable behavior you observe in the workplace



## OUR BUSINESS

### 4. Gifts, entertainment and anti-corruption

*Company* does not tolerate corruption or bribery in any form. We do not offer, give, solicit, or accept any improper or corrupt payments or benefits in return for a favorable decision or improper business advantage.

We expect all service providers, agents, consultants, and other third parties who act on our behalf to adhere to the same standards.

We may offer or accept gifts and entertainment only if they are consistent with applicable laws and customary business practices, reasonable in value, appropriate to the nature of the business relationship, related to a legitimate business purpose, and will not embarrass *Company* if publicly disclosed.

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Gifts and hospitality must never affect or appear to affect decision-making.

## What's an appropriate gift or hospitality?



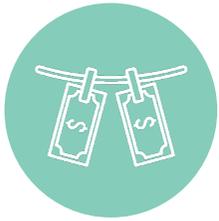
### Examples of permitted gifts

- Lunch in a local café or restaurant
- Promotional items with the company logo
- Tickets to a business fair



### Examples of prohibited gifts

- Gifts intended to influence a business decision
- Gifts of illegal nature
- Cash or cash equivalent (e.g. gift certificates)
- Overnight stays or foreign travel without prior approval from your manager



## 11. Trade compliance and anti-money laundering

We comply with all applicable customs and trade compliance laws and regulations, such as import and export regulations, export controls, embargoes, and economic sanctions. We also comply fully with all applicable anti-money laundering and counterterrorism financing laws, and will only accept funds from legitimate sources.

### What is **money laundering**?

Money laundering refers to disguising the origin of criminal money or assets to make them appear as if they came from a legal source.

## What can I do to **fight against money laundering**?

- Make sure our business partners are screened against applicable sanction lists as well as against money laundering, human rights violations, financial checks and other activities which decrease the trust in the business partner, its management or operations.
- Keep an eye out for unusual or complex payment structures or requests for payment to an unrelated account, country or third part.

## LIVING THE CODE

“  
Silence is not  
an option.  
Do the right  
thing and  
speak up!

Every one of us is responsible for maintaining the integrity of *Company* and ensuring that we act in accordance with this Code. If we are uncertain what action to take or what decision to make, we seek advice.

For employees, the first point of contact is their supervisor. Employees and supervisors can contact our experts in Human Resources or other specialist departments, who will provide support in assessing situations.

Our supervisors have a particular responsibility to listen carefully to the concerns of their team members and to create an environment in which employees feel safe to express their views and ask questions. Supervisors also have a duty to raise any concerns brought to their attention.

Any employee who becomes aware of an actual or potential violation of this Code has the responsibility to speak up. In this way, they can help us prevent errors and remedy shortcomings in a timely manner.

We provide several ways to raise a confidential concern. If you become aware of something that may be or result in a violation of our Code, you may:

- 1) Speak to your supervisor, Group's Legal or HR team. You may also write to our CEO or our Board.
- 2) Report your concern by using our whistleblowing line available on our intranet and website. Concerns may be raised anonymously but sufficient detail on the concern should be provided to allow appropriate follow up. This makes it possible for us to deal with issues and correct them in a timely manner and prevent them from happening again at the same place or elsewhere in the organisation.

All reports made in good faith concerning violations of the Code of Conduct will be investigated thoroughly and fairly with the assistance of the appropriate internal and/or external party. Reports of potential violations will be processed with strict confidentiality. We don't tolerate any retaliation against anyone who raises a concern in good faith.

## In situations when you feel unsure what to do, ask yourself the following questions:



Is my conduct legal, fair and honest?



Is my conduct compliant with *Company's* Code of Conduct and other company guidelines?



Would my manager, colleagues, family and friends think that I am doing the right thing?



Have I thought about the impact of my behavior to *Company* or other people?



Will my conduct allow *Company* to maintain its reputation as a trustworthy and responsible company and employer?



Would I feel comfortable if my conduct became public?



Does my conduct feel right?