



# Code of Conduct

Sikri Holding ASA

5 juni 2023



## Document information

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## Revision history

Revision number	Revision date	Changes	Revised by
0.9	13.12.2019	Established by transition from EVRY to Sikri AS	Eva Marie Røen
1	13.12.2019	Approved by the Board of Sikri AS	Nicolay Moulin, CEO
2	02.09.2021	Revised layout	Eva Marie Røen
2.9	26.05.2023	Updated layout and owner of document to Sikri Group ASA	Helen Indrekvam, Compliance officer
3	02.06.2023	Approved by SCO and HR Director	Anny Margrethe Bratterud, HR Director

## About this document

### Purpose

Provide guidelines for ethical and appropriate conduct in Sikri Group ASA.

### Scope

All employees and contractors of Sikri.

Please check Personelhåndboka in each business area for the most recent version if you are reading a previously downloaded or printed copy.

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# 1. General guidelines

Business ethics are more than avoiding contravening laws. They are about how we behave towards each other and towards the outside world.

Everybody associated with Sikri is responsible for following the rules and guidelines that are built on Sikri's basic values and that forms attitudes we all can be proud of. At Sikri we want everyone to be involved in this and we want everyone to contribute to good business culture based on well-being and security.

Sikri's Code of Conduct apply primarily to members of the board of directors, managers, employees, contracted consultants, and others acting on behalf of Sikri. It also applies to the subsidiaries in the Group. It is the line managers' responsibility to make sure that everybody is aware of, and complies with, these guidelines. As an employee or person associated with Sikri you are obliged to become acquainted with and comply with the guidelines. Those who infringe Sikri's rules and guidelines must be prepared to face the consequences that are in line with the infringement's type and scope.

Sikri shall comply with all applicable laws and governmental rules and regulations.

This also applies to internally determined guidelines. It is a personal responsibility of each individual to acquaint themselves with and adhere to the relevant standards and restrictions imposed by laws, rules and guidelines, including those relating to accounting matters.

## 1.1 Human worth

Sikri supports international human rights as outlined, i.e., by the UN declaration and associated conventions. No one shall in any way cause or contribute to the violation or circumvention of human rights. We place great importance on ensuring the compliance with employees' basic human rights as outlined in the International Labour Organization's core conventions. We shall comply with prevailing laws and legislation concerning distribution of content services and display a responsible attitude towards content that poses a danger to society, such as child pornography and racism.

## 1.2 Working Environment

Sikri shall be a good and professional place of work with an including working environment. Thus, you shall behave with respect and integrity towards anyone you meet through your work. You shall help create an environment free from any discrimination, such as in form of religion, skin colour, sex, sexual orientation, age, nationality, ethnic origin or disability.

You shall also help keep the working environment free from bullying, harassment or similar. We do not tolerate any behaviour that can be perceived as degrading or threatening.

## 1.3 Occupational Health, Safety and Employee Security

Sikri shall be a pioneer in the field of health, safety and employee security to promote good health and safe working environment in compliance with internationally recognized standards. You share the responsibility for achieving this goal. We shall do our utmost to control hazards and take necessary precautions to prevent accidents and occupational diseases.

## 1.4 Freedom of association and the right to collective bargaining

Sikri recognizes the right to freedom of association and collective bargaining in mature labour environments. In such environments Sikri shall allow its employees to freely elect representatives among the employees unless

this would represent a breach of national laws and regulations. Such employee representatives shall be allowed to carry out their functions unhindered at the workplace. You share the responsibility to avoid discrimination against any employee representatives.

### **1.5 Forced labour**

Any employment relationship with Sikri shall be freely chosen and free from threats. Sikri oppose the use of forced or compulsory labour, including but not limited to exchange of labour for payment of debt. Any employee shall be free to leave his/her employment after giving reasonable notice. No one shall be required to deposit money, lodge identity papers or similar order to receive or keep their employment with Sikri.

### **1.6 Child labour**

Sikri shall not employ or contract child labour. "Child labour" means any work by child or young person unless it is considered acceptable under the United Nations sustainability goal 8 and ILO Minimum Age Convention 1973 (C138). "Child" means anyone under 15 years of age, unless national or local law stipulates a higher minimum working age or higher age for completing mandatory schooling, in which case the higher age shall apply. Everyone shares a responsibility to secure that persons under the age of 18 do not perform any hazardous work, including but not limited to exposure to physical, psychological or sexual abuse.

If you become aware of any employment situation in breach with the standards set out above, you shall at once notify your immediate superior or any other appropriate executive. The employment situation shall straight away be remedied in the best interests of the child.

### **1.7 Loyalty, impartiality and conflict of interests**

Sikri respects the individual employee's right to a private life and private interests but demands openness and loyalty to the Group and the Group's interests. You shall not allow personal interests affect your work or prioritize personal gain ahead of your work at Sikri. Neither shall you take part in or attempt to influence a decision or settlement if there is a conflict of interest or other circumstances exist, which could give grounds to question your or Sikri 's impartiality.

Conflicts of interests should, wherever possible, be avoided. Conflicts of interest could involve, i.a., customers, suppliers, cooperative partners, present or prospective employees, competitors or other business activities. Probably, anything that would present a conflict for you, would also present a conflict if it is related to a member of your family. Should a risk for a conflict of interest arise, or if you are not sure if such situation exists, you shall on your own initiative evaluate and notify your immediate superior of the situation arisen.

### **1.8 Confidentiality**

Every employee and person associated to the Group has a duty of confidentiality by law and/or written agreement in accordance with this Code of Conduct. You shall preserve confidentiality concerning all business and other circumstances that could provide third parties unauthorized access to confidential information. Further, you shall exercise caution about discussing internal matters in a way you may be overheard by persons not concerned. The principle of "need to know" shall apply in all circumstances. The duty of confidentiality also applies after the termination of employment or contractual relationship with Sikri for as long as the information are considered of a sensitive nature or in any other way confidential.

### **1.9 Protection of personal data**

Sikri's processing of personal data shall be subject to the care and awareness which is required according to law and regulations and with special consideration for information that might be sensitive, regardless of whether the data refer to customers, employees or others. Processing of personal data shall be limited to what

is deemed necessary for efficient customer care, relevant commercial activities and proper administration of human resources.

At Sikri we manage sensitive data for our customers and their customers. We have therefore established strict guidelines, procedures and solutions to protect these from unauthorized access and theft. As an employee at Sikri it is important that you acquaint yourself with this and actively assist in ensuring that all our solutions have such security in place and that the current solutions are effective in relation to the threats we see and foresee.

### **1.10 Intellectual property**

Intellectual property such as know-how, methodology, concepts and ideas are important for Sikri to succeed in the market. If you are involved with the Group's intellectual property, you shall protect and manage it in the interest of the Group and in accordance with the relevant guidelines determined. You shall also respect the intellectual property rights of others and seek to avoid infringement of such rights. Unless otherwise stated by law or orders from public authorities, you shall not make business secrets or other important information available to unauthorized persons before obtaining an authorization from your superior.

### **1.11 Property and assets**

Sikri's property and assets, i.e., buildings and equipment, shall be managed and safeguarded in an appropriate manner. You shall observe the Group's security requirements concerning access to and use of the Group's facilities, IT resources and access to electronic resources and documents. Equipment and property owned by the Group may only be used for personal purposes if agreed in terms of your employment or if allowed in Sikri's rules and guidelines.

### **1.12 Nature and the environment**

Sikri shall be at the forefront in protecting the environment and undertake initiatives to promote greater environmental responsibility. Sikri shall adhere to relevant local and internationally recognized standards, minimize its environmental impact and continuously improve its environmental performance. We shall promote development and diffusion of environmentally friendly technologies. You share a responsibility for achieving these goals.

### **1.13 Information, communication and contact with media**

All information from Sikri shall be reliable and correct and maintain high professional and ethical standards. All of those who, through their work, deal with information is responsible for meeting these standards.

Communication with the media, the public or financial markets shall take place in accordance with defined guidelines and procedures and comply with rules and practice applicable to public listed companies. If you should be contacted by a journalist, outside consultant, analyst etc. and you are unsure whether you can or should give a statement, you should consult Corporate Communications for guidance.

### **1.14 Expertise and authority**

All decisions shall be made at the appropriate level in accordance with the applicable regulations concerning authority. You may only make internal decisions and/or commit Sikri towards external third parties if an authorization for this is delegated to you, and you must always keep within the limits of your mandate.

### **1.15 Accounting and reporting**

Sikri's accounting shall ensure that all transactions are correctly registered in accordance with local law and good accounting practice. You shall follow the Group's regulations concerning the registration of transactions and proper documentation and you share a responsibility for ensuring that business transactions are fully and correctly reported and documented, and in accordance with applicable accounting principles. The annual accounts and interim accounts shall be in accordance with the law, good accounting practice and those accounting standards determined in and for Sikri.

### **1.16 Internal control**

All parts of Sikri shall have good internal controls that ensure that the Group's goals and strategies are fulfilled and complied with. Internal controls shall ensure that the business processes are, always, efficient and within an acceptable level of risk, that physical and intangible assets are safeguarded and utilized, that financial information is correct and timely, and that laws, regulations and guidelines are followed. Internal control is the responsibility of management, but every individual bears shared responsibility for this.

## **2. Relations with customers, suppliers, competitors and public authorities**

Customers shall be met with insight, respect and understanding. You shall always try to fulfil the needs of the customer in the best possible manner, within the business ethical guidelines that apply to the business. Customer's personal information shall be protected in accordance with the relevant laws on protection of personal data. Suppliers shall be treated impartially and justly. Suppliers in competition for contracts with Sikri are always able to trust Sikri's selection processes. When selecting suppliers, you shall therefore always follow the Group's established guidelines and routines.

Sikri's competitiveness in the market is based on good products and services to the right price. You shall always meet the Group's competitors in an honest and professional manner. Public authorities shall be met in an appropriate and open manner. Public information about the Group shall be given by Sikri's management or by the person responsible for public communications only, unless otherwise agreed.

### **2.1 Competition**

Sikri wants fair and open competition in all markets, both nationally and internationally. Under no circumstances shall you cause or contribute to any breach of general or special competition regulations, such as illegal cooperation on pricing, illegal market sharing or any other behaviour in breach of prevailing competition laws.

### **2.2 Corruption and bribery**

Sikri is opposed to all forms of corruption. You shall never offer or accept illegal or inappropriate monetary gifts or other remuneration to gain business or personal benefits for yourself or others. Sikri has a firm attitude to gifts, remunerations and activities that may be perceived to include elements of a gift. This applies to both how we treat our customers and how our employees and cooperating partners should approach this issue.

Special guidelines have been prepared to advise you on how to handle this kind of issues. You are expected to acquaint yourself with these guides and to comply with it. Furthermore, you shall not use agreements with middlemen to channel payments to parties in such a manner so that it can be interpreted as contributing to corruption.



### 2.3 Gifts and business courtesies

You shall always exercise caution in relation to offering or accepting gifts and business courtesies. You shall under no circumstances accept gifts or other remuneration if it can be reasonably perceived that these are for the purpose of influencing business decisions. Reference is made to the special guidelines prepared, advising you on how to handle these issues. You are expected to acquaint yourself with this guide and to comply with it. If you are unsure of the situation, you must consult your immediate superior for guidance.

### 2.4 Money Laundering

Sikri is firmly opposed to all forms of money laundering and shall take steps to prevent that financial transactions with the Group can be used by others to launder money.

## 3. Relations to employee's private interests and actions

As an employee of Sikri, you shall not hold another position or carry out work for others during working hours without a specific prior permission from your superior. If you are appointed on a level where an Executive Vice President is your immediate superior, then such approval is to also be obtained from the CEO.

### 3.1 Duties, positions and ownership in external businesses

Engagements in external duties and positions are positive, but their scope or type must not affect your working relationship with Sikri or otherwise come into a conflict with Sikri's business interests. Board duties in, consultancy for or ownership in customers', suppliers', cooperating partners' or competitors' businesses, as well as duties and positions of a scope or nature that can affect your working relationship with Sikri, shall be expressly agreed in advance by your immediate superior. If you are appointed on a level where an Executive Vice President is your immediate superior, then such approval is to also be obtained from the CEO.

### 3.2 Political activity

Sikri does not give support to political parties, neither in the form of direct financial support nor paid working time. Employees participating in political activities will be granted leave from their work in accordance with the law and agreements.

## 4. Handling of infringements

Should you become aware of an infringement of Sikri's rules and guidelines, you should raise this issue with your immediate superior. Should you wish to report an incident to someone outside the company or anonymously, you may report it through our external service for Whistleblowing at BDO by following an updated link in our Personnel handbook. The aim is for employees not to have to fear the consequences if they report something they see or hear. Failure to do so is itself a breach of the Code.

Sikri does not allow reprisals of any kind against those who, in good faith, report an infringement or suspicion of an infringement of the rules or guidelines. Any questions regarding how the Code should be interpreted or applied may be directed to the Compliance Officer.

The Board of Directors at Sikri shall take all action it considers appropriate to investigate any violations reported to it. If a violation has occurred, Sikri will take such disciplinary or preventive action it deems appropriate. In the event of a member of the Board or someone within Executive management is related to a case reported, the Board of Directors shall be consulted before a decision is made. If the case reported is related to other employees, the Compliance Officer shall be consulted before a decision is made. Any changes or waivers to the Code for board members, managers or employees of Sikri can be granted by the Board of Directors only.

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## Confirmation

I hereby confirm that I have read and understood Sikri's Code of Conduct.

I am also aware that this Code of Conduct is revised at irregular intervals, and I undertake to keep myself updated on possible changes.

<b>Date:</b>	
<b>Name (in Capital letters):</b>	
<b>Signatur:</b>	