## enfo

# Code of Conduct



### About our Code of Conduct

As an IT service company, we are in the business of trust. We enable our customers' data-driven business transformation and strive for a more intelligent Nordics. Our success relies on the confidence our customers and stakeholders have in us, and every Enfonian has a critical role in building and maintaining that trust.

Together with other Enfo policies, this Code of Conduct (Code) forms the foundation for the way we work and it applies to everyone at Enfo. It helps us to ensure that we conduct business in an ethical and responsible way in accordance with Enfo's policies and values, which are collaboration, trust, continuous development and expertise. Read more about Enfo's values on the intranet.

Enfo and all Enfonians are committed to ethical and responsible conduct in all of Enfo's operations, and we expect the same commitment from our contractors and suppliers. We operate in full compliance with all applicable laws and regulations of each country in which Enfo operates.

This document is based on recognized international standards, principles and best practices. It is not a substitute for, and should not be considered to override, applicable laws and regulations. Where local or applicable industry standards are higher than applicable legal requirements, we meet the higher standards. For some topics, more instructions are included in separate policy documents.

At Enfo we live by our values and our Code of Conduct. If you have questions, concerns or would like to report something a potential violation of this Code of Conduct, please share it with your manager, Enfo's General Counsel or send an email to <u>codeofconduct@enfogroup.com</u>. Your input is handled with total confidentiality.

#### We respect the rights of Enfonians

Enfo's most valuable assets are its people, Enfonians. A healthy and safe work environment is ensured for all Enfonians in compliance with all applicable health and safety laws and regulations. Enfo also complies with applicable employment legislation and collective bargaining agreements on e.g. working hours and respects employees' right to leisure time and work-life balance.

Enfo complies with international human rights and labor rights standards and ensures equal opportunities for all Enfonians (including potential recruits) based on competence, experience and performance, without regard to gender, ethnicity, religion, sexual orientation and/or other characteristics protected by applicable law. All Enfonians are free from corporal punishment, physical, sexual, psychological or verbal harassment, bullying or abuse.

Enfo does not use child or forced labor in any of its operations or activities.

#### We fight corruption and fraud

We at Enfo are against every kind of bribery, fraud and corruption committed to obtain or retain business or otherwise gain an undue advantage, pay or receive bribes, or provide or request anything of value. We comply with applicable anti-bribery and corruption laws and regulations in each country in which Enfo operates.

Any event organized or participated in with a government official or other business partner should be reasonable, appropriate and have a legitimate business purpose. Customary gifts of limited nominal value may be given or accepted, if it is obvious that the receiver will not be influenced in their decision by accepting the gift.

More information about anti-corruption, as well on working with government entities and other related topics, is included in Enfo's Anti-Corruption Policy.

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#### We avoid conflicts of interest and encourage fair competition

All Enfonians, as well as Enfo Board members, must avoid any situation in which a personal interest conflicts or appears to conflict with the interest of Enfo. For more information on agreements with related parties, please refer to Enfo's Approval Policy.

Enfo is committed to always competing fairly, and we do not enter into any agreements that hinder competition. Enfo also complies with applicable trade regulations, including export controls, trade restrictions, trade embargoes, economic sanctions and boycotts.

Enfo's contractors and suppliers are required to adhere to the principles described in this Code and described in detail in Enfo's Supplier Code of Conduct.

#### We safeguard assets and information

We always safeguard Enfo's, our customers' and our business partners' assets, such as tangible assets, data or intellectual property rights. Such assets are only to be used for legitimate business purposes and protected from loss, damage, disclosure or unauthorized use.

Trust is the foundation of every successful business. Trust is also one of the values that we as Enfonians adhere to, both in our role as colleagues and in our contact with customers or other stakeholders. As part of this, we raise concerns early and are transparent, honest and open in all situations.

We are all an important part of Enfo's brand, and communication is an important tool for managing our company internally and externally. We do not make public statements that harm Enfo, Enfonians or our business partners. We all take responsibility of only communicating true and accurate information and not disclosing confidential or business-critical information. Employees who are contacted by outside sources or the media requesting information should refer to Enfo Communications.

Enfo complies with the applicable laws and rules governing privacy and data protection. For more information, please refer to Enfo's Privacy Policy.

#### We preserve the environment

Enfo is committed to protecting the environment beyond our corporate boundaries. As we do not manufacture products, we concentrate our efforts on the services and activities that are within our sphere of influence, such as office-related services, data centers, corporate cars and business travel. For more information, please refer to Enfo's Environmental Policy.

