

2021

Code of Conduct – workers



CONTENTS



Field of application
General principles

04



Environment
Climate and energy use
Natural resources

05



Social
Equal opportunity
Discrimination or harassment
Healthy environment

06



Governance
Data and Information Security
Fair and honest reporting
Governance and anti-corruption
Acceptance of Advantage
GDPR compliance and data information security
Property of the Company
Outside Employment
Conflict of Interest
Competition
International sanctions lists

07



Compliance with this Code and sanctions
Reporting Non-Compliance with this Code

09

Introduction

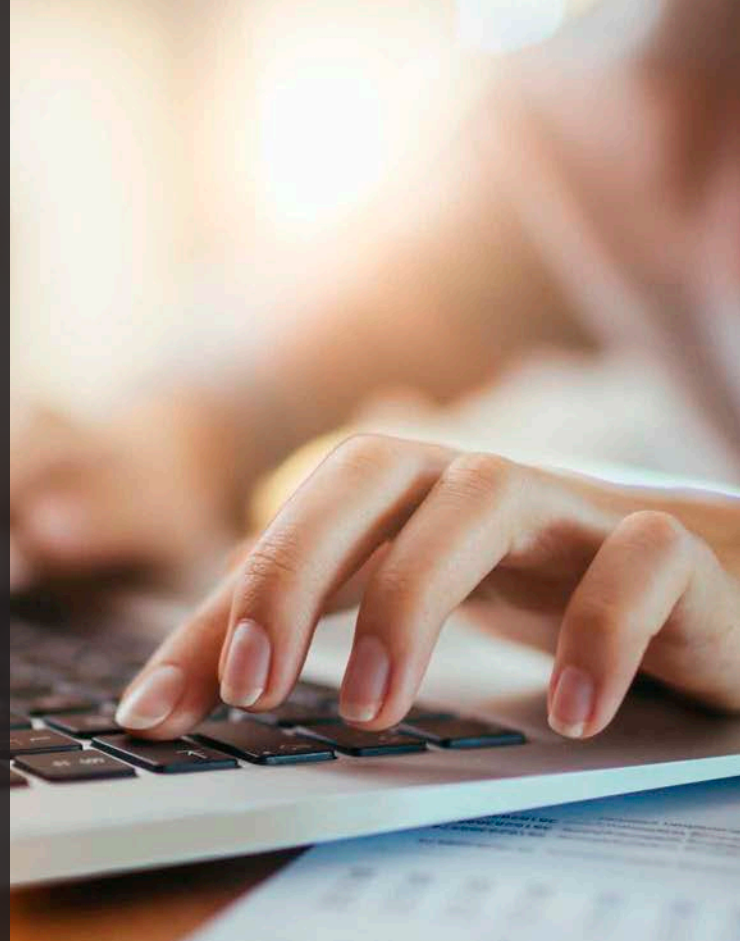
In EG, we strongly believe in the value of making a positive difference to society. This includes demonstrating responsibility towards the environment and the people taking part in the development and delivery of our solutions and services. This Code of Conduct clarifies our expectations to our workers and shows our commitment to maintain a diverse and unified world class work place.

Field of application

The code applies to all employees and contracted staff, hereafter workers, working within EG and group companies.



[List of EG's group companies](#)



General principles

Respect for human rights is fundamental within EG and we support the UN Global Compact.

We expect our workers to read and comply with the UN Global Compact and to support our CSR-initiatives as described in our UN Global Compact Communication on Progress and our ESG report.

The Code of Conduct is based on national regulations, worker's contract with EG and EG's policies and standard operation procedures, which are made available in EG Information Security.

Workers are required to be familiar with and comply with all relevant rules and procedures relevant for their job and job position. Compliance with this Code is a part of any agreement or contract between workers and EG, just as workers are required to comply with applicable laws and regulations.



[About EG](#)





Environment

EG wants to be a climate positive software company. We expect our workers to support a proactive approach to environmental challenges and undertake initiatives to promote greater environmental responsibility. Also, we encourage the development and diffusion of environmentally friendly technologies.

Climate and energy use

Workers should make climate-friendly choices where possible, including holding online meetings where possible, reducing unnecessary air travel, using public transportation and car-pooling where possible.

Natural resources

The workers should help to avoid unnecessary use of natural resources by recycling where possible, avoiding food waste and sorting waste for recycling.



Social

EG wants to be a diverse and unified world class working place, and we expect our workers to support the human and labor rights.



[Diversity & Non-discrimination Policy](#)



Equal opportunity

EG has zero tolerance against discrimination and harassment based on human differences, including but not limited to gender, transgender identity or expression, ethnicity, religion, disability, sexual orientation and age. This principle applies to all aspects of the employment relationship, including recruiting, hiring, training, work assignment, promotion, transfer, termination, and wage and salary administration.

Discrimination or harassment

All workers within EG must respect and contribute to diversity and non-discrimination.

Healthy environment

Workers should perform their work in a safe manner with care for co-workers and business relations. EG is committed to an injury-free and illness-free work place that is operated in an environmentally sound manner in compliance with all relevant laws and regulations that protect worker safety and the environment.

Governance

EG wants to be an honest, trusted and accountable software company. We expect our workers to follow our rules, practices, and processes to ensure accuracy, consistency and responsiveness to key stakeholders including customers, shareholders and regulators.

Data and Information Security

Workers must treat data belonging to EG or EG's customers with confidentiality and protect it against unauthorized use, unlawful processing and against accidental loss, destruction, damage, alteration or disclosure. Each worker must ensure that personal data is handled in accordance with applicable data protection laws and regulations.



[GDPR handbook](#)



[EG Cyber and information Policy for EG Group](#)



Fair and honest reporting

All transactions of EG must be duly recorded to permit preparation of clear financial state-ments in conformity with generally accepted accounting principles. No false or misleading entries may be made in the books and records of EG for any reason, and no worker may engage in any arrangement that results in such a prohibited act.

Governance and anti-corruption

EG has zero tolerance for corruption and bribery. All workers must never offer to provide anything of significant value directly or indirectly to government officials and business partners to secure an advantage.

Acceptance of Advantage

Workers are prohibited from soliciting or accepting any advantage from any persons having business dealings with EG.

GDPR compliance and data information security

EG must as a company comply with the GDPR, including supplementary regulations set out in national legislation applicable to each EG company. All workers processing personal data as part of the execution of their job must be familiar with these rules and the principles applicable to the processing of personal data.



Property of the Company

Workers must ensure any property of EG is properly used for the purpose of conducting EG's business. Misappropriation of the property for personal use or resale is strictly prohibited.



[Employee handbook](#)

Outside Employment

Workers who wish to take up paid outside work, including those on a part-time basis, must seek the written permission and guidance from their immediate manager. If a potential conflict with the interest and values of the corporation is identified the manager must before any approval consult the Vice President of Group Legal & Compliance. Approval will not be given if the outside work conflicts with the interest and values of the corporation.

Conflict of Interest

EG recognizes and respects the right of its workers to engage in outside activities which they may deem proper and desirable, provided that these activities do not impair or interfere with the performance of their duties to EG or their ability to act in EG's best interests. In most, if not all, cases this will mean that workers must avoid situations that present a potential or actual conflict between their personal interests and EG's interests.

A "conflict of interest" occurs when a worker's personal interest interferes with EG's interests. Conflicts of interest may arise in many situations. For example, conflicts of interest can arise

when a worker takes an action or has an outside interest, responsibility or obligation that may make it difficult for him or her to perform the responsibilities of his or her position objectively and/or effectively in EG's best interests.

Conflicts of interest may also occur when a worker or his or her immediate family member receives a personal benefit - whether improper or not - as a result of the position of the worker with EG.

Any transaction or relationship that reasonably could be expected to give rise to a conflict of interest should be reported promptly to Group Legal and Compliance. Group Legal and Compliance may notify the Executive Management, Board of Directors or a committee thereof as he or she deems appropriate.

Competition

It is EG's policy to conduct all our business in an honest and ethical manner and comply with any applicable law, rule and regulation in all markets in which we operate including the observation of any applicable provision of competition law. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and to implement and enforce effective systems to counter anti-competitive behavior.

We recognize that it is our responsibility, and of those working for us, to observe and uphold our position on anti-competitive behavior and to ensure compliance with any applicable provision of competition law. Generally, any contact between EG and our competitors is strictly prohibited if it concerns:

- (1) prices,
- (2) sales, market or customer sharing or allocation,
- (3) limitation of production and
- (4) boycotts.

This applies to formal or informal agreements including so-called 'gentlemen's agreements' and exchanges of information, whether they are written, and whether they are legally binding.



[Competition policy](#)

International sanctions lists

EG is committed to ensure compliance with all relevant national and international sanctions applicable to restricted countries, territories, governments, companies, entities and/or persons, including but not limited to trade, economic or financial sanctions laws, regulations, embargoes or restrictive measures imposed by the United Nations, the United States of America, the United Kingdom, Denmark or the European Union. All EG workers must refrain from entering transactions, investments, partnerships or any other type of dealings with any person or entity, that is subject to sanctions or is owned or controlled by or acting directly or indirectly on behalf of or for the benefit of, any person or entity subject to sanctions.



[United Nations Security Council Consolidated List](#)



[Restrictive measures](#)

Compliance with this Code and sanctions

Breach or non-compliance with this Code may lead to breach of the contract with EG. A breach may lead to reprimands like verbal or written warning, redeployment, temporary suspension or permanent dismissal.

Reporting Non-Compliance with this Code

The business partner must ensure that its employees do not participate in any activities where there is a conflict between the personal interests of the employee and the professional interests of the business partner in its relationship with EG.

Workers are expected, without undue delay, to report suspected violations of applicable laws, regulations or this Code to compliance@eg.dk.

If it is not possible or appropriate to use the usual reporting channels, you may use the EG whistleblower scheme at [WhistleBlowerForm](#)

or contact DAHL Advokatfirma, att.:
lawyer Søren Wolder, phone +45 88919245.

The lawyer has a duty of confidentiality and does not give information about your request to EG.



[Report of violations](#)



[Whistleblower Scheme](#)

Legal and Compliance

Group Legal & Compliance is responsible for the legal and compliance risk management in the EG Group. You can contact Group Legal & Compliance by sending a mail to Grouplegal@eg.dk.



[EG Legal](#)



[The Code of Conduct online](#)

EG and ESG

Read more about EG's and our Corporate Social Responsibility on our website.



[We behave responsibly](#)

