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# Code of Conduct

Rev 2021



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## 1 General guidelines

Business ethics is about more than avoiding offences. Business ethics is about how we behave towards each other and towards the outside world. Everyone associated with Diri has a responsibility to follow the rules and guidelines that support Diri's values and create attitudes we can be proud of. Diri is concerned that everyone is involved in this and that each individual through the community contributes to a good corporate culture characterized by well-being and security.

Diri's Code of Conduct applies primarily to directors, officers, employees, hired consultants, and others acting on Diri's behalf. It is the responsibility of line management to make these guidelines known and ensure compliance. As an employee of or affiliated with Diri, you are obliged to familiarise yourself with and comply with the Code. Anyone who violates Diri's rules or guidelines must be prepared to be met with a reaction appropriate to the nature and extent of the violation.

Diri shall comply with all applicable government laws and regulations. The same applies to internally established guidelines. It is the individual employee's personal responsibility to familiarise themselves with as well as to comply with the requirements set by laws, regulations and guidelines, including requirements for accounting matters.

### 1.1 Human dignity

Diri supports international human rights as enshrined in 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 particular emphasis on ensuring compliance with the fundamental rights of employees, as enshrined in the ILO's core conventions.

We will comply with the laws and regulations that apply at all times to the distribution of content services and take a responsible attitude towards socially harmful content such as child pornography and racial harassment.

### 1.2 Work environment

Diri shall be a good and professional workplace with an inclusive working environment. Therefore, you must act with respect and integrity towards everyone you come into contact with through your work. You must contribute to a working community free from discrimination, whether due to circumstances such as religion, skin colour, gender, sexual orientation, age, national or ethnic origin or disability. You must also contribute to a working community free from bullying, harassment, harassment and the like. We do not tolerate anyone exhibiting behaviour that could be perceived as degrading or threatening.

### 1.3 Health and environment

Diri shall be a pioneer in health, safety and the environment (HSE) to promote good health and a safe working environment in accordance with international standards. You have a shared responsibility for ensuring that this objective is achieved. We will do our best to control OSH risk in the workplace. We will also take the necessary precautions to prevent accidents and occupational diseases.

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

Diri recognises the right to freedom of association and collective bargaining where there is a well-developed working life. If it does not contravene national laws and regulations and the labour market is well developed, Diri shall allow its own employees to freely elect representatives from among the employees. Such employee representatives shall be able to perform their duties unhindered in the

workplace. You have a shared responsibility to avoid discrimination against employee representatives.

## 1.5 Forced labour

All employment with Diri shall be entered into voluntarily and without threats. Diri opposes forced labour, including work performed as payment of debts. All employees shall be free to terminate their employment after a reasonable notice period. Diri shall not require anyone to deposit money, identity documents or the like in order to obtain or keep their work

## 1.6 Child labour

Diri shall not use child labour. Child labour means work performed by children and young people, unless the work is considered acceptable under the ILO Convention on minimum age for access to employment 1973 (No. 138). By children is meant someone under the age of 15. Where national or local law provides for a higher minimum age for employment or a higher age for completion of compulsory schooling than 15 years, the highest age shall be applied.

## 1.7 Loyalty, impartiality and conflict of interest

Diri respects the individual employee's right to privacy and private interests but demands openness and loyalty to the company and the company's interests.

You shall not allow your own personal interests to influence your work or allow personal interest or gain to take precedence over your work at Diri. You shall also never take part in or try to influence a decision or decision if there is a conflict of interest or other circumstances that could undermine confidence in independence.

It is your responsibility to avoid or avert a conflict of interest that you may become a part of. Conflicts of interest may include, for example, customer, supplier, partner, current or potential employees, competitors or other business activities. Matters that constitute a conflict of interest for you are also likely to constitute a conflict of interest if it concerns someone in your family.

If there is a risk of a conflict of interest, or if you are in doubt as to whether this is the case, you must on your own initiative submit the issue to your immediate superior.

## 1.8 Confidentiality

All employees and affiliates in the company have a duty of confidentiality based on law and / or written agreement, as well as in accordance with these Business Ethics Guidelines. You must maintain confidentiality about all business and other matters that may give outsiders unwarranted access to confidential information, and be cautious about discussing the company's internal affairs under such circumstances that the discussion may be overheard by unauthorized persons. The principle of "need-to-know" shall be applied in all contexts.

The duty of confidentiality also applies after the employment or contractual relationship has ended, as long as the information must be regarded as anti-competitive or otherwise confidential.

## 1.9 Protection of important information and personal data

Diri's processing of important information and personal data shall be carried out in accordance with the requirements imposed by laws and regulations, and with special attention to information that may be critical, regardless of whether these refer to customers, employees or others.

At Diri, we manage important information and data for our customers and their customers. We have therefore established strict guidelines, routines and solutions to protect these from unauthorized access and theft. As a Diri employee, you are responsible for actively helping to ensure that critical information and personal data for Diri and our customers are processed in accordance with laws and regulations, and that security solutions are in place and that they are continuously effective in relation to the threats we see and expect.

## 1.10 Intangible assets

Intangible assets, such as special knowledge (know-how), methods, concepts and ideas, are an important part of Diris' prerequisites for success in the market. If you have dealings with the company's intangible assets, you must protect and manage these assets in the interests of the company and in accordance with the guidelines established. You shall also respect the intellectual property rights of others and avoid infringement of such rights. Unless otherwise provided by law or orders from public authorities, you shall not make trade secrets or other important information available to outsiders until you have obtained the consent of your superior.

## 1.11 Property and assets

Diri's property and assets, such as buildings and equipment, shall be duly managed and secured. You must comply with the Company's security requirements regarding access to and use of the Company's facilities, IT resources and access to electronic resources and documents. You may only use group equipment and property for personal purposes if this is agreed in connection with the employment relationship or it is permitted by Diri's rules or policies.

## 1.12 Nature and the environment

Diri shall be a pioneer in taking care of nature and the environment, both by minimizing its own environmental impacts and by developing, promoting and even using environmentally friendly technology. You must take into account the environmental effects of work-related activities on nature and the environment and shall as far as possible choose environmentally friendly solutions.

## 1.13 Information, communication, and media contact

All information from Diri must be reliable and correct and maintain high professional and ethical standards. Everyone who is involved in the information in their work has a shared responsibility for ensuring that this is complied with. Communication with the media, the public and the market, in general, shall take place in accordance with established guidelines and procedures and satisfy the rules that apply to the company. Public information about the company shall only be provided by Diri's management or information officer unless otherwise agreed.

## 1.14 Competence and power of attorney

Any decision shall be made at the appropriate level in accordance with the applicable power of attorney rules. You may only make internal decisions and/or commit Diri vis a vis others if you have been granted special power of attorney, and you must always comply with the power of attorney framework that you have been given.

## 1.15 Accounting and Reporting

Diri's accounting shall ensure that all transactions are correctly recorded in accordance with law and generally accepted accounting principles. You must comply with the company's rules on recording transactions and submitting vouchers and take joint responsibility for ensuring that business transactions are posted and documented fully and correctly in accordance with applicable accounting principles. The annual and interim financial statements shall be in accordance with the law, generally accepted accounting principles and the accounting standards otherwise laid down in and for Diri.

## 1.16 Reporting and disclosure

Diri's reporting shall be in accordance with applicable laws and regulations and be complete, proper, correct, current and understandable.

## 2 RELATIONSHIPS WITH CUSTOMERS, SUPPLIERS, COMPETITORS AND PUBLIC AUTHORITIES

Customers should be met with insight, respect and understanding. You must always seek to take care of the customer's needs in the best possible way within the business ethics framework that applies to the business. Customers' privacy shall be safeguarded in accordance with applicable privacy legislation.

Suppliers shall be treated impartially and fairly. Suppliers competing for contracts with Diri should always have confidence in the integrity of Diri's selection process. When choosing between suppliers, you must therefore always follow the company's established policies and procedures.

Diri's competitiveness in the market is based on good products and services at the right price. You must always meet the company's competitors in an honest and professional manner.

Relations with public authorities in their capacity as public authorities shall always be handled in a professional manner. In the event of an unannounced visit from a public authority, the company's guidelines in this area must be followed.

### 2.1 Competition

Diri wants fair and open competition in all markets – nationally as well as internationally. Under no circumstances shall you cause or contribute to a breach of general and special competition rules, for example by illegal price fixing, illegal market sharing or other conduct in violation of applicable competition law.

### 2.2 Corruption and bribery

Diri opposes all forms of corruption. You shall never offer or receive illegal or unlawful monetary gifts or other remuneration in order to obtain business or private benefits for you or others. Diri has a strict attitude towards gifts or benefits or activities that may be perceived to have a gift element in them. This applies both in relation to our handling of our customers and how our employees and partners should relate to this type of attention from others.

You shall also not use agreements with intermediaries to influence or channel payments to anyone so that this can be considered complicity in corruption.

### 2.3 Gifts and courtesy gestures

You should always exercise caution in offering or accepting gifts and courtesy gestures. Under no circumstances shall you receive gifts or other remuneration if it is reasonable to believe that this is likely to influence business decisions. You must always present a case of doubt to your immediate superior.

### 2.4 Money laundering

Diri distances itself from all forms of money laundering and is committed to preventing financial transactions with the Company from being misused by others for money laundering purposes.

## 3 RELATIONSHIP TO EMPLOYEES' PRIVATE INTERESTS AND ACTIONS

As an employee of Diri, you must not hold another position or perform work for others during working hours without special prior written consent from your superior.

### 3.1 Positions, positions and ownership in external activities

Involvement in external offices and positions is positive but must not have a scope or be of such a

nature that it affects the employment relationship or conflicts with the company's business interests. Directorships, advice for or ownership in customers', suppliers', partners' or competitors' activities, as well as positions and positions that are of scope or of such a nature that it may affect the employment relationship, require that you have received special prior consent from the superior's manager.

### 3.2 Political activity

Diri does not provide support to political parties, either in the form of direct financial support or paid working hours. Employees who participate in political life are granted leave from work according to law and agreement.

## 4 REPORTING AND NOTIFICATION

### 4.1 Notification to the manager

Should you discover a violation of Diri's rules or guidelines, you should raise this with your immediate superior. If the matter involves this, or it is otherwise difficult to raise with the immediate manager, you can raise it with the manager's manager.

### 4.2 Duty to notify

Diri does not allow any form of retaliation against anyone who reports in good faith of infringement or suspected violation of rules or guidelines.

Failure to report violations may in itself be considered a violation of the Code.

### 4.3 Proceedings

Diri's Board of Directors shall take such action as the Board deems appropriate to investigate violations or suspected violations reported to the Board. If violations occur, Diri will take the disciplinary and preventive measures considered necessary.

Amendments to or exemptions from this Code for Diri directors, officers or employees may only be granted by the Board of Directors.