

A CODE OF ETHICS AND PROFESSIONAL CONDUCT
JANUARY 2021 EDITION

DMC
N O R D I C

DENMARK ESTONIA
NORWAY SWEDEN

STAY NORDIC COOL, LEAVE INSPIRED!

Code Of Conduct



Our Values



Living our values through our ethical behaviour

Our values: Creative Thinking, Client Commitment, Quality, Expertise and Personal touch, are at the heart of everything we do, mirroring a vision that goes through the whole organisation, underlying our business.



Creative Thinking



Client Committed



Quality Driven



Local Expertise



Personal

The Code And Our Standard Of Conduct

- The Code of Business Principles
- Applying the Code in Business Practice
- Responsible Risk Management
- Service Safety & Quality



The Code of Business Principles





STANDARD OF CONDUCT

We always conduct our businesses with honesty, integrity, and openness, and with respect for the human rights and interests of our employees. We shall similarly respect the legitimate interests of those with whom we have work relationships.

We are always dedicated to providing transparency across all our operations ensuring trust in what we do.

COMPLY WITH THE LAW

DMC Nordic company and all employees are obliged to obey the laws and regulations of the countries in which our company operates.

EMPLOYEES

Our company is dedicated to creating a working environment that promotes diversity, inclusion, life-long learning, and equal opportunity. We believe in a workplace where there is mutual trust, respect for human rights and no discrimination. We support the physical and mental wellbeing of our employees, ensuring safe working conditions.

We recruit, employ, and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed. We aim to provide employees with a total salary package that meets or exceeds the legal minimum standards and in line with industry standards in the markets in which we operate.

We are committed to not using any form of forced, compulsory, trafficked or child labour. We respect the dignity of the individual and the right of employees to freedom of association and collective bargaining.

We always maintain good communications with our employees through company-based information and advisory procedures.

At DMC Nordic we always provide transparent, fair and confidential procedures for employees to raise their concerns.





BUSINESS PARTNERS

DMC Nordic is continuously working on establishing jointly beneficial relations with our suppliers, clients, and business partners. While involved in various business activities we always expect all our partners to follow business principles consistent with our own. We will only work with these business partners who have high business standards making sure that their employees are paid a living wage and are not subject to forced, compulsory, trafficked or child labour.

PUBLIC ACTIVITIES

DMC Nordic neither supports political parties nor contributes to the funds of groups whose activities are calculated to promote party interests.

BRIBERY & CORRUPTION

DMC Nordic does not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain. No employee may offer, give, or receive any gift or payment which is, or may be construed as being, a bribe. Any demand for, or offer of, a bribe must be rejected immediately and reported to management.

THE ENVIRONMENT

DMC Nordic is committed to making continuous improvements in the management of our environmental impact and to the longer-term goal of developing a sustainable business. We work in partnership with others to promote environmental care, increase understanding of environmental issues and expose the good practice.

DATA PROTECTION

DMC Nordic is committed to the responsible, ethical, and fair while using data. We collect and use data in line with our values, applicable laws and with respect for privacy as a human right.



Applying The Code in Business Practices



STANDARD OF CONDUCT



Violating the Code or Code Policies could have very serious consequences for DMC Nordic and for all individuals involved. Where illegal conduct is involved, these could include significant fines for DMC Nordic, penalties for individuals significant damage to our reputation.

This Code Policy explains how to guarantee that the Code and all Code Policies are understood and followed by all our employees and others working for DMC Nordic. It verifies everyone's responsibility to speak up and testify suspected or actual breaches and gives guidelines in regards to how such situations must be managed.

Any failure to comply with the Code of Conduct and any of the Code Policies is taken very seriously by DMC Nordic and may result in the disciplinary action, including firing and even legal actions.

References in the Code and Code Policies to 'employees' include the following:

- DMC Nordic full-time employees
- DMC Nordic freelance employees
- DMC Nordic fixed-term employees
- DMC Nordic trainees

Living the Code is always a team effort. It is not always possible for The Code and Code Policies to cover every contingency, as laws might differ between countries, where DMC Nordic operates. If specific situations are not specifically covered, the nature of the Code and Code Policies must be maintained by always exercising common sense and good judgement, in compliance with relevant local laws.





MUSTS



All DMC Nordic employees **must**:

- Ensure they know and understand the requirements of our Code and Code Policies
- Undertake relevant training as required by the Country Manager.
- Follow the Code and Code Policies: if they are unsure of how to interpret these or have any doubts about whether specific behaviours meet the standards required, they must seek the advice of their Country Manager.
- Immediately report actual or potential violations of the Code or Code Policies, whether relating to them, colleagues or people acting on DMC Nordic's behalf and whether accidental or deliberate. This includes cases where business partners' behaviour may not meet the same standards.

In addition, those at the Manager level and above must:

- Lead by example, setting a strong tone from the top, showing they are acquainted with the Code and Code Policies and taking steps to embed a culture of integrity across all business operations.
- Ensure that all their team members, including new joiners:
 1. Have read the Code and Code Policies
 2. Have completed any related mandatory training.
 3. Understand how to raise concerns and/or report actual or suspected violations.
 4. Deliver training that Country Manager has asked of them, e.g. face-to-face briefings and team discussions
 5. Ensure that anyone who raises concerns, or highlights potential or actual violations, receives support and respect and that there is no retribution against them.

6. Ensure that concerns raised are taken seriously and addressed promptly, treating related information with discretion, and discussing them with Country Manager as soon as possible to determine the appropriate course of action including whom else to inform.
7. Collaborate further and complete any documentation (e.g. case information and lessons learnt) as may be required of them by Country Manager.
8. To that extent as a violation may have occurred within their operations, consider what additional communications, training or changes to business controls and procedures are necessary to reduce the likelihood of similar violations occurring.



MUST NOTS

All DMC Nordic employees **must not**:

- Ignore or fail to report situations where they believe there is or may be a violation of the Code or Code Policies
- Attempt to prevent a colleague from reporting a potential or actual violation or ask them to ignore an issue.
- Get Revenge against any person who reports a potential or actual violation.
- Discuss any potential or actual violation under investigation with other persons unless this has been cleared with the inspecting Manager.



Responsible Risk Management





DMC Nordic pays serious attention to risk management, which puts risk and opportunity assessment at the core of the leadership team agenda. DMC Nordic defines risks as actions or events that have the potential to impact our ability to achieve our objectives.

Our company recognizes and mitigates downside risks such as loss of money, reputation, or talent as well as upside risks such as failure to deliver strategy if it does not strengthen brand equities.



Our Risk Management approach is integrated into the normal course of business with a set of global Principles of Risk Management with local implementation.

Its structural elements include:

- Governance of DMC Nordic, organizational structure, and delegation of authority
- Vision, Strategy and Objectives
- Code of Business Principles,
- Code Policies and Standards
- Risk and Control Frameworks
- Performance management and operational processes execution
- Compliance and assurance activities



MUSTS



All company's managers and top management team **must** execute DMC Nordic's Principles of Risk management as follows:

- Accountability: all risks related to their role must be identified and managed.
- Risk Appetite: levels of risk have to be determined, after the implementation of controls, that they are prepared to accept such that there is not a significant threat to achieving their objectives.
- Risk Mitigation: they must put adequate controls in place, and ensure that they are operational, to deliver their objectives.

All members of leadership teams **must** carry out an annual all-inclusive risk discussion during which:

- Key business risks for which they are responsible are identified;
- How those risks are being managed is reviewed;
- Any gaps in their desired risk appetite are identified.
- Perform regular reviews and ensure risks are mitigated as desired.

All department leaders **must**, together with their teams:

- Identify the key risks associated with their project achieving its objectives.
- Prepare risk mitigation plans
- Review progress with the project steering group.

Service Safety & Quality





MUSTS

All DMC Nordic employees **must**:

- Apply effective practices to measure and evaluate service and process performance and, where necessary, take effective precautionary steps or corrective action to assure great service quality and experiences for our customers and end consumers.
- Promptly and proactively report all service safety or service quality concerns to Department Manager or Country Manager.



MUST NOTS

All DMC Nordic employees **must not**:

- Knowingly create and provide services that could negatively impact employees' or customers' health, endanger customers, or negatively impact DMC Nordic's brand reputation.
- Take decisions about service safety and quality without sufficient knowledge to do so.
- Respond to customers about the service quality or safety without permission to do so.

Counteracting Corruption

- **Anti-Bribery**
- **Anti-money Laundering**





Anti-Bribery





MUSTs

All DMC Nordic employees **must**:

- Always make clear, internally and when dealing with suppliers, customers and business partners, that DMC Nordic has a zero-tolerance approach to bribery and corruption and will not (directly or indirectly) offer, pay, seek or accept a payment, gift or favour to inappropriately influence a business outcome.
- Immediately notify their Country Manager if they become aware of any suggested or actual payment or other transaction which has the potential to be in violation of this Code Policy.
- Use electronic communications or e-government solutions (in areas such as licensing, procurement, taxes, brand protection, etc) or any other means available to reduce face-to-face interactions with public officials and the connected risks of bribe solicitation.





Employees **must not** directly or indirectly (e.g. via suppliers, agents, distributors, consultants, lawyers, intermediaries or anyone else):

MUST NOTs

- Offer or give bribes or unlawful gains (including facilitation payments) to any public official or other individual or a third party, which are, or give the impression that they are, intended to influence decisions by any person about DMC Nordic.
- Request or receive bribes or unlawful gains from any third party, which are, or give the impression that they may be, intended to influence decisions by DMC Nordic about that third party.
- In exceptional situations where employees cannot escape impending threat to their life, freedom, or physical harm without meeting a demand for payment, such a payment may be made but those involved must immediately report full details to their General Manager



Anti-Money Laundering





MUSTs

All DMC Nordic employees **must**:

- Immediately notify their Country Manager if they have any suspicions about actual or potential money laundering activity:
- Look out for warning signs of money laundering, such as:

- Supplier requests to:

1. Pay funds to a bank account in the name of a different third party or outside the country of their operation
2. Take payments in a form outside the normal terms of business
3. Split payments to several bank accounts
4. Overpay

- Customer payments to DMC Nordic

1. From multiple bank accounts
2. From bank accounts overseas when not a foreign customer
3. Made in cash when normally made by cheque or electronically.
4. Received from other third parties.
5. Made in advance when not part of normal terms of business

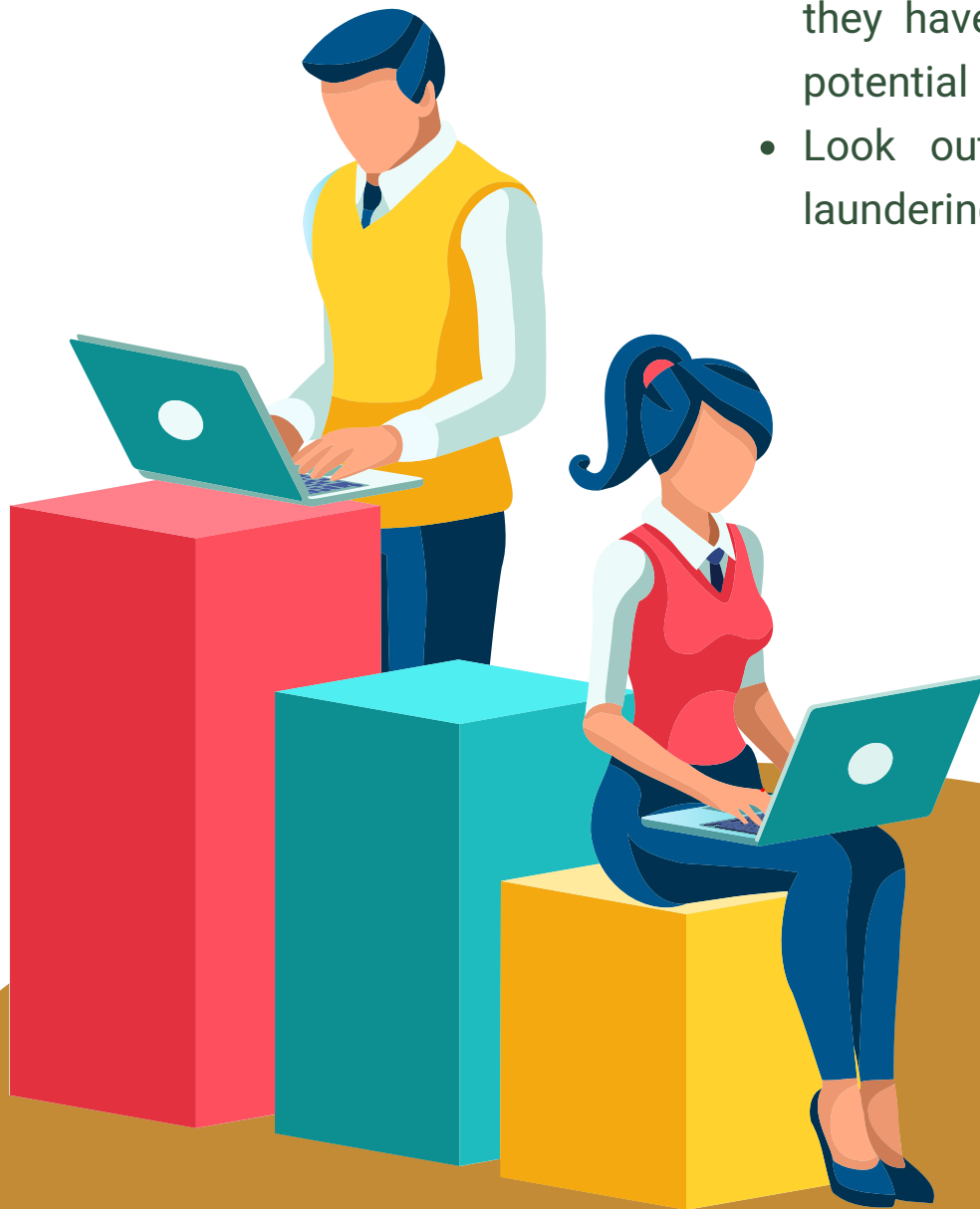
All DMC Nordic employees involved in engaging or contracting with third parties such as new suppliers, customers and distributors **must**:

- Ensure that the third parties in question are subject to screening to assess their identity and legitimacy before contracts are signed or transactions occur. Various factors will determine the appropriate forms and levels of screening.
- Carefully consider, where necessary in consultation with their Country Manager screening outcomes before deciding whether to do business with the third party.

MUST NOTs

All DMC Nordic employees **must not**:

- Simply assume relevant third-party screening has already taken place: failure to check or update screenings periodically may put DMC Nordic and its employees at risk.





Respecting People

- **Employee Health & Safety**
- **Respect, Dignity & Fair Treatment**



Employee Health & Safety





MUSTS

All DMC Nordic employees **must**:

- Work and behave safely.
- Comply with health and safety procedures and instructions relevant to their work and/or about which they have been trained or notified.
- Support team leaders to ensure that everyone they work with, including contractors and visitors, are familiar with and follow applicable health and safety procedures and instructions.
- Only undertake work that they are trained, competent, medically fit, sufficiently rested and alert enough to do.
- Make sure they know what to do if an emergency occurs at their place of work/ on the road or at a location they are visiting.
- Promptly report to DMC Nordic Health & Safety Manager and Country Manager any actual or near-miss accident or injury, illness, unsafe or unhealthy condition, incident, spill or release of material to the environment, so that steps can be taken to correct, prevent or control those conditions immediately.





MUSTs

All DMC Nordic team leaders have overall operational responsibility for health and safety at their location and **must**:

- Establish and maintain appropriate health and safety at work management system for their sites and their teams, including the appointment of managers, competent experts, and a system for gathering employees' concerns/input.
- Identify health and safety hazards and manage/control risks arising from their team and their site's routine and planned operations, activities and services.
- Regularly review and comply with all applicable local health and safety legislation, including relevant mandatory DMC Nordic requirements.
- Report all incidents, accidents and near misses in line with reporting requirements, including thorough investigation, follow-up and communication of lessons learned.
- Maintain, communicate, and test both site and role emergency plans.
- Ensure all employees, contractors and visitors receive information and training in health and safety relevant to their roles and activities.





MUST NOTs

DMC Nordic employees **must not**:

- Undertake work or related activity, such as driving, when under the influence of alcohol or drugs, or when using medication improperly.
- Carry on with any work that becomes unsafe or unhealthy.
- Assume someone else will report a risk or concern.



Respect, Dignity & Fair Treatment





MUSTS

All DMC Nordic employees **must**:

- Respect the dignity and human rights of colleagues and all others they come into contact with as part of their jobs.
- Treat everyone fairly and equally, without discrimination on the grounds of race, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, dependants, disability, social class or political views. This includes consideration for recruitment, redundancy, promotion, reward and benefits, training or retirement which must be based on merit.



MUST NOTS

All DMC Nordic employees **must not**:

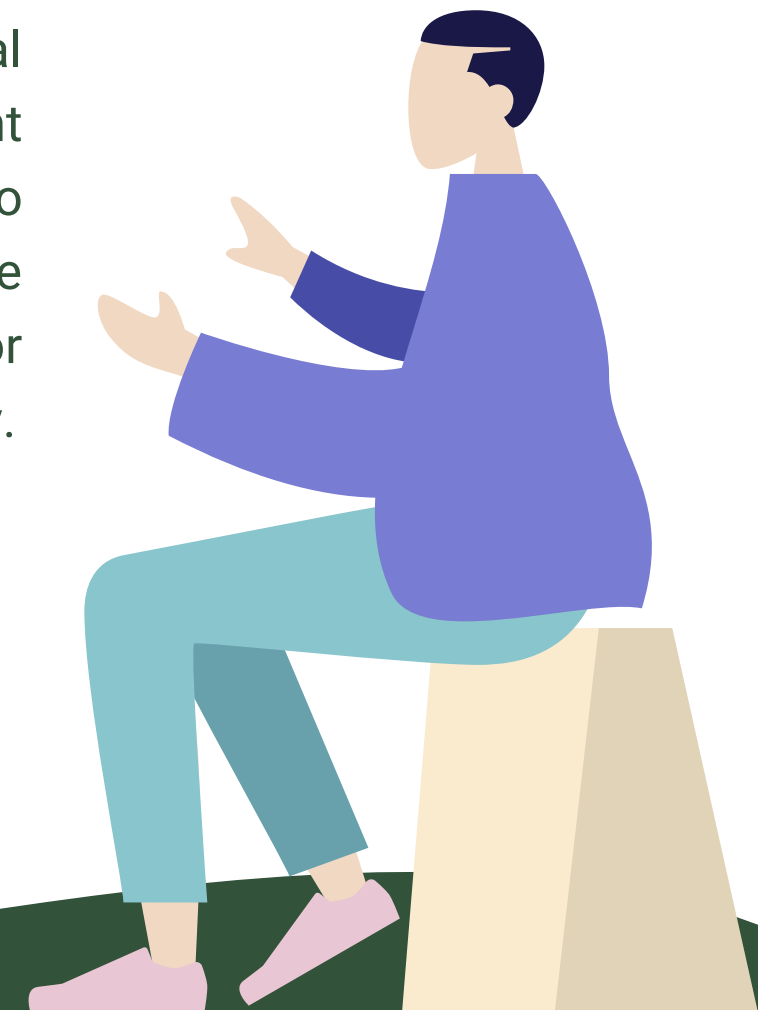
- Engage in any direct behaviour that is offensive, intimidating, malicious or insulting.
- This includes any form of sexual or other harassment or bullying, whether individual or collective and whether motivated by race, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, disability, social class or political views.
- Engage in any indirect behaviour which could be construed as sexual or other harassment or bullying, such as making offensive or insults, displaying, emailing, texting, or otherwise distributing, offensive material or material of a sexually-explicit nature, misusing personal information, creating a hostile or intimidating environment, isolating or not co-operating with a colleague, or spreading malicious or insulting rumours.



MUSTS

All DMC Nordic Managers **must**:

- Ensure all employees' work is conducted based on freely agreed and documented terms of employment, clearly understood by and made available to relevant employees and others working for DMC Nordic.
- Ensure all employees are provided with fair wages including a total remuneration package that meets or exceeds legal minimum standards or appropriate prevailing industry standards, and that remuneration terms established by legally binding collective agreements are implemented and obeyed. Other than legally mandated deductions from wages require the express and written consent of the employee.
- Comply with local legal requirements in relation to short-term, casual or agency employees.
- Maintain a clear and transparent system of employee and management communication that enables employees to consult and have an effective dialogue with management.
- Provide transparent, fair and confidential procedures for employees to raise relevant concerns. These must enable employees to discuss any situation where they believe they have been discriminated against or treated unfairly or without respect or dignity.





MUST NOTs

DMC Nordic Managers **must not**:

- Use, or permit to be used, forced or compulsory or trafficked labour. We have a zero-tolerance for forced labour.
- Use child labour, i.e. individuals under the age of 15 or under the local legal minimum working age or mandatory schooling age, whichever is the higher.
- When young workers are employed (insofar as short-term work experience schemes and work that forms part of an educational programme are permitted), require or allow them to do work that is mentally, physically, socially or morally dangerous or interferes with their schooling by depriving them of the opportunity to attend school





Keeping Information Safe

- Protecting DMC Nordic's Information
- Personal Data & Privacy





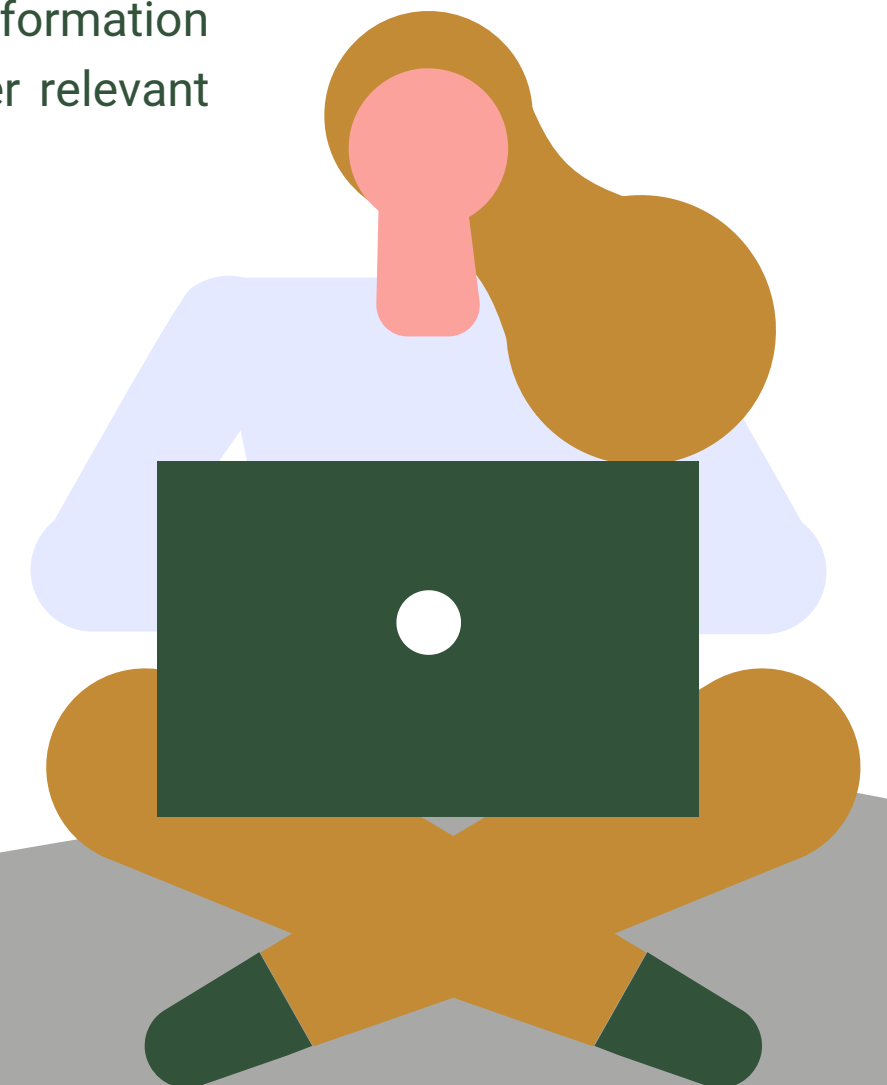
Protecting DMC Nordic's Information



MUSTS

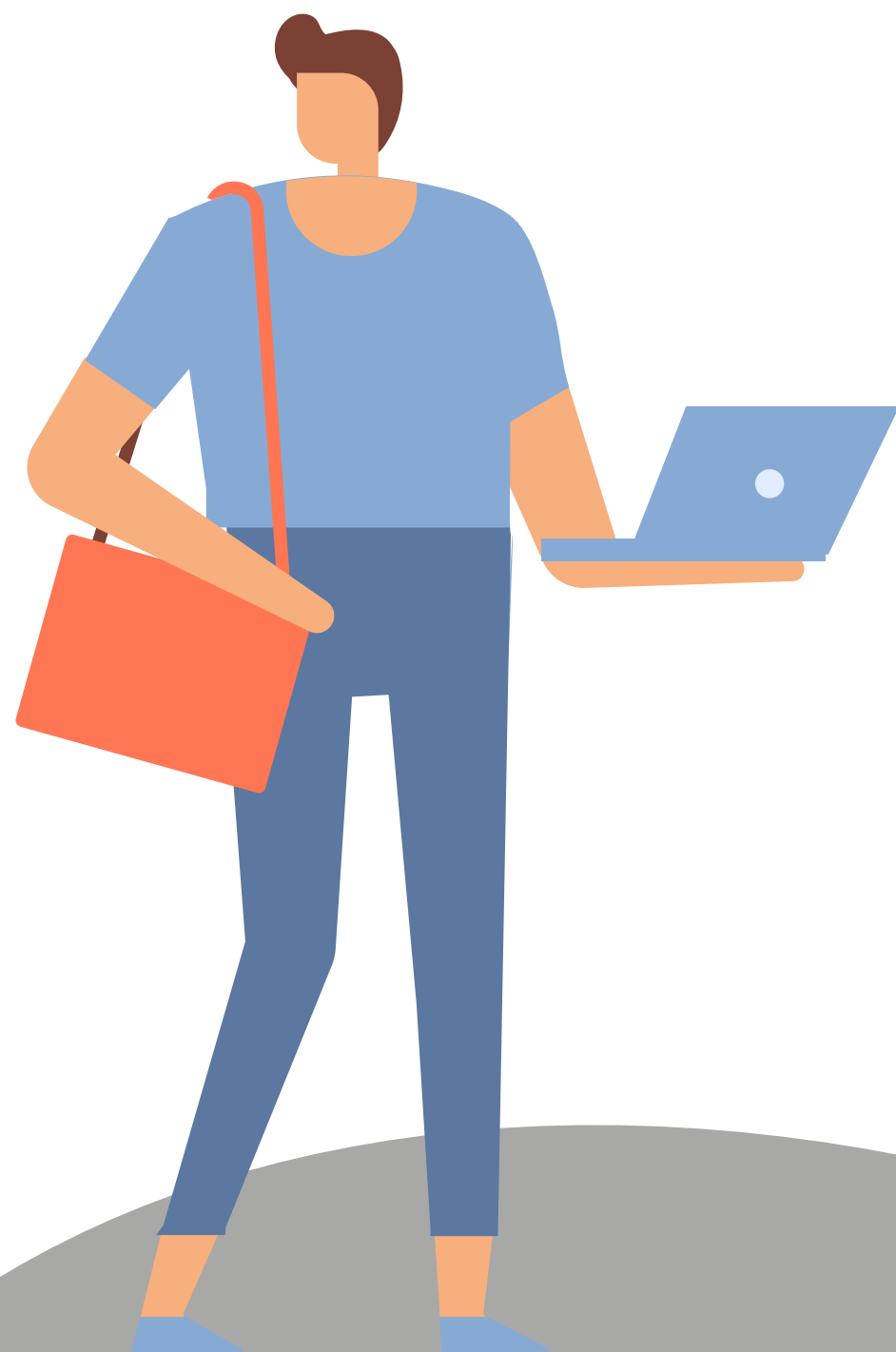
When handling DMC Nordic's information employees **must**:

- Understand the nature and classification of the information, as defined in given Information
- Handling Guideline and take personal responsibility for the correct use, circulation, maintenance, protection, and clearance of DMC Nordic's information
- Only distribute or share DMC Nordic's information on a need-to-know basis, ensuring that only employees or others working for DMC Nordic have access to the information.
- Take care not to release information in public places, including taking all necessary steps to protect the information in documents and on IT devices away from the workplace.
- Immediately report events which could affect the security of DMC Nordic information by following the DMC Nordic's Information Security reporting procedures.
- This includes, but is not limited to, clicking links or attachments in suspicious emails, accidentally sharing confidential information with the wrong recipient or any other relevant events.





MUST NOTs



DMC Nordic employees **must not**:

- Release DMC Nordic's information externally to third parties unless in accordance with DMC Nordic's Information Handling standards
- Use DMC Nordic's information for anything other than a legitimate business purpose.
- Personal data relating to employees, business partners, customers and other individuals is subject to specific laws and regulations in most countries and requires special handling. Additional information relating to the classification and protection requirements for personal and sensitive personal data can be found in the Code Policy on Personal Data and Privacy
- If in doubt about how to handle any information, restricted or otherwise, employees must seek advice from their Department Manager or Officer responsible for Information Security.



Personal Data & Privacy



MUSTS

When collecting, using or storing personal data DMC Nordic employees **must**:

- Only collect data that is sufficient and relevant and use it solely for the purpose for which it is collected.
- Be transparent with individuals in relation to how their personal data is used in accordance with DMC Nordic privacy notices.
- Keep personal data up to date correcting inaccurate information when requested and respecting individual legal rights.
- Keep personal data confidential and secure.
- Act responsibly and ethically, upholding DMC Nordic's core values, always considering the risk to individuals in using their personal data and take steps to mitigate such risk.





MUST NOTs



When collecting, using, or storing personal data, employees **must not**:

- Keep personal data for longer than necessary to achieve a related project or the business objective or meet minimum legal requirements.
- Transfer personal data outside the country, where it was originally without discussing this with DMC Nordic Group lawyer, as there may be legal restrictions or requirements applying to the transfer.
- Collect and use personal data for purposes that are not reasonably expected by our business partners, customers, and employees.

If in doubt, employees must always seek advice from their department manager and DMC Nordic Group lawyer.



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