

eGISS CODE OF CONDUCT

eGISS Code of Conduct is made on the backdrop of our company values and on the UN Global Compact's 10 Principles covering universally recognized principles of human & labour rights, environment, and anti-bribery.

We seek to ensure that the eGISS Group, its employees, suppliers, and all business partners comply and operate in accordance with the requirements of the enclosed Code of Conduct and of all relevant national and international laws.

Should there still be any doubt, we encourage you to ask yourself the following questions:

- Is it legal?
- Is it in compliance with the Code?
- Is it ethical?
- Do I lead by example?
- Will it reflect positively on the eGISS Group?
- Would I be comfortable to read about it in the news?
- Would my relatives and close friends approve of it?

If the answer is “no” to any of the above, avoid doing it – and if still in doubt, ask for help and guidance.

We feel confident that cooperation and dialogue will result in a more efficient partnership with both our customers, suppliers, and other business partners, which all parties will benefit from.

Please refer to the enclosed Code of Conduct for more information about the specific requirements. If you have any questions regarding our Code of Conduct, please do not hesitate to contact our offices.

Present version of the Code of Conduct is made January 2021.

Kind regards,

Johannes Bach,
Chairman of the Board

Jesper Ravn
Group CEO

1. PURPOSE AND GENERAL PRINCIPLES OF THE CODE OF CONDUCT

The purpose of this Code of Conduct (Code) is to communicate clearly what the eGISS Group expects of our employees, business partners and suppliers in relation to the internationally recognized standards on human and labour right, the environment and anti-corruption.

Operating globally with a wide range of international customers, suppliers, and partners the eGISS Group has chosen to use the 10 Guiding Principles on Business and Human Rights set out by UN Global Compact. The 10 principles are to be considered as minimum requirements and must always be supplemented and acted upon in combination with relevant international and national laws, regulations, administrative practices and other applicable standards (e.g. collective bargaining agreements).

Where there are differences between the terms of this Code and national laws or other applicable standards, you shall adhere to the higher requirements. Conflicts between the provisions of this Code and national laws or other applicable standards shall be evaluated by the eGISS Group in cooperation with its business partners and relevant stakeholders in order to establish the most appropriate course of action, and if any conflicts are detected, partners must inform the eGISS Group immediately.

The eGISS Group adheres to the content of this Code and expects the same of our employees and business partners. If non-compliance is to be identified, the eGISS Group will assess the implications of the breach, and take the necessary precautions and actions which ultimately can bring an end to the contract in question. Whenever possible the eGISS Group will help business partners improve their management of adverse impacts as a mean to obtain compliance with the provisions of this Code. However, the eGISS Group will not conduct business with a business partner if compliance with the terms of this Code is deemed impossible and the business partner shows no willingness or ability to mitigate identified adverse impacts.

The eGISS Group is aware that our company's actions and procurement practices can influence partners' ability to comply with the requirements in this Code. Therefore, the eGISS Group will routinely assess any adverse impacts it may cause or contribute to through its purchasing, compliance, and other supply chain practices. In addition, the eGISS Group shall periodically review the adequacy and continuing effectiveness of this Code.

2. THE 10 PRINCIPLES AND STANDARDS OF THE CODE OF CONDUCT

The 10 Guiding Principles on Business and Human Rights as defined by UN are:



Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2: Make sure that they are not complicit in human rights abuses.

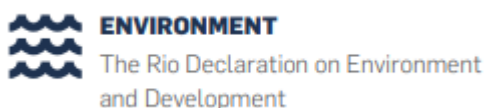


Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

Principle 4: The elimination of all forms of forced and compulsory labour.

Principle 5: The effective abolition of child labour.

Principle 6: The elimination of discrimination in respect of employment and occupation.



Principle 7: Businesses should support a precautionary approach to environmental challenges.

Principle 8: Undertake initiatives to promote greater environmental responsibility.

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.



Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

HUMAN AND LABOUR RIGHTS



The eGISS Group

- + Supports and recognizes human and labour rights, and we actively seek to work against discrimination, different treatment, and harassment be it based on gender, race, ethnicity, nationality, disability, political belief, or religion. We will not tolerate any form of physical, mental, sexual, or verbal abuse or intimidation.
- + Complies with current national and international laws and agreed terms for employee working hours and environment. Remuneration should always meet or exceed statutory or agreed national industry minimum wages. All eGISS Group employees must receive a contract confirming their employment if so required by national law. All employees have the right to join a union and to collective bargaining.
- + Ensures a healthy and safe working environment for all employees. We believe in open and constructive dialogues between employer and employees, and we strongly encourage all employees to speak up and be part of the continuous development of a strong and positive psychical and mental working environment.
- + Will actively work against child labour, human trafficking, and conditions resembling forced labour.
- + Protects personal data privacy as defined by the GDPR legislation.
- + Relies on our employees to comply with their contracts and not disclose any confidential and proprietary information with regards to our business, our customers and business partners.
- + Expects our suppliers, business partners and customers to adhere to UN Principles regarding Human and Labour Rights.

ENVIRONMENT



The eGISS Group

- + Seeks to reduce and minimize our impact on the climate and on the environmental consequences of our business activities.
- + Works on our internal processes – waste recycling, electricity and water consumption, reduction of food waste etc. in order to minimize the impact on the environment.
- + Develops smarter ways of doing business with the least impact on the environment.
- + Encourages suppliers, business partners and customers to engage in partnerships whenever possible so we can make joint efforts in securing a sustainable business.
- + Expects our suppliers, business partners and customers to adhere to UN Principles regarding Environment.

ANTI-CORRUPTION



The eGISS Group

- + Has zero-tolerance towards corruption and bribery in any form.
- + Defines corruption and bribery as transfer of personal or financial benefits, delivery of products or services, payment of travel and accommodation expenses, charitable donations, disproportionate entertainment expenses and facilitation payments.
- + Does not support activities related to money laundering or funding of terrorism or any other criminal activity.
- + Expects all our employees, customers, suppliers and business partners to adhere to the zero-tolerance policy by neither offering nor accepting any kind of bribery be it in the form of any material or non-material offer, kick-back, loan, fee, remuneration used as an incentive to promote or influence specific actions that would otherwise not have been taken or been appropriate if not in the form of a bribe.
- + Will inform all relevant authorities if the zero-tolerance policy is not followed.

- + Acknowledges that exchange of business gifts, hospitality and entertainment are considered common practice in building and maintaining strong relationships with customers, suppliers, and business partners. Such exchanges will be accepted as long as the value does not exceed a reasonable level and as long as this exchange is not intended to influence the recipient in any form of decision making.
- + Expects our suppliers, business partners and customers to adhere to UN Principles regarding Anti-Corruption.

3. SCOPE OF THE CODE OF CONDUCT

The requirements of this Code extend to all eGISS Group employees, suppliers, business partners and all their workers, regardless of their status or relationship with the suppliers and business partners. This Code therefore also applies to workers who are engaged informally, on short-term contracts, or on a part-time basis.

eGISS Group employees are obliged to follow this Code. If you have questions or concerns about this Code or if you experience breach or suspected breach of the principles outlined in this Code, employees are urged to contact their immediate manager, HR or the board of directors. Employees can report without fear of retaliation unless part of the breach.

The eGISS Group considers any breach of the Code to be a neglect of the agreement and contract made between the eGISS Group and the employee, and it may lead to the termination of employment with immediate effect.

The eGISS Group expects all suppliers and business partners to declare their unambiguous support to the requirements contained in this Code and to be able to demonstrate compliance with the requirements of the Code. Appropriate documentation includes but is not limited to

- Policy Commitment(s).
- Documentation of due diligence processes.
- Records of any significant instances of non-compliance encountered in relation to this Code, including a summary of corrective actions taken.

The eGISS Group may monitor the operations of suppliers and business partners with the purpose of gaining insight into how they manage their impacts on human & labour rights, the environment, and anti-corruption principles. Further, suppliers and business partners are expected at any point to willingly cooperate in answering further questions or self-assessments, and if deemed necessary cooperate with the eGISS Group in improving systems to manage adverse impacts the principles in

this Code. If requested, suppliers and business partners shall allow physical access to onsite inspections to any representative from the eGISS Group or from an independent third party of our choice assigned by the eGISS Group.

Where instances of non-compliance are detected suppliers and business partners will be given a fixed period of time to self-correct the deficiency. The eGISS Group is willing to engage in a constructive dialogue with suppliers and business partners to develop and implement action plans, with appropriate time scales for implementation and improvements to be achieved. Agreement to abide by action plans allows for continuation of a business relationship, as long as the eGISS Group finds that suppliers and business partners are implementing the plan in good faith. In the event of repeated and serious breaches of the requirements of this Code, the eGISS Group reserves the right to cease business relationships with its suppliers and business partners and possibly cancel any production or delivery in progress.

If you have any questions to the Code of Conduct, if you want to report a breach or suspicion of breach, please contact us at:

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8382 Hinnerup, Denmark
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For more information on the 10 Guiding Principles on Business and Human Rights set out by UN Global Compact, please go to UN Global Compact <https://www.unglobalcompact.org/>
