

## Trifork - Code of Conduct

All business units in Trifork work as separate entities who all enjoy the benefits of being a part of a bigger family - Trifork Group.

Trifork honors a flat hierarchy and a spirit of trust. We believe in distributing responsibility to our colleagues in each business unit, as they are closest to the tasks. To do this, we ensure that our colleagues have the right competences and can be powered with authority and freedom to make the right decisions. This requires trust in both our employees and business partners - trust that they will do the right thing.

In order to support everyone in making the right decisions, Trifork has set out this Code of Conduct defining the expectations to everyone engaged with Trifork Group. These rules are meant to help everyone to do the right thing as well as protect colleagues, society, partners and Trifork against misconduct.

We encourage everyone to help each other out with compliance - and to notify each other if you see or hear about actions that may be in conflict with this Code of Conduct.

It is important for Trifork that this should not be perceived as an encouragement to make unnecessary reports on your colleagues or business partners, but more as a tool to support them in making the right decisions or to seek advice.

In case you are in doubt of what to do in a given situation, please do not hesitate to use our whistleblower set up, giving you full anonymity: [www.trifork.com/whistleblower](http://www.trifork.com/whistleblower).

We encourage all to help each other out in our day-to-day work so we can keep our organization of trust and our Code of Conduct as simple as possible.

The Code of Conduct core principles will help us all with acting safely and ethically in our everyday work. Without exception, everyone at Trifork must follow and understand this Code of Conduct just as we must follow relevant laws and regulations. In case there is a difference between the terms in this Code of Conduct and applicable laws or regulations, the employee must adhere to the higher requirements.

## **General**

Trifork supports the UN Global Compact, reinforcing our commitment to the ten principles of human rights, labor rights, anti-corruption and the environment. This serves as the foundation of Trifork's position as an active partner in society. Moreover, Trifork supports the UN's Sustainable Development agenda by using the UN's Sustainable Development Goals as a reference point for our sustainability approach.

Trifork encourages all employees to have these principles and goals in mind, when conducting business.

## **Anti-bribery, anti-corruption, sanctions and trade controls**

Trifork does not tolerate any form of bribery or corruption, including e.g., facilitation payments and non-contractual kickback schemes. This is regardless of whether the business unit is operating in a country with less strict laws on bribery and corruption.

Entertainment, hospitality and the exchange of business gifts are considered common practice and part of building and maintaining business relationships throughout the world. However, the intentions of gifts and donations need to be clear and related to the business conducted by Trifork. The exchange of cash or other monetary gifts is forbidden. Our funds, property or services must not be used to support political purposes.

All business units must comply with international economic sanctions as well as trade controls and engagement in funding of terrorism is strictly forbidden.

If there is any doubt in this regard, please do not hesitate to contact CFO, Kristian Wulf-Andersen ([KWA@trifork.com](mailto:KWA@trifork.com)).

## **Fraud**

Trifork is an organization of trust, where honesty and transparency are key elements. These elements are not only important to conduct a sustainable business, but also in relation to the Trifork brand and reputation.

Accordingly, there is no tolerance with respect to fraudulent or intentionally misleading behavior, and fraud in any way is not accepted by Trifork.

## **Money laundering**

Money laundering is a way to conceal the origin of money obtained by illegal activities. Just a remote connection to any kind of money laundering could have a great negative impact on Trifork, and it is therefore important that Trifork employees always know their business partners, and not in any way do business which may put Trifork at risk.

If you are in doubt, please do not hesitate to contact Trifork CFO, Kristian Wulf-Andersen ([KWA@trifork.com](mailto:KWA@trifork.com)).

## **Competition**

As with all other legislation, any violation of competition laws is strictly forbidden. Trifork business units are not allowed to conclude any contracts or agreements, formal or informal, that have the purpose or is likely to have the effect of substantially limiting competition. Employees are not authorized to discuss business-related, potentially competition-restricting topics with competitors.

## **Conflicts of interest**

Trifork employees must not participate in any commercial transactions between a Trifork business unit and a supplier or customer in which he or she has direct or indirect personal interests, financial or otherwise, unless the transaction is made on an arm's length basis (market conditions).

## **Working conditions**

Trifork strongly believes that human rights are fundamental and must be protected at all times.

It is the policy of Trifork that all employees carrying out services for Trifork - whether directly as employees or indirectly as employees of suppliers - must be treated with decency and dignity. All employees deserve a fair and ethical workplace, and Trifork is committed to the fight against human trafficking, forced labor and debt servitude.

Trifork commits to secure occupational health and safety standards for all employees, and give employees mandatory training and information.

## **Mutual respect and non-discrimination**

Trifork demands mutual respect among employees and business partners. There is no tolerance of bullies.

Everyone at Trifork is obligated to not base recruitment, remuneration, training, advancement, benefits, discipline, dismissals and any other employment-related decisions on characteristics that are not related to their merit or the inherent requirements of the job.

Trifork is committed to having a workplace, which is free of any kind of harassment or discrimination, regardless of who contributed hereto.

If you have experienced any type of harassment or discrimination, please do not hesitate to use our whistleblower service: [www.trifork.com/whistleblower](http://www.trifork.com/whistleblower). Full anonymity is ensured.

## **Freedom of association and collective bargaining**

Trifork respect all employees' right to form and join (or not join) a trade union, select their own representatives and to bargain collectively. Trifork does not interfere with or restrict this right.

## **Environmental impact**

As leading provider of a wide range of IT-services, Trifork is committed to take on its share of the responsibility to reduce the environmental impact of our business operations.

This mindset should be adopted by all Trifork employees, and our services should reflect environmental considerations.

For an insight in Trifork's environmental initiatives, please read Trifork's [ESG report](#).

## **Respect confidentiality, intellectual property and data privacy rules**

Our employees and business partners must protect and respect the intellectual property and confidential information of Trifork and third parties. Among other things, this means that intellectual property and confidential information of

Trifork or third parties must only be used as explicitly permitted in relevant agreements.

Be aware that Trifork is only allowed to collect, process, disclose or store personal data, if it has a legitimate business purpose, and ensure that necessary agreements are in place before collecting, processing or transferring personal data to third parties.

## **Market abuse**

Trifork identifies and maintains confidentiality of inside information and will not tolerate behaviors that may result in market misconduct. Furthermore, our employees must not engage in or induce others to insider dealing or market manipulation.

All employees must be educated and up to date with relevant insider regulation and requirements.

Kind regards,

Trifork Holding AG, Executive management