



ACCOUNTOR CODE OF CONDUCT

WHY IT IS IMPORTANT TO HAVE A CODE OF CONDUCT?

We want to be trustworthy, responsible and ethical towards our clients, partners, employees, directors and other stakeholders. Accountor's Code of Conduct is an important tool for risk management and it sets out the general principles and guidelines which all our employees, managers and partners need to comply with.

This Code of Conduct is accepted by the General Management Team of Accountor and it is binding to all our business lines in all our countries.

ACCOUNTOR'S VALUES

- Respect
- Trust
- Courage
- Future

We respect others, we build trust between our clients and ourselves and we dare to exceed the boundaries of our comfort zone in order to create a better future for our clients and for ourselves.

We are always honest. We don't lie. Our tone of voice is human and we follow our values in all our operations. We respect all people.

We are an ethically led and behaving, good organisational citizen. We are a future-oriented company which is aiming to gain improvements within the society.

ACTING AGAINST ANTI-BRIBERY, ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING

Accountor expects our employees, directors and all our partners acting on behalf of Accountor to act with high ethical standards.

Accountor has strict policies when it comes to acting against bribery, corruption and money laundering including obeying the *EU Act on Preventing and clearing money laundering and terrorist financing*. We obey the instructions on Knowing Your Customers according to the law and follow the instructions on surveillance for Anti-Money Laundering. Each director, employee and other partner working for Accountor must obey the rules set in this code.

1) What is bribery?

Bribery is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust in the conduct of Accountor's business.

2) What is corruption?

Corruption is the misuse of entrusted power for private gain.

The examples given below in this policy document are not exhaustive, but set out rules and procedures that must be followed.

Everyone working for and on behalf of Accountor must at all times act in accordance with the following provisions:

- Behave honestly, be trustworthy and set a good example;
- Use the resources of Accountor in the best interests of Accountor and do not misuse those resources;
- Make a clear distinction between the interests of Accountor and your private interests to avoid any conflict of interest. If conflict does arise it must be reported the superior immediately;
- Confidentially report all incidents, risks, and issues which are contrary to this policy document. Issues will be dealt with anonymously and a written response will be issued.
- Do not offer, promise, request, receive or agree to bribes to obtain a business advantage, win business, or keep business;
- Do not offer or accept any gifts or hospitality to or from clients, contractors, suppliers or any other third parties other than bona fide hospitality or promotional activity. Bona fide in this means that the gift or hospitality is not in any ways an attempt to influence any decision making or other business activity but only a gesture of good will. In no situation can a gift or hospitality either given or received be worth more than the value of a minor tax-free gift defined by the local tax administration. In all situations, the receiver or giver must always consider the purpose why the gift is given and if the purpose is not bona fide despite the value of the gift or hospitality, it must be declined.
 - *Gifts* are presents such as flowers, vouchers, food and drink. Event and travel tickets given to you as an individual are also gifts when they are not to be used in a hosted business context.
 - *Hospitality* includes invitations to hosted meals, receptions and events for business purposes.

- Do not offer money to associates to speed up service or gain improper advantage. This type of bribery is classed as a 'facilitation payment' and can be illegal.

By complying with this policy document we aim to ensure that Accountor will not at any time knowingly breach any relevant anti-bribery and corruption legislation.

EMPLOYMENT

We at Accountor are committed to the health and safety of our employees as well as to good working environment. In our employment activities, we are committed to complying with the applicable employment and labor laws and regulations.

Our employees are the core of our business. One of our values is respect and we require all our employees, directors and partners to treat one another with respect. Accountor is a safe and equal place to work. We are committed to the principles of equal treatment and non-discrimination of people. We do not approve any type of harassment. We offer everyone regardless of age, gender or other personal characters a possibility to develop professionally and to advance in career. Just as well, we demand that all our employees take part in training and education by which we make sure that our employees develop their professional skills and knowledge and we can provide even better service to our clients.

Our leadership is based on openness, integrity, courage and trust. We demand fair and equal leadership. No one should be treated unequally. We require that all our managers and directors comply with these principles. If we notice or suspect mistreatment, these suspicions will be dealt with immediately.

We are committed to the well-being of our employees. We support the refreshment of our employees and provide other benefits which improve the well-being at work.

We do not accept child labor or any other type of abuse of people. We provide a competitive salary and benefits.

PRIVACY

Accountor respects privacy in all its aspect. Accountor collects, uses, holds and processes personal and customer data responsibly, lawfully and carefully.

The privacy of our customers and their information as well as the privacy of our own personnel is essential in all our activities. We obey all laws and regulations concerning data privacy.

We communicate transparently how we manage and process personal data of our clients, partners and personnel. We have built an organisational structure for data privacy matters and we have a data privacy officer who makes sure that all our business lines in all countries comply with the data privacy requirements and that we are in constant development process in data privacy matters.

The cost of privacy violations is very high, both in money and in reputation. The violations in processing of personal data can cause irreparable harm to individuals when their personal data ends to wrong and criminal hands.

Personal data includes any information that could identify an individual. This data may include customer- and HR-related information such as name, contact details, salary etc. If you have doubts whether an information is personal data or not, treat the information as personal data.

We have written agreements with all our clients and suppliers. When we must assign personal information to any third parties, we do this only by following the requirements of the laws. In our supplier agreements, we have terms about the processing of personal data. By this we secure that all our suppliers comply with the personal data regulations but just as well we want to make sure that each supplier understands the importance of the matter and how committed we are when it comes to keeping all personal information secure. In our client agreements, we have terms about the processing of personal data and the responsibilities of both us and our client. This is how we make sure that our clients know for sure how and why we process data for which the client is the owner and on what grounds this processing happens.

Our personnel are trained for data privacy matters and our personnel can have access and right to use only the personal data that is necessary to fulfill their job responsibilities. There must be a legitimate business purpose for any use or sharing of that data. We demand from all our personnel strict confidentiality and respect for our client's information.

Each employee must report if any breach or violation of personal data is noticed according to our internal guidance for notifications of violation of personal data.

INTELLECTUAL PROPERTY & CONFIDENTIALITY

We do not infringe anyone's right to intellectual property. We do not represent third parties' intellectual property as our own. We respect and protect the intellectual property of others with the same care as our own.

We make sure that our employees are aware that they are not allowed to use or represent as their own any ideas or information of third parties which they are not allowed to do use by an agreement between the owner and Accountor. No employee or director can give license or permit any use for any intellectual property or confidential data to third parties without a proper and lawful right.

Accountor respects the confidentiality of our Clients. We have high standards and processes when it comes to confidentiality. We protect both our own and our clients confidential information and trade secrets from unauthorized disclosure and misuse, and we do not share them with third parties except under approved terms which restrict their disclosure and use. We respect and protect the confidential information of others with the same care as our own.

HUMAN RIGHTS, DIGNITY AND RESPECT

Accountor respects Human Rights and is committed to the principles of The Universal Declaration of Human Rights and the United Nations' Global Compact. We also expect our suppliers and business partners to share these values.

We are committed to providing excellent service from one human to another. We want to provide the best service in the world. We want to be the best possible partner for our clients and want to help our clients do better in their business. One of the key elements in excellent service is the respect we share with one another. We do not infringe the dignity of others. Opinions may vary but everyone is treated with dignity and respect regardless of their opinions, status or other personal factor.

We respect everyone and every opinion in our own organisation and of our clients, partners and other third parties. One of our values is respect and we take it seriously. We are interested in our clients and we want their feedback regularly to be able to learn from

each feedback about how we could be an even better partner for our clients and how we can create even more trust between the client and us.

ENVIRONMENT

Accountor is committed to protecting the environment. We follow the applicable environmental regulations and guidelines. We expect our directors, employees, suppliers and other business partners to follow the same standards on protecting the environment.

Accountor is the forerunner in electrification of financial and HR management and we want to reduce the environmental impact by creating a non-paper world to financial and HR management of our clients and Accountor. We also help our clients to reduce their environmental footprints.

We guide our personnel with actions how they can participate in saving the environment by reducing the use of paper. We want everyone to be aware of the environmental impacts their actions have and how each and every one can contribute in protecting the environment.

We aim to develop new technical solutions which reduces the use of electricity. We want to create firm processes which reduce the possibilities for mistakes and which therefore reduce the amount of data processing which consumes much electricity.

We provide services which are independent of time and place. This is how we reduce the need for transportation, travelling and postal services. We avoid unnecessary travelling and prefer electronical meeting arrangements.

We also demand the same from our suppliers and partners. We encourage them as well to participate in electrification. By electrification we also improve our quality and work faster and in a more efficient way.

EVERYONE IS RESPONSIBLE FOR THE COMPLIANCE OF THE CODE OF CONDUCT

Each and every one of our employees, managers and officers is responsible for the compliance of the principles and standards set in this code of conduct. Just as well we expect our suppliers and partners to commit to equivalent standards. Every person in Accountor group will read, understand and follow the guidelines set in this document. Everyone must avoid any practices that may lead to a situation of non-compliance of the code of conduct.

Leaders and managers hold a special role in adopting the principles of the Code of Conduct. Each manager is responsible that their team members are aware of this code of conduct and understand it's purpose and meaning. For the managers and leaders this also means that they must observe their business and business activities and anticipate the business compliance risks. Managers must always report incidents or risks to their superiors. Managers also hold the responsibility over that their team members feel comfortable in raising questions and attention to possible problems. Managers and leaders must participate actively in the compliance process and follow the governance of Accountor.

Everyone is obligated to raise a concern promptly if they become aware of a potential or suspected violation of the Code of Conduct. Suspicions must be reported quickly. The compliance of the Code of Conduct is crucial to the reputation of Accountor and therefore potential problems need to be solved before any damage has occurred.