advania

ADVANIA GROUP

Internal Code of Conduct

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Message from **Hege Støre, Group CEO**

Advania is a different kind of tech company - we put people first in everything we do, all the time. Our business is built around understanding people and building strong relationships. In short, we are the tech company with people at heart. The connections we form with each other and with our customers are essential for our success, and it all starts with the small decisions we make every day.

It is also our everyday actions that build the brand and reputation that our employees, owners, customers, suppliers, and other stakeholders associate Advania with. We know that trust and reputation is hard to earn but easy to lose. At Advania, we conduct all business in compliance with applicable legislation and adhere to internationally agreed standards on business ethics. Beyond legal compliance, this Internal Code of Conduct sets the framework for how we act, and it describes what others can expect from us. It provides everyone within Advania Group with clear expectations, guiding principles, and advice on how to navigate situations that may arise at work. I ask that you read it thoroughly and consider how it applies to your role.

Our people are our most important asset. You have the power and responsibility to act. Every member of staff is an ambassador for Advania and has a personal responsibility to act in line with our policies and values. Advania is a company where we treat each other with respect, where there is zero tolerance of harassment of any kind, and where we do our best to have a positive impact on other people as well as society at large. I encourage and expect you to speak up in case you see or experience any unwanted behaviour.

I am committed to leading with integrity and to continue to support our people and our values. Together, we make it possible for Advania to be the leading mid-market IT services provider in Northern Europe.

Hege Støre, Group CEO

"Advania is a different kind of tech company - we put people first in everything we do, all the time."

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Advania, the tech company with people at heart

We design tailored solutions and create sustainable value through the smart use of technology. Through long-term relationships, leading technologies, modern platform solutions, and strategic partnerships, we assist our customers in their ambitions and goals to digitalise their operations.

Our purpose goes beyond technology: to empower people to create sustainable value. At the heart of our business model is decentralisation and customer intimacy. We grow our business by empowering the people who are closest to our customers. Decisions must be taken where the action is. Our business is built around understanding people, and our employees are empowered to act on this understanding every day.

About this Code

Our values are the foundation for what we do

The Code describes how we should behave – towards each other, towards our business partners and towards our surrounding society. The Code also describes our values in practice (particularly in areas with ethical or legal considerations), specifies what is expected from everyone at Advania and provides guidance on appropriate behaviour in different situations. Each section refers to additional relevant policies and supporting documents, which offer further clarity and direction on specific matters.

The Advania Group Internal Code of Conduct (the Code) is based on the UN Global Compact's ten principles on human rights, labour rights, environmental protection and anti-corruption, and the underlying international declarations and conventions. The Code is also based on applicable law; compliance with relevant laws in each country of operations is a fundamental requirement. Where the standards set by this Code exceed local law, the Code shall apply—except where doing so would necessitate violating local law.

This Code applies to everyone

The Code applies to all full- and part-time employees, consultants, trainees, management and board members in the Advania Group (Staff). Each person has a responsibility to familiarise themselves with this Code and associated company policies, guidelines and instructions that are relevant to their work.

Advania also imposes requirements on our business partners through our Supplier Code of Conduct. The Supplier Code of Conduct is available at www.advania.com

There are consequences for not following the Code

All staff at Advania are accountable for their actions. Failure to follow the Code or Advania's other policies or procedures may lead to disciplinary action, including the risk of dismissal and legal action. Disciplinary measures will also be taken against anyone who commits, authorises or knows about offences and does not immediately report or rectify the situation.

Commitment to training

All staff must complete Advania's mandatory training, which is ongoing and requires periodic renewal. This ensures that everyone stays competent and informed about company processes and routines, legislative changes, and best practices, maintaining compliance with Advania's policies.

Internationally recognised standards at the base of our Code of Conduct

- The Universal Declaration of Human rights
- The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work
- The Rio Declaration on Environment and Development
- The United Nations Convention Against Corruption
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises

Report behaviours that go against our values

Staff are encouraged to report behaviours or situations that do not align with this Code or Advania's values. Reports can be made to your line manager or to HR. For serious violations, such as criminal offences, staff can report anonymously via Advania's whistleblowing channel.

The whistleblower channel platform can be accessed via www.advania.com, and contains information on the reporting process, how anonymity is protected and how personal data is processed.

Read more on page 14, Our reporting channels.

This Code does not provide every answer

Always use your common sense. When you are unsure, ask yourself the guiding questions below. If the answer to any of these questions is yes, stop and consult your manager or legal and compliance teams to help you find a way to handle the situation.

- Is it against the law?
- Is it unethical or does it go against Advania's values and principles?
- Could it reflect badly on Advania or damage our reputation?
- Would I be uncomfortable explaining my actions to a manager, colleague or family member?
- Would I be embarrassed if my actions became public on TV, in the newspaper or in social media?

Ownership and review

The Group Compliance Officer reviews the Code annually and implements necessary updates. Each Advania company's local CEO is responsible for the local implementation. The Board of Directors of Ainavda Holding has the final responsibility for the Code's review and approval.

Our people and workplace

We provide a safe, engaging and inclusive working enviroment

Our difference is you! We are committed to respecting internationally recognised human rights and minimising our negative impact on people and communities. We provide an inclusive, stimulating and safe work environment where all our staff can be themselves and reach their full potential.

Diversity, equity and inclusion

Every person's unique skill, qualities, and background contribute to the diversity of our teams. We know that diverse teams perform better, are more innovative and resilient, while also making us a more attractive employer and partner. Our ambition is that the company's staff should reflect society at large. We acknowledge that individuals from groups at particular risk of vulnerability may face unique challenges, and we are committed to taking positive action to ensure equity and inclusion in the workplace. Ensuring that all staff feel seen, included, and appreciated is essential to our long-term success.

We treat colleagues, customers, partners and other people we encounter with kindness and respect. We do not tolerate any forms of discrimination, harassment, threats, bullying or violence based on gender identity or expression, sexual orientation, ethnicity, religion, nationality, social origin, political views, trade union membership, disability, marital status, pregnancy or age. This includes subtle or indirect behaviours such as intimidation, hostility, humiliation, psychological abuse, offensive remarks, jokes, name-calling, unwelcome attention, physical contact, or other invasions of privacy or personal space.

Respect for human rights

Advania is committed to respecting internationally recognised human rights and acknowledges our responsibility to address negative human rights impacts related to our operations in our value chain, while striving to contribute positively wherever possible. We are committed to ensuring that everyone that we interact with is treated with dignity and respect. Staff are provided with fair wages and remuneration packages that meet or exceed legal minimum standards.

All forms of child labour, modern slavery (including forced or bonded labour), and human trafficking are strictly prohibited, both within our operations and those of our business partners. The consumption of pornographic materials involving minors is prohibited under any circumstances, as is the purchase of sexual services for yourself or others during company-sponsored trips or in connection with company activities, regardless of local laws.

We respect everyone's right to freedom of association and collective bargaining, as well as the choice to refrain from joining a union.

Health, safety and well-being

Ensuring the health, safety, and well-being of our staff, and minimising work-related ill-health and sick leave is a high priority in all Advania companies. Advania works pro-actively and systematically to manage physical, organisational and social factors across all our locations, guided by applicable health and safety laws, local regulations and local internal policies.

A healthy and safe workplace is a shared responsibility, and many accidents and work-related illnesses are preventable. Staff must follow relevant instructions and take proactive measures to minimise the risk of accidents or illness.

Advania provides employees rebates for health costs, such as a wellness allowance and access to resources from professional healthcare partners. Sickness benefits are regulated by national law or, where relevant, by local collective agreements.

Professional development and benefits

Advania offers staff an attractive work environment with competitive terms and conditions and a healthy work-life balance. This is a prerequisite to attract and retain competent staff. To maintain our competitive edge, we provide continuous opportunities for professional development, ensuring that staff have the skills and knowledge to succeed in their roles. Advania holds appraisals with the aim of ensuring staff satisfaction, competence and development. Staff may also provide feedback or raise concerns to the company through surveys, which serve as an alternative means of communication.

Advania complies with or exceeds local legislation regarding pension schemes and insurance coverage. We also adhere to local laws and collective agreements related to parental leave and benefits. Offering comprehensive parental benefits not only gives us an advantage in the recruitment process but also supports staff members in sharing parental responsibilities more equally.

Report inappropriate behaviour and health and safety risks or incidents immediately. There is zero tolerance for retaliation against staff who choose to report misconduct or participate in an investigation.

In practice, remember to:

- Treat everyone with respect.
- Be mindful of the impact of words and actions on others and avoid conduct that could make others feel excluded, unwelcome or uncomfortable, in person as well as on online platforms or forums.
- If you have a leadingship position, ensure equitable treatment and equal opportunities for staff members by recognising and adressing individual needs.
- Recruit, reward, and promote based on merit.
- Ensure that staff have terms and conditions that are in line with or surpass applicable legal requirements and collective bargaining agreements.
- Be aware of the impact Advania's operations may have on the human rights of others.
- Respect everyone's right to organise and bargain collectively.
- Understand and comply with all health and safety instructions and procedures at your place of work.
- Stay at home when you are sick.
- Take responsibility for your own physical and mental health. Take regular breaks and manage your workload to safeguard your long-term well-being.
- Abstain from consuming alcohol or illegal drugs while performing work duties.

Related resources:

- Sustainability Policy

Our business

We do business ethically and with integrity

We conduct business with integrity and in line with legal requirements, industry standards and principles of good business ethics. We do not offer or accept bribes or other improper advantages, for example excessive gifts or hospitality, for the purpose of influencing business decisions or securing an improper advantage. We compete fairly and openly, comply with applicable trade controls and maintain transparent and accurate records of our operations.

Anti-bribery, gifts & hospitality

Upholding high standards of business ethics helps build trust in our brand and in our business. Advania Group has zero-tolerance towards all forms of unethical business behaviour, corruption and financial crime, such as bribery, money laundering, fraud, embezzlement, extortion and any other way of exploiting Advania's position to gain an inappropriate advantage.

Hospitality and symbolic gifts for the purpose of building relationships can play a positive role in business. They can also be used to obtain improper benefits, or influence decisions, and should therefore be used carefully. All gifts, entertainment, representation and similar must always be legitimate and proportionate in the context of the business activity and align with local law and Advania's internal policies. Exercise particular care in relation to the public sector, where more restrictive rules apply, and always follow local guidelines in relation to gifts and hospitality.

Keep in mind that even if your actions are not intended to be improper, they might be perceived to be by others. Use good judgment in your decisions and actions.

Fair competition

At Advania we compete fairly. We follow all applicable antitrust laws and never engage in any form of anti-competitive behaviour, such as price fixing, collusion or market manipulation. Staff must recognise behaviours and situations that are not in line with antitrust regulations, especially during interactions with competitors.

Examples of commercially sensitive information include prices, surcharges, costs, margins, terms of sale or profitability, business plans, after market strategies, market forecasts or product development plans.

Sanctions and trade controls

Advania complies with all applicable trade controls, including economic sanctions in all countries of operations. We have a systematic and pro-active approach to ensure that we do not directly or indirectly conduct business with entities, countries or individuals under sanctions by the UN, US, EU and UK.

Conflicts of interest

Business decisions must be made objectively, prioritising the company's interests without personal bias or gain. A conflict of interest occurs when an individual's personal interests, relationships, or activities interfere, or appear to interfere, with their ability to act in the best interests of Advania. Staff must disclose any actual or perceived conflicts of interest to their manager. Equally, staff must withdraw from decisions where their impartiality could be questioned, for example if they have a personal connection to a counter party in a recruitment process, public procurement or business negotiations.

Accounting and reporting

We maintain transparent, accurate, and timely records of all financial transactions and communicate a true representation of Advania Group's performance. We operate in full compliance with applicable tax laws and regulations and report both financial and non-financial (ESG) information in an honest and transparent manner.

In practice, remember to:

- Complete all mandatory training modules on business ethics.
- Familiarise yourself with the Guidelines on anti-corruption, which contain concrete guidance, checklists and monetary limits for gifts and hospitality.
- Never give or receive gifts, benefits, services, or other offers that could compromise your integrity or judgement or be perceived as an attempt to gain an improper advantage or influence a decision.
- Ensure that gifts, representation and hospitality always are reasonable and appropriate under the circumstances, obtain required approvals and act with maximum transparency.
- Remember that more restrictive rules apply in relation the public sector, including pre-approval from your local compliance officer or legal department before the giving or receiving of any gift or representation is arranged.
- Consider the blush test! Only act in a way that you would feel comfortable with if it were to be made public in the media tomorrow.
- Ensure that you submit and/or approve expenses accurately and in line with company policy.
- Never share commercially sensitive information with our competitors.
- Disclose any situation where your, or someone else's partiality could be questioned in relation to a business decision, for example if you have a personal connection to the counter party in a recruitment process, public procurement or business negotiations.
- Be aware of relevant trade restrictions and do not engage in business activities with companies that are under sanctions.
- Ensure that you have reviewed relevant requirements with regards to sanctions and information security before travelling to a country outside of your regular country of operations.

Related resources:

- Anti-corruption Policy
- Anti-corruption Guidelines
- Sanctions and Export Controls Policy
- Sanction and Export Controls Guidelines
- Antitrust and Competition Policy
- Antitrust and Competition Checklist
- Advania Group Tax Policy

Quick checklist: gift and benefits

Ask yourself these questions to assess the compliance and appropriateness of any gift or benefit you plan to give or receive. Read Advania's Anti-Corruption Guidelines for local guidance on gifts and representation!

If the answer to any of these questions is yes, stop and consult your legal or compliance department.

- [ ] Is someone from the public sector or a publicly owned company the giver or receiver of the gift or benefit?
- [ ] Does the gift or benefit have the potential to influence the recipient in their professional practice?
- [ ] Is the benefit or gift addressed to a specific person?
- [ ] Is the benefit or gift given to or received by the same person regularly?
- [ ] Is the benefit associated to an event to which family members are invited?
- [ ] Is the giver or recipient trying to conceal the fact that the benefit or gift has been given/received?
- [ ] Is the value of the benefit or gift disproportionate to the purpose of the gift?
- [ ] Can the benefit or gift be considered to have a wow factor, i.e. be impressive or attention-grabbing?
- [ ] Can the benefit or gift be used by the recipient privately?
- [ ] Is it unusual for this type of benefit or gift to occur between companies and public institutions?
- [ ] Has the benefit or gift been initiated by the recipient?

Our resources

We safeguard company information and assets

Advania's information, physical property, premises and customer information are valuable assets that must not be misused, lost or shared inappropriately. All staff must understand and adhere to internal policies on information security and data privacy to ensure the safeguarding of Advania's and customers' information, preventing unauthorised access, loss of property, breaches and other security incidents.

Information Security

We work proactively and continuously to safeguard information related to Advania, our customers, and our partners. We stay up to date on the latest risks and best practices in information security and adhere to internal processes to identify and manage information security risks. We take all necessary precautions to prevent unauthorised or accidental disclosure, ensuring compliance with legal, contractual, and business requirements.

All staff must follow internal processes that are designed to minimise risks to our business operations and avoid actions that could expose Advania to information security threats or make the company more vulnerable. Working for Advania, you may not share sensitive or confidential information with competitors, suppliers, or any unauthorised parties, unless authorised to do so, nor use such information for personal gain. Disclosing non-public information to friends, family, or unauthorised colleagues is also strictly prohibited.

Data Privacy

At Advania, we handle personal data responsibly and in full compliance with all applicable data protection laws in the countries where we operate. We recognise data privacy as a fundamental human right and only collect, process, and store personal information for legitimate business purposes. Working for Advania, you are expected to ensure that you handle personal data in line with company policies and guidelines and protect data from unauthorised access or disclosure.

A personal data breach is a security incident that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data that is transmitted, stored, or otherwise processed.

If you suspect or become aware of misuse or incorrect handling of personal data, a so-called personal data breach, you must report it immediately to your Local Data Protection Organisation.

In practise, remember to:

- Complete all mandatory training modules on Cyber Security awareness and Data Protection Laws.
- Keep your desk clean and lock your computer before you leave it unattended.
- Protect the information and personal data you are entrusted with. Do not seek access to confidential data of any kind, unless for a relevant legitimate business purpose.
- Be careful and cautious when sharing sensitive information and do not discuss confidential information in public places or online on platforms or systems not controlled and governed by Advania.
- Be aware that potential cyberattacks are a part of our reality. Avoid inappropriate internet use and ensure you align to all security controls and policies.
- Do not share passwords.
- Always think twice before opening attachments and clicking links.
- Adhere to the internal IT-policy set by your company when requesting new software and when using your devices for appropriate and authorised personal use. Do not take risks that could jeopardise the stability and operational reliability of our IT environment.
- When connecting to unsecured wireless networks, users should exercise additional caution as all traffic to and from the device will be unsecured. Login details for any online site should only be used on secure sites using HTTPS.
- The use of public Wi-Fi should be limited, whenever possible.
- All remote connections must be shut down at the end of a session.
- Never use non-public information obtained at work to gain advantage for yourself or a third party.
- Escort your visitors at our Advania offices.
- When travelling, equipment and media must not be left unattended and in an unsecured location, for example, devices should not be left unattended in places such as restaurants, bars and pubs.
- Protect company assets from damage, theft or loss and report any misuse of company inventory, cash, equipment, supplies or other assets.
- If you leave Advania, do not take any Advania or Customer information with you. All company information belongs to Advania.

Related resources

- Data Retention Policy
- Advania Internal Privacy Notice

Our environmental responsibility

We care about our environmental impact

Advania's commitment to minimise the environmental impact of our operations is embedded in all aspects of our work. Staff are expected to do their part to contribute to reducing Advania's environmental footprint, for example by being aware of our environmental impact, minimising waste, conserving energy, and adhering to company guidelines and instructions on sustainable business practices.

Environmental commitments

We comply with all relevant environmental laws and regulations in the countries where we operate, and we support the precautionary principle in relation to environmental challenges. All Advania companies work systematically, and in alignment with management systems for environment, to assess and manage the environmental impact associated with our business. We have goals in place to reduce our greenhouse gas emissions and to increase energy efficiency across both offices and data centres. We recognise the limits of our planet and the resource-intensive nature of the IT-industry, and therefore advocate for a shift towards circularity within the tech sector.

We believe technology plays a crucial role in driving solutions for a more sustainable future, and it requires a collective effort. Advania supports our customers in leveraging technology to improve resource efficiency and reduce the environmental impact in their operations and we communicate clear expectations and requirements for our suppliers' environmental efforts.

Business travel

Business travel is one of Advania's main environmental impacts. When planning business travel, financial and environmental factors must be considered when deciding if a trip is necessary and when choosing the mode of transport. If an established relationship exists with a customer or partner, the same results can often be achieved through web- or teleconferencing.

In practice, remember to:

- Use company resources responsibly and limit waste.
- Follow local office routines on recycling.
- Minimise business travel, and where possible, choose surface travel before air travel.
- Think about how you can contribute to reduce Advania's environmental impact within your sphere of influence. What may seem like a small change, can have a lasting impact.

Related resources

- Sustainability Policy

Our reporting channels

Advania strives to offer a safe working environment where all staff should feel comfortable voicing their opinion. To safeguard our people, our assets and our reputation, speaking up about known or suspected breaches of this Code or other company policies is encouraged and expected. Advania also encourages external stakeholders to report concerns to Advania using our whistleblowing channel.

What should be reported?

Behaviours and actions that are unlawful or not in line with Advania's Code of Conduct should be reported. This can include observed or suspected instances of bribery or inappropriate collusion with competitors, perceived incidents of bullying or harassment, unsafe use or inappropriate handling of company information, or other behaviours that might be damaging to people, the environment or the business.

You do not have to be sure, but all reports must be made in good faith. Report your concern as early as possible, you do not need to collect evidence or investigate the matter on your own.

How to report a concern?

If you are comfortable doing so, we recommend that you raise your concern with your closest manager, your manager's manager or HR. You can arrange a physical meeting, write a letter, email, or call.

If the matter is of public interest, you may wish to raise it through the Whistleblowing process.

How to use the Whistleblowing service?

The whistleblowing channel can be used to report serious wrongdoing, illegal actions and misconducts of public interest. This includes financial crime, bribery, serious wrongdoings of vital importance to Advania or the life or health of an individual, breaches of work environment codes and instances of discrimination or harassment. You do not have to provide any details revealing your identity, however, you are encouraged to do so for the purpose of facilitating the investigation.

The channel is managed by an independent third party and is available 24/7 to all internal and external stakeholders in over 60 languages. The system can be accessed on all devices, including smartphones. We recommend that staff use the channel from a device that is not connected to the local intranet.

Please include the following in the report:

- What is your concern?
- When did this happen?
- Where did it happen?
- Details of the case (describe what has happened, who are involved and why you are submitting your report).

It is important that you describe all circumstances and facts regarding the reported matter – also circumstances and facts that you believe may be less important. If possible, please enclose documentation or pictures.

Can reports be submitted anonymously?

Using the whistleblowing channel to report a concern is the best option if you want to stay anonymous. The channel is encrypted and password-protected, and all messages will be processed in confidence. In some jurisdictions, anonymous reporting may not be allowed due to legal restrictions.

What happens after a concern has been raised?

Reported incidents and concerns are assessed promptly, independently and objectively. You will receive a confirmation of receipt within seven days after having submitted your report. Within three months of submitting your report you will receive information on the follow-up of your report. The documentation of your report will be kept as long as necessary, however no longer than two years after the follow-up of your report has been concluded. You can read more about how personal data is managed in the Whistleblowing policy.

You will always be protected from retaliation when you raise a genuine concern in good faith. There is zero tolerance for retaliation against staff who choose to report detected or suspected misconduct or participate in an investigation into misconduct, regardless of the outcome of the investigation and whether or not the report was substantiated.

The whistleblowing channel and Advania's whistleblowing policy is available on www.advania.com.

The tech company
with people at heart