

Code of Conduct

Summary

Our Code of Conduct (the “Code”) describes how we act as representatives of CtrlPrint and how we do business. It also outlines CtrlPrint’s expectations of employees and business partners and what our stakeholders can expect from us.

The Code applies to all CtrlPrint representatives worldwide. It is the responsibility of each one of us to read, understand and act in accordance with the Code.

We take all violations of our Code seriously and breaches may lead to disciplinary action, up to and including termination of employment. It is easier to prevent a violation than to manage its consequences. Therefore, all CtrlPrint employees should make every effort to promote a culture of compliance with the Code of Conduct.

Your guide to making decisions

Our Code of Conduct does not cover all situations, relevant laws, regulations and internal policies. On occasion, you may face situations where it is difficult to determine what is the right thing to do. In such cases, you should use your sound judgement and ask yourself the following questions:

1. Is this consistent with our Code of Conduct, our policies and the law?
2. Is it aligned with our values?
3. How would this look to others inside and outside CtrlPrint?
4. Could this harm the reputation of CtrlPrint?

If you feel uncertain about how to act, consult with your manager, COO, CFO, CISO or People & Culture Director. If local law or custom conflicts with the principles set out in our Code, you should always seek advice from one of the above.

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Revision History

Author	Version	Date	Change
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Scope

The Code applies to all CtrlPrint representatives worldwide. It is the responsibility of each one of us to read, understand and act in accordance with the Code.

Our values are our guiding principles

CtrlPrint shall be an attractive employer with a positive and sustainable work environment; an engaging, clear and strong corporate culture and an active focus on continuous learning. Our values – inclusive, respectful, and inspired – form the basis of our corporate culture. In our business activities and working relationships, we always strive to adopt the following behaviours.

Inclusive

- Everyone plays an important part in our success
- We encourage and support each other to succeed
- To listen is more important than to talk

Respectful

- We are sincere and transparent
- We value people's needs and their trust
- We support each other

Inspired

- There is always more to learn

- We are not afraid to try - It's okay to fail
- We are constructive and not dissuaded by difficult problems

At work

A healthy work environment

We are all entitled to a safe and healthy workplace that provides a sustainable work environment for all our employees. In this regard, we have a zero vision for work related accidents as well as ill health, meaning no one should be injured or harmed while at work, both physical and mental.

To achieve this goal, we must prevent, mitigate and address safety and health-related risks and promote the well-being of our employees. We will comply with all applicable health and safety laws and regulations.

Open and respectful workplace

We engage in fair workplace practices and expect everyone to be treated with dignity and respect. We value inclusion and encourage each other to contribute and speak openly. Harassment, intimidation, bullying or other inappropriate behaviour in the workplace is not tolerated.

We offer a workplace where differences are respected and appreciated and where all people feel included and have a sense of belonging.

Equal opportunities and non-discrimination

We place value on having a diverse workforce and our aspiration is to help every employee reach their full potential. We know that a diversity of people contributes to a more effective and sustainable business development for CtrlPrint. We make better decisions by getting a broader perspective on our challenges and opportunities.

We recruit, select, evaluate and promote employees based on competencies and performance, not on bias or personal preference.

Remember

- Always act respectfully toward everyone you interact with at work
- Be aware that humour may be perceived differently by different people, and avoid jokes or distributing material that could be offensive to others

- Immediately report or challenge inappropriate behaviour that comes to your attention

Learn more

[Read our Equality and Inclusion Policy](#)

[Read our Policy & Action Plan - Harassment, Sexual harassment and Victimisation](#)

Fair working terms

We apply fair labour practices and follow applicable national and international labour standards. Furthermore, we provide fair wages and benefits in accordance with national law and relevant industry standards.

We recognize the right of employees to decide whether they wish to be represented by a union, to organise and to bargain collectively or individually. We also respect an employee's right to refrain from joining a union.

Open and honest communication is fundamental to establishing trust. We engage in a fair and open dialogue with all employees and their representatives. To this end, we also ensure that all employees receive clear and understandable information regarding the terms and conditions of their employment and their job performance.

Use of Company Resources

CtrlPrint's assets are reserved for use in company business in accordance with CtrlPrint policies. It is our responsibility to protect and use such assets with care and sound judgement to ensure they are not lost, stolen, misused or wasted. This applies to physical assets such as computers and mobile phones etc, as well as intellectual property (IP). We protect our IP, such as patents, trademarks, copyrights, domain names and know-how, by enforcing our IP rights against unauthorised use.

Remember

- Never use company assets and equipment, such as computers and mobile phones, to engage in illegal or inappropriate activities that may damage CtrlPrint or its reputation.
- Make sure that any images or materials you obtain from the internet or a third party are used lawfully
- Don't share CtrlPrint's proprietary information with any third party without proper approval, and secure the necessary confidentiality

agreements.

Information security

Our clients trust us to handle their most important documents. So, information security is something we highly prioritise and part of everything we do. Since 2016 CtrlPrint has been ISO certified according to 27001:2013 Information Security Management. The certification covers our systems, processes and personnel. Our security work is audited annually by external auditors.

All information must be adequately protected based on the business needs. The need should be assessed based on the consequences that may occur if information is exposed to a risk correlated with the costs for protection. This assessment should be based on the following objectives:

Integrity - Information to be current, accurate, complete and understandable. Information assets must not be changed out of control, nor be manipulated.

Availability – Information to be available to authorised users at defined times. Protection from loss should be in place.

Confidentiality – Information that is stored, processed, transported and/or communicated are protected from unauthorised users and disclosure.

Learn more

[Read our Information Security Policy](#)

The complete document inventory can be found in the [CtrlPrint ISMS - Documentation Inventory](#)

Privacy and personal data

We respect the privacy of all individuals and will collect and process personal data responsibly and always in accordance with applicable laws. We collect, process and store personal data from customers, consumers, employees or third parties for legitimate business purposes only and will protect it from unauthorised use or disclosure.

Learn more

[Read our Privacy and Personal Data Protection Policy](#)

In the market

Products & innovation

Our vision is to simplify corporate reporting worldwide and we are committed to delivering sustainable high-quality solutions to our clients. Information security and privacy are central in everything we do. Our products and services will meet applicable legislative and regulatory requirements.

Remember

- Quality issues are not only the responsibility of the product and/or client service teams. It is everyone's responsibility
- Take quality and information safety concerns seriously and promptly report any issues that come to your attention

Fair competition

While CtrlPrint will always compete vigorously for business, we must do so fairly and in compliance with competition laws (also called “antitrust” laws). These laws generally prohibit agreements or understandings between competitors that limit competition, including price fixing, allocation of customers or geographic markets, bid rigging or abuse of a dominant position.

We conduct CtrlPrint's business in accordance with applicable trade laws and regulations. This could include sanctions and import/export restrictions related to certain products or doing business with certain individuals, countries or businesses.

Remember

- Don't propose or enter into agreements or understandings – whether express or implied, written or oral – with any competitor that deal with such commercially sensitive matters as product pricing, bids, terms and conditions of sale or sales territories
- Exercise caution in activities involving competitors and consult with a member of the CtrlPrint management team before any interactions with competitors

Conflicts of Interest

Our business decisions must be made based on CtrlPrint's best interests. To this end, we must avoid conflicts of interest and properly disclose actual or potential conflicts of interest as soon as we become aware of

them. A conflict of interest arises when our private interests, personal relationships or activities outside CtrlPrint influence, or even appear to influence, our ability to make an objective decision.

Remember

- Always keep your relationships with business partners professional and don't involve or give favourable treatment to family or friends
- Avoid any investment, interest or activity that could cause others to doubt your objectivity or loyalty to CtrlPrint
- Not to exploit CtrlPrint's name, or make use of or exploit your connection with CtrlPrint or information obtained in the course of your duties to further your own private interest;
- Promptly report potential conflicts of interest to your manager as soon as you become aware of them

Learn more

[Read our Conflicts of Interest Policy](#)

Relationships with customers

We strive to offer services that exceed our customers' expectations. We act in such a way that customers perceive us as being inclusive, respectful, and inspired. The relationships with our customers are based on professionalism and respect.

Our contract terms are clear and reasonable, and we ensure that relevant information is easily accessible to everyone. We listen to our customers and take their comments into account in order to improve our business. We are meticulous about integrity, which applies to the handling of sensitive customer information.

Relationships with partners and suppliers

CtrlPrint's relationships with suppliers and business and collaboration partners are based on honesty and trust. This Code of Conduct lays the foundation for all interaction. We require our suppliers as well as business and collaboration partners to apply the same good business ethics as we do and for them to comply with all applicable laws and regulations.

In our supply chain, we require suppliers to adhere to the ten principles of the UN's Global Compact. We require our suppliers to prohibit all forms of corruption, respect human rights and international labour legislation and to promote environmental responsibility.

By purchasing responsibly, we build sustainable relationships with our suppliers, vendors and contractors. All our purchasing decisions should be based on fair and objective criteria.

In the society

Respecting human rights

CtrlPrint is committed to conduct our business ethically and to deliver responsible growth that is inclusive for all. We will not tolerate any form of human rights abuse, including modern slavery or human trafficking, in any part of our business or within our supply chains. We support and respect internationally recognized human rights wherever we operate.

Remember

- To take suspected or actual abuse of human rights seriously and ensure your concern is addressed promptly
- Whenever you use labour agencies or contractors, make sure that workers have legal permits to work and that the agency follows all applicable labour standards, including those related to compensations and benefits

Bribery and improper advantage

We are committed to combating corruption in all forms and do not tolerate bribery or

improper advantages in our business. This means that we do not offer, accept, request or authorise gifts, payments or other advantages that could affect or appear to affect the objectivity of a business decision. This includes facilitation payments made to speed up administrative or other routine tasks.

We provide gifts, hospitality or entertainment in a lawful and transparent manner, and only as an appropriate compliment to legitimate business relationships. We do not give or accept anything that could lead to a conflict of interest or raise questions about our integrity.

Remember

- During tender or contract negotiations, hospitality could easily be perceived as inappropriate. In these situations, you should always consult with your manager or the management team before proceeding

- There may be country or industry-specific standards related to gifts and hospitality.
- Don't provide anything that you know may breach the gift policy of other companies or organisations
- Under no circumstances should you give or accept cash or cash equivalents
- Always pay for your own accommodation and travel expenses when attending third-party events

Learn more

[Read our Anti-bribery & Corruption Policy](#)

Environmental responsibility

CtrlPrint views climate change as one of the greatest challenges of our times. We recognize that our company and business practices have an impact on the environment and are committed to developing, exploring, and contributing to solutions that aim to mitigate the climate crisis, both within our operations and beyond.

We are committed to being open and transparent with regard to our impact on the planet and our efforts to address climate change. We commit to informing and engaging our stakeholders, including employees, customers, partners, suppliers, and owners, in CtrlPrint environmental views and activities.

We work to reduce our direct emissions and pollution of air, water and soil, and support our suppliers to reduce emissions across our value chain. We minimise the waste we produce, and ensure that any waste generated by our business is managed effectively and disposed of safely. We work to reduce and prevent our overall impact on biodiversity and ecosystem affected by our value chain.

Community relations & political activities

We strive to contribute positively to our local communities by building lasting, long-term relationships based on open and honest dialogue.

CtrlPrint is politically neutral and does not make payments or donations in any kind to political parties or candidates, or their institutions, agencies or representatives.

We respect and follow the fundamental right to freedom of speech and the rights of employees to be able to express their opinions as

individuals.

As employees of CtrlPrint, we understand that the opinions and statements we give in our capacity as employees could harm the public perception of CtrlPrint and that it is our responsibility to avoid situations that damage our public image. When we as individuals participate in political activities, we understand it must be clear that the views expressed are personal and do not represent CtrlPrint. The same applies to other personal opinions that are expressed publicly, including on social media.

Learn more

[Read our Communication Policy.](#)

Raising concerns

CtrlPrint encourages an open and honest culture where every employee can report suspected violations of law or the Code in good faith. Every one of us is responsible for maintaining CtrlPrint's integrity and reputation.

You can always raise your concern with your manager, the management team or the People & Culture Director in accordance with locally established complaint procedures.

You may also report in accordance with CtrlPrint's Reporting Policy, to raise your concern in confidence. Such reports can be made anonymously when permitted by local legislation.

CtrlPrint will investigate reported violations and take appropriate action. Any information provided during such investigations will be kept confidential unless disclosure is required by law or the matter involves criminal conduct.

Retaliation or discrimination against any employee who, in good faith, reports a concern will not be tolerated and will be subject to disciplinary action. Good faith does not mean that your concern must be correct, but that you believe you are providing complete and truthful information when you are reporting the concern. An employee who knowingly makes a false or malicious allegation will be subject to equally serious disciplinary action.

Learn more

[CtrlPrint Whistleblowing Policy](#)

