

THE AMESTO WAY

# Code of Conduct.

Simplifying business.

**amesto**



## CODE OF CONDUCT

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Simplifying business.





## THE AMESTO WAY

# Life is now. Work somewhere awesome.

### OUR OWNERS

Amesto is owned by Spabogruppen, a family business owned by the Spandow family.

The Spandow family owns and runs the business with their hearts and minds. They have a long-term and sustainable perspective, and their motto is "You never really own a family business. You merely look after it for the next generation."

Our values are built on three pillars. People - the people around us. Planet - the world we live in. Profit - the values we create. We believe that profitability and sustainability go hand in hand. As a family company with a long-term, sustainable perspectives, we want to create value in society.

We strongly believe that we lead by example and through our behaviour. We carry the values and own our ventures with respect to both mind and heart. We operate through profitability and sustainability, and with a sincere desire to make the world a bit better.

### OUR VISION AND MISSION

Our vision is LIFE is now WORK somewhere AWESOME.

Our mission is "Simplifying business."

We want to have the most satisfied customers. We want to simplify our everyday lives and those of our customers by being accessible, sharing expertise and creating value based on insight. We will take inspiration and provide advice from a global perspective and be early adopters of new technology.





## AMESTO TRUST

Amesto wants to be a “preferred trusted partner”.

We believe that people perform better when we work for someone and with someone that we trust. We also believe that trust is at the heart of all negotiations and co-operations. At Amesto, trust is at the top of our agenda, because we believe that those who understand the importance of establishing trust are the heroes of tomorrow. We call this Amesto Trust.

To become a trusted partner, we apply high ethical standards to create a trust-based relationship towards all stakeholders. We must behave with caution, honesty and objectivity so they can be confident in our professionalism and integrity. To achieve this, we will in our business activities comply with applicable laws, act in an ethical, sustainable and socially responsible manner and practice good corporate governance. We will maintain an open dialogue on ethical issues, internally and externally.

To ensure that we deliver on our ambition to be a preferred trusted partner we have established the Amesto Trust Center enabling our customers to take informative and qualified decisions.

## AMESTO CODE OF CONDUCT

The Code of Conduct (the Code) sets out the basic principles for “The Amesto way”, including our expectations, commitments and requirements for ethical conduct throughout our organisation.

The Code applies to Amesto board members, employees and hired contractors.

The Code aims to include our most important requirements, provide references to more detailed requirements in our governing documents and refer to other helpful resources. However, the Code does not remove the need for you to exercise good judgment. The Code has been approved by the Amesto Group’s Board of Directors and it reflects our three guiding stars.

### Trasure talent

We want to be “An awesome place to work” with high appeal. We prioritise the employee journey and generate commitment and results with the aid of local managers, insight, expertise and sharing. Our employees have the sharpest minds and warmest hearts.

### Value insight

We want to have the most satisfied customers. We simplify our everyday lives and those of our customers by being accessible, sharing expertise and creating value based on insight. We will take inspiration and provide advice from a global perspective and be early adopters of new technology.

### Ask more

We know that ambitions and dreams are not enough to realise a good idea. Development requires someone to ask questions. Our employees are experts in their field. That is why we will ask questions that challenge and improve. In-house and externally.



## YOUR RESPONSIBILITIES

We set high ethical standards for everyone who acts on behalf of Amesto. It is your responsibility to comply with the Code, both in letter and in spirit. You are also responsible for complying with other governing documents and applicable laws relevant to your work.

### What this means to you:

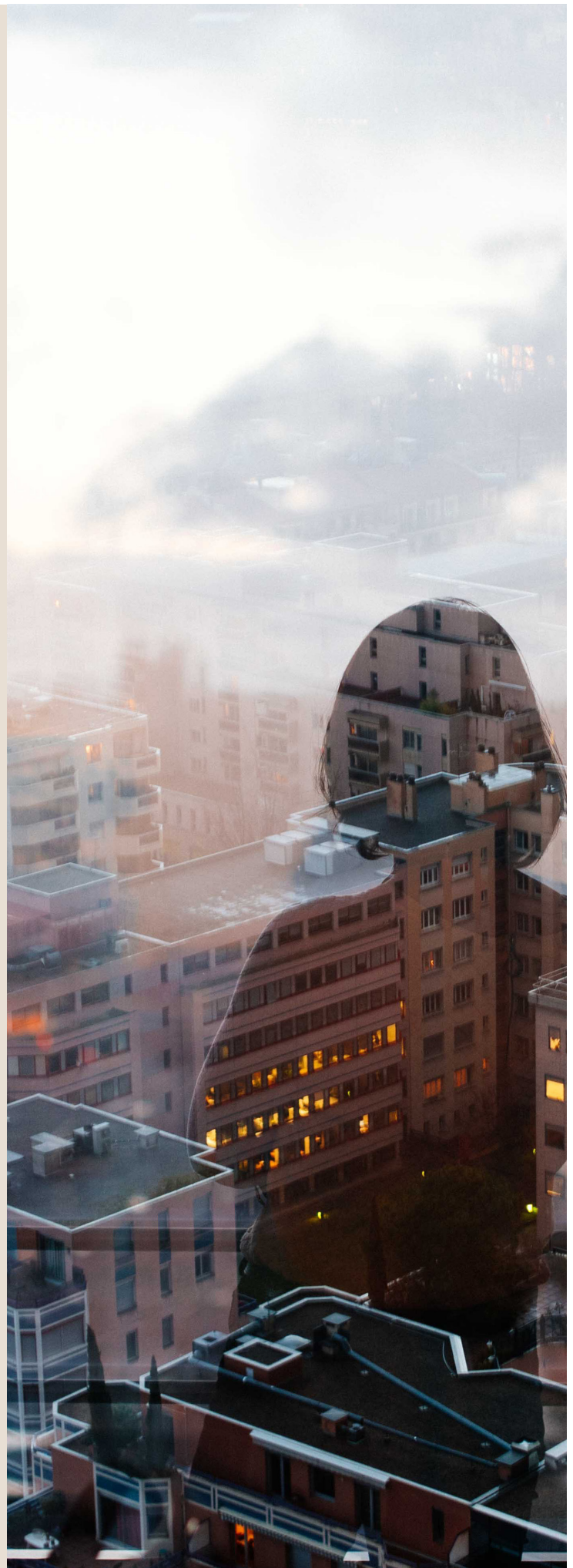
- Familiarise yourself with the Code as well as other governing documents and applicable laws relevant to your work.
- Act comfortably within our ethical standards and within the law. Operating in a grey zone increases the risk of things going wrong. When in doubt, disclose the issue to your leader and discuss it openly.
- Spend adequate time on difficult decisions and raise issues early. The wrong decisions are often taken when things have not been thought through properly and you are pressured into taking a rash decision.
- If there is a difference between a legal requirement and the Code, apply the most stringent standard.
- Participate in required ethics and compliance training and confirm annually that you have read through –and will comply with the Code.

## RESPONSIBILITIES FOR OUR LEADERS

We are committed to recruit and continuously develop the best leaders for Amesto. We expect our leaders to demonstrate ownership and commitment to our ethical standards by what they say and do. As a leader you must ensure that activities within your area of responsibility are carried out in accordance with the Code, other governing documents and applicable laws.

### What this means to you:

- Be a role model for ethical, diversified leadership through promotion of compliance, diversification and ethics. Show by behaviour what it means to act with integrity.
- Communicate the requirements in the Code and provide advice with respect to its interpretation and application.
- Create an environment where people feel comfortable speaking up and asking questions without risk of retaliation.
- Lead by example
- Be consistent when enforcing our standards and holding people accountable for their behaviour at work.
- Make sure your team members participate in required ethics and compliance training







**#askmore**

## **ASK MORE**

Amesto has an open communications policy, and we encourage our employees to #askmore. This is one of our guiding stars.

We know that ambitions and dreams are not enough to realise good ideas. Development requires someone to ask questions. Our employees are experts in their field. That is why we will ask questions that challenge and improve. Inhouse and externally.

The Code aims at being as clear and direct as possible, but it cannot address every situation that may arise. Furthermore, times change rapidly, and you might at some point question our Code or The Amesto Way. We encourage this and will always inspire you to be curious, speak up and ask more.

### **What this means to you:**

- Be curious, speak up and ask more.
- Raise questions or seek advice when you are uncertain on how to proceed in any given situation.
- Any questions regarding compliance with or the interpretation of the Code can be addresses to your closest leader or to HR.

## **REPORT CONCERNS**

Expressing ethical or legal concerns are important for many reasons. First, to defend democracy and our rights, such as securing fair public processes, defeating economical crime or enabling employees to be heard. Secondly, it is important to secure our welfare and security, such as preservation of HSE in the workplace. Finally, it is important to express concerns to uphold efficiency and constant improvement by evading or rectifying situations that might damage Amesto and our reputation, and by constantly improving the quality of everything we do.

If you suspect a possible violation of the Code or other unethical conduct, it is your duty to say something immediately. This includes any attempt of corruption you may become aware of. We recognise that raising a concern is not always easy and you may choose between several channels for taking concerns forward.

### **What this means to you:**

- Inform your leader immediately if you become aware of any activity that you think is a violation of the Code, or other unethical conduct.
- If you do not get the desired action from your leader, or you for some reason do not feel comfortable with contacting your leader, contact your leader's leader or someone else you trust.
- For our external stakeholders we have a form that can be filled out on our website, under our Trust site.

We will not tolerate any form of retaliation against any person who has raised an ethical or legal concern in good faith. Acting in good faith means that you have made a sincere report in a responsible manner through any of the channels listed above. This applies even if your report does not turn out to be an actual violation.

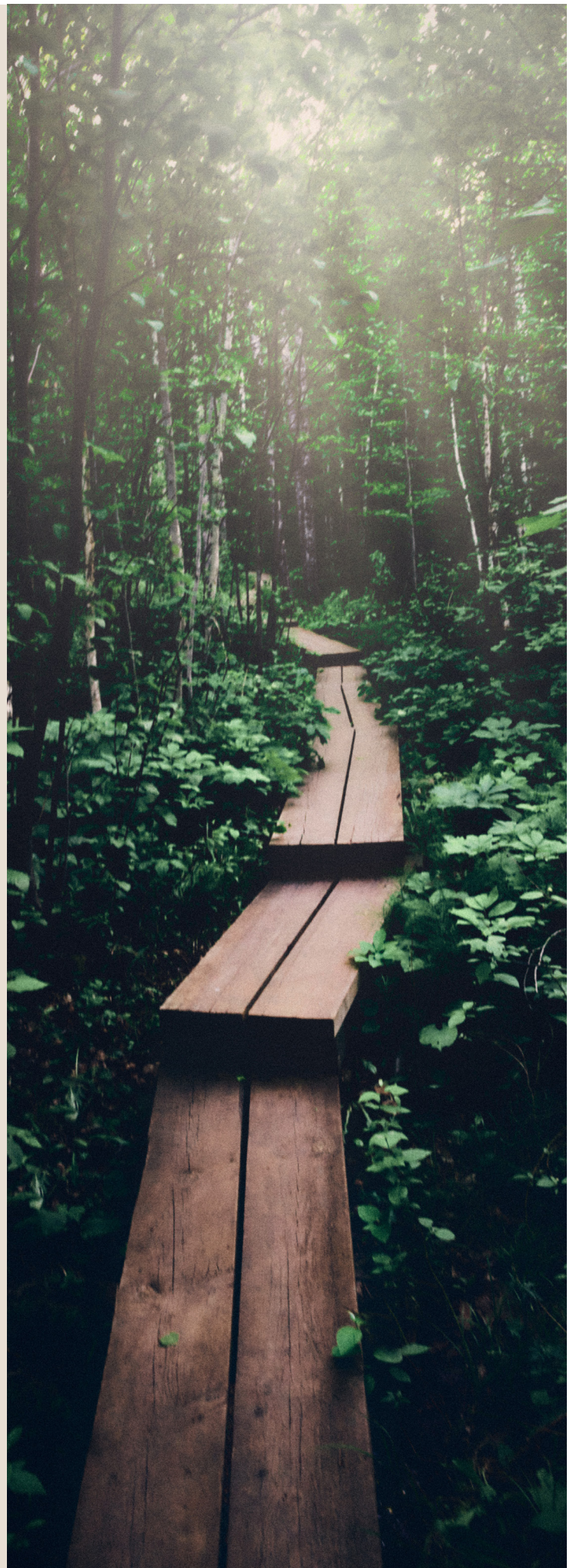


## **CONSEQUENCES OF BREACHES**


We in Amesto will take any raised concern seriously and will always look into the matter. We will not tolerate any breaches of the Code or the law. Potential misconduct may be investigated by external experts. We will pursue remedial measures if you breach the Code or laws. The same applies to leaders who disregard or tolerate such breaches either through negligence or actual knowledge. The remedial measures may include termination of your employment contract and reporting to relevant authorities. Incidents of ethical misconduct shall be registered and reported.

## **ETHICS AND COMPLIANCE**

We work in a systematic manner to ensure compliance with the Code and applicable laws. HR and Head of CSV is responsible for supervising Amesto's ethics and compliance activities, ensuring strong focus on and a common understanding of the Code, including providing guidance on the Code and follow up of potential breaches.







**LIFE is now.  
WORK somewhere  
AWESOME.**

## Awesome place to work.

### **PEOPLE - TREASURE TALENT**

Our most valuable assets are our people, attracting the right employees. To treasure talent is one of our guiding stars and to achieve this want to be "An awesome place to work" with high appeal. We prioritise the employee journey and generate commitment and results with the aid of local managers, insight, expertise and sharing. Our employees have the sharpest minds and warmest hearts.

### **EQUALITY, DIVERSITY AND INCLUSION**

Every employee is important to Amesto, and we are committed to providing an inclusive environment recognised for its equality and diversity. Equality is about ensuring all our employees' equal opportunities to make the most of their employment while working for Amesto. Diversity is about respecting and cherishing our differences and every individual. In Amesto we believe that both equality and diversity are essential elements to increasing our competitive advantage and to nurturing a positive triple bottom line. The value of equality and diversity lies not in the numbers, the highlighting or the marketing to the outside world, but rather in our organisations ability to truly understand, possess competence and maintain a high

degree of maturity regarding the value and importance of equality and diversity.

Amesto will treat everyone with fairness, respect and dignity, and we do not tolerate any negative discrimination of colleagues or others affected by our operations. Discrimination includes all unequal treatment, exclusion or preference based on race, gender, age, disability, sexual orientation, religion, political views, national or ethnic origin or any other characteristic that results in compromising the principle of equality.

#### **What this means to you:**

- Treat everyone with fairness, respect and dignity.
- Base your work-related decisions on merit and not on other characteristics that result in compromising the principle of equality.
- Think diversity in all -making processes.
- Make sure you always respect and cherish differences in opinions, backgrounds and personalities, and constantly keep in mind that those differences are in fact of high value and great importance to Amesto.





## **HARASSMENT AND INTIMIDATION**

Courtesy and respect are important aspects of a sound working environment and business dealings. We expect you to treat everyone you meet through work or work-related activities in a respectful manner. We will not tolerate any form of harassment or actions that reasonably can be considered as offensive or intimidating, including any form of unwanted attention of a sexual nature.

### **What this means to you:**

- Take responsibility to create and maintain a good working environment.
- Never engage in harassment, bullying, workplace violence or other behaviour that colleagues or business partners may regard as threatening or degrading.
- Offensive messages, derogatory remarks and inappropriate jokes are never acceptable.
- Respect other people, including their customs or culture.
- Speak up if you observe or experience harassment or intimidating behaviour.

## **PLANET - HEALTH, SAFETY AND ENVIRONMENT**

Amesto regards health, safety and the environment (HSE) as key conditions for our business operations. Our aim is zero harm, and we maintain continuous efforts to improve health, safety and the environment. We are committed to providing a good environment for all the people who work for Amesto, preventing accidents and incidents from affecting people, environment and our assets.

Any questions relating to HSE may be addressed to your applicable human resource.

### **What this means to you:**

- Health, Safety and Environment are everyone's responsibility. You must understand and act on your responsibilities to contribute to a healthy, safe and secure work environment.
- Stop work immediately if you consider it unsafe.
- Report any incident or unsafe condition as soon as possible. If you see something, say something.
- Know the relevant emergency procedures for your work.



## PRIVACY AND DATA PROTECTION

Privacy and data protection laws protect the integrity and confidentiality of a person's personal data. We are committed to protecting the privacy rights of our employees and everyone with whom we do business. We will only use personal data for appropriate purposes, and personal data will be processed in accordance with applicable laws, Amesto Privacy Code, our general Amesto policy on handling personal data, and the Amesto policy on handling employee personal data.

### What this means to you:

- Respect everyone's right to privacy.
- Make sure you watch our Amesto GDPR training video and confirm that you have read the Amesto policy on handling personal data.
- Make sure you read and comply with the Amesto Privacy Code.
- Make sure you watch our internal Amesto training video on Amesto Trust and comply with Amesto Trust Notification.
- If your job includes handling personally identifiable data, ensure that you are sufficiently familiar with and comply with our Amesto policy on handling personal data and other internal Amesto procedures for processing that personal data.
- If you have permanent or regular access to personal data, or if you are involved in the collection, copying, storing, analysing or disclosing of personal data, take appropriate training.

## DRUGS AND ALCOHOL

Amesto is a drug and alcohol-free workplace. We will not tolerate anyone being under the influence of drugs or alcohol while at work for Amesto. Limited amounts of alcohol may, however, be consumed when local custom and occasion make it appropriate, and provided the consumption is not combined with driving or any other incompatible activity. Tests for drugs and alcohol may be conducted whenever deemed necessary and in accordance with applicable laws.

### What this means to you:

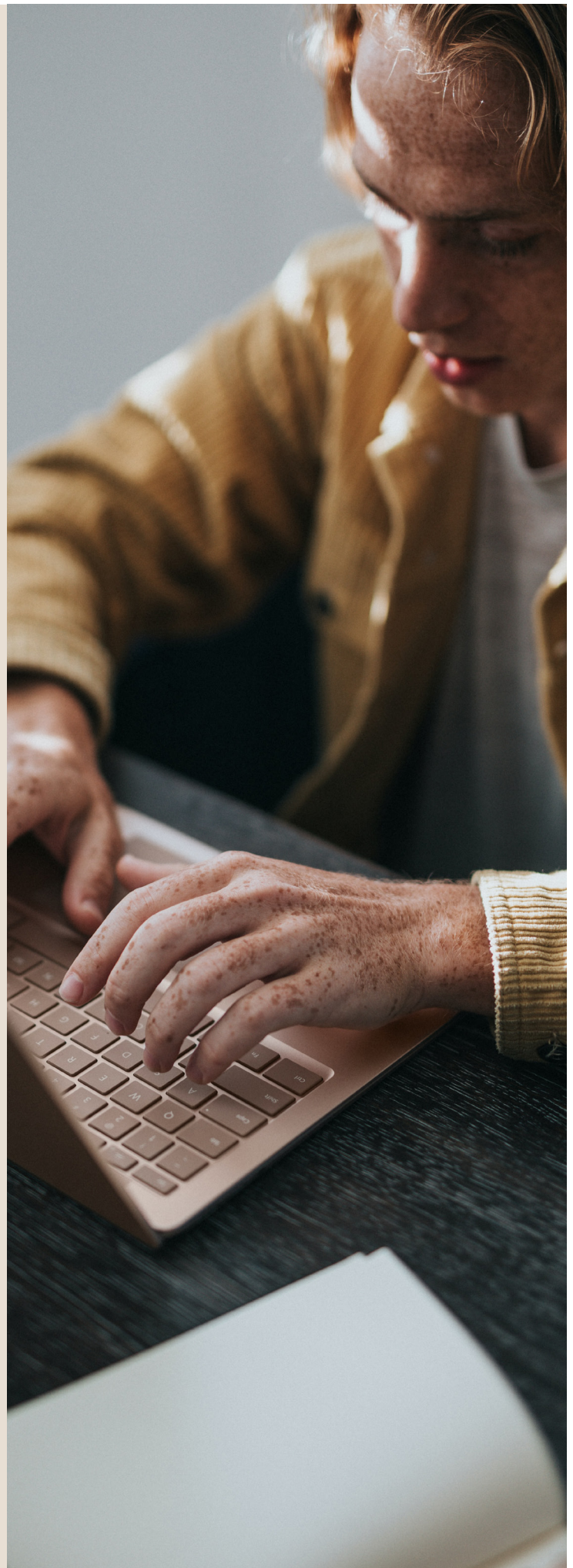
- Never work under the influence of drugs or alcohol.
- Be conscious about work-related events where alcohol is served and show moderation.

## PURCHASE OF SEXUAL SERVICES

Purchase of sexual services may be illegal and support human trafficking. Human trafficking is a violation of human rights. Regardless of local rules, regulations and customs, Amesto prohibits the purchase of sexual services when on assignments or business trips for Amesto. This also includes any contribution to the purchase of such services.

### What this means to you:

- Never purchase sexual services when you are on business trips or other assignments on behalf of Amesto.
- Never influence others to purchase sexual services and never accept to receive sexual services others have paid for.







# Conducting our Operations.

## **CORPORATE COMPLIANCE**

Everyone conducting business for Amesto shall follow our general requirements for good business practice, including orderly, fair and accountable business implementation. Our CEOs and leaders must follow board decisions and navigate within any given authorisation of power.

## **ANTI-CORRUPTION**

Corruption undermines legitimate business activities, distorts competition, ruins reputations and exposes companies and individuals to risk. We have zero tolerance for corruption in any form. We will comply with all applicable anticorruption laws and regulations and take active steps to ensure that corruption does not occur in relation to Amesto's business activities. Transparency is vital in the combat of corruption. We are committed to conducting our business activities in an open and transparent manner, promoting transparency in our industries and supporting efforts to combat corruption worldwide.

## **What this means to you:**

- Never engage in, authorise or tolerate corruption at any time for any reason.
- Never offer or accept an improper advantage. An improper advantage is an advantage that has no legitimate business purpose and is given to influence the recipient's decision making.
- Payment extorted from you under threat of life, health, safety or illegal detention is allowed and will not result in any form of retaliation, but you must report the payment immediately.
- Know your business partner, follow our integrity due diligence requirements and never engage others to do something we cannot ethically or legally do ourselves.
- Participate in required anti-corruption training and understand the risks you face in your work.



## CONFLICT OF INTEREST

Amesto respects your right to manage your personal affairs and investments. However, a conflict of interest may occur when your personal interests and Amesto's interests are different, and this may interfere with your ability to make the right decision for Amesto. We expect you to always act in the best interest of Amesto when you are representing us. You should also avoid situations that could be.

### What this means to you:

- Do not work in connection with any Amesto or Amesto related transaction, procurement, or other contract award in which you have, or a related party has a financial interest. A related party means your partner, close relative, or any other person with whom you or they have close relations.
- The same restriction applies where there are other circumstances that undermine trust in.
- Be open, disclose and discuss with your leader any situation that might lead to an actual or perceived conflict of interest.

## DIRECTORSHIPS AND OWNERSHIP INTERESTS

We expect you to spend your full working day on Amesto matters. Before accepting external directorships or other material assignments, you must obtain prior written consent from your leader. If you hold directorships on behalf of Amesto, you are not entitled to board remuneration, but if you hold directorships in a private capacity, you may retain any remuneration paid. Elected employee representatives on any Amesto board may receive the remuneration decided by the corporate assembly.

There are certain specific requirements for registering directorships for the following group of employees: (1) The CEO, executive vice presidents and senior vice presidents; (2) employee representatives on the board of Amesto Group AS and (3) employees exerting influence on Amesto's procurement or other contract awards. These categories of employees must register all directorships, except directorships in Amesto subsidiaries or when representing Amesto in non-controlled companies, in our HR system. This information must be updated on a continuous basis and verified once a year.

Furthermore, employees in groups (1) and (2) cannot hold ownership interests, or options to ownership interests, directly or indirectly, in any company that does or seeks to do business with Amesto if the employee can exert influence on business decisions related to such company. The same applies to companies that are competitors to Amesto. This prohibition does not apply to ownership interests in securities funds or shares in Amesto Group AS.

### What this means to you:

- Ensure you have the required approval before accepting a directorship or material assignment for another company.
- Note the special requirements for registration of directorships for certain employees.
- Note the special prohibition of ownership interests in other companies for certain employees.







## INTERNATIONAL TRADE RESTRICTIONS

Amesto Countries can impose various economic sanctions restrictions targeting business dealings with specific countries, economic sectors, entities, or individuals of concern. Export controls on the export or in-country transfer of certain restricted items, technology and software are also common. We will comply with all applicable economic sanctions as well as export and import control laws. We will assess whether government authorisation is required before engaging in activities involving restricted items, sanctioned parties or countries and will obtain and comply with all required authorisations.

### What this means to you:

- Screen your business partners, suppliers, and other parties against relevant restricted parties' lists.
- Obtain and comply with necessary governmental licences where cross-border export or import activity involves restricted items, technology, or software.
- Be mindful that both sanctions and export control regulations are complex and subject to frequent changes. Stay updated on the rules applicable to your business activity.
- Seek advice from Amesto legal if asked to deal with a sanctioned party, market, or country

## ANTI-MONEY LAUNDERING AND FACILITATION OF TAX EVASION

Money laundering is illegal and supports other criminal activities, including drug trafficking, terrorism, corruption, human rights violations, and tax evasion. Money laundering is the processes of disguising the proceeds of crime to hide its illegal origins or otherwise dealing with the proceeds of crime. Criminal proceeds include not only money, but all forms of assets, real estate and intangible property that are derived from criminal activity. We will comply with all applicable anti-money laundering laws. Tax evasion is an illegal practice where a person or entity evades paying their actual tax liability. We do not tolerate the facilitation of tax evasion by persons who act for or on behalf of Amesto.

### What this means to you:

- Be attentive to unusual payments, invoicing, and banking arrangement as well as unusual tax status of suppliers.
- Seek advice from Amesto legal if you need a better understanding of money laundering or tax evasion and how to mitigate such risk to Amesto.
- Know your business partners and make sure you follow our integrity due diligence requirements.



## FINANCIAL AND BUSINESS RECORDS AND REPORTING

Recording and reporting financial or non-financial information completely, accurately and objectively is essential for Amesto's credibility and reputation. It is also a prerequisite for meeting legal and regulatory obligations and standards. We are committed to transparency and accuracy in all our dealings, and we will provide full, fair, accurate and understandable disclosures in our financial reports, documents filed with regulatory authorities and in other public communications. .

### What this means to you:

- The data and information you submit in our books and records must be accurate, complete and reliable. This includes both financial and non- financial information, such as environmental data and operations reports.
- Any accounting information you provide must be correct and registered in accordance with applicable laws and relevant accounting standards.
- Never enter false, misleading or artificial entries in our books and records. Any such intentional act may be treated as fraud.
- Always exercise the highest standard of care when preparing business, operations and financial records to ensure full, fair, accurate and understandable information in all our reporting and public communications.
- If you suspect or become aware of any indications of improper financial business records and reporting or allegations of such, you shall report it to your leader or HR immediately.

## REPUTATION, COMMUNICATION AND MARKETING

We believe that open, honest and accurate communication is essential to our integrity and business success. We will communicate about Amesto in a consistent manner, and only authorised persons may talk to the media, members of the investment community or make statements on Amesto's behalf on social media. Any private use of social media must not breach confidentiality obligations and should not compromise Amesto's reputation or business interests.

### What this means to you:

- Do not speak on Amesto's behalf unless authorised to do so. Involve CEO and Head of Communications regarding any enquiries from the media .
- If you participate in social media, use good judgement and show respect towards your colleagues, business partners and communities. Be vigilant that participating in social media may represent a security risk.







## PROPERTY AND ASSETS

We trust you with Amesto's assets so that you can effectively do your work. You are responsible for safeguarding those assets against loss, theft and misuse. Amesto's assets include working hours, facilities, equipment, computers, software, information, intangible property rights and financial assets. We will not tolerate any misuse of our assets for personal benefit.

### What this means to you:

- Any use of Amesto's assets for purposes not directly related to our business, unless specifically provided for in this Code, requires permission from your leader.
- You may not purchase goods and/or services for private use at Amesto's expense or by charging Amesto's credit card. This rule applies even if you have the intention of personally refunding the bills later.
- Ensure that any sale of Amesto's products or services for private use to an employee, must be subject to prior approval from your leader and the sale subject to applicable general terms and condition.
- Ensure that documents used to obtain company funds and property are accurate and complete. This includes time sheets, invoices, benefit claims and travel and expense reimbursement reports and underlying documentation. Inaccurate or unsubstantiated records may be treated as fraud.
- As a leader you must ensure proper control before you approve any time sheets, invoices, benefit claims and travel and expense reimbursement reports and underlying documentation for people in your team.

## IT SYSTEMS

The use of our IT systems must be based on business needs. Information produced and stored on our IT systems is Amesto's property and may be accessed in accordance with applicable law. Cyber-attacks and malicious activity are a continuous threat to Amesto and use of our IT solutions and equipment may be monitored to detect such risk. This includes blocking access to inappropriate web sites and interception of any information transmitted by or stored on our IT systems.

### What this means to you:

- Make sure you are familiar with and comply with our Amesto security instruction when handling company information.
- You must read and accept the content of the security policy at Amesto Way of Work that is relevant to your role.
- Do not use Amesto's information acquired through your work for personal advantage or for the purpose of competing with Amesto.
- You have a duty of confidentiality, which applies even after your employment or assignment with Amesto has ended.
- If you think there might have been a breach of confidentiality involving personal information, you must immediately report such incidents using the Amesto Trust Notification form. If the breach might be ongoing, you must also call the IT security emergency phone number +47 400 22 499.



## INFORMATION SECURITY AND CONFIDENTIALITY

Information security is important to preserve confidential information, business sensitive information and data protection in an appropriate manner. While conducting our business, we gain and produce such information that is vital to our financial and business integrity. That information may, however, also be valuable for competitors and others. We will protect information created by us, or given to us, to ensure appropriate confidentiality and integrity. It is important to share information across the organisation to ensure collaboration, efficiency and experience transfer, but information transfer and access must take place in accordance with our *Amesto security instruction*.

## INSIDE INFORMATION

Amesto supports fair and open securities markets wherever we operate. You may become aware of information about Amesto or other companies that is not publicly available. Such information may constitute inside information. Inside information is precise information likely to have a significant effect on the price of securities and which is not publicly available or commonly known to the market. If you are in possession of inside information, even if acquired incidentally, you have a legal duty of confidentiality and due care of handling to prevent such information from coming into the possession of unauthorised persons. Any use of inside information about Amesto or publicly traded companies for personal gain is prohibited. Certain persons, such as members of the board of directors or corporate executive committee, are considered primary insiders. Additional restrictions apply for primary insiders.

### What this means to you:

- Never buy or sell Amesto's or other companies' shares or other securities, or provide advice to others' investment decisions, when you have access to inside information.
- Holders of inside information must treat this confidentially and can only pass such information to individuals who need it in their work for Amesto based on authorisation from the information owner.







**Simplifying business.**

# Our business partners.

## **SUPPLIERS AND BUSINESS PARTNERS**

Business relationships based on trust and transparency are vital to our business. Our suppliers and business partners are essential to our ability to do business but can also cause or contribute to harm people and expose us to reputational, operational, and legal risk. We expect our suppliers and business partners to comply with applicable laws, respect internationally recognised human rights and adhere to ethical standards which are consistent with our ethical requirements when working for or together with us. We seek to work with others who share our commitment to ethics and compliance, and we manage risk through in-depth knowledge of our suppliers, business partners and markets.

### **What this means to you:**

- Communicate and follow-up regularly and clearly our expectations to our suppliers and business partners.
- Report any misconduct by a supplier or business partner to your leader or any of the other reporting channels listed in the Code.

## **INTERMEDIARIES**

Intermediaries are a particular type of business partner and include agents, consultants, lobbyists and others who act as a link between Amesto and others. The use of intermediaries may pose a particular risk to us, and we therefore have additional requirements for hiring intermediaries. It is mandatory to perform integrity due diligence on all intermediaries. The agreed compensation must be proportionate to the service rendered and only paid against satisfactory documentation of work performed, which must be regularly monitored. The agreement with the intermediary must be made in writing, describe the true relationship with Amesto and include an obligation to follow the Code.

### **What this means to you:**

- Any intermediary you plan to hire must be subject to Amesto procedure for third party due diligence.
- Monitor regularly the work performed by the intermediary to ensure it is in line with the Code.





## FAIR COMPETITION

We believe in the benefits of competition, and Amesto will always compete in a fair and ethically justifiable manner. We will comply with applicable competition and antitrust laws. We will not engage in or tolerate anyone who engages in anti-competitive behaviour, such as price fixing, bid rigging, market sharing or abuse of market power.

We participate in legal collaborative projects with other companies and share information required for such projects. It may be a violation of competition and antitrust rules to receive or share with competitors non-public commercially sensitive information beyond what is necessary for a legal cooperation. Commercially sensitive information includes information which may reduce uncertainty about future market conduct, such as prices, competitive bids, commercial strategies, costs, customers and suppliers.

### What this means to you:

- Do not enter into anti-competitive agreements or engage in anti-competitive conduct, such as agreeing with competitors to fix prices or to allocate markets by territory, by products or by customers.
- Be vigilant of situations where non-public commercially sensitive information may be exchanged and speak out against disclosure of information by others to you. Never share such information with competitors.
- Competition laws are complex and often require a detailed assessment of facts. If you are in doubt, seek advice from Amesto legal.
- Participate in required competition and antitrust compliance training.

## GIFTS, HOSPITALITY AND EXPENSES

Relationships with our business partners can be built and strengthened through legitimate networking and social interaction. However, giving or accepting gifts and hospitality may be regarded as corruption in certain situations, and we have strict limits for when we allow the giving or acceptance of gifts and hospitality. As a rule, we do not offer or accept gifts, except for promotional items of minimal value. In a situation where it would clearly give offence to refuse, the gift may be accepted if it is of reasonable value and handed over to Amesto immediately. We only offer or accept hospitality where there is a clear business reason for Amesto to participate and the costs involved are reasonable. We will always pay our own costs related to travel, accommodation, and other related expenses. Except as otherwise stated in the Code, we do not pay travel, accommodation, and other related expenses for others.

### What this means to you:

- Never offer or accept gifts, except for promotional items of minimal value.
- Before accepting or offering hospitality, ensure that it is in line with our requirements. Written approval from your leader is required unless the hospitality clearly is acceptable.
- Ask yourself how the acceptance or offer would be perceived by others and never offer or accept anything that is or could be perceived as an improper advantage.
- Ensure that all acceptance and offering of hospitality are open, transparent and properly documented.





# Triple Bottom Line.

## PEOPLE, PLANET, PROFIT

We believe that contributing to society is good business. Our owners run Amesto with their hearts and minds, and with a sincere desire to make the world a bit better. Contributing to society is part of running good business. Long-term value creation must be sustainable. This means that our social value creation must be solved as a natural part of running our companies. We will work with many different initiatives that will support the basic pillars of our values. People. Planet. Profit. These initiatives are important contributions to creating pride and meaning around the work we do and the companies we build. We want to attract and keep the smartest heads and the warmest hearts. Some initiatives may go across companies. Here, we as owners will have a particularly important role in ensuring that we pull together. We have already launched some important initiatives. We have chosen to call this "Corporate Social Value" as we truly believe contributing to society is not only of value to our surroundings, but also of great value to Amesto.

As part of the *UN Global Compact* we are committed to the SDGs and the 10 principles regarding human rights, labour rights, the environment and corruption. You may read more about this on our [website](#).

To our excitement we increasingly experience that our business partners and applicable governments expect us to think and work in accordance with sustainable requirements.

To ensure and maintain focus on corporate social value we measure our CEO's on the three P's; People, Planet and Profit. Furthermore, our employees are serving a key role complying with our commitment to corporate social value. This work cannot only be done at a high-level but must form part of our everyday life. We want our employees to be proud of working for a company that is future-oriented and conscious of its environmental and social values.

### What this means to you:

- Systematically consider and address the impact our activities may have on social responsibility and take this into account when making business decisions
- Actively identify opportunities related to our activities that can contribute to our social responsibility.
- Ensure that social contributions are made in compliance with our anti-corruption requirements.



## ENVIRONMENT

Amesto is a certified Eco Lighthouse and have been so since 2013. The certification obligates us to “think and act green” and contributes to better management of our environmental work by giving us a framework to navigate. We must measure our environmental impact and set Amestos environmental targets each year. All Eco lighthouse companies are transparent and annually publish their climate and environmental report to the public.

### What this means to you:

- Assess and communicate the impacts our activities have or may have on the environment.
- Ensure that relevant measures are considered when making business decisions, including the use of environmentally friendly technologies.
- Contribute actively to efficient use of resources and prevention of harm to the natural environment.
- Assess and follow-up results and contribute to continued improvement.

Amesto has also established Amesto Footprint, which work on sustainability reporting, both when it comes to climate and social value.

## PUBLIC AFFAIRS

We may make Amesto's position known on important industry matters through proactive engagement with public officials, government policy makers and other stakeholders, such as the media, civil society and international institutions. However, we will not make gifts, donations or otherwise support political parties or individual politicians. We may nevertheless be members of interest organisations relevant for our industry that support political parties or certain political issues. Any hiring of lobbyists will be in accordance with applicable law and subject to full disclosure to any external party they wish to influence that the lobbyist represents Amesto.

### What this means to you:

- Do not use company funds or resources to support any political candidates or party. Never use your position in Amesto to try to influence any person to make political contributions.
- Ensure that all contracts with lobbyists impose an obligation to disclose to any external party they wish to influence that the lobbyist represents Amesto.
- If you choose to participate in political activities or give any public contributions, this must be personal and not linked to Amesto.

