



Code of conduct

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For the purposes of this policy, "Egiss" and "Egiss Group" refers to Egiss A/S and its global affiliates.

This Code of conduct outlines Egiss Group's commitment to ethical business practices, legal compliance, and responsible conduct. It references supporting policies available on the Egiss Guide (internal) and www.egiss.net.

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1 Foreword from the Chairman of the board

At Egiss, our reputation is built not just on what we deliver, but how we deliver it. This Code of conduct is our compass: it sets out the values, standards, and behaviours that every colleague, partner, and stakeholder can expect from us.

We are a global organisation, and with that reach comes responsibility. Integrity, transparency, and accountability are not optional - they are the bedrock of our success. Compliance with this Code is a shared responsibility, binding on each of us. It is how we protect Egiss' integrity, reputation, and future.

And while we are precise and professional in our commitments, we are also bold. At Egiss, we do not just follow the rules - we set the example. We take pride in being thorough, responsible: we say things as they are, without excuses. That honesty keeps us sharp, authentic, and trusted.

I call on every colleague to read this Code carefully, to apply it diligently, and to take personal accountability for upholding its principles. Together, we make sure Egiss continues to deliver IT – as expected.

René von Staffeldt Beck
Chairman of the Board

2 Introduction

Egiss carries on business in strict respect of the laws and regulations of the countries in which we operate. This means that in every market, across all regions, we make compliance the foundation of our operations. However, our ambition goes further than merely meeting legal obligations. We believe that ethical responsibility, good business practice, and a commitment to the environment and human rights are essential to long-term success. This Code sets out how each of us – employees, managers, executives, and partners – must translate these principles into practice. By following this Code, we demonstrate our dedication to integrity, fairness, and accountability, ensuring that Egiss is trusted not just for what we deliver, but also for the way we conduct ourselves.

3 Our promise

Egiss is committed to conducting business responsibly and sustainably, in every market and every transaction. We pledge to uphold human rights, foster a culture of fairness and inclusion, and ensure that our dealings with customers, partners, and colleagues are transparent and respectful. Delivering on our promises with precision is not just about business efficiency; it is about setting a standard that others can trust. Our global reach gives us influence, and with that influence comes responsibility. Compliance is not simply a requirement to us – it defines who we are, and it is woven into the way we think, act, and lead.

4 Guiding questions for employees

Making the right decision is not always straightforward, and the pressure of business can sometimes create difficult situations. That is why we ask every employee to use this set of guiding questions when in doubt:

- Is it legal?
- Is it in compliance with the programme?
- Is it ethical?
- Do I lead by example?
- Will it reflect positively on Egiss?
- Would I be comfortable to read about it in the news?

- Would my relatives and close friends approve of it?

If the answer to any of these questions is 'no', the correct course of action is to stop and seek guidance. Your manager, the management team, the Compliance manager, or the designated reporting channels are always available. When in doubt, asking for advice is not a weakness - it is proof of your integrity and commitment to Egiss' values.

5 Object of the compliance programme

The compliance programme is designed to do more than prevent wrongdoing. It is a framework that helps us build confidence with our stakeholders and maintain Egiss' reputation as a responsible global business. The programme aims to:

- Encourage employees to act when faced with suspected unlawful conduct, by providing clear support mechanisms.
- Offer transparent procedures for reporting, investigating, and resolving concerns.
- Introduce preventive measures that reduce opportunities for misconduct.
- Minimise risk of legal or ethical breaches through proactive oversight.
- Require external partners to comply with our standards, with termination as a consequence of non-compliance.

This programme is not static – it evolves as legislation, industry standards, and our business change. It is reviewed regularly to ensure it remains effective and aligned with Egiss' values.

6 Decent and honest conduct

Every Egiss employee is expected to act with integrity at all times, whether dealing with colleagues, customers, or external partners. Honesty is non-negotiable, and it must guide how we handle information, documentation, and communication. This extends beyond following the letter of the law: it is about doing what is right, even when nobody is watching. This means:

- Protecting confidential information at all times, recognising the trust that clients and partners place in us.

- Ensuring accuracy in services delivered, documents prepared, and financial records maintained.
- Rejecting money laundering, fraudulent practices, or opaque transactions that could harm Egiss or its stakeholders.
- Verifying the legitimacy of services provided by third parties to safeguard quality and accountability
- Seeking advice when in doubt – transparency is always better than silent uncertainty.

By living up to these standards, we reinforce Egiss' reputation as a company where promises and actions align.

7 Employees' rights and responsibilities

7.1 Human and labour rights

Egiss respects international conventions on human and labour rights. We prohibit forced, bonded, or child labour in any form. We uphold fair working conditions, freedom of association, and equal opportunities for all. We are dedicated to providing safe workplaces and ensuring our supply chains reflect the same values.

7.2 Anti-discrimination and diversity

We foster a workplace free from discrimination, harassment, and bias. Diversity is an asset that drives innovation, creativity, and growth. All individuals must be treated with fairness, dignity, and respect regardless of race, ethnicity, gender, age, disability, religion, sexual orientation, or any other status. We promote inclusion not only as a legal requirement but as a principle embedded in our corporate culture.

7.3 Working hours and remuneration

We comply with national and international standards for working hours and conditions. Employees must never be required to work beyond lawful limits. Remuneration must always meet or exceed statutory or industry minimums, ensuring employees are rewarded fairly for their work.

7.4 Health and safety

Egiss ensures that working environments are safe and healthy. We encourage open dialogue on safety concerns and take proactive measures to prevent risks. Well-being is more than physical safety: we also promote mental health and a positive working culture.

7.5 Employment contracts

All Egiss employees must have clear, written contracts that outline rights, responsibilities, and conditions of employment. Contracts must meet or exceed ILO standards and safeguard the dignity and rights of every employee.

8 Business ethics

8.1 Anti-bribery and anti-corruption policy

Egiss prohibits bribery in all forms. No bribes, facilitation payments, or improper gifts may be offered, requested, or accepted. Employees must not exploit their positions for unfair advantage. Conflicts of interest must be avoided and, if they arise, disclosed immediately. We expect business partners to adhere to the same standards.

8.2 Measures to prevent money laundering

Egiss rejects cash and unusual forms of payment. All financial transactions must be transparent and reflect the true nature of the business. If you encounter a transaction that seems unusual or opaque, raise it with the Group CFO or use the Whistleblower scheme immediately.

8.3 Legal obligations and export control

Egiss complies fully with national and international export control laws. We do not sell goods to high-risk destinations without clearance from the relevant authorities. Employees must consult the Danish Business Authority or similar national bodies when in doubt. This safeguards Egiss from involvement in activities that could contribute to unlawful or unethical trade.

9 Whistleblower policy

The whistleblower system allows employees and partners to raise concerns safely and confidentially. Reports may be made anonymously or with contact details provided in confidence. All reports are handled objectively and thoroughly by the designated panel, in compliance with Danish and EU data protection laws. We encourage all employees and business partners to speak up: silence protects misconduct, while transparency protects Egiss.

Link to the Egiss whistleblower scheme: [Egiss Whistleblower System | Home](#)

10 Policies & guidelines concerning customers, suppliers and business partners

10.1 Screening and risk assessments

Egiss carries out regular risk assessments of customers, suppliers, and business partners. This ensures that we only work with parties who uphold standards compatible with our own. Where risks are identified, inspections or corrective actions will be required, and contracts may be terminated if standards are not met.

10.2 Agreements with contracting parties

All agreements with suppliers and business partners must contain provisions that allow Egiss to inspect operations and require full compliance with this Code. Breaches of these standards will be considered material and may lead to termination of the relationship.

10.3 Specific demands on business partners and vendors

Business partners must guarantee respect for human rights and labour rights and commit to not using child or forced labour. Suppliers must ensure that only conflict-free minerals are used and that they comply with international environmental regulations. Egiss expects nothing less than the highest standard of responsibility from its partners.

11 Implementation and responsibility

11.1 Compliance manager

Egiss appoints a Compliance manager responsible for implementing, monitoring, and updating this Code. The Compliance manager ensures that all employees receive the necessary training and that procedures remain current and effective.

11.2 C-level and managers

C-level and managers play a key role in communicating and enforcing this Code. They are responsible for sharing relevant updates, providing guidance to employees, and reporting breaches promptly. Their leadership sets the tone for compliance across the organisation.

11.3 Employees' duties

Every employee must read, understand, and follow the Code. Employees are also required to report violations or suspicions of misconduct through the available channels. Responsibility for compliance lies with each individual as much as it does with leadership. Colleagues who are struggling with the language of this Code will get assistance from People & Culture.

12 Reporting policy

All employees are responsible for conducting themselves honestly. Reporting any misconduct can be done via the next manager, one member of C-level or via the Whistleblower scheme. Those who report misconduct in good faith will be protected from retaliation. Disciplinary action will apply to breaches of this Code or to failure to report known misconduct. Every report will be treated seriously, investigated fully, and handled confidentially.

13 Procedures for amendments, revisions, and inspections

This Code is a living document and will be reviewed regularly to ensure it remains aligned with Egiss' values and external regulations. Employees will be informed of any changes, and additional training will be provided where needed. Revisions are undertaken transparently, ensuring employees and stakeholders can trust the integrity of this programme.

14 Procedures upon suspected non-compliance

When non-compliance is suspected, Egiss acts swiftly. Reports will be reviewed by the Compliance Officer and, if necessary, escalated to management or external advisors. Investigations will respect the rights of all individuals involved and be carried out with discretion. Preventive measures will be taken to ensure misconduct is not repeated, reinforcing the culture of compliance.

15 Documentation and control measures

Egiss maintains full documentation of compliance activities. This includes reports, statistics, descriptions of measures taken, and outcomes of investigations. The Compliance Officer ensures accurate record-keeping, which provides accountability to management, the Board, and our stakeholders.

16 Approval by the Board of directors

This Code of Conduct, and any amendments to it, must be approved by the Board of Directors. Such approval underscores the importance of the Code as a guiding document for the entire organisation.

Approved and adopted by the Board of directors,

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René von Staffeldt Beck, Chairman of the board