



# BUSINESS CONDUCT GUIDELINES

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work smarter

## Table of Content

1. Objective.....	2
2. Who must follow the Code of Conduct?.....	2
3. Corporate Social Responsibility .....	2
3.1 Health and Safety .....	2
3.2 Staff Development .....	2
3.3 Equal Opportunities .....	3
3.4 The Environment.....	3
3.5 Personal Conduct .....	3
3.6 Business Practice.....	3
3.7 Competition and Anti-Corruption .....	4
3.8 Whistle Blowing .....	4



## 1. Objective

KJAER DATA ApS specializes in the sale and supply of IT-solutions, IT-services, and IT-consulting to the B2B market hereunder private companies as well as public institutions. KJAER DATA operates in 2 segments: Offshore and Onshore.

This Code of Conduct sets out the core principles and values which apply to the corporate social responsibilities, personal conduct, and business practices of KJAER DATA. We are committed to promoting and upholding these standards in our daily activities.

## 2. Who must follow the Code of Conduct?

All our employees at KJAER DATA are expected to adhere to the Code of Conduct. External third parties such as suppliers, customers and contractors who work with or perform services for KJAER DATA are also expected to comply with the Code of Conduct in their dealings with us. Failure to do so can result in disciplinary action or termination of business relationships.

## 3. Corporate Social Responsibility

KJAER DATA aims to conduct business in an ethical, sustainable, and socially responsible manner, and comply with all applicable rules and legislation. Our employees are at the very core of our business. Without a doubt, their hard work, commitment, and persistence are fundamental to our growth and take our business to new heights. We firmly believe that for our people to deliver the very best results, they must feel their very best. The following sections will set out the key areas of our corporate social responsibilities:

Health and Safety, Staff Development, Equal Opportunities, and the Environment.

### 3.1 Health and Safety

KJAER DATA seek to create satisfactory and optimum working conditions for our employees. Work is planned and performed with the highest possible level of consideration and care for the well-being of our employees. Routines to ensure the health and safety of our employees are continually developed and improved with the aim of attaining the best foundation for happy, healthy, and productive staff. Besides our focus on the individual human being, we are also actively engaged in community projects to support various good causes. It is of utmost importance that the work environment should be a safe place for all. Any abuse, bullying, harassment, violence, or threats at the workplace will not be tolerated. Such violations should be reported to the manager or KJAER DATA Human Resources department immediately.

### 3.2 Staff Development

The Management considers staff development to be a key factor in the further development of KJAER DATA with overall benefit to everyone. To ensure the welfare, job satisfaction and motivation of our employees, we provide



opportunities for them to continually develop their professional and personal competencies through internal and external education. All employees are always encouraged to seek out relevant training courses to keep their professional and personal skills sharp and updated.

### 3.3 Equal Opportunities

When recruiting new colleagues, we take into consideration the professional and personal skills of candidates and evaluate their fit in our organization. We look to recruit reliable, respectable, and competent professionals, and in our view, gender, nationality, skin color, religion or sexual orientation are not decisive factors as they say nothing about a person's competencies, level of commitment or ability to cooperate with others. All employees will have equal career and management opportunities. Everyone must be allowed to make the best possible use of their skills in an open-minded and unprejudiced culture.

### 3.4 The Environment

Cooperating in the energy/wind we do everything in our capacity to reduce any impact on the environment. A particularly important area of focus in our business is reducing CO2 by solely having company cars that are driving on electricity by 2030. We will strive to improve our operational performance whilst assisting and meeting the needs of our business partners. All business partners that we work with are expected to meet all requirements, provide safe working conditions and equipment, and have environmentally responsible practices.

### 3.5 Personal Conduct

KJAER DATA expects our employees to act in complete compliance with the law as well as with internal standards and practices. Our employees should likewise abstain from assisting any entities or individuals in any breach of such laws, standards, and practices. Employees must treat each other and any other person, with whom they come into contact, with respect. Any behavior that offends local customs and culture, or is of a detrimental nature, such as harassment, discrimination, threats, or degrading actions, is strictly prohibited. Any violations will not be tolerated. All personal data is gathered legally with respect to the rights of the data owners, protected from misuse, and handled in accordance with data protection legislation. All employees are bound by the duty of confidentiality and must prevent any unauthorized persons from accessing information or learning about business secrets that could harm KJAER DATA, our customers, or other associates in any way.

### 3.6 Business Practice

At KJAER DATA we know that every lasting business relationship is based on mutual trust and respect. We know that trust is earned and should not be taken for granted. Keeping promises and meeting expectations are key to building a trusted relationship where two parties can rely on each other. We encourage open and honest communication internally between colleagues as well as with all other stakeholders. Trust is essential in every aspect of our business and helps to create the kind of work environment, cooperation and business relationships that inspire, motivate, and add true value. KJAER DATA expects its business partners and customers to respect human rights and refrain from using child labor. This also means that we condemn any use of forced, bonded or prison labor as well as harsh disciplinary measures. Any business partner of KJAER DATA must abide by applicable laws and regulations, provide accurate



business information, and live up to any agreements made.

We cooperate with partners and suppliers only, who comply with laws and regulations. We understand that having safety and sustainability in the process creates comfort for our customers. Quality, proactivity, and attention to detail must characterize everything we do. This means that we must always strive to create value for our customers and suppliers in any way that we can, and that we aim to avoid unnecessary bureaucracy and obsolete routines. We set high standards for our employees and expect initiative from all, while at the same time displaying a high degree of humanity and compassion.

### 3.7 Competition and Anti-Corruption

KJAER DATA complies with all relevant rules and legislation in all countries where we operate. It is a fundamental principle that we act in full compliance with applicable competition laws and anti-corruption laws in all its dealings. All employees must have general knowledge of competition and anti-corruption laws to demonstrate proper business ethics and integrity.

### 3.8 Whistle Blowing

We strongly encourage our employees to immediately raise any concern of breach or suspected breach of this Code of Conduct, any KJAER DATA's policy or laws. This can be done by email to Human Resource Department at [mnk@kjaer-data.com](mailto:mnk@kjaer-data.com). All concerns will be treated on a confidential basis.

