

2021



Code of Conduct – business partners



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Introduction

In EG, we strongly believe that it is in the mutual interest of both EG and our business partners to make a positive difference to society. This includes demonstrating responsibility towards the environment and the people taking part in the development and delivery of our solutions and services.

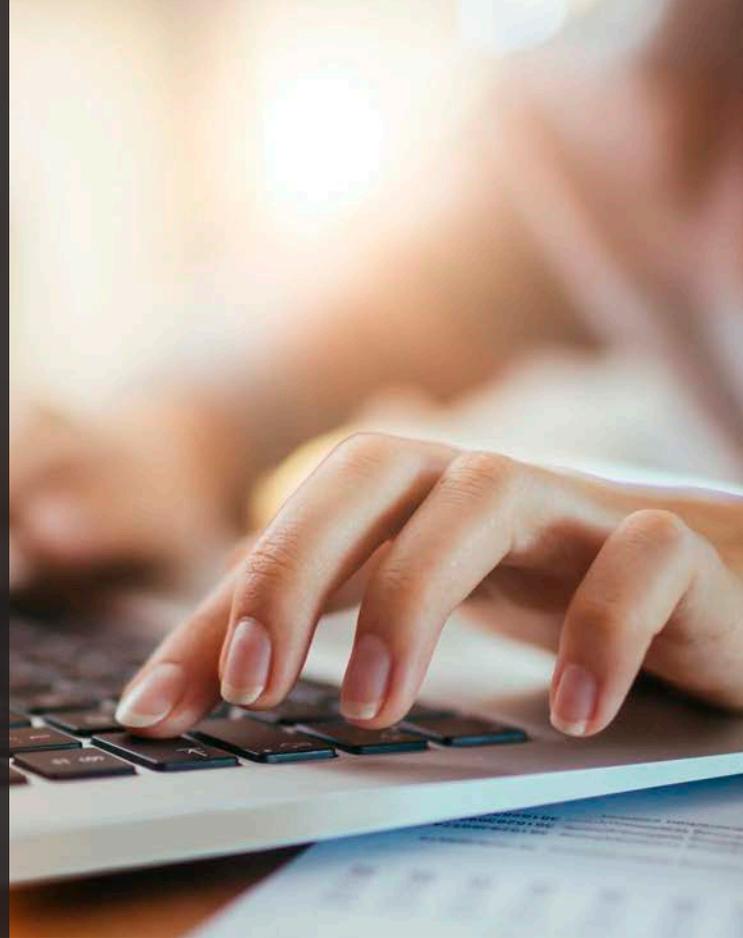
In order to make our position clear we have established this Code of Conduct, describing our corporate social responsibility requirements and expectations to our business partners.

Field of application

The Code of Conducts applies to all our suppliers, vendors and partners, hereafter named business partners, that are delivering their products or services to EG or any of our subsidiaries.



Application



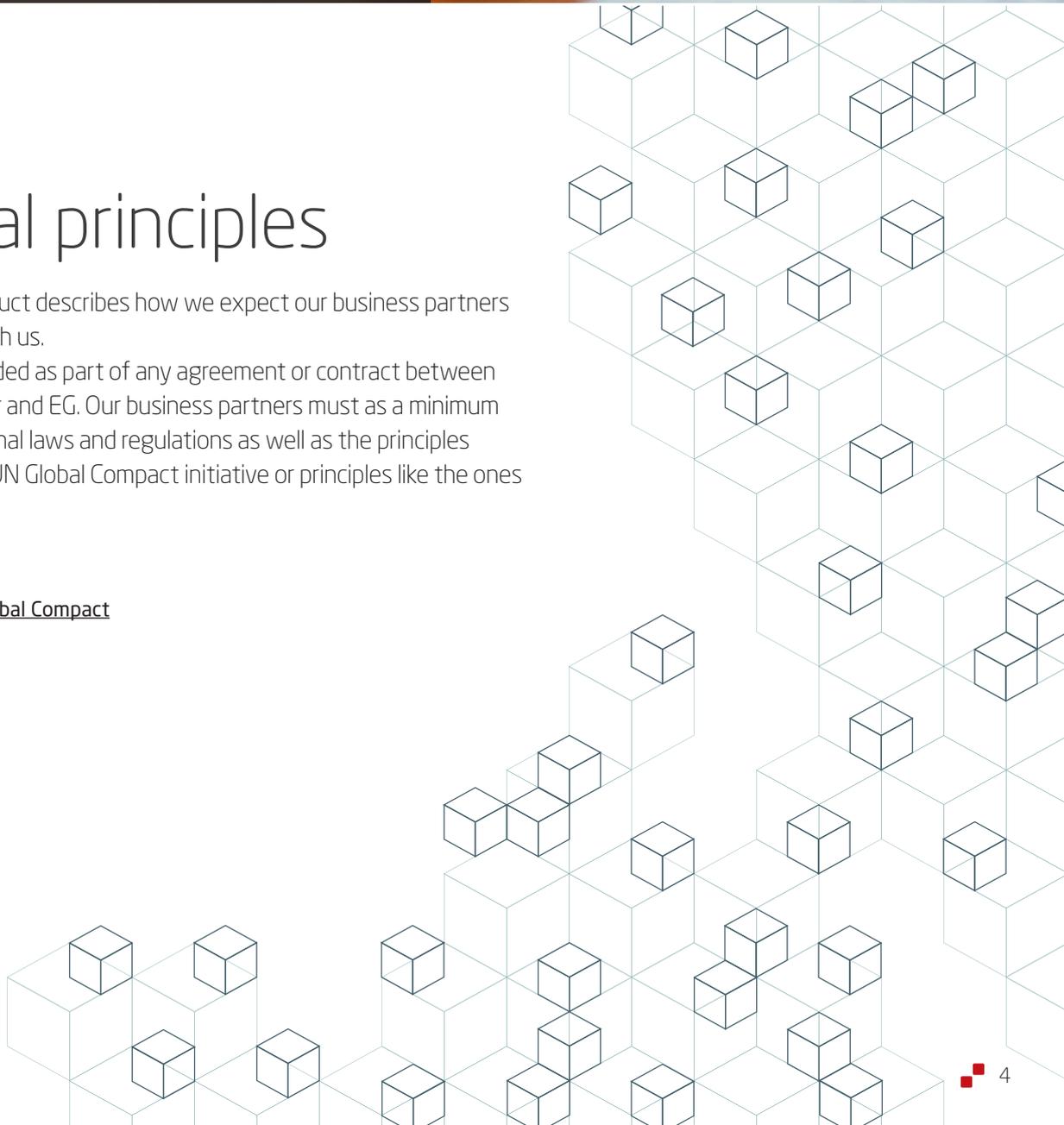
General principles

EG's Code of Conduct describes how we expect our business partners to do business with us.

This Code is regarded as part of any agreement or contract between a business partner and EG. Our business partners must as a minimum comply with national laws and regulations as well as the principles expressed in the UN Global Compact initiative or principles like the ones expressed herein.



UN Global Compact





Environment

We expect our business partners to support a proactive approach to environmental challenges and to undertake initiatives to promote greater environmental responsibility. Also, we encourage the development and diffusion of environmentally friendly technologies.

Climate and energy use

EG has committed itself to being CO2 positive in 2030, as we recognize the climate crisis as the major threat to both society and business and we expect our business partners to support us on this journey. The business partner must comply with regulation regarding use of energy resources and emissions of the six greenhouse gasses e.g. European Emissions Trading Scheme or other national legislation regarding climate. We expect our key business partners to measure and be able to document emissions of GHG and energy use.



[EU Emissions Trading System](#)

Natural resources

The business partner must have the necessary permits for and comply with legal requirements regarding production related to use of natural resources.

Business partners should demonstrate efforts to substitute non-renewable resources used in production with renewable resources. If business partners supply products or parts thereof that include metals or minerals that are covered by the OECD's "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas", the business partners must ensure compliance with these guidelines.



[OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)



Social

We expect our business partners to support the Universal Declaration of Human Rights and Labor Rights and respect these rights within their sphere of influence and operate their business in a transparent and trustworthy way.



[Universal Declaration of Human Rights](#)



[ILO Declaration on Fundamental Principles and Rights at Work](#)

Non-discrimination

The business partners must ensure equal rights and opportunities for its employees and the business partner must not discriminate based on race, ethnicity, gender, age, marital status, religion, political affiliation, union membership or sexual orientation.



[Diversity & Non-discrimination Policy](#)

Freedom of association

The business partners must respect the employees' right to form and join associations of their own choosing and their right to collective bargaining.

Forced and compulsory labor

The business partner must support the elimination of all forms of forced and compulsory labor and must ensure that it does not occur in any part of its supply chain. If the business partner is subject to UK Modern Slavery Act 2015, the business partner must ensure compliance with the requirements therein.



[Modern Slavery Act 2015](#)

Abolition of child labor

The business partner must respect children's right to development and to receive education, and the business partner must never support or make use of child labor.

Health and Safety

The business partner must ensure safe working conditions for its employees that comply with applicable laws and regulations. EG requires the business partner to integrate sound health and safety practices and to ensure that all workers have the right to refuse unsafe work and to report unhealthy working conditions.

Governance

We expect our business partners to have an appropriate set of rules, practices, and processes in place to ensure accuracy, consistency and responsiveness to key stakeholders including customers, shareholders and regulators

Data and Information Security

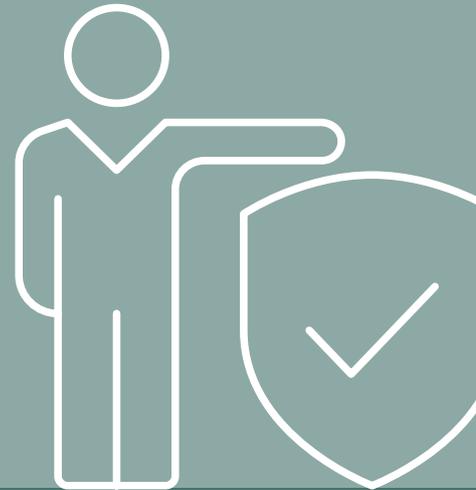
The business partner must treat data belonging to EG or EGs customers with confidentiality and protect it against unauthorized use, unlawful processing and against accidental loss, de-struction, damage, alteration or disclosure. The business partner must ensure that personal data is handled in accordance with applicable data protection laws and regulations.



[General Data Protection Regulation \(GDPR\)](#)

Anti-Corruption

The business partner must comply with applicable anti-corruption laws and regulations, including the UK Bribery Act and the US Foreign Corrupt Practices Act. The business partner must work actively to avoid all forms of corruption, including extortion and bribery, or similar methods, as means of obtaining unfair commercial benefits. The business partner must also refrain from offering large gifts and extravagant representation to employees in EG or on behalf of EG.



[Bribery Act 2010](#)



[The Foreign Corrupt Practices Act](#)



[EG Anti-Corruption Policy](#)





Restrictive agreements with 3. Parties

The business partner must not condone activities that seek to gain an unfair competitive advantage.



Money laundering

As a software company, EG is not directly subject to the rules on measures to prevent money-laundering and financing of terrorism. However, EG remains committed to support the combatting of money laundering and terrorist financing. The business partner must actively oppose all forms of financial money laundering and must only enter cooperation with companies that conduct legal business with funds that come from legal sources. The business partner must take appropriate steps to detect and counteract illegal forms of payment as well as ensure that its transfers are not used by others to conduct financial money laundering.



[Anti-money Laundering Directive](#)



[Anti-Money Laundering Act](#)

Conflict of Interest

The business partner must ensure that its employees do not participate in any activities where there is a conflict between the personal interests of the employee and the professional interests of the business partner in its relationship with EG.

Antitrust and competition

It is EG's policy to conduct all our business in an honest and ethical manner and comply with any applicable law, rule and regulation in all markets in which we operate including the observation of any applicable provision of competition law. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and to implement and enforce effective systems to counter anti-competitive behavior. We recognize that it is our responsibility, and of those working for us, to observe and uphold our position on anti-competitive behavior and to ensure compliance with any applicable provision of competition law.

Our business partner must comply with applicable competition laws and regulations, including national, EU competition law and must not cause or be part of any breach hereof.

<https://danskelove.dk/konkurrenceloven>



[Competition rules](#)



Financial reporting

All transactions of the business partner must be duly recorded to be able to deliver a clear financial statement in conformity with national and international rules, regulations and generally accepted accounting principles.



[Danish Act on Commercial Enterprises](#)

Regarding tax

The business partner must act in accordance with applicable national and international tax laws and regulation, including joint taxation, and the OECD Transfer Pricing Guidelines for Multinational Enterprises.

Our business partner must comply with applicable competition laws and regulations, including national, EU competition law and must not cause or be part of any breach hereof.



[OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2017](#)

International sanctions lists

EG is committed to ensure compliance with all relevant national and international sanctions applicable to restricted countries, territories, governments, companies, entities and/or persons, including but not limited to trade, economic or financial sanctions laws, regulations, embargoes or restrictive measures imposed by the United Nations, the United States of America, the United Kingdom, Denmark or the European Union.

EG is further committed to ensure that no party with whom it transacts, including but not limited to all new and existing business partners, suppliers, purchasers, customers, agents, consultants, contractors, sub-contractors as well as any entities or persons acting on any of their behalf, is subject to sanctions. The business partner must take appropriate steps to ensure that persons or companies on the sanctions lists for the UN, the EU or as stated in other relevant sanctions lists are not involved in or otherwise benefit from the supplier's company or part of its value chain.

The business partner must also counteract being involved in activities that are illegal in accordance with applicable sanction legislation.



[United Nations Security Council](#)



[Restrictive measures](#)



Compliance with the Code

The business partner must ensure fulfilment of its obligations under the terms of this Code and be able to document its processes for fulfilment of the individual obligations at EG's request. Subject to prior notice thereof, we EG additionally reserve the right to conduct an audit to verify that the business partner complies with this Code. In addition, EG reserves the right, upon prior notice, to conduct a supplier audit to verify the supplier's compliance with this Code.

Sanctions

Breach or non-compliance with this Code may lead to the breach of partnership or contract with EG.

Reporting Non-Compliance with this Code

The business partner is encouraged to report possible violations of laws, regulations or this Code to its primary contact in EG A/S or directly to EG Group Legal & Compliance by sending a mail to Compliance@eg.dk. If this is not possible or appropriate to use the ordinary reporting channels, potential violations made by EG employees or consultants acting on behalf of EG may be reported via our online Whistleblower Program. Any external individuals who wants to report any knowledge, concerns or suspicions to EG may also contact DAHL Law Firm directly att. Solicitor Søren Wolder, e-mail swk@dahlaw.dk, telephone: (+45) 88 91 92 45 / (+45) 30 84 35 12. The solicitor is bound by professional secrecy and does not disclose information about identity, questions or potential inquiries to EG.



[Submit report of violations](#)



[EG Whistleblower Scheme](#)



Code of Conduct – business partners

Legal and Compliance

Group Legal & Compliance is responsible for the legal and compliance risk management in the EG Group. You can contact Group Legal & Compliance by sending a mail to compliance@eg.dk



[EG Legal](#)



[The Code of Conduct online](#)

EG and ESG

Read more about EG's and our Corporate Social Responsibility online.



[We behave responsibly](#)

