



Code of Conduct

Clients



Introduction

At 7N, we work hard every day to match the professional and social skills of the very best IT consultants to the specific needs of companies. We strive to be among the best in our field, whether we are agents or support staff, and use our knowledge and skills to benefit others. We are committed to helping companies build high-performance IT project teams, always having in mind to lower the social and environmental impact of our business activities. We are aware that our responsibility goes beyond our own activities, and we take a responsible approach throughout the entire supply chain.

Our Code of Conduct for clients builds on 7N's core values: Professionalism, Mindset of a servant, and Respect. It describes the main principles of ethical behavior and our expectations to you as a clients to 7N. Further, the Code of Conduct is aligned with the ten principles of the UN Global Compact, which we signed in 2017.

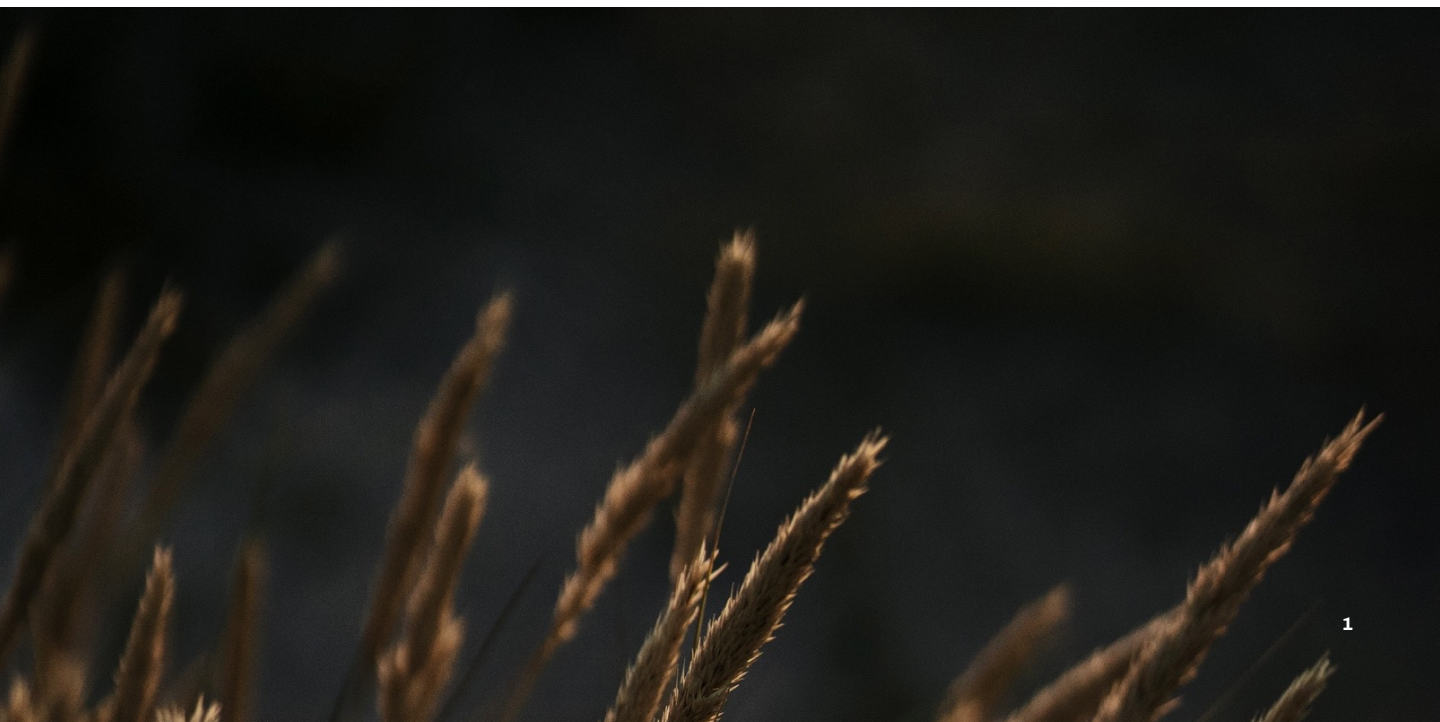
7N requires all our clients to comply with the expectations specified in the Code of Conduct. Moreover, all **clients** must always as a minimum comply with local laws and regulations in their countries of operation. Should any of the specific provisions of the Code of Conduct legally conflict with national or local laws, the applicable laws should always prevail; in these cases, 7N should be notified. We encourage our

clients go beyond legal compliance and continuously seek to improve ethical, social, and environmental performance.

Further, we require our clients to follow and comply with this Code of Conduct, and fully understand the content and obligations set forth. 7N's clients must, if necessary, provide help and training to their employees, when required for employees to fully understand their obligations following from this Code of Conduct.



Jeppe Hedaa, Chairman
7N



Labor Conditions

At 7N, our employees and the independent consultants and contractors providing services to 7N on specific projects form the basis of our success. We are committed to provide a motivating and inspiring work environment for all and likewise, we expect our **clients** to equally focusing on employee well-being etc. and to provide a healthy work environment free of discrimination and with proper terms of employment for their own employees.

Working Conditions

Hence, 7N requires that **clients** of 7N in all aspect of employment treat their employees within the applicable national or local laws as well as industry practices and collective bargaining agreements, e.g.:

- Working conditions, hours, rest periods, leave and wages should be in accordance with local regulations and industry practices, and should be at a level that enables a decent living standard according to local conditions.
- Wages may not be withheld as a disciplinary sanction. Any deductions from wages should be transparent and clearly stated on pay slip.

Health and Safety

Clients must provide a healthy and safe working environment for all employees. We expect **clients** to:

- Follow all applicable local laws and regulations to prevent accidents and injury to health.
- Continuously improve working conditions and reduce workplace related risks and hazards by e.g., having a health and safety management system in place, ensuring management responsibilities, providing necessary safety training and equipment to employees, setting targets, and conducting training.

Freedom of Association and Collective Bargaining

Clients must respect its employees' right to organize themselves and negotiate collective wage agreements. We expect our **clients** to ensure that:

- Employees have freedom of association and the right to collective bargaining consistent with applicable laws.



Human Rights

It is important for 7N that all people related to our business are treated with respect and dignity. We expect our clients to respect human rights, including the principles set forth in the International Bill of Human Rights and the International Labor Organization's (ILO) declaration on Fundamental Principles and Rights at Work.

Forced Labor

7N does not accept forced labor or any form of human trafficking and 7N will not conduct business with **clients** that are associated with any form of forced labor, labor with a fear of punishment or any form of human trafficking.

- Employees must work at their own will and employees should be free to leave and their employment at any time.

Child Labor

7N will neither conduct business with **clients** that are associated with any form of child labor. Every child is to be protected from economic exploitation and from carrying out work that could have a negative effect on the child's education or be harmful to the child's health or physical or mental development.

Clients must prohibit the use of child labor and ensure that no person shall be employed at

an age younger than the minimum age prescribed by mandatory notional or local law in the relevant country of employment.

At 7N we strive to prevent and mitigate adverse human rights impacts with which we become involved either in our own business operations or through business relationships and expect our clients to do the same.

Nondiscrimination

At 7N, we welcome diversity and value individual differences. We promote a positive and inclusive work environment that respects the individual and is free from any form of discrimination or harassment and we expect that our clients strives to act in the same manner. Discrimination of any form is not tolerated, which includes discrimination based on sex, race, color of skin, religion and beliefs, political opinion, sexual orientation, age, handicap, or national, social and/or ethnic origin.

Likewise, we expect our **clients** to treat their employees fairly without discrimination.

- Employees must have equal opportunities and treatment in employment and when hiring new employees.



Right to Privacy

In 7N we emphasize our employees' right to privacy when gathering and keeping personal information or if monitoring employees and we expect the same of our clients.

Anti-corruption and Business Ethics

In 7N we compete fairly and are responsible, ethical, and transparent in our business and we work against corruption in all its forms.

At 7N, we do not tolerate and work against corruption in all its forms and we always comply with applicable laws and regulations applicable within the geographical business areas of the 7N Group.

We do not bribe or provide improper advantages. Bribes and improper advantages can be monetary such as cash payments or illegal rebates. But they may also include non-monetary items such as improper gifts, products, hospitality and meals, travel and accommodation, or other items or services that ultimately mean the transfer of value in return for special consideration.

We do not receive or give payment, gifts, or any other form of indemnity from and to third parties that may affect or give rise to doubts about our impartiality in business decisions. This is also the case for sponsorships and donations, where we have four eyes principle and segregation of duty.

In 7N we emphasize that our clients do not engage in any form of corrupt practices, and we expect clients to maintain adequate procedures for preventing its employees, from

undertaking any illegal behavior regarding corruption.

Anti-corruption

We expect all our clients not to engage in any form of corrupt practices, including bribery whether direct or indirect. This means that a client must never, directly or through intermediaries, accept or offer bribes. Clients shall also refrain from offering expensive gifts or extravagant entertainment to 7N in an attempt to influence business decisions.

Clients

Our clients must maintain adequate procedures for preventing employees, from undertaking any illegal behavior regarding corruption.

Facilitation Payment

Our clients must not offer facilitation payment, i.e., paying extra to public authorities to speed up routine duties to avoid undue delays.

Fair Competition

All clients must act in compliance with national and international competition legislation and regulation.

Confidential Information

We expect clients to keep all confidential and proprietary information in strict confidence, except when authorized or legally required to disclose information and data.

Climate and Environment

In 7N, it is important for us that we conduct business in a sustainable way with care for the environment. We are aware that acting responsibly goes beyond our own activities, and we therefore expect our clients to carry out operations with care for the environment and to strive to minimize adverse impacts on the environment, such as disproportionately large amounts of CO2 emissions and waste.

We expect all our clients:

- To comply with local environmental regulation and maintain the necessary registrations, permits and licenses.
- To handle air emissions and appropriately handle waste, attempt to minimize energy consumption and waste and to reuse and recycle resources and materials.
- To monitor and continuously strive to improve environmental performance, e.g., by having an environmental management system in place.

Compliance with the Code of Conduct

7N reserves the right to request and obtain further information and documentation of client's compliance with this Code of Conduct. Furthermore, we reserve the right to carry out audits and inspection visits at **clients** to ensure compliance with our Code of Conduct. In order to verify compliance with the Code of Conduct, our **clients** shall be prepared to provide 7N access to relevant and reasonably requested information and documentation, during an audit.

In case the client fails to comply with the terms of this Code of Conduct, 7N has the exclusive right to require improvements by the **client** in related matters. If improvements are not made within the time limit set by 7N, then 7N has the exclusive authority to terminate its contract and business with the **client**.

Whistleblower Policy – Report a Concern

In 7N we are dedicated to act and do business in a way that is right to our employees, independent consultants, suppliers, Clients,

business partners, and the society in general. To continuously make sure that 7N does just that, we encourages that concerns are shared.

7N has established a Group Whistleblower system with the objective of ensuring a relevant platform for independent consultants/contractors, suppliers, Clients, and other business partners of 7N to use, if the need for reporting suspicion of non-compliance with the laws or regulations applicable to the 7N Group, non-compliance with internal policies or standards of the 7N Group or any behavior or incidents of concern not directly covered by such internal policies, arises.

So, if you detect any concerns, illegal or unethical business behavior, harassment of any kind or any other serious non-compliance, 7N encourage you to make use of the Group Whistleblower system. The Whistleblower system provides you with guidance on how to report and as part of your business engagement with 7N you will receive access to the Whistleblower system and guidance on use upon your request.



7N A/S is a global, elite IT consultancy and agency with 30 years market experience in serving all aspects of critical IT projects both within the public and private sector.

We have dedicated ourselves to finding the right match between our consultants and the companies we serve – we believe that is how the best results are created. At 7N, we have built a professional community of extraordinary people. A community dedicated to achieving professional and personal development. A place where the best gets to play with the best.

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