



Code of Conduct

Independent Consultants



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

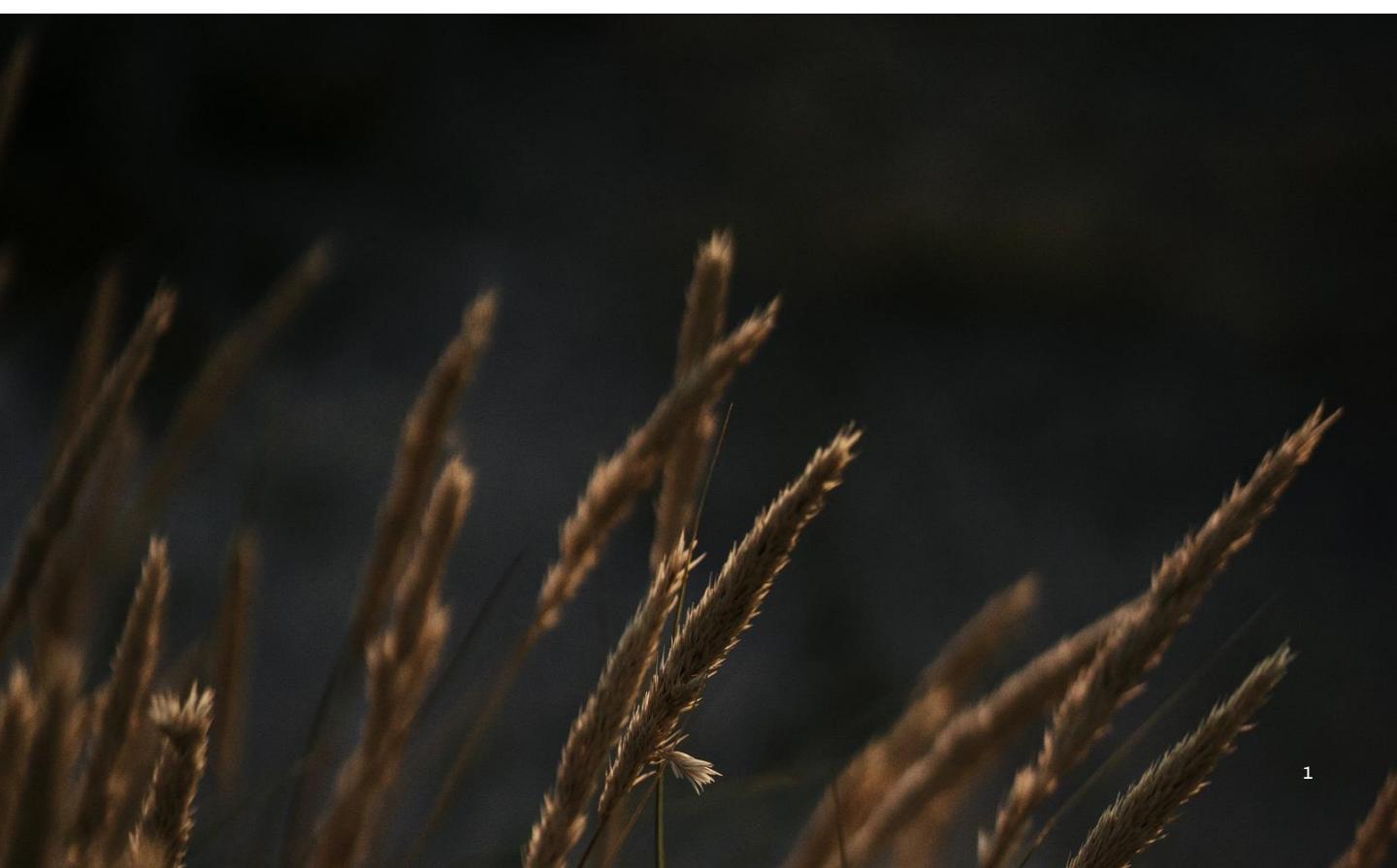
The Code of Conduct applies to all independent consultants, agents and business partners (hereafter '**Consultants**') of 7N. The purpose of this Code of Conduct is to ensure that our Consultants understand how we see responsible business practice, and to set forth our expectations to our Consultants.

7N requires all our Consultants to comply with the expectations specified in the Code of Conduct. Moreover, all Consultants 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 Consultants go beyond legal compliance and continuously seek to improve ethical, social, and environmental performance.

Further, we require our Consultants to ensure that their suppliers follow and comply with this Code of Conduct, and fully understand the content and obligations set forth. Our Consultants must offer help and training when required to fulfil the set obligations.



Jeppe Hedaa, Chairman
7N



Labor Conditions

At 7N, our Consultants and employees form the basis of our success. We aim to attract the best IT professionals as Consultants with passion for their work, who can challenge status quo in the pursuit of excellence. We believe in the power of teamwork, shared knowledge, and support of each other's development through feedback and mentoring. Only by working closely together we can fulfil our vision of developing and offering of the best IT consultancy services.

Personal and Professional Development

When working for 7N, you are joining an elite field of consultants and we expect you to constantly strive to be the best that you can be. At 7N, we will provide you with a professional support system and agents who will look out for our common best interests.

Working conditions: At 7N, we are a responsible company, and we work to ensure safe and healthy working conditions. We expect our Consultants to follow the applicable national or local laws as well as industry practices in the area, to continuously improve working conditions and reduce workplace related risks.

As a Consultant providing services to 7N:

- We expect you to be among the top 3% best IT professionals. You are expected to take an active role in your professional development and constantly stay on top within your area.
- You are expected to be a strong team player, share knowledge and support others' development through feedback and mentoring.
- You are expected to follow the applicable national or local laws as well as industry practice in the area.
- You are continuously improving working conditions and reducing workplace related risks.



Human Rights

It is important for 7N that all people related to our business are treated with respect and dignity. We expect our Consultants 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.

Child Labor, Forced Labor, and Human Trafficking

7N does not accept child labor, forced labor, or any form of human trafficking and 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 we expect our Consultants to do the same. At 7N, 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 Consultants associated with 7N strive to act in the same manner.

Anti-discrimination and Diversity

At 7N 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 Consultants associated with 7N strive to act in the same manner

We expect our Consultants not to tolerate any kind of discrimination or harassment because of religion, race, skin color, gender, disability, age, sexual orientation, or political view.

Right to Privacy

We expect our Consultants to ensure that all personal and confidential data obtained when working for 7N clients and with 7N employees is handled with caution and in accordance with our procedures and applicable laws in the field. We expect you to be familiar with our processes and procedures as described in our Data Privacy Guidelines.

As a Consultant providing services to 7N:

- You must never discriminate Clients, 7N employees, other Consultants, or business partners based on age, race, sex, color, religion, sexual orientation, etc.
- You must handle personal and company data in accordance with our policies and processes. This applies to all personal data including unsolicited application and information about employees, consultants, or employees of suppliers of 7N.
- You must never verbally, physically, or sexually harass colleagues, Clients, suppliers, or any one else.



Anticorruption and Business Ethics

At 7N we compete fairly and are responsible, ethical, and transparent in our business.

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.

Driving responsible business practice is of high importance to us. At 7N, we do not tolerate and work against corruption in all its forms and we, including bribery and facilitation payments. We always comply with applicable laws and regulations applicable within the geographical business areas of the 7N Group.

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.

Likewise, it is important for us that our Consultants do not engage in any form of corrupt practices, and we expect Consultants to maintain adequate procedures for preventing business partners, suppliers etc. from undertaking any illegal behavior regarding corruption.

Anticorruption

We expect all our Consultants not to engage in any form of corrupt practices, including bribery and facilitation payment, whether direct or indirect. This means that a Consultant must never, directly or through intermediaries, accept or offer bribes. Consultants shall also refrain from offering expensive gifts or extravagant entertainment in an attempt to

influence business decisions. Further, we expect our Consultants to maintain adequate procedures for preventing clients, suppliers etc. from undertaking any illegal behavior regarding corruption.

Facilitation Payment

We expect our Consultants not to offer facilitation payment, i.e., paying extra to public authorities to speed up routine duties to avoid undue delays.

Confidential Information

We expect Consultants to keep all confidential and proprietary information in strict confidence, and not to pass it on to third parties unless you are legally obliged to do so. Disclosures of confidential information and data is not allowed, even to relatives of the Consultants. As a Consultant providing services to 7N:

- You must not engage in any form of corrupt practices, including bribery whether direct or indirect. This means that a Consultant must never, directly or through intermediaries, accept or offer bribes. Consultants shall also refrain from offering expensive gifts or extravagant entertainment to employees of 7N or employees of 7N's Clients (or other relevant business partners) in an attempt to influence business decisions.
- You must not offer facilitation payment, i.e., paying extra to public authorities to speed up routine duties to avoid undue delays.
- You must keep all confidential and proprietary information in strict confidence, except when authorized or legally required to disclose information and data. This includes handling such information in a manner that does not comprise 7N's or our Clients' security.

Climate and Environment

At 7N, it is important for us to minimize our impact on climate and environment. We are aware that acting responsibly goes beyond our own activities, and we therefore expect our Consultants to carry out consultancy services with care for the environment and to strive to minimize adverse impacts on the environment.

As a Consultant providing services to 7N:

- You must contribute to lower our environmental footprint and minimize our climate impact by reducing unnecessary consumption of energy and resources in your activities.
- You must comply with local environmental regulation and maintain the necessary registrations, permits and licenses.

Compliance with the Code of Conduct

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

In case the Consultant fails to comply with the terms of this Code of Conduct, 7N has the

exclusive right to require improvements by the Consultant 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 Consultant.

Whistleblower Policy – Report a concern

In 7N we are dedicated to act and do business in a way that is right to our employees, 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 Consultants, suppliers, Clients, and other business partners of 7N to use, if the need for reporting a suspicion of non-compliance with the laws or regulations applicable to 7N , non-compliance with internal policies or standards of 7N 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.





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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