# Wiba Tech Aps's Ethical Guidelines:

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## This "Ethical Guideline" applies to all employees at Wiba Tech Aps

## Purpose

As a company we have a responsibility to the community around us, and we are conscious of this responsibility. We conduct our business responsibly and with respect for the individual human being and the society we operate in. We want to operate a commercially sound company, and we are aware that our chances for this are largely dependent on the reputation and the confidence that we obtain from our business partners, be they customers, suppliers, authorities, or others. We want to protect our reputation by incorporating the following rules and guidelines for business ethics.

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#### Compliance with applicable laws

It is a general and very important principle that we comply with applicable laws and regulations in the countries in which we operate. This, of course, applies to all areas covered by such, including competition laws, employment laws and environmental laws.

# Respect for the individual

Respect for the individual and the individual's rights is a key value to us. At Wiba Tech Aps we advocate equality regardless of gender, age, race, religion or sexual orientation. Wiba Tech Aps does not accept that employees are engaged in or exposed to sexual harassment, violence, bullying or the like.

## Assessment of partners' ethical standards

In connection with entering and maintaining business partnerships or cooperation with companies, including suppliers, we consider in good faith the individual company's position on human rights, labor rights (including the elimination of forced labor and child labor), environmental and anticorruption, and the company's willingness and ability to meet high ethical standards in these areas. This assessment is crucial to whether we enter into a business partnership or cooperation.

# Confidentiality

We have clear rules for handling confidential information that we receive in the work context. The employees are bound by secrecy, both during and after employment, with respect to all matters concerning the company's business matters, including matters relating to suppliers, partners, principals and customers. Both current and former employees must refrain from commenting on or discussing confidential matters to the media or other public forums incl. social forums and other Internet forums. Should an employee suspect that unauthorized persons have access to confidential information, the employee must immediately inform his/her leader.

## Avoiding conflicts of interest

Our employees are expected to work in good faith towards the business objectives of the company. The employee cannot have personal or business interests which conflict with this. We do not accept that employees achieve personal gain at the company's expense (exempt for this is, of course, agreed salary, bonuses and any other forms of remuneration). If an employee is in doubt whether there may be a conflict of interest, the employee must submit this to his/her leader.

## Bribery

We have a principle of honesty and integrity in business affairs and relationships that we as a company are involved in. The payment or receipt - incl. contribution to the payment or receipt - of bribes is in clear violation of this principle, and therefore it is strictly prohibited. In the concept of bribery are also included kickbacks and other similar remuneration, outside of the actual trade agreement.

# Gifts and entertainment

Gifts, hospitality and entertainment in many parts of the world are a part of business life. But it is also something that must be handled with great caution. Giving or receiving gifts or hospitality/entertainment disproportionately, it can affect, or be experienced as if it affects your business integrity. The handling of this area is largely up to each employee's common sense and sound business judgment. However, the following applies:

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 The employee shall not offer or accept gifts or hospitality/entertainment in conflict with applicable law, or if it can influence, or appear to influence the outcome of a commercial agreement.

# Knowledge of this Code of Ethics

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All employees of companies within Wiba Tech Aps, as well as all companies and individuals acting on behalf of Wiba Tech Aps must read and comply with this Code of Ethics. Group management is responsible for communicating and enforcing this Code of Ethics. Employees who have any questions, or need clarification of the contents of this Code shall apply to their leader.

# **Reporting of violations**

It can have major commercial and human consequences if this Code is not met. It is therefore important that any violation is stopped quickly. Employees, who experience or suspect a breach of this Code of Ethics, must immediately contact their manager for reporting this.

## **Consequences of violations**

Violation of this Code of Ethics may result in disciplinary action in accordance with applicable labor laws and regulations and may result in termination of employment.

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