NETCONTROL
CODE OF CONDUCT

Code of conduct

BUSINESS PRINCIPLES

Management systems

Our quality, environmental and information security management systems are certified against the internationally recognised ISO 9001, ISO 14001 and ISO 27001 standards covering our office locations across Europe.

In addition, our UK office has the ISO 45001 certification, and the other offices conform to that standard, too, as far as possible.

Many of the issues relating to our company Code of Conduct are covered in detail in Netcontrol's Corporate Management System and its Policies.

Supporting policies

We follow a number of policies to ensure that we conduct business in an ethical and transparent manner. The policies are available to everyone via our website and are reviewed regularly in our management review meetings.

The Netcontrol policies supporting our Code of Conduct include our:

- Quality policy,
- Environment policy,
- Health and safety policy,
- Whistleblowing policy, and
- Social responsibility policy.

Laws and regulations

Netcontrol respects all applicable national and international laws and regulations. We also recognise a need to communicate our standards of conduct to partners and customers both in our home market and especially in new markets.

Zero tolerance for corruption and bribery

Netcontrol's anti-corruption policy requires all Netcontrol employees and all parties carrying out activities financed by Netcontrol to adhere to the highest financial and ethical standards.

Fair competition, transparency and openness

Netcontrol supports and strives for fair competition and has zero tolerance for any kind of market manipulation.

We promote a culture of transparency and openness in our work.

Data protection and privacy

Netcontrol respects the data privacy of its employees, partners, suppliers and customers.

Supplier policy

Netcontrol follows a supplier policy and maintains a preferred supplier list. We conduct due diligence on a selected supplier before adding it to the list.
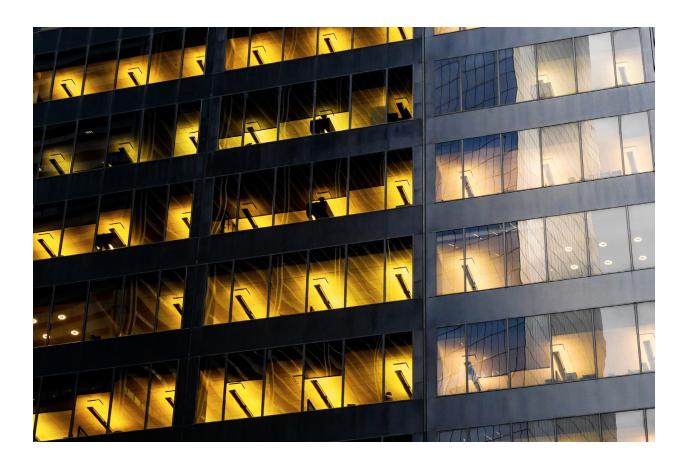
Our code of conduct forms part of our contract with all our preferred suppliers, who are required to confirm that they follow it.

PEOPLE AND SOCIETY

Human rights

The human rights legislation in place in the UK and the Nordic countries shall be respected in all of Netcontrol's activities.

Forced labour

Netcontrol has zero tolerance for all forms of modern slavery such as child labour and human trafficking. We are committed to acting ethically and with integrity and transparency in all our business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery within the company or our supply chain.

Freedom of association

Any person employed by Netcontrol is entitled to join a trade union or a comparable organisation representing her or his occupation and to act on behalf of that organisation in such occupational questions as concern her or him.

Employment conditions

Any person employed by Netcontrol signs a contract of employment. The contract follows the legislation of the country where the person is employed.

Equal opportunities and nondiscrimination

A person's colour, gender, physical handicap or religious or political conviction shall not, in itself, form an obstruction to her or his employment by Netcontrol as long as it does not affect her or his ability to meet the employer's requirements. Neither shall it form an obstruction to her or his promotion, salary development, job benefits or education.

Health and safety at work

Netcontrol sees it as its responsibility actively to contribute to the wellbeing of its employees. Netcontrol has organised healthcare for its employees and appointed persons and committees responsible for safety at work.

Workforce sustainability

Netcontrol's employees are the company's most valuable asset.

Netcontrol seeks to create a workplace that attracts top talent, retains employees with engaging work,

embraces differences and encourages all team members to reach their full career potential.

To ensure workforce sustainability Netcontrol offers their employees:

- work–life flexibility
- various training and professional development opportunities
- healthcare assistance
- the possibility to purchase company C-class shares

ENVIRONMENT

Netcontrol has a responsibility to care for the environment as part of its activities. It shall take future generations into consideration and support sustainable development.

Netcontrol shall give the highest priority to solutions and products with the minimum environmental impact and the maximum use of resources.

Netcontrol's personnel shall be aware of the environmental requirements applying to Netcontrol's activities set by society.

To achieve sustainable development, we are:

- following up and adapting our activities to the applicable legal requirements,
- enhancing our recycling and reuse of materials,
- informing interested parties of our environmental policy and demanding behaviour that contributes to its fulfilment, and
- decreasing the negative environmental impact of our energy consumption and the carbon footprint of our logistic solutions.

ASSURANCE OF COMPLIANCE

Reporting misconduct

We are committed to operating lawfully, ethically and with integrity. It is the responsibility of each Netcontrol employee to ensure that we fulfil this commitment. However, from time to time there may be situations where the right course of action is unclear or where an employee feels that something is improper, unethical or inappropriate. We have a legal duty to take the appropriate measures to identify such situations and to attempt to remedy them.

Our aim is to:

- ensure that all employees feel supported in speaking up in confidence and reporting matters which they think may involve anything unethical or inappropriate,
- ensure that all unethical or inappropriate behaviour is identified and challenged,
- manage all disclosures in a timely, consistent and professional manner, and
- provide assurance that all disclosures will be taken seriously and treated as confidential.

Review and approval

Netcontrol's code of conduct is reviewed and approved every year in the management review meeting.