

## e-Boks Code of Business Conduct

## **Introduction and Scope**

e-Boks develops products, services, and solutions with our customers' needs and interests in mind. We pay attention to our customers and strive to treat them with professionalism, honesty and respect. We are direct, trustworthy, transparent and fair in our business relations. Part of our commitment to this group of stakeholders is to make sure that our business partners and suppliers uphold the ethical standards that we set for our own entities.

We are in ongoing interactions with our surroundings. In relations with our customers, suppliers, business partners and colleagues, we seek to conduct ourselves in a professional and courteous manner. In other words: we treat others as we would like them to treat us.

Our suppliers and business partners are independent entities. However, their business practices and actions may have an impact on e-Boks' reputation. Therefore, we carefully select suppliers, and we expect to operate in compliance with recognized national and international standards and appropriate codes of practice.

Besides price, e-Boks selects suppliers and business partners based on the following criteria: The ability to deliver the required services in a professional manner, and the ability to meet the requirements and intentions of this Code of Business Conduct.

Each employee at e-Boks must adhere to this Code of Business Conduct. Processes defined by e-Boks ensure that this Code of Business Conduct are followed, and immediate actions are taken if non-compliance is detected.

## **1. Legal Compliance and Human Rights**

We expect our suppliers and business partners to comply with the legal requirements, rules, and regulations that apply to their field of work. We respect human rights and the political and cultural customs of the countries we operate in.

## **2. Labour Standards**

### **2.1 Freedom of Association**

e-Boks emphasises the legal right of employees to join or to refrain from joining unions or other associations of their own choosing. Suppliers must respect the right of workers to associate freely, form and join workers' organisations, seek representation, and bargain collectively, as permitted by and in accordance with applicable laws and regulations.

### **2.2 Forced Labour**

e-Boks will not participate in, or benefit from, any form of forced or involuntary labour (e.g. forced prison labour). All work must be voluntary, and the workers must have the freedom of movement during the course of their employment and be free to leave work or terminate their employment with reasonable notice.

### **2.3 Child Labour**

e-Boks does not accept the use of child labour. Suppliers must not employ children, i.e. the minimum age for employment must not be less than 15 years (or 13 years when accepted under national law) or below the age of completion of compulsory schooling.

e-Boks accepts the use of legitimate apprenticeship programmes provided that such programmes are in full compliance with applicable laws and regulations. e-Boks disapproves of hiring young workers (below 18 years of age) to perform any type of work which is likely to jeopardise their health, safety, or morals.

### **2.4 Non-Discrimination**

e-Boks will not engage in any form of discrimination based on race, sex, religion, political affiliation, caste, national or social origin, sexual orientation, family responsibilities, age, disability, or other distinguishing characteristics. Our suppliers and business partners are expected to provide a workplace free of discrimination, harassment, and bullying. No one should be discriminated against or harassed for any reason or under any circumstances. The workplace should be free of threats and insults.

Hiring, remuneration, benefits, training, advancement, discipline, termination, retirement, and any other employment-related decisions must be based on relevant and objective criteria.

## **2.5 Employment Conditions**

e-Boks requires that wages shall be paid in compliance with national laws and meet the legal minimum standards, including compensation for relevant overtime and other elements of compensation. Wages must be sufficient to meet the basic needs of the employees. Deductions from wages must be transparent and must never be used as a disciplinary measure. As a rule, and as far as possible, overtime must be on a voluntary basis and paid accordingly.

## **3. Health and Safety**

e-Boks and our Suppliers must commit to creating safe working conditions and a healthy work environment in compliance with all applicable laws and regulations for all their employees. Adequate health and safety policies and procedures must be established and followed. Employees must be provided with the protective equipment and training necessary to perform their tasks safely. Accommodation, if provided by the employer, must conform to the same requirements, including the general provisions on health and safety listed above.

## **4. Environment**

e-Boks requires supplier compliance with all relevant host country environmental legislation. We insist that full knowledge of applicable environmental legal requirements relevant to the environmental impact of the business activities, products, and services is maintained and that legal compliance through training, awareness, operational control and monitoring is ensured. Continuous improvement of the overall environmental performance related to significant environmental aspects is expected. Measures to prevent, minimise, and remedy adverse environmental impact of business activities, products, and services through a proactive approach and responsible management of environmental aspects are expected.

## **5. Prohibited Business Practice**

e-Boks complies with applicable laws and regulations concerning bribery, corruption, fraud and any other prohibited business practices. e-Boks does not offer or promise to give any undue advantage, favour, or incentive to any public official, international organization, or any other third party. This applies regardless of whether the undue advantage is offered directly or through an intermediary.

### **5.1 Gifts, Hospitality, and Expenses**

At e-Boks we are aware of possible intentions and consequences of gift exchanges, and we comply with norms that are outlined in legislation and generally accepted in society.

e-Boks employees may only give or receive gifts for business purposes and only up to reasonable levels. If e-Boks employees are offered a gift which exceeds in value a reasonable level, they must fully inform their superior by e-mail. Any gift exchange must never affect our ability to act independently. e-Boks covers travel and accommodation expenses for e-Boks employees when they are travelling in a professional context. If anyone outside e-Boks offers to cover our travel or accommodation expenses or other large expenses, the e-Boks employee must review this with his or her superior before accepting the offer.

### **5.2 Money Laundering**

e-Boks operates in full compliance with applicable laws on this area and does not accept any forms of money laundering and we are continuously taking steps to prevent any of our financial transactions from being used by others to launder money.

### **5.3 Competition**

e-Boks operates in full compliance with applicable laws on this area and will not be part of any breach of general or special competition regulations, such as illegal cooperation on pricing, illegal market sharing, or any other behaviour that is in breach of relevant competition laws.

## **6. Confidential Information**

e-Boks values and protects confidential information. Ensuring that confidential information is kept secure is one of the foundations for doing business. This is particularly applicable to and important for customer information, end-user information, both comprising personal data, but also trade secrets, business, marketing and service plans, etc. A range of security precautions, including technical, manual and day-to-day routines

ensures that confidential information is kept secure.

e-Boks uses risk management to carefully track the risks which are relevant to us, including those that can compromise the safekeeping of confidential information. By doing so we ensure proper security precautions are implemented and managed in accordance with the risk.

Additionally, we use and operate in compliance with the ISO27001 standard, to govern and manage our information security, as it is widely recognized as a modern and effective ISMS.

#### **6.1 Monitoring/records and documentation**

All e-Boks' suppliers must maintain appropriate records to demonstrate compliance with the requirements of this Code of Business Conduct. Records and documentation must be available to e-Boks upon request at any time with reasonable notice. e-Boks reserves the right to conduct second-party audits by our internal auditing team or third-party audits to monitor and ensure proper compliance with this Code of Business Conduct.

#### **6.2 Legal requirements**

In addition to meeting the provisions of this Code of Business Conduct, compliance with national laws, rules and regulations as well as other applicable standards is required. Conflicts between the provisions of this Code of Business Conduct and national laws or other applicable standards, shall be evaluated by e-Boks in cooperation with the supplier in order to establish the most appropriate course of action. If any conflicts are detected, the supplier must inform e-Boks immediately.

### **7. Non-Compliance and Corrective Action**

e-Boks will not tolerate non-compliance with this Code of Business Conduct, whether due to conscious action, complacency, indifference, or lapse of ethical judgement. Where non-compliance with the requirements of this Code of Business Conduct is identified, corrective action must promptly be taken to remedy the deficiencies, including measures to prevent similar problems from recurring in the future.

In the event of repeated and serious breaches of the Code of Business Conduct, e-Boks reserves the right to terminate the business relationship with a supplier and cancel any production or delivery in progress.

In the event of an employee's breach of the Code of Business Conduct, e-Boks will take appropriate disciplinary actions according to the nature of the breach, including but not limited reporting the employee to relevant authorities and taking any available employment law actions.