

CODE OF CONDUCT



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CODE OF CONDUCT ECIT

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INTRODUCTION, LETTER FROM THE CEO



Dear colleagues

Since the foundation of ECIT in 2013, focus has been to develop, strengthen and improve our business as well as how we conduct our business. The reputation of ECIT is a direct result of competent employees, quality services delivered timely and at agreed price, and a result of acting with a high ethical standard in all our relations.

As we work hard to become the strategic and trusted partner to our customers, all actions we do are linked to our behaviour and our ethical standards.

ECIT core values are Courage, Open communication, Integrity and Entrepreneurship. The commitment to these values is and are to be respected throughout the entire company. All we do in ECIT should ensure that we act in line with our values, our Code of Conduct, and the laws and regulations that apply in the countries in which we operate.

To succeed as a company, we are dependent upon all employees acting according to the guidelines. We commit to live by the trust placed in us and reject unethical or illegal business practices.

ECIT support the international conventions on Human Rights, and the UN Global Compact 10 principles of responsible business.

It is a clear expectation that all ECIT people will adhere to these guidelines, as well as we all are to create value for our customers, employees, shareholders, suppliers and to society in general.

Kind regards
Peter Luring, CEO





ABOUT THE CODE

This Code applies to all employees and officers of ECIT as well as to consultants working on behalf of ECIT.

The Code helps to guide our behaviour and thus does not cover every situation. The Code rather translates our values into our day-to-day behaviours and decision making. In situations where the Code or laws and regulations does not provide clear guidance, the employees are to exercise good judgement consistent with the business ethics promoted by the Code.

ECIT supports the Ten Principles of the United Nations Global Compact on human rights, labour, environment, and anti-corruption. Our Code of Conduct is founded on our core values and the ten principles of the United Nations Global Compact*.

The 10 principles of the United Nations Global Compact*

 HUMAN RIGHTS	Principle 1	Businesses should support and respect the protection of internationally proclaimed human rights
	Principle 2	Businesses should make sure that they are not complicit in human rights abuses
	Principle 3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
 LABOUR	Principle 4	The elimination of all forms of forced and compulsory labour;
	Principle 5	The effective abolition of child labour
	Principle 6	The elimination of discrimination in respect of employment and occupation
 ENVIRONMENT	Principle 7	Businesses should support a precautionary approach to environmental challenges
	Principle 8	Undertake initiatives to promote greater environmental responsibility
	Principle 9	Encourage the development and diffusion of environmentally friendly technologies.
 ANTI-CORRUPTION	Principle 10	Businesses should work against corruption in all its forms, including extortion and bribery.

*Further information on the ten principles of the UN Global Compact:
<https://www.unglobalcompact.org/what-is-gc/mission/principles>

RIGHTS

All employees have rights and obligations they are expected to understand and fulfil. The Code of Conduct plays an important role in showing that ECIT support and respect the Universal Declaration of Human Rights and to ensure that employee rights are safeguarded.

Human rights

The UN Global Compact first two principles cover human rights: Businesses should support and respect the protection of internationally proclaimed human rights, and make sure they are not complicit in human rights abuse.

Working conditions at ECIT

The third, fourth, fifth and sixth principles of the UN Global Compact relate to labour rights.

ECIT commits to comply with local labour legislation, hereinunder pension schemes and insurance protection of employees in accordance with, or exceeding, local legislation. ECIT aim to offer its employees competitive salaries and good working conditions, to attract and retain competent employees.

"The Code of Conduct plays an important role in showing that ECIT support and respect the Universal Declaration of Human Rights and to ensure that employee rights are safeguarded".

Equality and diversity

ECIT values a diverse workforce, and diversity in ECIT covers gender, age, cultural back-ground, and race. ECIT strives to increase the diversity of our workforce through recruitment practices and in close cooperation with subsidiaries. ECIT measures and monitors the development of diversity within the workforce, both concerning the number of women/men as share of employees, and number of women/men in managerial positions.

Discrimination and harassment

ECIT values every employee, and every employee must be given opportunity to grow, to develop and to do their best to be able to “exceed their potential”.

All forms of discrimination based on gender, gender identity or gender expression, sexual orientation, ethnicity, religion or other beliefs, nationality, social origin, political views, trade union membership, disability, civil status, pregnancy, or age are not tolerated. ECIT’s efforts are at the minimum compliant with local laws.

ECIT has zero-tolerance against discrimination and encourage all employees to report any incidents of experienced discrimination. Any retaliation, i.e., punishment, against employees who choose to report detected misconduct, is forbidden.

When reporting a concern, our employees shall be assured that their report will be handled confidentially and discussed on a need-to-know basis only. In ECIT we shall apply the Code of Conduct as well as ECIT guidelines when addressing and handling our employee’s concerns.

Health and work environment

ECIT provides a healthy and safe work environment. Local managers are ultimately responsible for the work environment. Tasks within health and environment are shared between managers and appointed committees or similar groups. Each manager must ensure that the tasks and workplaces in his or her area are designed to protect employees against illness and the risk of accidents at work.



“The ECIT way”

– Employee development

Employees are the fundament on which we are building ECIT, and development and continuous learning is key to attract and retain skilled and motivated employees. In ECIT, we provide training and personal development in several ways, through talent programmes, through ECIT Academy programme and through continuous development and learning activities. Employees have regular meetings with their managers regarding their personal development. In addition, ECIT has a leadership training programme which play a key role in employee development.

ECIT holds regular employee appraisals to ensure employee engagement. The EES-scores (EES = employee engagement survey) are then utilized to maintain and improve employee engagement through relevant measures.

OBLIGATIONS AND BEHAVIOUR

In addition to rights, there are certain obligations employees are expected to understand and fulfil. In the following, employee obligations are described.

Integrity and an inclusive culture

Every employee must familiarize themselves with and follow the company's policies and instructions.

Integrity is a core value, and as employees are entitled to not be discriminated against in the workplace, they must as well act in a non-discriminatory way towards their colleagues, customers, suppliers, and others. Every employee should contribute to an inclusive culture, through a behaviour that is inclusive as opposed to a discriminating behaviour.

Breaking the law on ECIT's premises or by using the ECIT equipment is prohibited. In addition, activities that are not unlawful, but contrary to the company's values, are not permitted. Every employee must familiarize themselves with and follow the company's policies and instructions.

Transparency and ethics

The tenth principle of the UN Global Compact states that businesses should work against corruption in all its forms. Corruption is strictly forbidden in ECIT. This includes money laundering and bribery. All gifts, entertainment and benefits from business relationships must comply with current legislation and follow business ethics principles.

Environmental issues

The UN Global Compact-principles also covers environmental issues, (principle 7, 8 and 9) and state that a business should support a precautionary approach to environmental challenges, promote environmental responsibility and encourage development of environmentally friendly technologies.

Internal and external environmental efforts

ECIT has taken initiatives to improve our own environmental impact. ECIT has a techdivision and an IT division that develops and supports use of technology to improve businesses administrative tasks. Through use of modern technology, application development and advisory, modernization of ECIT customers IT-environment is improved.

Further information on our internal and external environmental activities are to be found in our financial report.



"Through use of modern technology, application development and advisory, modernization of ECIT customers IT-environment is improved".

COMPLIANCE AND CODE OF CONDUCT

Handling confidential material and information in general

It is important to respect privacy and confidentiality of information regarding our customers, our employees, and our business relations, etc. All employees and others who act on behalf of ECIT have a statutory duty of confidentiality concerning customers, employees and other business or private matters that they become acquainted with in connection with their work. This applies unless they are obliged or encouraged to disclose information by law or internal guidelines. The duty of confidentiality also applies between the individual companies in the Group, and to others in the same company who do not need to familiarize themselves with the information in their work.

It is the individual's responsibility to process information correctly. The principle of "need to know" shall always apply when handling sensitive information.

All employees have a responsibility to safeguard sensitive information relating to ECIT, as well as its customers, partners, and other stakeholders. The duty of confidentiality is essential to building trust and strong relations with ECIT customers, towards our other stakeholders and towards society at large.



Inside information

ECIT is listed on Euronext Growth, (Oslo). This means that ECIT has several requirements to fulfil to comply with the rules established by the Stock Exchange. Inside information is of particular importance to understand for all employees and is therefore part of this Code of Conduct.

As an employee of ECIT you may receive inside information. Inside information is information about a company, for example information about financial forecasts, merger and acquisition proposals, and key personnel changes that has not been made public. You are involved in insider trading when you trade in publicly traded shares or other securities while in possession of specific information capable of affecting the price of shares or securities and which is not publicly available or generally known in the market or when you disclose this information to someone else or influence someone else who then trades in those shares or other securities.

ECIT has implemented procedures for the handling of inside information, to ensure that persons given access to inside information, if any, are aware of the duties and responsibilities this involves, as well as the criminal liability associated with misuse or unwarranted distribution of such information.

We ask that you refer to Group Legal if you are involved in any cases where it is perceived that there can be an insider risk.



"Inside information is information about a company, for example information about financial forecasts, merger and acquisition proposals, and key personnel changes that has not been made public".

The requirements to comply with data privacy law

ECIT and all employees are to handle personal data with due care. Personal data is defined as any information which can be a reference to a specific and identifiable person. ECIT is subject to standard legal requirements when handling personal data, as defined by the General Data Protection Regulation (GDPR) of the European Union.

Responsible conduct - everywhere

ECIT's reputation is a result of all employees' behavior and conduct. Please be aware of this when communicating in the public domain (online through social media or otherwise). Please make sure to comply with the ECIT Code of Conduct principles, show respect and behave with integrity towards others.

Investor relations

To ensure that financial reporting on ECIT is correct, consistent and reliable, only a limited number of people are authorized to handle investor relations. All queries regarding Investor relations must be referred to Group CFO.

Media contact

To ensure that public reporting on ECIT is correct, consistent and reliable, only a limited number of people are authorized to speak with news media. All queries from the media are to be referred to Group CFO.

Notification of breach

ECIT has implemented a whistleblowing channel to ensure that employees and outside parties can expose misconduct done by ECIT. To guarantee anonymity, ECIT has set up a whistleblowing function that allows information to be sent securely and anonymously. It is meant for reporting serious misconduct and can be used by internal as well as external individuals.

ECIT guarantees that no one will be subject to retaliation for reporting or participating in an investigation into a reported misconduct.

The Whistleblowing-channel is available on ecit.com/whistleblower and can be accessed on all devices. We recommend all employees to use the channel from a device that is not connected to the local intranet.

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