

JN Data A/S

Supplier Code of Conduct

Introduction

Integrity throughout our business is vital to JN Data A/S. JN Data believes that acting responsibly and with integrity is fundamental in the way JN Data does business and for creating long-term value for our company and our business partners. This entails being a responsible employer, having a high standard of integrity in our business relationships and acting with care in regard to the societies and environments in which JN Data operates.

Application

While JN Data recognises that there are different legal and cultural environments in which suppliers operate throughout the world, the JN Data Code of Conduct ("the Code") states the minimum requirements that all suppliers of services and/or goods to JN Data must meet ("Suppliers").

The work behind the Code has been inspired by the principles of the United Nations' Global Compact. JN Data has selected and elaborated on the ones that are relevant for JN Data and the industry in which JN Data operates.


JN Data requires that our Suppliers establish corporate policies and management systems appropriate to their sector and size to ensure that the requirements of the Code are fulfilled. Suppliers shall be responsible for ensuring that their production and their sub suppliers comply with the Code.

Suppliers must comply with all applicable national laws, regulations and industry standards. In case that the standards stated in this Code are less stringent compared to applicable national laws or other regulations or standards, JN Data expects Suppliers to always fulfil the more stringent requirements.

JN Data is aware that improving ethical, social and environmental performance requires time and resources. However if a Supplier by intention or repeated negligence fails to live up to this Code in a manner that is explicit, intentional and/or severe, JN Data reserves the right to terminate the business relationship. In certain cases, e.g. in cases of bribery, termination may be with immediate effect.

Dignity and respect

Suppliers shall treat everyone - including but not limited to its employees - with dignity and respect, and free from direct or indirect discrimination on the grounds of race, colour, sex, language, religion, political orientation, age, nationality, social status, sexual orientation, birth, pregnancy, marital status, health status, trade union membership, or mental or physical disability.



Suppliers shall respect and support human rights and endeavour to ensure that they do not contribute to human rights violations.

Working conditions

Suppliers must prohibit the use of corporal punishment and any form of coercion, abuse or harassment. Monetary fines or deduction in compensation as a means of disciplinary measure can only be conducted if permitted by national law and agreed by the applicable collective bargaining agreement.

Suppliers shall abide with all local wage, pension and benefit laws and regulations, including those pertaining to minimum wages, overtime wages, piece rates and other elements of compensation. Suppliers shall also abide by lawful collective agreements on wages and benefits, and provide all employees with written employment contracts outlining the conditions of employment in a language understood and voluntarily accepted by the employee.

JN Data expect Suppliers to provide a safe and healthy working environment for all their employees and to educate, train and protect all employees from any harm arising from workplace activities.

Child Labour

Suppliers shall not use child labour in any stage of manufacturing or in the provision of services or supplies and must ensure that no person shall be employed at an age younger than the age for completing compulsory education in the country of production, also if such age is higher than 15.

Employees below 18 years of age must not be involved in hazardous work (work which by its nature or circumstances is likely to harm the health, safety or morals of children) or night work, regardless of the number of hours worked.


Environment

Suppliers shall carry out operations with care for the environment, comply with all relevant local and national environmental regulations and maintain all applicable licenses, registrations or permits. Suppliers shall strive to minimise adverse impacts on the environment, human health and livelihoods, including the establishment of control mechanisms for the prevention of pollution from hazardous substances, waste and effluents, and air emissions.

Security and Confidentiality

Suppliers are responsible for safeguarding the confidentiality, integrity and security of both JN Data's and JN Data's customers' data, including specifically the infrastructure managing such data, in accordance with both applicable contractual requirements and privacy and data protection laws.

If Suppliers have access to JN Data's and/or JN Data's customers' data, Suppliers are obligated to make sure that access or use only happens when Suppliers' specific employees have a need to do so for legitimate business purposes, and always in



accordance with applicable contractual procedures and JN Data security policy and rules.

Competition law

Suppliers shall compete fairly and promote and support free and fair competition within the relevant market in which they operate. When Suppliers interact with competitors and customers, Suppliers shall always comply with applicable competition law and regulations.

Inside information and money laundering

Suppliers shall not engage, aid or assist in any illegal activity, including money laundering and/or the use of inside information in connection with the trading of financial instruments, including listed shares or certain other securities or debt instruments.

Anti-Corruption/Bribery

Corruption and bribery is recognised as barriers to sustainable development and free trade. JN Data maintains a zero tolerance policy in terms of corruption.

JN Data expects that Suppliers do not engage in any form of corrupt practices. Suppliers must ensure - through training and management systems appropriate to the size of the company - that bribes are not offered, promised, given, accepted, condoned, knowingly benefited from or demanded.

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Claus Toxværd Østergaard, CEO