

Columbus[®] | Once you
know how..

Code of Conduct

Columbus A/S | CVR no. 13 22 83 45

Contents

| | |
|----------------------------------|---|
| Introduction | 3 |
| Compliance | 3 |
| Transparency and credibility | 3 |
| Corporate Governance | 3 |
| Business partners | 3 |
| Whistleblower function | 3 |
| Sustainability | 4 |
| Anti-bribery and anti-corruption | 5 |
| Human Rights | 6 |
| Labour rights | 7 |
| Data Ethics | 8 |
| Taxation | 9 |



**Columbus supports
the UN Global Com-
pact**

Columbus has been part of the UN Global Compact since 2012, which shows our commitment to being socially and environmentally responsible.

Columbus supports and enacts ten general principles of corporate social responsibility.

These principles are based on internationally recognized conventions on human rights, labour standards, environment, and anti-corruption.

Code of Conduct

Columbus has established Code of Conduct, which is our general ethical guideline for business conduct to ensure that we in Columbus on a global level are dedicated to promoting ethical business practices and protect Columbus against corruption and other unethical business behavior, which we believe is incompatible with the operation of a healthy business.

Introduction

Columbus is committed to being socially and environmentally responsible and has been part of the UN Global Compact since 2012.

Columbus supports and enacts the UN Global Compact ten general principles of corporate social responsibility.

These principles are based on internationally recognized conventions on human rights, labour standards, environment, and anti-corruption.

Compliance

Columbus complies with the requirements of the Universal Declaration of Human Rights and The United Nations Convention against Corruption as well as the laws of each country in which we operate.

Transparency and credibility

In Columbus, we are committed to show openness towards customers, employees, shareholders, suppliers and other

stakeholders. It is essential that their understanding of our services and products is accurate, updated and truthful. Therefore, there is no incongruence between what we communicate within the company and what we do externally.

Corporate Governance

Columbus' commitment to run a sustainable business is firmly based on the company's core values, our Leadership Principles, our Code of Conduct and the Corporate Governance recommendations.

Columbus is committed to follow the Danish Recommendations for Corporate Governance as implemented on 2 December 2020 by NASDAQ Copenhagen in its Rules for Issuers of Shares.

Business partners

Columbus is committed to responsible sourcing and collaboration with third parties. We expect all business partners to adhere to applicable laws of each country in which they operate.

Whistleblower function

Columbus has established a whistleblower function, which enables employees, former employees, customers, suppliers, business partners, shareholders and other stakeholders to report any suspected unlawful activity or unethical misconduct in the Columbus Group in the form of, for example: financial fraud, bribery, corruption, violation of competition laws, any form of sexual harassment and harassment due to race, gender, religious or political affiliation, as well as infringements of EU law, which fall within the scope of the Directive of the European Parliament and of the Council on the protection of persons who report infringements of EU law.

All communication may be reported anonymously and will be handled confidentially and securely.

Link to the reporting system can be found on Columbus' global website, on local country websites and on the intranet.

Link to global website:

www.columbusglobal.com/en/whistleblower-reporting

Sustainability

In Columbus, we are committed to contribute to the UN Sustainable Development Goals (SDG's). We focus on seven of the 17 SDG's. For each SDG, we have formulated our commitment and focus point.

Columbus' Sustainability Strategy contains four strategic programs; Enabling sustainable impact, Growing af diverse and talented culture, Building sustainable operations and Ensuring responsible business conduct. All seven SDG's are covered by these four strategic programs.

The strategy comprises two streams; an external stream aiming at accelerating our customers' sustainable performance by advising and providing digital solutions, and an ESG stream focusing on our culture, conduct and our operations' impact on the environment.

Our footprint

We are committed to improving daily operations to create significant sustainable outcomes.



We started monitoring our greenhouse gas emissions globally in 2022 to better understand how our operations affect the climate. To develop effective sustainable practices and contribute to creating a more sustainable future, we are quantifying and reporting our emissions based on the guidelines of the Greenhouse Gas (GHG) Protocol and in line with World Resources Institute's (WRI) GHG Protocol Corporate Accounting.

The GHG Protocol includes both direct emissions from the company's own operations (Scope 1 emissions), indirect emissions from purchased energy (Scope 2 emissions) and the production of purchased goods and services (Scope 3 emissions).

Our data scope includes all Columbus Group companies and offices with more than five employees and/or above 50 m2 of office space.

Further information

The Sustainability Strategy is described in the Columbus Sustainability Report 2022, which is available at: www.columbusglobal.com/Investors/CSR

UN Global Compact

Principle 7:

Businesses should support a precautionary approach to environmental changes.

Principle 8:

Businesses should undertake initiatives to promote greater environmental responsibility.

Principle 9:

Businesses should encourage the development and diffusion of environmentally friendly technologies.



Anti-bribery and anti-corruption

Columbus will not tolerate corruption, money laundering, fraud bribery or other illegal or unethical business activities.

Our performance and competitiveness are strengthened solely through lawful conduct, and all employees must at all times comply with applicable laws, rules and regulations.

Columbus has adopted an Anti-bribery and Anti-corruption Policy. The policy should be read in conjunction with applicable laws.

This policy applies to all people employed by and associated with Columbus A/S, covering all employees, whether permanent or temporary, sub-contractors, third party agents, suppliers, etc.

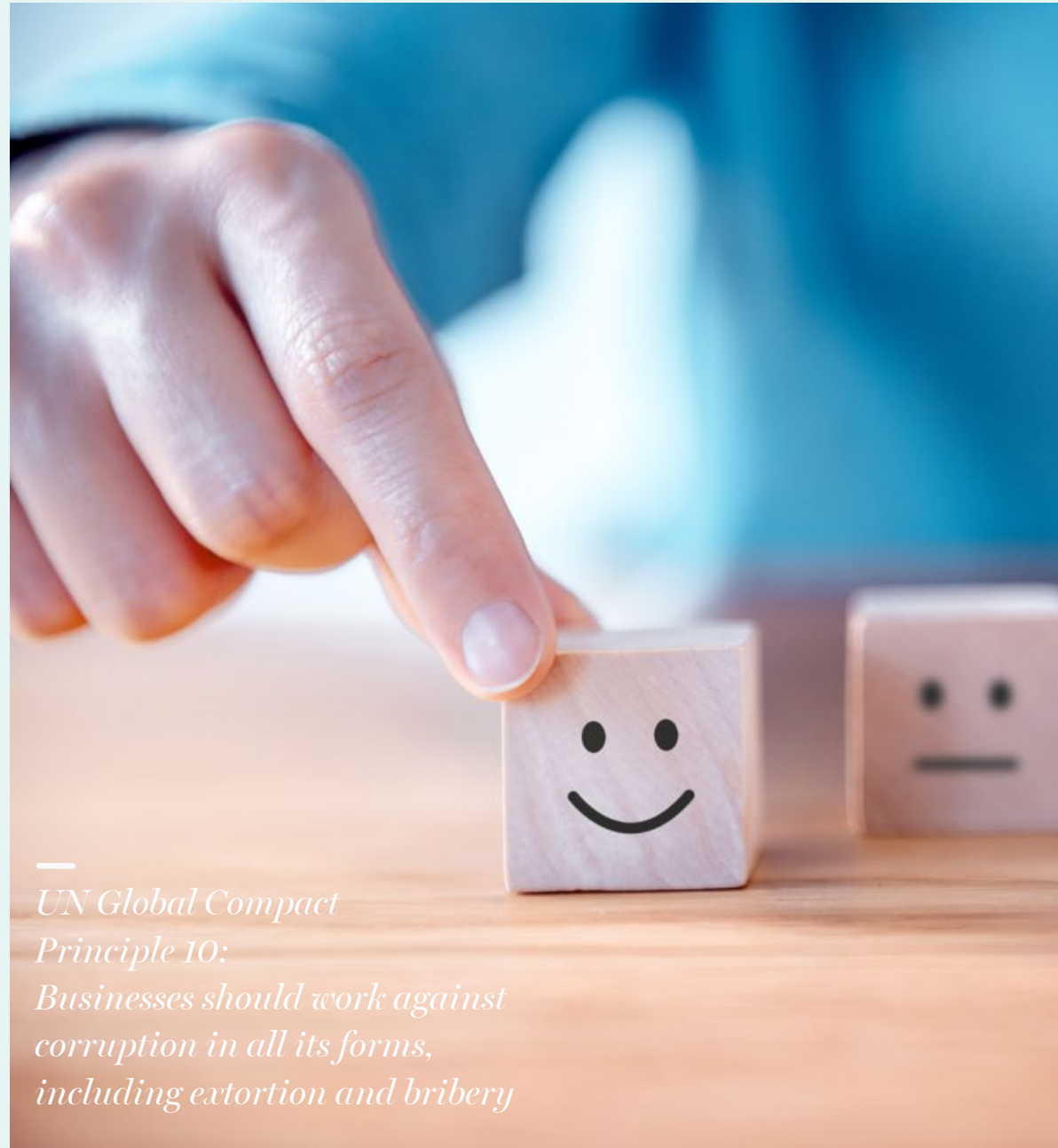
Columbus' management is overall responsible for ensuring that Columbus' business is conducted in accordance with this Policy.

To support the policy and to prevent corruption and bribery, Columbus has implemented Authorization and Risk Management Rules (CARMR), which encompass rules on the authorization hierarchy and

ensure the senior management's involvement in major contracts and investments.

Further information

Columbus' Anti-Bribery & Anti-Corruption Policy is available at: www.columbusglobal.com/Investors/Policies&ArticlesofAssociation



*UN Global Compact
Principle 10:
Businesses should work against
corruption in all its forms,
including extortion and bribery*

Human Rights

Columbus complies with the requirements of the Universal Declaration of Human Rights as well as the laws of each country we operate in.

We respect the human rights of all employees, and all employees in Columbus have been carefully selected on the basis of professional competencies without regard to religion, race, skin colour, gender, age, disability or sexual or political orientation. We regard multiplicity as a strength, and we will not tolerate any kind of discrimination, harassment or bullying of employees.

To support this, Columbus has adopted a Diversity, Equity & Inclusion Policy, which is reviewed annually.

Any suspected unlawful activity or unethical misconduct can be reported through Columbus' whistleblower system (for more information, see page 3 in this Code of Conduct).

Further information

Columbus' Diversity, Equity & Inclusion Policy is available at: www.columbusglobal.com/Investors/Diversity,Equity&Inclusion

Diversity, Equity & Inclusion

At Columbus, we believe that diversity, equity and inclusion (DE&I) are essential to drive innovation and creativity and enables better decision-making. We are committed to building a diverse workplace that is welcoming, respectful and inclusive for all employees. Our vision is to grow a diverse and talented culture.

The purpose of our DE&I Policy is to give guidance and describe our strategies to promote diversity, equality and inclusion in Columbus.



*UN Global Compact
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.*

Labour rights

Columbus will not tolerate any kind of child labour, forced labour, slavery or human trafficking.

We strive to take good care of our employees and to treat all with respect, and we do not tolerate any kind of discrimination and harassment. Columbus respects employee privacy and supports the freedom of association and collective bargaining.

We continuously work to improve working conditions, such as equal pay, employee benefits and working environment to ensure that our workplaces are operated safely and responsibly, and to secure avoidance of workplace accidents.

Following Danish legislation, Columbus carries out the mandatory APV (workplace assessment survey) every three years at all Danish offices. Actions based on the results of the survey are taken.

Columbus offices outside Denmark must comply with local legislation in terms of workplace environment.

Once a year, Columbus conducts a global employee survey, which covers questions related to social working environment.



UN Global Compact

Principle 3:

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargain.

Principle 4:

Businesses should work towards the elimination of all forms of forced and compulsory labour.

Principle 5:

Businesses should work towards the effective abolition of child labour.

Principle 6:

Businesses should work towards the elimination of discrimination in respect of employment and occupation.

Data Ethics

Columbus has adopted a Data Ethics Policy. The purpose of the policy is to establish the high standards for data ethics that Columbus A/S group wishes to adhere to and to emphasise our commitment to a responsible and sustainable use of data and to account for our general data collection and use in order to ensure transparency.

Columbus has laid down principles and guidelines which support ethical decision-making when using data across the value chain.

At Columbus, control and sustainable utilization of data is vital component in the data management lifecycle. Columbus focuses on building an ecosystem that is well-connected and can evolve sustainable technologies to define customer needs. Data privacy and security are integral to the future of these services.

Columbus will ensure by means of ongoing awareness-raising e-learning activities that the organisation is fully aware of and committed to respecting data ethics within Columbus. We consequently set high standards for ourselves as regards our data

Further information

Columbus' Data Ethics Policy is available at: www.columbusglobal.com/Investors/Polices&Articlesofassociation

collection sources, what we do with the data, and how we use them.

Columbus will periodically review and revise the principles to reflect evolving technologies, the regulatory landscape, stakeholder expectations, and understanding of the risks and benefits to individuals and society of data use.



Columbus has laid down principles and guidelines which support ethical decision-making when using data across the value chain.

Taxation

Columbus Group aims to be a good corporate citizen from a tax payment perspective in all countries in which the Group companies operate.

Columbus has adopted a Tax Policy, which applies to all companies in the Columbus Group, and aims to ensure that all taxes are paid according to local tax rules in all countries the Columbus companies operate in.

All Group companies must comply with all local and international legislation on tax as well as the OECD guidelines. It is a fundamental principle that all Group companies must pay all taxes in a timely manner and strive to pay taxes accurately.

Columbus Group aims to have a clear and transparent corporate structure, and avoids any aggressive tax planning. The corporate structure is always driven by commercial consideration and business strategy, rather than any tax incentives. All tax planning is based on interpretations of applicable laws and legislation. When in doubt about interpretation, legal advice from auditors or tax authorities will be consulted.

The policy is reviewed at least annually on the basis of the Group's operations and regulatory changes.

Further information

Columbus' Tax Policy is available at: www.columbusglobal.com/Investors/Policies&ArticlesofAssociation

Columbus has adopted a Tax Policy, which applies to all companies in the Columbus Group, and aims to ensure that all taxes are paid according to local tax rules in all countries the Columbus companies operate in.

