



# data respons

## GOVERNANCE POLICY

# DATA RESPONS SOCIAL POLICY

Building trust through good corporate governance is key and part of the licence to operate for every company. Data Respons continues to identify ways to improve on topics like transparency, supply chain management and professional conduct. With a growing number of companies, employees, locations, and customers it is very important to us that we continue to build a professional and responsible corporate culture.

## 1.1 Ethical guidelines

In 2019 we made a comprehensive Code of Conduct that was launched in 2020 together with an updated whistle-blower service. The Data Respons Code of Conduct is sent to every new employee when in their first week of work. Everyone is requested to read it and follow up with their supervisor if something remains unclear. The supervisor has the responsibility to follow up that the Code has been read and understood.

Also, we launched a Supplier Code of Conduct Principles in 2019 and have scheduled supplier audit as soon as possible, most likely after the pandemic when travelling to Asia is possible again. The Supplier Code of Conduct sets out the minimum standards in key areas including business ethics and anticorruption, as well as human rights, labour conditions and sustainability for Data Respons' suppliers. Failure to comply with these requirements may result in the termination of the business relationship.

## Risks and opportunities

Ethical risks include for instance employee failure to comply with national regulations, Data Respons' Code of Conduct or employee involvement in corruption, bribery, or other irregularities. Such actions may damage the brand or lead to legal sanctions and fines. Data Respons does not have any operations in high-risk countries. Regardless, running a professional corporate culture is very important to us.

## 1.2 Whistle blowing

We are committed to building a culture of trust where employees are comfortable to ask questions, seek guidance, raise concerns, and report suspected violations. Normally, concerns and complaints should be raised with the employee's superior. However, if the employee is uncomfortable with that, he or she may raise the issue with human resources, HSE (health, safety, and environment), a union/safety representative, compliance, legal or internal audit. The employee can also use Data Respons' whistle-blower channel, where concerns can be reported anonymously. Examples of concerns that can be addressed in the whistle-blower channel are for instance fraud, deceiving employees, corruptions, or any other act that misleads employees.

## 1.3 Responsible purchasing

Data Respons' success is dependent upon the cooperation from our business partners – suppliers, customers, contractors, agents, distributors, consultants or joint venture partners and others. Our business partners are expected to comply with all applicable laws and regulations. Suppliers that have a direct contractual relationship with Data Respons should adhere to the principles set out in Data Respons' Supplier Code of Conduct. We aim to use our purchasing power to actively promote positive change across our value chain.

## Risk assessments

We must exercise caution when entering into agreements with intermediaries, i.e. business partners who are acting on Data Respons' behalf, which may include agents, distributors, and resellers, as Data Respons may be held responsible for the actions of such intermediaries. For the same reason, we must be vigilant in exercising oversight and supervision of such intermediaries throughout their engagement with us. Our intermediaries shall follow all applicable laws and regulations and are expected to adhere to Data Respons' Code of Conduct. It is our responsibility to ensure that intermediaries understand Data Respons' Code of Conduct and our requirements on environmental impact.

This includes the manufacturing process, choice of materials, transport and working conditions. We rely on the supplier's disclosures concerning environmental impact and work environment.

We carry out risk-based integrity due diligence processes to ensure that the business partners' reputation, background and abilities meet our standards. All Data Respons suppliers must adhere to our Supplier's Code of Conduct, which aligns with the Data Respons Code of Conduct in all material respects, including environmental guidelines. Corporate department has conducted the risk assessment.

## 1.4 Data security and integrity

As we detect and prevent thousands of attempts at cyberattacks every year, we are constantly developing our security efforts, in line with the external and internal threat picture.

We realise that advanced security solutions are needed to handle a wide range of cyber threats. Our foremost task is to protect our customers' data in compliance with relevant authorities and legal frameworks.

Data security and integrity are critical issues for the Data Respons Group for a number of reasons. In addition to existing country data protection regulations, the EU General Data Protection Regulation (GDPR) became effective on 25 May 2018. The GDPR regulates the protection of Personal Data (PD) that companies collect and process.

### GDPR

Under the GDPR, Data Respons has firm legal requirements to protect against PD breaches and specific timelines within which to report and communicate applicable breaches to affected personnel. The GDPR requirements extend to all vendors that Data Respons uses to collect, store and process PD on its behalf. Data security and integrity is managed at Data Respons through a combination of Group-wide and complementary daughter company policies and processes. Information security is managed within each subsidiary with oversight at Group level.

Data Respons will continue to implement Information Security programmes aimed at improving the overall security posture of the company. The programmes will focus on both preventative and reactive measures to ensure Data Respons remains resilient to the rapidly changing threat landscape.

## 1.5 Legal and appropriate conduct

### Ethical guidelines and responsibilities

Data Respons does not tolerate any form of corruption. We are committed to complying with all applicable laws and regulations enacted to fight corruption and bribery. We prohibit payments of bribes and kickbacks of any kind, whether in dealings with public officials or individuals in the private sector. Data Respons is opposed to any form of money laundering and has taken the relevant measures to prevent

financial transactions that are of criminal intent. Data Respons complies with the governmental guideline on anti-corruption in Norway and applies it to all daughter companies and works actively to combat corruption and unethical practices. The CEO of Data Respons, Kenneth Ragnvaldsen, bears the ultimate responsibility for ethics and anti-corruption at Data Respons. Further, the CEOs in each subsidiary, bear the responsibility in their companies.

### **Guidelines for employees**

Employees must not give or receive gifts, benefits, or bribes. Employees are not allowed to obtain or retain business or other advantage in the conduct of business, offer, promise, or give anything of value or an undue advantage to a public official or to any third party to influence such person to act or refrain from acting in relation to the performance of her/his duties. This applies regardless of whether the advantage is offered directly or through an intermediary. Employees shall not, in the conduct of your work for Data Respons, request, accept or receive any improper advantage that may influence your decisions. Non-compliance will be treated as a serious violation and a disciplinary matter.

Employees shall be protected against any sanctions from Data Respons or any Data Respons representative for refusing to participate in any action that is or can be perceived as corruption, bribery or facilitation payment.

### **Independence and political affiliations**

Data Respons is politically independent and does not sponsor political organisations.

## **1.6 Human rights**

### **Modern Slavery Act**

We support the principles underlying the Universal Declaration of Human Rights, the UN Global Compact and ILO's eight core conventions. Our human rights policy is based on the UN Guiding Principles on Business and Human Rights.

Data Respons' business is heavily dependent on human resources. This entails risk linked to discrimination based on gender, sexual orientation, ethnic origin, religious identity, political affiliation, disability or age. Through our own Code of Conduct and our Supplier Code of Conduct we have set out strict guidelines against anything that violates human rights. In addition, we do regular supplier audits. Data Respons' management works continuously to ensure that all operations follow the company's Code of Conduct. Everyone must show respect for the individual and their privacy and dignity.

Our main business operations are located in Europe where we consider human rights to be assured in working environments. However, we also have a location in Taiwan where we produce technology. Data Respons has conducted quality assessments there in 2019 and 2020 to make sure human rights are assured.

## **1.7 Data Respons Code of Conduct**

Our Code of Conduct is built on Data Respons' values and, together with our policies and procedures and applicable laws and regulations, provide a framework for what we consider responsible conduct for all employees. Download our Code of Conduct [here](#).