CODE OF CONDUCT

Our commitment to acting responsibly



CEO'S MESSAGE

Responsibility is something we at Compusoft are proud to embrace in our everyday actions. Responsible business activities are crucial for achieving sustainable financial results. All our operations are built on trust between Compusoft and our customers.

The three cornerstones of our strategy:

Our values:

- Think customer
- Create enthusiasm through unbeatable service
- Embrace and drive change
- Be open and honest
- Build a positive team spirit
- Stay humble

Vision:

- As a clear market leader in our sector, we want to bring Compusoft to an even stronger position to ensure our customers always get the best solutions on the most solid technological platforms. More, faster, easier.

Mission:

- We continuously strive to create measurable value for our customer's business. All our decisions and actions are always grounded in integrity and inspired by our customers' best interests.

The entire company and its employees are committed to complying with the principles and practices described in this code. We also expect our business partners to operate responsibly. Responsibility starts with each of us. This code guides us in our day-to-day choices and activities. Together we put the Compusoft Code of Conduct into action.

Sarpsborg, 27 August 2018

David Tombre

INTRODUCTION

All units and employees within the Compusoft Group shall strive to comply with laws and agreements that apply to their operations and employment in the countries where they work. This also means that all employees must know and follow the laws that govern their individual tasks. Compliance with laws and regulations is an obvious and absolute requirement. We at Compusoft expect our business partners to share this commitment and this Code of Conduct contains key statements for how we conduct business with our partners and the shared responsibility we have.

CODE of CONDUCT

1. I COMPLY WITH THE LAW IN MY ACTIVITIES

Compusoft does not, and as a Compusoft business partner, I do not condone any breach of law, and I will never incite or advise anyone to violate applicable laws and regulations. Of particular significance are laws concerning prevention of bribery and corruption, competition and consumer protection, occupational safety, environmental protection and product safety. As a Compusoft business partner, I will not prompt any other party to do anything I would not do myself in view of the law, policies, principles or my commitments to Compusoft.

2. CORPORATE IMAGE, BRAND VALUE AND REPUTATION

Compusoft cherishes and protects its brand and corporate image. Compusoft builds the brand on the basis of its value, vision and mission. Compusoft expects its business partners to operate in a way that does not endanger Compusoft's brand value and will do the same in return. As a Compusoft business partner, I never act in a way that could harm Compusoft's reputation or competitiveness. In social media, I comply with the same principles of confidentiality and accuracy as in other communications and interactions.

3. CONFIDENTIAL INFORMATION

We shall both mutually ensure that confidential or important information is not lost or passed on to third parties and handle electronic tools with due care and safety.

4. DATA PROTECTION AND PERSONAL PRIVACY

Compusoft has implemented data protection and privacy policies in line with relevant legislation. We expect that our partners are also vigilant and only collect information which is relevant for the purpose of the data file in question and ensure the accuracy of data on file and ensure that their processing does not jeopardize the privacy of individuals on file or is less secure than is expected by a professional party.

The persons processing confidential data may not disclose personal data they have accessed without lawful justification. Public authorities may have a legal right of access.

5. COMPETITION LAW

As a Compusoft business partner, I am committed to compliance with applicable competition law in my business conduct. My market operations are based on open and effective competition, which is beneficial to consumer customers as well as the entire trading sector.

I am aware of key competition law policies pertaining to my work. I do not participate in activities that are aimed at or potentially lead to restricting or impeding effective and fair competition.

6. CARE FOR THE ENVIRONMENT

Compusoft wishes to promote sustainable production, distribution and consumption. As a Compusoft business partner, I am committed to minimize the negative environmental impacts of my activities. I strive to find ways to further reduce our environmental impacts together.

7. WE DO NOT TOLERATE CORRUPTION OR BRIBERY

COMPUSOFT DOES NOT, AND AS A COMPUSOFT BUSINESS PARTNER, I WILL NOT PROMISE OR PAY BRIBES AND ILLEGAL PAYMENTS TO THE AUTHORITIES OR OTHER PARTIES, AND I WILL NOT INCITE OR ADVISE ANYONE TO OFFER OR ACCEPT THEM

Compusoft has zero tolerance towards all forms of bribery. This also applies to the operations of Compusoft's business partners.

8. RESPECT FOR HUMAN RIGHTS

As a Compusoft business partner, I join Compusoft in their commitment to respecting internationally recognized human rights, in all my operations and promoting them in practice. I do not tolerate human rights violations in any form. I do not tolerate the use of child labour, any form of forced labour nor other human rights violations in our supply chain. I do my share to ensure product safety and that all products and services meet legal requirements.

9. REPORTING CONCERNS AND INSTANCES OF NON-COMPLIANCE

Any activity violating this Code of Conduct may negatively affect the Compusoft brand and stakeholders' trust in the Company and may cause significant business, personal and social risks. It is the duty of each of Compusoft's business partners to request assistance from their contact person at Compusoft where needed and to immediately report to them any worries or detected violations.

Instances of non-compliance may be notified to [compliance@compusoft.no].

There will be no discrimination or repercussions against anyone for making a report in good faith of actual or suspected non-compliance. Reports will be treated confidentially and anonymously if requested.