



Code of Conduct

1 Follow laws and regulations

We shall follow laws and regulations. All employees are responsible for understanding and following local laws and regulations in the countries where we operate, as well as international applicable laws.

If these laws are less restrictive than our own standard, we shall always apply the DVel standard unless other instructions are given.

2 No corruption

2.1 Fair and honest competition

We always conduct our business in compliance with antitrust laws and other laws that regulate competition.

This means that we must not under any circumstances be engaged in, encourage or tolerate bribery through payments or other benefits to public officials or private sector employees with the aim of obtaining or retaining business or any other advantage.

2.2 Do not offer improper gifts

Moderate and reasonable gifts and hospitality which are customary in business are normally acceptable if given for the right reason, i.e., demonstrating DVel's services, improving the image of the company or establishing friendly business relations. We shall however be aware that even customary gifts and hospitality may be inappropriate in connection with forthcoming or ongoing business negotiations, and we always pay attention to our customers' integrity policies.

Some examples of gifts that are considered moderate and reasonable are a lunch or a dinner for a business meeting with a potential customer, partner or recruit. Another example is giving small gifts, preferably DVel branded, at an event or for a holiday.

We shall not offer gifts or hospitality of a value or nature or under circumstances that may be seen as an attempt to improperly influence business decisions or obtain other improper advantages.

Openness, transparency and correct recording are key elements to demonstrate compliance with this.

2.3 Do not accept improper gifts

As DVel employees we must always be, and be seen as, impartial and professional when dealing with others. From this it follows that we shall only accept gifts and hospitality offered by others if they are reasonable in relation to the business in question and if they are within the boundaries of customary business behavior.

Gifts and hospitality of high value or of unusual or unethical nature shall not be accepted. If you are in any doubt if you as a DVel employee shall accept a specific gift or participate in an event, you must seek advice from your manager or one of the members in the management team.

2.4 We avoid conflicts of interest

We shall always keep personal interests apart from company business. Decisions by or for the company must never be influenced by personal preferences, financial interests or relationships.

We shall always seek to mitigate the risk of conflicts of interest.

We support efforts to develop standards that encourage ethical behavior.

3 Our workspace

3.1 A safe and sound workspace

We show commitment to our employees' safety and health. We work to prevent and eliminate illnesses, accidents and injuries, both physical and psychological.

We shall appoint a safety delegate to manage health, safety and environmental programs and improvements together with the management team. We shall ensure that all employees are aware of risks and appropriately trained to avoid these.

3.2 No harassment or bullying

We do not tolerate any form of harassment, bullying or other offensive physical or verbal treatments. We need to ensure that the working environment is safe, both physically and psychologically. This includes communication both internally and externally with customers, suppliers and others. Both spoken and written harassments are prohibited on all platforms and forums we use and act on.

Behaviors including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative is prohibited. Harassments can also include sending texts or images of the above nature, giving intrusive glances or unwelcome compliments.

3.3 Discrimination is prohibited

Our decisions on hiring, promotion, development and compensation are based on the employees' abilities and skills related to the job and must never be based on irrelevant factors, such as gender, age, ethnic or national origin, religion, disability, sexual orientation, union

membership or political affiliation. As employees we shall conduct our work with respect for all people regardless of differences.

We believe diversity is a basis for successful business with greater creativity and innovation. Therefore, we shall actively work to make DVel more diversified.

3.4 The right to form and act through trade unions

We respect all employees' right to form or join a trade union and to freely associate and bargain collectively.

3.5 Right of privacy

We respect the fundamental human right of privacy. Personal information must be obtained correctly and lawfully, be relevant for the purpose for which it has been obtained and be treated with utmost care.

3.6 Security

We shall conduct our business in a secure manner. Implement reasonable measures for minimizing exposure of DVel to security threats such as terrorism, crime, pandemics and natural disasters. We shall follow our security procedures and report any security concerns to the management team. Also, we shall treat our passwords to our business systems with care, not to expose these to others.

4 Working according to our principles

All employees are responsible for understanding and following DVels principles. Our acting internally as well as externally shall show who we are. We shall make decisions and treat each other and others according to our principles.

4.1 Everything we do is built on trust

We are confident that our trust in each other contributes to a high level of professionalism. When everyone takes ownership, responsibility, and their own initiatives, this is easy!

4.2 It is easy to be part of our team

We feel that it is essential to build relationships based on openness, honesty and cooperation. You will quickly become a valuable member of our team because we care about each other and have fun together!

4.3 Be curious and you will learn

We believe that continuous learning through engagement is key. By sharing your own knowledge and being open to learning from others, you will succeed!

5 Information and communication

We protect internal, our customer's and partner's information as an asset. Information about the company related to strategy, economy, sales and projects is internal and confidential, unless the management team tell us otherwise or it is publicly released. We are cautious in handling restricted information and third- party proprietary information.

We shall not share confidential information with others outside the company. DVel employees shall always ensure that the company's interests are preserved. We shall pay attention to the risk of unintentional exposure of such information, for instance by discussing company matters related to internal or confidential information with co-workers during transportation or in public places and so on.

All employees are representatives of DVel and sharing positive things about our company is encouraged. Our communication as employees must never be unlawful or unethical. The communication shall be respectful and correct. This applies to using our mail, our channels, our company name or social media or forums where you have a connection to the company.

We treat information obtained from others in the same way as we expect them to treat information received from us, and in accordance with terms applicable to its disclosure. We do not try to access or accept receipt of proprietary information from others unless the owner has agreed to its release. Proprietary information that is accidentally received shall not be disseminated but instead be returned to its owner.

All employees are responsible for investigating if there are a special agreement, like an NDA, that DVel has signed with the customer in the project that the employee works in. The employee is responsible for knowing the content of the agreement if there is one.

5.1 Internal forum on Teams

Our internal forum is used to share information internally. All employees at DVel can post in the forum. The information can be about meetings, conferences, company status updates and news. It can also be about questions regarding our assignments if this is not confidential, or if someone is looking for advice or help on a technical topic. Therefore it is important that everyone keeps an eye on the forum to stay updated. The forum can also be used as a social forum to some degree, preferably in special channels for this purpose.

The same rules as stated in the other sections of this document applies to the forum. Before sharing photos of colleagues, ask for their permission to do so. Use a polite tone and avoid allusion and irony, since these can be misinterpreted. Do not share sensitive information.

If you make a mistake on the forum, correct it as soon as possible and let the management know about what happened.

5.2 Social media

We encourage employees to engage with DVel in social media, but we must not spread any DVel information that is not intended for the public and we shall never use social media in a way that can harm DVel's brand or reputation.

5.3 Communication with media

Comments to media shall not be made if they can influence DVel negatively or can be considered sensitive for any of DVel's employees. Refer to management if approached by media in a negative context.

In case of a crisis at DVel only the management team or representatives appointed by them shall speak on behalf of DVel in the media.

6 Social responsibility

6.1 UN Sustainable Development Goals

We shall consider the UN Sustainable Development Goals to continuously strive for a more sustainable business. <https://www.un.org/sustainabledevelopment/>

6.2 Human rights and fair labor conditions

We respect human rights, including principles regarding labor. We shall consider the human rights aspect when deciding for which suppliers to use.

6.3 Environment

We strive to conduct our business in an environmentally sustainable way and keep this in mind during decision making in all parts of our organization.

We shall take the environmental aspect into account when deciding for which suppliers to use and when we choose means of transportation for professional business.

6.4 Social engagement

Our employees can contribute to the social development of communities, aid agencies or similar from their own "Projektpott". Social initiatives must be linked to DVel and shall be marketed in a way that it gives DVel value. Our contribution must always be in accordance with DVel's business ethics principles.

7 Whistleblowing

Our Code of Conduct is an essential part in defining the DVel culture. It states our responsibilities and commitment to DVel's principles. You are encouraged to report any conduct that you believe to be a violation of laws or this Code of Conduct. The information that you provide shall be accurate to the best of your knowledge.

Reports shall normally be made to your manager. Where you feel that is not appropriate, or where your concerns have not been adequately addressed, you may report to someone else in the management team or your human resources representative. It can also be made anonymously through our website.

Regardless of which reporting channel is used, confidentiality will be fully maintained, and we guarantee that your comments will be heard. No one shall ever be discriminated against or punished for reporting in good faith any suspected or observed violations of the law or of the Code of Conduct. DVel is committed to protecting personal data in accordance with applicable laws.

8 Signature

The document is signed by all employees and sub-consultants at DVel.