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[OPEN]

CODE OF CONDUCT

BUYPASS BUSINESS ETHICS GUIDELINES

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Our business ethics guidelines

1 General guidelines

These guidelines describe the basic business ethics requirements that we at Buypass have set for ourselves and for those we work with through our business. These revolve around how we behave towards each other and how we interact with the world around us. Those of us who are associated with Buypass and Buypass' subsidiaries have an obligation to act in accordance with the rules and guidelines that form our shared value base, and to contribute to a corporate culture we can be proud of.

Buypass' business ethics guidelines apply to our board members, managers, associates and employees, as well as anyone else who acts on behalf of the company. It is the responsibility of the line managers to ensure that everyone is familiar with the guidelines, and that the guidelines are adhered to.

As an employee or associate connected to Buypass, you must familiarise yourself with the company's business ethics guidelines and thereby help to ensure that Buypass remains a good workplace that is safe and secure, and in which people feel well. Buypass has a policy to comply with all applicable laws and regulations. Violation of the rules or guidelines set out by Buypass will be met with a reaction commensurate with the nature and extent of the violation.

1. Inclusive work environments

Buypass must be a good and professional workplace with an inclusive work environment. We treat each other and everyone we interact with through our work with respect and dignity. Everyone must contribute to ensuring that the working community at Buypass is free from any form of discrimination on the grounds of religion, skin color, gender, sexual orientation, age, nationality or ethnic origin, disability, political opinions, membership in a trade union or anything else. At Buypass, we do not tolerate any behavior that could be perceived as degrading or threatening, and we must all contribute to a work environment that is free from bullying, victimisation, harassment, or similar behavior.

2. Health, safety, and the environment

Buypass promotes good well-being, and a safe, secure, and healthy work environment for all employees. We all share the responsibility of achieving this objective and must do our best to manage all health and safety risks in the workplace. We must take the necessary precautions to prevent accidents and occupational illnesses.

3. Human dignity

Buypass supports the international human rights laid out in the UN's Declaration of Human Rights and its pertaining conventions. No one at Buypass shall, in any way, cause or contribute to the violation or circumvention of human rights, and we must ensure that the basic rights of the employee are respected, as these are laid down in the core conventions of the International Labour Organization (ILO). We comply with the laws and regulations in force at any given time that relate to the distribution of our content services and display a responsible attitude when it comes to socially harmful content such as child pornography and racism.

4. Forced labour

All working relationships must be entered into voluntarily and employees are free to terminate their employment contract after an agreed upon or reasonable notice period. This applies regardless of whether the employment relationship with Buypass is direct or indirect. Examples of the latter include employment contracts entered into with partners or suppliers of Buypass.

5. Child labour

Buypass will not use child labor. Child labor refers to any work carried out by children and young people, unless the work is considered acceptable according to ILO's Convention Concerning Minimum Age for Admission to Employment of 1973 (no. 138). The term "children" here refers to anyone under the age of 15. If national or local legislation sets a higher minimum age for employment, or a higher age for completing compulsory schooling than 15, the highest age shall be used.

6. Loyalty, impartiality, conflict of interest and agreements with related parties

Buypass respects the individual employee's right to a private life and private interests but requires transparency and loyalty towards the group and the group's interests. You must not let your personal interests influence your work, or let personal gain come before your work for Buypass. You must never be party to or try to influence a decision or resolution if there is a conflict of interest or other circumstances that could undermine confidence in independence. It is your responsibility to avoid or avert a conflict of interest that you may become party to. Conflicts of interest may involve customers, suppliers, business partners, current or potential employees, competitors, or other business activities. Circumstances that may constitute a conflict of interest for you are also likely to constitute a conflict of interest if it concerns someone in your family. If there is a risk of a conflict of interest, or you are unsure as to whether this is the case, then you must, on your own initiative, raise the issue with your line manager.

7. Confidentiality

All employees and affiliates of Buypass have a duty of confidentiality when it comes to our business ethics guidelines and pursuant to a written agreement. The duty of confidentiality applies to all business relationships and any other matters that may result in outsiders gaining unauthorised access to confidential information. Everyone must exercise care when it comes to discussing the company's internal affairs, where such discussions may be overheard by unauthorised persons. The "need to know" principle must be the starting point in all contexts. The duty of confidentiality continues to apply even after the employment or contractual relationship has ended if the information is considered sensitive or otherwise confidential.

8. Protection of personal data

Buypass' processing of personal data must be carried out with the care and attention as is required pursuant to applicable laws and regulations, and with special consideration of information that may be sensitive, regardless of whether it refers to customers, employees, or others. The processing of personal data must be limited to the extent necessary in terms of ensuring effective customer care, relevant marketing strategies and the correct administration of human resources. At Buypass, we process sensitive data on behalf of our employees, our customers, and their customers. We have established guidelines, procedures, and solutions to protect data against unauthorised access and theft. As an employee of Buypass, it is important that you familiarise yourself with these. It is expected that you will actively contribute to ensuring that all our solutions have such safeguards in place, and that they remain effective on an ongoing basis in relation to any threats we observe and expect.

9. Intangible assets

Intangible assets such as specialist knowledge (know-how), methods, concepts and ideas are an important part of Buypass' foundation for success in the industry. If you are party to the group's intangible assets, you must protect and manage these in line with the group's interests, and in accordance with the applicable guidelines. You must respect others' intellectual property rights and avoid the infringement of such rights.

Unless otherwise required by law or an order from a public authority, you must not make trade secrets or other important information available to outsiders before having obtained consent to do so from your superior.

10. Property and assets

Buypass' property and assets must be adequately managed and secured. You must comply with the group's security requirements regarding access to and use of the company's facilities, IT resources and access to electronic resources and documents. You may only use equipment and property for personal purposes if this has been agreed in connection with your employment contract or permitted in Buypass' rules or guidelines.

11. Nature and environment

At Buypass, we look after nature and the environment by minimising our own environmental impact, as well as by developing, promoting, and using environmentally friendly technology ourselves. We shall choose environmentally friendly solutions as far as is possible.

12. Information and communication

All information provided by Buypass must be comprehensible and correct and maintain a high standard of professional ethics. Everyone who is involved in information services through their work at Buypass has a shared responsibility for ensuring that this is complied with. Communication with the media and the public must only take place through the CEO or by agreement with the CEO.

13. Skills and authorities

Decisions must always be made at the appropriate level and in accordance with the applicable authority rules. You may only make internal decisions and/or bind Buypass in respect of other parties if you have been granted the authority to do so, and you must always comply with the authority framework you have been given.

14. Accounting and reporting

We are committed to transparency, verifiability, and accuracy in everything we do. All accounting information provided by Buypass employees must be correct, registered and recorded in accordance with applicable laws and regulations. Annual accounts and interim accounts must be in accordance with the law, good accounting practice and the accounting standards otherwise adopted in and for Buypass.

15. Internal controls

Buypass must ensure that robust internal control procedures are in place that ensure the fulfilment of and adherence to the group's goals and strategies. The internal control procedures must ensure that business processes are, at all times, efficient and within the acceptable limits of risk, that physical and intangible assets are secured and utilised, that financial information is correct and provided in a timely manner, and that laws, rules and guidelines are complied with. Internal controls are a managerial responsibility but co-responsibility of these still lies with the individual.

2 Relationships with customers, suppliers, competitors, and public authorities

We must demonstrate insight, respect and understanding towards our customers. We must always seek to take care of the customer's needs in the best way possible, and within the business ethics framework that applies to the company. Suppliers must be treated fairly and with impartiality. Suppliers who compete for contracts with Buypass must always be able to trust the integrity of Buypass' selection process. The business ethics guidelines for Buypass' competitiveness in the market are based on good products and services offered at the right price. We must always treat Buypass' competitors fairly and

professionally. Public authorities must also be met in a correct and open manner. Public information about the group may only be disclosed by Buypass' management.

16. Competition

Buypass wants fair and open competition across all markets, both nationally and internationally. You must not, under any circumstances, cause or contribute to breaches of general and special competition rules, such as by way of illegal price collusion, illegal market sharing or any other behavior contrary to applicable competition legislation.

17. Corruption and bribery

At Buypass, we distance ourselves from all forms of corruption. No one at Buypass shall offer or receive illegal or improper monetary gifts or any other remuneration in order to obtain business or private benefits for themselves or others. Buypass has a strict attitude towards gifts or benefits that could be perceived as having a gift element to them. This applies both in terms of how we handle customers and how our employees and partners deal with this type of attention from others. We shall not use agreements with intermediaries to channel payments to anyone in such a way that this could be considered as participation in corruption.

18. Gifts and courtesy gestures

We must always exercise caution when offering or accepting gifts and courtesy gestures. You must not, under any circumstance, accept gifts or other remuneration if it is reasonable to assume that this could be considered as having an influence on any business decisions. If you are in doubt, you must always raise the issue with your line manager.

19. Fraud, extortion, money laundering, and other related crimes

At Buypass, we comply with all applicable national and international regulations aimed at preventing, detecting, and correcting financial crime, in particular those relating to fraud, extortion, money laundering and other similar crimes. All individuals at Buypass must refrain from such criminal activity and actively cooperate with any inquiries relating to such crimes.

Buypass distances itself from all forms of money laundering, and employees must prevent any of the group's financial transactions from being misused by others for money laundering.

3 Employees' private interests and rules of conduct

As a Buypass employee, you must not hold another position or perform work for others during your working hours without special prior written consent from your superior.

20. Positions, roles, and ownership in external businesses

Involvement in external roles and positions is positive but must not be of such a nature that the scope of this work goes beyond an employment relationship or comes into conflict with Buypass' business interests. In order to take on board positions – such as consultancy roles for or ownership in customers', suppliers', partners' or competitors' companies, as well as offices or positions that are of a scope or of such a nature that it may affect your working relationship with Buypass – Buypass requires that you obtain prior consent from your superior.

21. Political activities

Buypass does not provide support to political parties, either in the form of direct financial support or paid working hours. The Buypass name or other resources controlled by Buypass must not be used to promote the interests of political parties or candidates.

Employees who participate in political life must be granted a leave of absence from work in accordance with applicable law and agreements. Such agreements impose a duty of confidentiality for all information that the person becomes aware of in their contact with Buypass.

4 Reporting and whistleblowing

If you discover a breach of Buypass' rules or guidelines, you must alert your line manager, safety representative or employee representative.

22. Handling of incidents and malfunctions

No one who works for Buypass should be concerned about the consequences of reporting anything that they have seen or heard. Failure to report is considered a breach of the guidelines. Buypass does not allow any form of retaliation against anyone who has, in good faith, reported a violation or a suspected violation of the rules or guidelines. Whistle-blowers are also protected under the Norwegian Work Environment Act, which prohibits retaliation or sanctions as a result of whistleblowing. Any questions regarding how the guidelines are interpreted or practiced can be directed to the safety and quality manager.

The board of Buypass AS and Buypass Payment AS will initiate any measures that the boards deem appropriate in the investigation of violations or suspected violations that have been reported to the board. If a violation does occur, Buypass will take appropriate disciplinary and preventative measures. If the relationship concerns a board member or someone in the management, the board must be consulted and, if the matter concerns other employees, then the safety and quality manager will be consulted before a decision is made. Changes to or exemptions from these guidelines for board members, managers, or employees of Buypass can only be granted by the board.