

## **BEC – CODE OF CONDUCT**

*Orderliness is a fundamental value at BEC*

### ***Purpose***

A code of conduct is about values and ethical guidelines – in short orderliness. It frames the way we go to work at BEC and the way we act in relation to the world around us, including our customers, vendors, collaborators, and government agencies. Everybody at BEC must live BEC's code of conduct every day. It is therefore important to BEC that our culture is consistent with our code of conduct.

Our code of conduct is supported by several policies. The policies are not exhaustive but help us raise the bar for orderliness together throughout BEC so that we achieve our common ambitions and goals.

BEC's employees are our most valuable asset. The individual employee is important to BEC, and together the employees form the basis for BEC's ability to deliver good business results. Everybody at BEC has responsibility for living BEC's orderliness. The managers are responsible for assessing whether a more detailed framework is required in precisely their department.

*February 2021*

Sincerely,  
BEC



Jesper Nielsen  
CEO

## **SECURITY AND CONFIDENTIALITY**

All BEC employees are obliged to keep up to date on the current rules in BEC's security policy. Security work is incorporated into the daily work routines to achieve the desired security level. BEC's managers must keep BEC's security steering group informed of security-related matters and bring security risk issues before the steering group.

BEC protects confidential information whether the information comes from customers, vendors or other external collaborators, government agencies, or from other BEC departments. Confidential information must not be disclosed to third parties without the owner's expressed consent.

## **EQUALITY**

At BEC, we make each other shine. By that, we mean that we must respect and understand the solidarity as well as the individual. Respect and understanding are the foundation for good dialogues within BEC, which nurture our potential and promote our professional and personal development. In other words, BEC does not tolerate discrimination on the grounds of sex, ethnic origin, sexual orientation, political or religious views, or age.

## **PERSONAL BEHAVIOR**

BEC does not interfere with the private affairs of BEC employees. The employees must maintain respect towards colleagues and external business partners. In contexts where it is known that the employees are employed by BEC, the employees are expected to act properly so as not to damage BEC's reputation.

## **CUSTOMER PARTNERSHIP**

Based on the customers' business needs, BEC offers customers an IT partnership loyal to the community of customers and the individual customer. The BEC partnership builds on transparent, attentive, and open communication, ensuring that agreements are made based on reciprocity.

BEC employees are key persons in customer relations, and BEC employees have special responsibility for creating a good partnership.

## **INSIDE INFORMATION**

BEC employees must not purchase, sell, or induce the sale of securities based on inside information. In that connection, BEC employees must not disclose inside information to anyone (including colleagues) who has no work-related need for the inside information, such as family members, co-habitants, or acquaintances.

BEC has detailed rules for inside information that BEC employees must read and understand. Also, BEC regularly registers and categorizes BEC employees with inside information.

## **GIFTS AND EVENTS**

In normal business relations, customers and vendors may offer gifts to BEC employees, including tickets for events, as a token of their appreciation of good cooperation. BEC employees must exercise due care and only accept and give gifts of a symbolic value. In that connection, BEC has an anti-corruption policy that ensures common understanding and handling of gifts.

## **CORPORATE SOCIAL RESPONSIBILITY (CSR)**

BEC has a Corporate Social Responsibility (CSR) Policy based on BEC's awareness of its general corporate social responsibility and its responsibility to many stakeholders such as its employees, customers, owners, business partners, and the local community. The CSR Policy addresses both employees and stakeholders of BEC who look to BEC's policy for CSR.

To integrate CSR in the BEC business, BEC has acceded to Global Compact - the UN initiative for private undertakings and organizations. Global Compact aims to promote sustainable development of society based on internationally recognized principles on labor, human rights, the environment, and anti-corruption. Global Compact sets a general framework and serves as a source of inspiration for BEC's CSR work.

BEC wishes to help vendors make social and environmental improvements. Therefore, BEC expects vendors to comply with national legislation and internationally recognized standards and conventions relating to ethical, environmental, and social matters. BEC further encourages its most important vendors to also accede to UN Global Compact.

## **GOVERNMENT AGENCIES**

BEC is subject to the supervision of various government agencies, including the Danish Financial Supervisory Authority. BEC always strives to maintain good cooperation relations.