



Prenax.

ETHICS POLICY

02.09.2022 v. 1.1

Policy brief & purpose.

Our Ethics policy outlines our commitment to business ethics. The aim of this policy is to provide guidelines for all our employees, partners and customers.

As a company we have identified these key topics that are relevant for our company based on industry, size and location:

- Anti-corruption
- Anti-competitive practices
- Responsible management of information

Topic definitions.

Corruption

What is corruption?

It can be cases of:

Bribery – offering or exchanging money, gifts or favors –an act that is illegal, unethical

Conflict of interest – a situation in which private interests risk impacting work duties

Money laundering – when concealing the origin, ownership or destination of illegally or dishonestly obtained money

Fraud - An act of intentionally deceiving someone in order to gain an unfair or illegal advantage. For example, the misrepresentation of accounting records.

- We aim to conduct business in a way that is honest and ethical
- We have zero tolerance regarding bribery and corruption
- All our employees, partners and customers are expected to act professionally and fairly
- Any cases of bribery, corruption or breach of law will be acted on

Topic definitions.

Anti-competitive practices

What is anti-competitive practices?

Bid-rigging - when competing parties cooperate to determine the winner of a bidding process.

Price-fixing - An agreement (written, verbal or implied from conduct) among competitors that raises, lowers or stabilizes prices or competitive terms

Predatory pricing and dumping - Pricing below the normal price that is designed to drive out competition and creating a monopolistic situation where a company can dictate the price and quality of a given product or service.

Territory allocation – when competitors split up markets as an agreement

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Topic definitions.

Responsible management of information

What is management of information?

Information security and management - that aims to:

Safeguard confidentiality

Develop business resilience

Handle personal and third-party data ethically

Be compliant with global guidelines and regulations – such as GDPR, which is a legal framework in the European Union (EU) that aims to protect the data privacy of all EU citizens (reference to our GDPR policy).

- We aim to safeguard data in a way that is compliant with legal regulations
- We have practices in place to ensure compliancy
- We ensure that we have clear routines in place for data management and information security

Policy commitments.

What do we expect from our employees, partners & customers?

We expect all parties to follow our Ethics policy.

We commit to train 100% of our employees by end of 2022 in business ethics.

We discourage employees from accepting gifts from clients or partners. We prohibit briberies for the benefit of any external or internal party.

All employees should fulfill their job duties with integrity and respect toward customers, publishers and the work community.

Compliance with law

All employees must protect our company's legality. We should comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

Policy elements.

Disciplinary actions

Our company will take disciplinary action against employees who breach our ethical policy. Incidents must be reported to direct manager or in case of escalation to HR as soon as any issues or concerns arise, as part of early detection and prevention.

We will take legal action in cases of corruption, theft, embezzlement or other unlawful behavior. Other concerns or complaints regarding employee workplace behavior or unfair treatment can also be handled according to separate Grievance Policy.

Sign-off

All employees must read and follow our company policies. A part of the training ensures a sign-off of completion.

Policy ownership

This policy is approved by the Management team. The policy is owned by the Human Resource Manager, and all updates, changes, deviations and supplements shall be authorized by the policy owner. All updates are published directly on our Intranet.

This policy has been read and verified by the CEO

jerome conquest

jerome conquest (Sep 2, 2022 12:04 GMT+2)

Place, Date _____ Sep 2, 2022



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Ethics policy v.1.1

Final Audit Report

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