

Trifork - Code of Conduct

1. Introduction

1.1 Organisation

All business units in Trifork work as separate entities who all enjoy the benefits of being a part of a bigger family - Trifork Group.

Trifork honours a flat hierarchy and a spirit of trust. We believe in distributing responsibility to our colleagues in each business unit, as they are closest to the tasks. To do this, we ensure that our colleagues have the right competences and can be powered with authority and freedom to make the right decisions. This requires trust in both our employees and business partners - trust that they will do the right thing.

1.2 Objective

To support everyone in making the right decisions, Trifork Group AG has set out this Code of Conduct defining the expectations to everyone engaged with Trifork Group (the "Group"). The purpose of this Code of Conduct is to help everyone to do the right thing as well as protect colleagues, society, partners and Trifork against misconduct.

We encourage everyone to help each other out with compliance - and to notify each other if you see or hear about actions that may be in conflict with this Code of Conduct.

We encourage all to help each other out in our day-to-day work so we can keep our organization of trust and our Code of Conduct as simple as possible.

The Code of Conduct will help us all with acting safely and ethically in our everyday work. Without exception, everyone at Trifork must follow and understand this Code of Conduct just as we must follow relevant laws and regulations. In case there is a difference between the terms in this Code of Conduct and applicable laws or regulations, the employee must adhere to the higher requirements.

In case of breach of certain EU Legislation, serious offences as well as other serious matters (as defined in the Trifork Group Whistleblower Protocol) please refer to the Trifork Group Whistleblower Protocol which can be found here: [<https://trifork.com/whistleblower/>]

1.3 Scope

The Code of Conduct is a cornerstone for conduct in the Group and describes the core principles of the Group which applies to employees in all functions and units in the Group in order to assist employees in acting safely and ethically in their everyday work.

The Code of Conduct further applies to all contractors working under the supervision and direction of the Group as well as the Code of Conduct outlines principles that business partners and suppliers are expected to adhere to (refer to appendix A – ("Supplier Code of Conduct").

2. General principles

Trifork recognises that a principle-based approach to doing business is a prerequisite for corporate sustainability. Consequently, Trifork is strongly committed to operate in a way that meets fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption.

Therefore, Trifork supports the ten principles of the UN Global Compact which serves as the foundation of Trifork's position as an active partner in society. Moreover, Trifork supports the UN's Sustainable Development agenda by using the UN's Sustainable Development Goals as a reference point for our sustainability approach (the above is further detailed in Trifork's ESG report).

Trifork encourages all employees to have these principles and goals in mind, when conducting business.

3. Financial crime

Trifork is committed to the fight against financial crime and we ensure compliance with applicable legislation in the jurisdictions that we operate in.

4. Anti-bribery, anti-corruption

Trifork does not tolerate any form of bribery or corruption, including e.g., facilitation payments and non-contractual kickback schemes. This is regardless of whether the business unit is operating in a country with less strict laws on bribery and corruption. Trifork Group has a specific Anti-Bribery & anti-corruption policy as well as adhering to the UK Bribery act, which is also made public on the company's website.

If employees are offered or requested to provide a bribe of any form they must instantly decline and inform the Group CFO, Kristian Wulf-Andersen.

5. Gifts, hospitality and entertainment

Trifork does not give or accept gifts, hospitality or entertainment that could in any way impair or raise concerns about our integrity.

Trifork however acknowledge that entertainment, hospitality and the exchange of insignificant (in terms of monetary value) business gifts are considered common practice and part of building and maintaining business relationships in certain situations, however, the intentions of gifts and donations need to be clear and related to the business conducted by Trifork.

The exchange of cash or other monetary gifts is strictly forbidden and our funds, property or services must not be used to support political purposes.

6. Sanctions and export controls

All business units must comply with international economic sanctions as well as trade controls (including export controls ensuring that technologies that are potentially dangerous do not fall in the wrong hands).

If there is any doubt in this regard, please do not hesitate to contact CFO, Kristian Wulf-Andersen (KWA@trifork.com).

7. Fraud

Trifork is an organization of trust, where honesty and transparency are key elements. These elements are not only important to conduct a sustainable business, but also in relation to the Trifork brand and reputation.

Accordingly, there is no tolerance with respect to fraudulent or intentionally misleading behaviour.

8. Money laundering and combatting financing of terrorism

Money laundering is a way to conceal the origin of money obtained by illegal activities. It is therefore important that Trifork employees always know their business partners and do not in any way do business which may put Trifork at risk of contributing to money-laundering.

Furthermore, Trifork does not engage in activities that could in any way engage in or fund terrorism.

If you are in doubt, please do not hesitate to contact Trifork CFO, Kristian Wulf-Andersen (KWA@trifork.com).

9. Competition and anti-competitive practices

As with all other legislation, any violation of competition laws is strictly forbidden. Trifork business units are not allowed to conclude any contracts or agreements, formal or informal, that have the purpose or is likely to have the effect of substantially limiting competition. Employees are not authorized to discuss business-related, potentially competition-restricting topics with competitors.

10. Conflicts of interest

Trifork employees must not participate in any commercial transactions between a Trifork business unit and a supplier or customer in which he or she has direct or indirect personal interests, financial or otherwise, unless this relationship has been disclosed and the transaction is made on an arm's length basis (market conditions).

11. Working conditions

Trifork strongly believes that human rights are fundamental and must be protected at all times.

It is the policy of Trifork that all employees carrying out services for Trifork - whether directly as employees or indirectly as employees of suppliers - must be treated with decency and dignity. All employees deserve a fair and ethical workplace, and Trifork is committed to the fight against human trafficking, forced labour and debt servitude.

Trifork commits to secure occupational health and safety standards for all employees, and give employees mandatory training and information.

12. Mutual respect and non-discrimination

Trifork demands mutual respect among employees and business partners and maintains a zero-tolerance policy towards any kind of harassment, discrimination or abusive conduct, and retaliation.

Everyone at Trifork is obligated to not base recruitment, remuneration, training, advancement, benefits, discipline, dismissals and any other employment-related decisions on characteristics that are not related to their merit or the inherent requirements of the job.

13. Freedom of association and collective bargaining

Trifork respects all employees' right to form and join (or not join) a trade union, select their own representatives and to bargain collectively. Trifork does not interfere with or restrict this right.

14. Environmental impact

As leading provider of a wide range of IT-services, Trifork is committed to take on its share of the responsibility to reduce the environmental impact of our business operations.

This mindset should be adopted by all Trifork employees, and our services should reflect environmental considerations.

For an insight in Trifork's environmental initiatives, please refer to Trifork Group's ESG report:

<https://investor.trifork.com/>

15. Respect confidentiality, intellectual property and data privacy rules

Our employees and business partners must protect and respect the intellectual property and confidential information of Trifork and third parties. Among other things, this means that intellectual property and confidential information of Trifork or third parties must only be used as explicitly permitted in relevant agreements.

Be aware that Trifork is only allowed to collect, process, disclose or store personal data, if it has a legitimate business purpose, and ensure that necessary agreements are in place before collecting, processing or transferring personal data to third parties.

16. Market abuse

Trifork identifies and maintains confidentiality of inside information and will not tolerate any behaviour that may result in market misconduct. Furthermore, our employees must not engage in or induce others to insider dealing or market manipulation. The company's policy on trading and handling of Trifork Group shares must be adhered to by all employees. All employees must be educated and up to date with relevant insider regulation and requirements.

Appendix A – Trifork Business Partner Code of Conduct

1 Introduction and scope

At Trifork, we strive to integrate corporate social responsibility and sustainability into our everyday work.

Trifork's business partners and suppliers play a central role in Trifork's mission to change the world to the better with software, and we rely on their commitment to conduct business ethically and responsibly.

The Trifork Business Partner Code of Conduct (the "**Business Partner Code**") sets out Trifork's expectations to our business partners and direct suppliers ("**Business Partners**").

The Business Partner Code reflects our commitment to the United Nations Global Compact as well as other globally recognised standards pertaining to the areas of human rights, labour conventions and sustainability as further detailed in section 3 (*Fundamental principles*) below.

Consequently, Trifork strongly endeavours to select Business Partners who share our commitment to corporate social responsibility and sustainability.

2 Adherence to the Business Partner Code

It is important to Trifork that Suppliers do likewise commit to good practices pertaining to social responsibility and sustainability, consequently our Suppliers are expected to operate in accordance with the principles set out in this Business Partner Code and comply with all applicable laws and regulations.

We acknowledge that our Business Partners are at different levels in terms of maturity, however we expect our Business Partners to continuously work on improving in the areas described in the Business Partner Code.

In case of material violations of the principles set out in this Business Partner Code, Trifork will upon discovery of such violation, enter into discussions with the Business Partner in question in order to evaluate the Business Partner's plan for improving the issue and if relevant work together with the Business Partner to agree on a corrective action plan.

3 Fundamental principles

3.1. Human rights

Trifork is strongly committed to the protection of internationally proclaimed human rights and expects all Business Partners to respect all human rights and make sure that they are not complicit in human rights abuses.

Trifork expects that Business Partners prohibits and actively prevents any type of discrimination e.g. related to (but not limited to) age, gender, nationality, ethnicity, religion, culture, political views, physical abilities and sexual preferences.

3.2. Labour conditions

Trifork expects that Business Partners ensures sound working conditions for its employees in accordance with applicable regulations and industry practices and ensure a safe working environment, both in terms of physical and mental health.

Businesses Partners is expected to respect employees' freedom of association and the right to collective bargaining.

Trifork has a zero-tolerance policy towards child labour and all forms of forced and compulsory labour and we expect the same of our Business Partners.

3.3. Environment

Sustainability is at the core of the way we run our business, all our activities and our solutions. Trifork expects its Business Partner take a responsibility appropriate for the Business Partner's size and type of business.

As a minimum, Business Partners are expected to comply with applicable environmental laws and local standards.

3.4. Ethical behaviour

Business Partners are expected to conduct their business in an ethical manner and should work against corruption in all its forms, including extortion and bribery.

Sincerely,

Trifork Group AG Executive management

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