



Supplier Code of Conduct

LINK Mobility Group Holding ASA

Ethical Business Culture

LINK Mobility's mission is to strengthen the relationship between our clients and their customers through digitalization and dialogue. Our impact on how people communicate means we have a responsibility to ensure that our values and our commitment to ethical business conduct shows in our expectations towards our business partners. We strongly believe that an ethical business culture is the cornerstone of a sustainable company, and a necessity to fulfil our values that are to be United, Dedicated and Enthusiastic.

We aim to develop long-lasting, trusting and mutually beneficial relationships with suppliers who share strong values and who demonstrate the same commitment to operating responsibly and ethically.

The LINK supplier Code of Conduct is set forth to show our expectations and requirements for ethical conduct, and is based on the international guidelines found in the ten principles provided by the United Nations (UN) Global compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. LINK expects its suppliers, consultants, contractors, and any other business partner to show the same commitment to an ethical business practice as we do in LINK.

We truly believe that by conducting business with this Supplier Code of Conduct we are all positively contributing to society and the environment.

May 2022

Reference in this [Supplier Code of Conduct](#) to "LINK" shall be understood as LINK Mobility Group Holding ASA, and/or any of its subsidiaries, and reference to "supplier" shall be understood as suppliers, consultants, contractors, and any other business partners of LINK.

Lawful and ethical business practices

LINK believes that creating value for customers depends on the application of ethical standards to create a trust-based relationship with its employees, its owners, its business partners, and the communities it is part of.

What does this mean to **LINK suppliers**?

Anti-corruption

LINK suppliers shall demonstrate a zero-tolerance policy prohibiting all forms of corruption and bribery. All business dealings shall be transparently performed and accurately reflected within their records.

LINK suppliers shall choose their business partners carefully and only after conducting a thorough background check and due diligence.

LINK suppliers shall not, directly or indirectly, offer gifts to LINK employees or persons representing LINK, or anyone closely related to these, unless the gift is of insignificant value.

LINK suppliers shall only offer hospitality, such as social events, meals, or entertainments if a legitimate business purpose allows it, and the cost is kept within reasonable limits.

LINK suppliers monitoring and enforcement procedures must be sufficient to ensure compliance with applicable anti-bribery and anti-corruption legislation.

Conflicts of interest

LINK suppliers shall have procedures in place to ensure that its employees make decisions without regard for personal gain. Conflicts of interest can be rooted in hospitality and entertainment, gifts, charitable contributions, political contributions, sponsorships, and close personal relationships. LINK strives to operate in a manner in which conflict of interests are actively avoided and, require its suppliers to do the same.

Anti-Money Laundering and Counter Terrorist Financing

LINK suppliers shall commit to all applicable Anti-Money Laundering and Counter Terrorist Financing laws and regulations applicable in the countries where Supplier or LINK performs business.

LINK suppliers shall not knowingly engage or attempt to engage in any transaction involving proceeds derived from unlawful activity, or have dealings with individuals and entities who are subject to international economic sanctions.

Fair competition

LINK suppliers shall under no circumstance cause or be part of any breach of general or special competition regulations and laws applicable in the markets where they or LINK operate, such as illegal cooperation on pricing or illegal market sharing.

LINK suppliers shall not participate in bid rigging by way of bid suppression, complementary, or cover bidding, bid rotation, or other mechanisms that limit fair competition in tender situations.

LINK suppliers shall not participate in any form of cartel practices with competitors, such as dividing or allocating markets or customers or price fixing.

LINK suppliers shall have sufficient procedures in place to ensure compliance with applicable competition and antitrust laws and laws relating to fair business practices and advertising.

Sanctions against certain countries, industries, or companies

LINK suppliers should avoid buying from a country when sanctions against the country have been implemented by the United Nations and avoid engaging with industries or companies when there is a broad consensus to boycott due to the negative social, environmental, or ethical effects of the products or services.

Promote a Respectful, Fair and Diverse Workplace

LINK is committed to supporting recognized human rights and fair working conditions for their employees and supply chain.

What does this mean to **LINK suppliers**?

Forced labor and human trafficking

LINK suppliers shall ensure that human resources are managed in accordance with internationally recognized principles of corporate responsibility.

LINK suppliers must not use forced, bonded, compulsory, or imprisoned labor, not force individuals into performing work, and not be involved in any manner with human trafficking.

LINK suppliers shall have a zero tolerance for child labor.

LINK suppliers shall ensure that their employees shall be free to leave employment after reasonable notice.

Humane treatment

LINK suppliers shall ensure that their employees receive at least minimum compensation, benefits, time-off, and overtime payments required by law.

LINK suppliers shall respect all internationally recognized human rights, and shall treat all employees with respect and dignity, and ensure that they are protected from physical, sexual, verbal, or other forms of abuse, coercion, or harassment.

LINK suppliers shall recognize the employees' right to join or refuse to join labor unions or associations.

Health and safety

LINK suppliers shall ensure a healthy and safe working environment for employees and contractors in their workplace, and shall meet all requirements of applicable health and safety laws and regulations.

LINK suppliers shall ensure that its employees and contractors are adequately trained and provided with proper equipment for safe work.

Equality and diversity

LINK suppliers provide equal treatment and employment opportunities, and embrace an inclusive culture.

LINK suppliers do not tolerate disrespectful behavior, discrimination, or harassment.

Protect the environment and community

LINK believes that protection of the physical and social environment in the communities and sectors where it does business is a clear responsibility for any company.

What does this mean to **LINK suppliers**?

Sustainability

LINK suppliers shall minimize the negative impacts their business operations have on the community, environment, and natural resources throughout their supply chain, and adhere to all applicable laws and , regulations related to sustainability.

LINK suppliers shall identify the environmental impacts of their operations, productsproducts, and services, hereunder air pollution, emissions, energy consumption, and waste, and endeavour to minimize such impact.

Corporate Social Responsibility

LINK suppliers are encouraged to contribute to the social, economiceconomic, and environmental improvement of communities where they have operations.

LINK suppliers shall source materials from environmentally and socially responsible sources only.

Protection of data and assets(tangible and intangible)

LINK is committed to protecting our assets and the data we process, as it is crucial to our business to ensure their safety.

What does this mean to **LINK suppliers**?

Privacy and Information Security

LINK suppliers shall comply with applicable privacy and information security laws and regulatory requirements when processing, collecting, storing, transmitting, or sharing information relating to an identified or identifiable natural person.

LINK suppliers shall commit to protecting the reasonable privacy expectations of such personal information of everyone it does business with. Personal information provided by or on behalf of LINK should only be used, accessed, and disclosed as permitted by the supplier agreement.

LINK suppliers shall have adequate security policies in place for their operations, and shall present documentation of such security policies upon request.

Tangible and intangible assets

LINK suppliers shall always respect intellectual property rights by using only information technology, software, and content that has been legitimately acquired and licensed. Any transfer of technology and know-how shall be carried out in a manner that protects intellectual property rights.

LINK suppliers shall not use LINK brands, trademarks, or domain names without written agreement allowing such use.

LINK suppliers who have access to LINK property or equipment shall only use such property or equipment if authorized , and with care.

Confidentiality

LINK suppliers ensure the protection of confidential information entrusted to them by LINK, LINK's customerscustomers, and others.

LINK suppliers do not act on confidential information received in error, whether it has come from LINK, LINK's customers, or others. Such information is promptly returned to the sender.

LINK suppliers shall treat personal data as strictly confidential and shall take appropriate technical and organisational security measures to protect this information against loss or unlawful processing.

Compliance with this Supplier Code of Conduct

LINK suppliers shall have adequate processes in place for identifying risks associated with their operations and have appropriate procedures and controls to manage such risks and ensure regulatory compliance.

LINK suppliers shall have adequate processes in place to encourage their partners and suppliers to adhere to requirements regarding ethical business practices that meet standards equal to the ones described in this Code of Conduct.

LINK suppliers shall have sufficient processes in place to ensure that clear and accurate information about their policies, expectations, and performance is communicated to their employees, suppliers, and customers.

LINK suppliers shall have sufficient training programs in place to ensure proper implementation.

LINK suppliers shall identify who is responsible for ensuring implementation of their management systems and associated programs in their company.

LINK suppliers shall create an environment where employees are comfortable with raising their concerns.

LINK suppliers shall have adequate "whistleblower" or reporting channels available and feedback processes in place designed to ensure confidentiality and protection for employees and suppliers.

LINK suppliers must not retaliate or tolerate retaliation against anyone who, in good faith, reports suspected or known misconduct.

Failure to comply with this Supplier Code of Conduct or any applicable laws and regulations may result in the termination of any agreement as a **LINK supplier** and referral of the matter to local authorities.

Signature:

Date:
