



Business partner Code of Conduct 2025

Admin By Request

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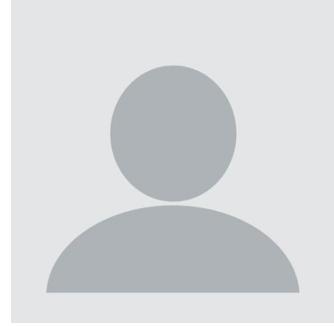
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Foreword

Founded in 2008 with a vision to create smarter, simpler tools for system administrators, Admin By Request has since grown into a leading provider of SaaS solutions in the cybersecurity industry, trusted by international customers of all sizes.

At Admin By Request, we put quality and a strong workplace culture at the heart of everything we do - and we expect the same high standards from our suppliers and partners, who are carefully chosen to share our commitment.

Who We Are

At Admin By Request, we are a global team delivering comprehensive security solutions in a rapidly evolving and expanding market. We continuously strive to introduce exciting new products that bring value to our customers.

You can find us at offices in San Francisco, New York, Chicago, London, Munich, New Zealand, Thailand, Denmark, Sweden, and Norway.

Our Mission

We aim to provide world-class, comprehensive, and secure privileged access management solutions to organizations of all sizes. Our SaaS-based PAM solution empowers businesses to protect their sensitive data and systems from cyber threats, while maintaining compliance and ease of use for their employees - all without sacrificing user productivity.

Focus Areas

At Admin By Request, we cover a wide range of focus areas, which is why each of our departments is staffed with top professionals in their respective fields.

We place great emphasis on the people who use our solutions, as we form strong, ongoing relationships with our customers and provide next-level support - something we're proud to be recognized for in the PAM space, and by our clients. In addition, our talented developers work tirelessly to continuously improve our product - ensuring it is always user-friendly and meets the highest industry standards.

Best regards,

Lars Sneftrup Pedersen
CEO - Admin by Request

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1. INTRODUCTION

At Admin By Request, we are committed to conducting business with integrity, transparency, and respect for human rights, social responsibility, and the environment.

This Code of Conduct therefore sets out, more specifically, the areas we focus on in our daily operations, as well as the practices that are not tolerated in the workplace. It reflects our values and shows how we act in certain situations.

We expect our suppliers, our suppliers' suppliers and partners to adopt the same approach. This is not only important to us as a company - ensuring we collaborate only with parties we can endorse - but also necessary because, given our global market position and customer base, we are contractually and legally obligated to ensure that our suppliers and partners comply with the principles set out in this Code of Conduct.

You therefore agree to abide by the terms of our Supplier Code of Conduct, as well as to comply with all local, national, and international applicable laws and standards, including but limited to laws related to:

- Labor;
- Health and safety;
- Environmental protection;
- Anti-corruption;
- Human Rights;
- Data protection and cybersecurity.

This Code of Conduct applies to all natural and legal persons who sell or provide products, processes, or services to Admin By Request. This can be either directly as partners, vendors, suppliers or via third parties, e.g. affiliated companies, distribution partners, subcontractors, agents, distributors and various partners involved in Admin By Requests supply chain, (hereinafter "Business Partners").

Failure to comply with the principles in this Code of Conduct may result in the termination of the business relationship between Admin By Request and the Business Partner. Business Partners are expected to actively monitor and improve their labor practices to align with these standards.

Admin By Request reserves the right to update or modify this Code of Conduct as necessary.

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2. HUMAN RIGHTS AND LABOR CONDITIONS

At Admin By Request we are committed to upholding human rights and ensuring fair and ethical labor practices throughout our supply chain. We require all our Business Partners to adhere to the following principles, in alignment with the Universal Declaration of Human Rights and the International Labor Organization (ILO) Core Conventions.

Equal opportunity and fair treatment

Business Partners will support and promote diversity and inclusion in all of its workplaces. They will not discriminate on grounds of sex, political opinion, national extraction or social origin, skin color, race, etc.

Protection against forced labor, child labor and human trafficking

Business Partners agree not to engage in child labor, meaning they shall refrain from employing any person under the age of 18 for work that is harmful to their health or development, or that is hazardous in nature. Furthermore, they shall refrain from employing children who are under the minimum legal working age in the country where the work is performed.

Business Partners shall ensure that none of their employees work against their free will and that they are at all times able to leave the workplace upon giving reasonable prior notice. Furthermore, Business Partners shall ensure that no human trafficking occurs within their supply chain.

No employees shall be exploited, coerced, or otherwise threatened to perform their work.

All legislation regarding working hours, including weekly working hours and days off, in the country where the work is performed must be complied with. In addition, all employees of the Business Partner must, at a minimum, be paid the applicable minimum wage and all employees shall be compensated for overtime to the extent required by law.

The Business Partners employees must not be required to deposit money, identity papers or similar items for the purpose of gaining employment or maintaining the employment relationship.

Safe and healthy workplace

The Business Partner shall ensure that its employees work in a safe and healthy working environment, where risks of illness or other injuries, both physical and mental, are avoided.

Where there is a risk of physical injury due to hazardous work at the workplace, the Business Partner shall ensure that all employees receive the necessary training, the appropriate safety equipment, and a secure working environment.

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Freedom of association and collective bargaining

The Business Partner must respect the right of their employees to join, or refrain from joining, worker organizations, and entering into collective bargaining, as permitted by law. The Business Partner will respect this right, without giving their employees a fear of retaliation.

3. ANTI-CORRUPTION

Business Partners must be committed to ensuring, that no form of bribery takes place within their organization or supply chain.

Furthermore, Business Partners must not offer any form of bribe to Admin By Request's employees, whether in the form of money, gifts, or any other benefit, in order to obtain a favor or service from the employee.

The following conduct is strictly prohibited:

- Bribing another person by offering, promising or giving them a financial or other advantage to induce or reward them to perform a relevant function or activity improperly;
- Being bribed by accepting, receiving or requesting a financial or other advantage as a reward for performing a relevant function or action improperly;
- Bribing a foreign public official, by influencing them to obtain or retain business or a business advantage;
- Offering, paying, or promising to pay money to any foreign official for the purpose of obtaining or retaining business;
- Authorizing any money, offer, gift, or promising to authorize the giving of anything of value to any person while knowing that all or a portion of it will be offered, given, or promised, directly or indirectly, to any foreign official for the purposes of assisting in obtaining or retaining business.

4. ENVIRONMENTAL IMPACTS

At Admin By Request, the environment is a key priority, and we work every day to minimize our CO2 emissions. We do this, for example, by sorting our waste, encouraging our employees to cycle to work, and by raising general awareness among our staff about the consequences of not taking care of the environment.

In the same way, we encourage all our Business Partners to take proactive steps to reduce the environmental impact of their business, and to promote sustainable practices.

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This includes but is not limited to:

- Compliance with environmental laws and regulations;
- Conserving natural resources and reducing waste, emissions, and pollution;
- Promoting energy efficiency and the use of renewable energy where feasible;
- Implementing environmentally friendly practices throughout their operations and supply chain;
- Efficient resource use and waste management;
- Reduction of CO2 emissions and climate-friendly solutions;
- Proper handling of hazardous substances.

5. ETHICAL BUSINESS PRACTICES

Competition laws

Business Partners will comply with all applicable competition laws and in particular not fix prices, rig bids, allocate customers or markets or exchange current, recent, or future pricing information with their competitors.

Sanctions

Business Partners must not do business with countries, groups, organizations or individuals that are subject to sanctions.

Anti-money laundering

As a Business Partner to Admin By Request you are required to comply with all applicable anti-money laundering laws, regulations, and industry standards. All Business Partners must implement robust measures to detect, prevent, and report any suspicious financial activity in accordance with applicable laws.

The Business Partner must provide training for their employees and other relevant personnel to ensure they are aware of risks and legal obligations regarding financial crimes.

Each Business Partner is responsible for promptly informing Admin By Request of any suspicious transactions or activities that can affect Admin By Request negatively.

Conflicts of interest

Conflicts of interest must be avoided. Business Partners' decisions must not be motivated or influenced by personal circumstances or interests. A conflict of interest arises when a Business Partner's representative attempts to promote their personal interests or the private interests of a friend or relative, while acting

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in their position as a representative of the Business Partner concerned. Business Partners must report all situations in which there is a potential or perceived conflict between their personal interests and the interests of Admin By Request.

6. WHISTLEBLOWER

Business Partners are expected to have established reporting procedures that are known to employees and that the employees can use to report their concerns without fear of negative consequences. Business Partners must ensure whistleblowers are protected and that any such reports are effectively investigated, clarified and dealt with.

Reports made through these procedures must be treated with confidentiality, and retaliation against individuals who report alleged misconduct in good faith must be prohibited.

We expect our suppliers to use our whistleblower scheme if they experience any irregularities, by sending an (optionally anonymous) email to speakup@adminbyrequest.com

7. INFORMATION SECURITY AND PRIVACY

Business Partners must comply with relevant data privacy laws and regulations and implement appropriate measures to protect personal data from unauthorized access, loss, or misuse.

Upon request, Business Partners must be able to present an established information security policy and describe how this is complied with. At the very least, the information security policy must ensure:

- Confidentiality, which means that no one shall have access to information unless they need it to perform their work;
- Integrity, which means that information and systems must be correct and reliable;
- Accessibility, which means that information and systems must be accessible to authorized users as needed.

The Business Partner must have procedures and systems in place to ensure that data privacy is protected and that no illegitimate acquisition, use or sharing of data, information or material takes place. The Business Partner must process confidential information in an ethically appropriate manner. Actual or suspected non-conformances must always be reported.

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8. AUDITS

Admin By Request reserves the right to audit their Business Partners once annually. Such audits will be carried out by sending a questionnaire, which will include questions regarding the Business Partner's policies and procedures amongst other, as well as supporting evidence of compliance with this Code of Conduct.

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