

# Code of Conduct

## Document Information

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## Table of Contents

<b>1</b>	<b>Introduction</b> .....	<b>3</b>
<b>2</b>	<b>Compliance with laws and standards</b> .....	<b>4</b>
<b>3</b>	<b>Anti-Corruption and Anti-Bribery”</b> .....	<b>5</b>
3.1	Preventive Measures.....	5
<b>4</b>	<b>Anti-Money Laundering</b> .....	<b>6</b>
4.1	Preventive Measures.....	6
<b>5</b>	<b>Modern Slavery</b> .....	<b>7</b>
5.1	Preventive Measures.....	7
<b>6</b>	<b>Anti-Trust Law</b> .....	<b>8</b>
<b>7</b>	<b>Discrimination</b> .....	<b>9</b>
<b>8</b>	<b>Prohibition of Child and Forced Labor</b> .....	<b>10</b>
<b>9</b>	<b>Environmental Protection and Occupational Safety</b> .....	<b>11</b>
<b>10</b>	<b>Reporting and Whistleblowing</b> .....	<b>12</b>
<b>11</b>	<b>Enforcement</b> .....	<b>13</b>
<b>12</b>	<b>Document History</b> .....	<b>14</b>

# 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.

As an employee at Admin By Request you agree to abide by the terms of this Code of Conduct, as well as to comply with all local, national, and international applicable laws and standards, including but not 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 Admin By Request's employees, directors, officers, agents (hereinafter "Employees").

## 2 Compliance with laws and standards

Admin By Request is committed to conducting business with integrity and in compliance with all applicable laws, regulations, guidelines and standards. This is ensured by our Legal department. Please reach out to [legal@adminbyrequest.com](mailto:legal@adminbyrequest.com) if you have any questions regarding this Code of Conduct.

## 3 Anti-Corruption and Anti-Bribery

Admin By Request condemns any form of corruption and bribery. This includes that employees do not grant payments or other advantages, such as kickback payments, gifts, entertainment, including the offering, promising, giving, or accepting of any undue pecuniary or other advantage to or from any person, whether directly or through intermediaries, in order to obtain or retain business or other improper advantage to any individual, company, or office bearer with the aim to influence decision-making processes. We strictly prohibit all forms of corruption and bribery.

The following conduct is strictly prohibited under this policy:

- Offering, promising, giving, or accepting any undue pecuniary or other advantage to or from any person, whether directly or through intermediaries, in order to obtain or retain business or other improper advantage
- Making or receiving payments or other benefits that are not transparent, properly recorded, or justified;
- Using company funds or resources as well as customer information for any unlawful or improper purpose;
- Concealing or failing to disclose any information that may be relevant to the detection or prevention of corruption or bribery.

### 3.1 Preventive Measures

To prevent and detect corruption and bribery, we have implemented the following measures:

- We have developed and implemented this anti-corruption and anti-bribery policy, and all new employees are introduced to this policy.
- We have established internal controls and processes to ensure compliance with this policy, including regular risk assessment and audits.
- We have implemented a system for monitoring and reviewing these policies and procedures to ensure they are effective and up to date.
- We have established a simple procedure for any employee, customer or other stakeholders to confidential whistleblowing hotline for employees and other stakeholders to report any concerns or suspicions about potential violations of this policy.

## 4 Anti-Money Laundering

Our organization is committed to complying with all applicable anti-money laundering (AML) laws and regulations. We have implemented robust policies and procedures to prevent, detect, and report any potential money laundering activities.

The following conduct is strictly prohibited under this policy:

- Engaging in any activities that may facilitate money laundering, such as concealing the proceeds of crime or facilitating the movement of illicit funds;
- Failing to report any suspicious activity or transactions that may be related to money laundering to the appropriate authorities;
- Failing to comply with any relevant AML laws and regulations.

### 4.1 Preventive Measures

To prevent and detect money laundering, we have implemented the following measures:

- We have developed and implemented this AML policy and all new employees are introduced to this policy.
- We have established internal controls and processes to ensure compliance with these policies, including regular risk assessments and audits.
- We have implemented a system for monitoring and reviewing these policies and procedures to ensure they are effective and up to date.
- We have established a simple procedure for any employee, customer or other stakeholders to confidential whistleblowing by email for any employees and other stakeholders to report any concerns or suspicions about potential violations of this policy.

# 5 Modern Slavery

Our organization is committed to ensuring, that no form of modern slavery, human trafficking, forced labor, or exploitation takes place within our organization or supply chain, in compliance with UK Modern Slavery Act 2015.

The following conduct is strictly prohibited under this policy:

- Engaging in any activities that may facilitate Modern Slavery, such as exploiting vulnerable workers.
- Failing to report any suspicion of labor exploitation, human trafficking or forced labor, within the organization or its supply chain.
- Failing to act ethically, responsibly, and in compliance with applicable laws.

## 5.1 Preventive Measures

To prevent and detect Modern Slavery, we have implemented the following measures:

- We have implemented UK Modern Slavery Act 2015, and all new employees are introduced to Modern Slavery through training.

## 6 Anti-Trust Law

Admin By Request is committed to fair competition and complies with the applicable anti-trust laws and will not engage in price agreements, the sharing of markets or customers, market sharing agreements, or bid-rigging.

Admin By Request will also not use any abusive practices, which means that no use of exclusionary conduct or unfair practices to push competitors out of the market, will take place. We will also not be applying different conditions to identical services in a way that creates an unjustified competitive disadvantage.

# 7 Discrimination

Admin By Request does not discriminate against anyone because of their age, gender, religion, ethnicity, or any other reason.

Any form of discrimination at Admin By Request will not be tolerated. We strive to foster a respectful, inclusive workplace where everyone feels valued and can thrive.

## 8 Prohibition of Child and Forced Labor

Admin By Request does not employ workers who cannot produce any evidence of their minimum age of 15. In those countries subject to the developing country exceptions of the ILO convention 138, the minimum age may be reduced to 14. Admin By Request refuses to employ anyone or make anyone work against their own free will. This includes an absolute ban on all forms of slavery, human trafficking, debt bondage, and recruitment of children for armed conflict.

# 9 Environmental Protection and Occupational Safety

Admin By Request undertakes to adhere to the applicable environmentally relevant legal provisions and official regulations of authorities and to continuously improve environmental protection on an economically justifiable scale. Admin By Request adheres to the legal provisions for assuring health and safety at work.

# 10 Reporting and Whistleblowing

If any employees have any concerns or suspicions about potential violations of this Code of Conduct, please report them immediately to Admin By Request's whistleblower [complaints@adminbyrequest.com](mailto:complaints@adminbyrequest.com).

At Admin By Request all reports of potential violations of this Code of Conduct is taken seriously and appropriate action will be taken to investigate and address them. We will not tolerate any form of retaliation against anyone who reports a concern or suspicion in good faith.

# 11 Enforcement

Violations of this Code of Conduct will not be tolerated and may result in disciplinary action, up to and including termination of employment or business relationship. We will also cooperate fully with any investigation by law enforcement or regulatory authorities and will take all necessary steps to prevent and address any potential violations of the law.

This Code of Conduct is intended to provide guidance on our commitments and to help ensure compliance with all applicable laws and regulations. If you have any questions about this policy or your responsibilities under it, please contact [legal@adminbyrequest.com](mailto:legal@adminbyrequest.com).

# 12 Document History

Version	Author	Changes
20 July 2021 <b>1.0</b>	J. B. Sorensen	Initial version.
3 July 2023 <b>1.1</b>	J. B. Sorensen	Annual audit/review
3 July 2024 <b>1.2</b>	J. B. Sorensen	Annual audit/review including addition of sections on environment and child labor.
5 August 2025 <b>1.3</b>	J. B. Sorensen	Annual audit/review.