



SuperOffice Code of Conduct

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At SuperOffice, our purpose is clear: to make every customer relationship valuable and effortless. Guided by our Constitution, we aspire to be Europe's most loved CRM – simple to use, powerful where it matters, and built for people. Our mission is to deliver intuitive, AI-driven solutions that empower individuals, teams, and organizations to grow, succeed, and build lasting connections.

Since our founding, we have dared to be different. We believe that true innovation is driven by the needs of our customers, not by technology alone. Our vision is to create growth by connecting people, enabling our users to achieve more through tools that are designed for usability, effectiveness, and tangible business value. We measure our success not only by our achievements, but by the trust and satisfaction of our customers, partners, and employees.

Our Constitution sets out four core values that guide every aspect of our business:

- **Keep it simple:** We design and innovate with simplicity at the heart of everything we do. Our solutions are carefully crafted to meet the needs of today and tomorrow, making it easy for our customers to find, catch, and keep more business.
- **Built on trust:** We build trust one interaction at a time, fostering long-term relationships based on transparency, reliability, and mutual respect. Our commitment to security and compliance is rooted in our European heritage and shines through every part of our operation.
- **People first:** We put people at the center – inside and outside SuperOffice. Technology and AI should empower, not replace. We build strong relationships through personal engagement and deep understanding of our customers' needs, ensuring we deliver what matters most.
- **Dare to be different:** We embrace creativity, boldness, and a unique culture that encourages everyone to stand up for what they believe in. We value humor, personality, and the courage to challenge the status quo.

These values are not just words, they shape our daily actions, our approach to business, and our interactions with everyone we encounter. We believe in openness, diversity, and equality, encouraging every member of our community to contribute positively, voice their ideas, and act with integrity and respect. Our Constitution ensures freedom of speech, curiosity, and a commitment to continuous learning and responsible innovation.

The SuperOffice Code of Conduct is the practical expression of these principles. It sets the standards for ethical, lawful, and sustainable behavior, ensuring that every citizen of SuperOffice acts with honesty, fairness, and responsibility. We monitor our operations for compliance, commit to acting in a socially responsible manner, and strive to exceed expectations in everything we do. Upholding our Code of Conduct means making a commitment to our shared values and to the ongoing success of our company and community.

Thank you for upholding our values and helping us be the best version of ourselves. This Code of Conduct applies to everyone we engage with – employees, suppliers, partners, owners, and customers – and reflects our promise to act responsibly, transparently, and in alignment with our mission, vision, and values.

Best regards,

SuperOffice, and the citizens of Superland.

Contents

1.	Personal conduct	3
2.	Compliance and integrity	6
3.	Security	7
4.	Anti-corruption	9
5.	Contact information	10

1. Personal conduct

Violation of the Code of Conduct may result in corrective actions depending on the nature of the violation. In case of violations, reports outlining the situation, consequences and corrective actions should be shared with the relevant manager or channel.

1.1 Decision making

When making a decision, ask yourself the following:

- Is it legal?
- Does it comply with the Code of Conduct?
- Does it reflect our company's values and ethics?
- Does it respect the rights of others?

If you are unsure about any of the answers, just ask.

1.2 Conflicts of interest

A conflict of interest may occur when an employee's personal activities, investments or associations compromise their judgment or ability to act in the company's best interests. Employees should avoid the types of situations that result in conflicts of interest. It's important for employees to disclose to their manager any relationships, associations or activities that could create actual, potential, or even perceived conflict of interest.

1.3 Confidentiality

The company and its employees should keep all proprietary information confidential. Proprietary information includes all non-public information that might be harmful to the company and its customers and business partners if disclosed. Confidential information can include:

- Customer lists
- Supplier lists
- Pricing information
- Terms of contracts
- Company policies and procedures
- Financial statements
- Marketing plans and strategies
- Trade secrets

Any other information that could damage the company or its customers or suppliers if it was disclosed.

1.4 Harassment, bullying, reporting, and speaking up

SuperOffice will not tolerate discrimination based on race, color, religion, gender, age, national origin, sexual orientation, marital status, disability or any other protected class.

We strive to treat all fellow employees, customers, business partners and other stakeholders with dignity and respect at all times. All employees have a right and a duty to notify SuperOffice immediately about serious matters, such as errors and incidents that may endanger life or health, such as harassment, bullying, discrimination, and any other matter that could cause SuperOffice, its employees, or the surroundings any loss or damage, including reputational loss.

If an employee wishes to speak up, they should raise their concerns as soon as possible through the available channels which include the employee's immediate manager or local leader, the Head of People, or SuperOffice's [external speaking up portal](#) operated by BDO AS in Norway. Concerns can be reported anonymously via this portal.

In addition, employees also have the right to report to regulatory authorities or other public authorities (such as your local Labor Inspection Authority, Data Protection Authority and the police).

Employees who report a concern in good faith cannot be subjected to any adverse employment action including:

- Unfair dismissal, demotion or suspension,
- Unfair denial of a promotion, transfer or other employment benefits,
- Bullying and harassment, either in person or online,
- Exclusionary behavior,
- Any other behavior that singles out the person unfairly.

1.5 Health and safety

The company conducts business in accordance with applicable health and safety requirements and strives for continuous improvement in its health and safety policies and procedures.

All employees are expected to perform their work in compliance with applicable health and safety laws, regulations, policies and procedures and always apply safe work practices in all locations.

Applicable safety and health requirements must be communicated to visitors, customers or contractors at any company location.

Employees are required to immediately report workplace injuries, illnesses or unsafe conditions.

1.6 Gifts and entertainment

While gifts and entertainment among business associates can be appropriate ways to strengthen ties and build goodwill, they also have the potential to create the perception that business decisions are influenced by them. The company is committed to winning business only on the merits of its products, services and people, and complies with all legal requirements for giving and receiving gifts and entertainment.

Employees are to:

- Use sound judgment and comply with the law regarding gifts and other benefits.
- Never allow gifts, entertainment or other personal benefits to influence decisions or undermine the integrity of business relationships.
- Never accept gifts or entertainment that are illegal, immoral or would reflect negatively on the company.
- Never accept cash, cash equivalents, stocks or other securities.

Employees may accept occasional unsolicited personal gifts of nominal value, such as promotional items, and may provide the same to customers and business partners.

When in doubt, employees should check with the CFO before giving or receiving anything of value.

1.7 Charitable contributions

A need to engage in things that matter

In SuperOffice we believe in simplifying our customers' lives with our product. In line with this value, our shareholders, management and employees decided that we should engage with local organizations doing good things for the less fortunate people. Therefore, we decided to reach out to the organizations that are engaged in non-political and non-profit activities aimed at making life easier for people or animals in challenging situations.

The result is our “Do Stuff That Matters” program

We realized that what we can do is offer a solution that simplifies things that matter. Our CRM solutions help organizations become more professional, structured, effective and, in the end, more successful at what they do. The truth is that non-profit organizations who try to help others often have limited funds. Yet they have the same needs as any other professional business – they too need to automate and digitize their operations, and overall work smarter. And that's how the program “Do Stuff That Matters” was born.

The essence of our initiative

The “Do Stuff That Matters” program offers free usage of our cloud solution – SuperOffice CRM Online – to an organization with up to 30 users for a period of 3 years. The offer includes 5 days of free consultations performed by our top professionals who will help an organization to get started. Each year, we accept one new organization in each market that we operate in. Our aim is to make a real difference by creating a more efficient and structured work process for a non-profit, non-political humanitarian organization, because at SuperOffice, we are proud to simplify things that matter!

2. Compliance and integrity

SuperOffice presents confidential information. We have a strong focus on corporate governance, and we maintain insider lists for people with inside information related to our financial position and performance. If you are added to SuperOffice Group AS insider list, you are subject to the following relevant duties and responsibilities.

2.1 Record keeping

Our records are clear, accurate, and complete. Our stakeholders rely on accurate and easily comprehensible information to understand our financial results, where we are heading as a company, and to have confidence in that direction. Keeping accurate records is critical to maintaining investors' trust, making good business decisions, and meeting our regulatory obligations. Details regarding the GDPR are outlined later in this document.

2.2 Building trust

How we build trust:

- We honestly and accurately record business information and report financial transactions, following applicable laws, regulations, and accounting practices.
- We are transparent about our commitments to our partners and customers, and our written contracts reflect the actual state of affairs.
- We don't make side agreements or other "off-the-books" arrangements.
- We use standard agreements and contracting processes or get approval for custom terms.
- The CEO, CFO, Group Controller and other employees in the finance organization comply with the SuperOffice Finance and Accounting guidelines.

2.3 The Transparency Act

The Transparency Act gives insight and transparency to the consumers regarding human rights and working conditions related to production of goods and the provision of services. Enterprises will need to disclose information about how they address actual and potential negative impacts on human rights and work conditions.

SuperOffice supports the Transparency Act with the laws and requirements that come with it.

We commit to:

- Carry out due diligence by following the OECD Guidelines for Multinational Enterprises.
- Our duty to provide information to relevant stakeholders.
- Follow up on our Suppliers Code of Conduct to ensure that our suppliers meet the requirements outlined in the policy.

3. Security

3.1 Governance in SuperOffice

SuperOffice Quality Management System (SQS) is built on the structures of ISO standards, as well as on the GRC principle: Governance + Risk management + Compliance.

The processes established and executed by the SuperOffice's Board of Directors are reflected in the organization's structure and how it is managed and led toward achieving our goals.

SuperOffice SQS currently covers the Information Security Management System for all internal systems and the SuperOffice CRM Online cloud service offered to customers.

Furthermore, SQS covers all processes related to privacy mandated by the General Data Protection Regulation (GDPR).

3.2 Risk management

An overall risk assessment is implemented in relation to information objects and is updated periodically. Our approach to security is based on risk assessments according to Article 24 in the General Data Protection Regulation (EU-GDPR) and ICT regulations.

Risk management is a set of processes through which SuperOffice management timely and appropriately identifies, analyzes and responds to risks that might adversely affect the realization of our organization's business objectives. The response to risks typically depends on their perceived gravity and involves controlling, avoiding, accepting or transferring them to a third party.

We manage a wide range of risks: technological risks, information security risks, commercial/financial risks, and external legal and regulatory compliance risks.

3.3 Information classification and control

It is important that breaches of confidentiality and insufficient integrity of information do not occur. It is, therefore, important that we protect information based on its criticality. That is why all main information and assets are registered and assigned to a designated owner.

The information is also classified to enable the application of necessary and appropriate security controls. The information owner is responsible for maintenance and continuous application of approved and appropriate checks and improvements.

3.4 Compliance

SuperOffice follows the legal requirements provided by the EU in the Regulation 2016/679 of the European parliament and of the council of 27 April 2016 on the protection of persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation – GDPR). The U.S.-based services are certified under the EU-U.S. Privacy Shield Framework, and/or the U.S. – Swiss Safe Harbor Framework. All SuperOffice data is stored in Europe.

4. Anti-corruption

4.1 Competition, fair dealings and antitrust

While SuperOffice competes for new business, our relationships with business partners are built on trust and mutual benefits, as well as being compliant with competition/antitrust laws.

SuperOffice employees are required to:

- Communicate the company's products and services in a manner that is fair and accurate, and that discloses all relevant information,
- Refrain from price fixing, bid rigging, and any other anticompetitive activities,
- Use only publicly available information to understand business, customers, competitors, business partners, technology trends, and regulatory proposals and developments,
- Advise their manager immediately of possible violations of fair competition practices.

4.2 Bribery and facilitation payments

SuperOffice will not attempt to influence judgement or behavior of a person in a position of trust by paying a bribe or a kickback. This applies both to people in government and in private business.

SuperOffice does not permit facilitation (or "grease") payments to government officials or private businesses in order to secure or speed up routine actions.

SuperOffice employees are to:

- Select third parties carefully and monitor them continuously to ensure they comply with our anti-bribery policies,
- Keep accurate books and records at all times and monitor that funds are not being used for bribery or facilitation payments,
- Refuse any offer or request for an unlawful payment and report the incident to the CFO.

4.3 Money laundering

The company complies with anti-money laundering laws. Money laundering is the process of concealing illicit funds by moving them through legitimate businesses to hide their criminal origin.

Employees must never knowingly facilitate money laundering or terrorist financing and must take steps to prevent inadvertent use of the company's business activities for these purposes. Employees are required to immediately report any unusual or suspicious activities or transactions.



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