



# The Code of Conduct

**We're a pretty down-to-earth company. This means that our Corporate Values are quite straight-forward too. They are – Sincerity, Honesty, Friendliness, and Simplicity.**

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**Doing things right is one of our most important values at SuperOffice. We work hard every day to deliver CRM with a smile to our customers.**

**We are clear about what we mean when we talk about doing things right. Not only does it mean that we provide a product that is well made, fairly priced and of exceptional quality, but it also means that every step we take in making that product is taken with ethics and integrity in mind. We monitor our entire operation for compliance with our Code of Conduct.**

**Doing things right is not an option at SuperOffice. Working here means making a commitment to uphold our company values and following the Code of Conduct outlined in this document. Thank you for upholding our values and helping us be the best product supplier we can be.**

**This Code of Conduct applies to everyone we are in touch with – our employees, suppliers, partners, and customers.**

A handwritten signature in black ink, consisting of a stylized 'G' followed by a long horizontal line that tapers to the right.

Gisle Jentoft, CEO

# Our Corporate Values

We are  
**SINCERE**



## **We are SINCERE in everything we do**

We want you to know what to expect from us, and we want to deliver on our promises. We will always be open and transparent. And we will share our thoughts and concerns with you, as much as we share our good news.

We are  
**FRIENDLY**



## **We always aim to be HONEST**

We will challenge the status quo, and we will tell you what we believe is right. But we will not be rude or disrespectful, and we will never lie to you. When something is important to us, it is very likely to be important to you too. Therefore, we will openly share both our concerns and good news.

We are  
**HONEST**



## **We are FRIENDLY towards everyone**

CRM prospers with relationships, and relationships prosper with friendliness. Friendliness is all about being open towards other people, and taking the risk of inviting them into a relationship. To us, it also means being curious, warm, and inviting to people we don't know well, and relying on people that we do.

We  
**SIMPLIFY**



## **We are here to SIMPLIFY**

What inspires us to get up every day is the fact that we are here to SIMPLIFY! How we can simplify your tasks, processes, projects and your job – is what motivates us to work even harder, every single day. We know that your success is our success, and when it's simple for you, it is

# Ethics

## Decision Making and the Code of Conduct

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.

## 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 the 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.

## 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

## How we deal with 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 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.

Should an employee wish to report a violation of laws, guidelines or ethical rules, then, as a general rule, he or she should raise concerns to their immediate supervisor or someone else with management responsibilities. We also have an external whistleblowing service, operated by BDO AS in Norway. Concerns can be reported to them anonymously, by using an online form, emailing or by post.

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.

## 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.

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**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.

# Compliance

## Record Keeping

Our records are clear, accurate, and complete. Our stakeholders rely on accurate and easily comprehensible information to understand our financial results and where we are heading to 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.

## 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 book" 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.

## 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).

## Risk Management

An overall risk assessment is implemented in relation to information objects and is updated once a year. Our approach to security is based on risk assessments according to Article 24 in the EU General Data Protection Regulation (EU-GDPR) and the ICT regulations §3.

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, of course, external legal and regulatory compliance risks.

## 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. Therefore, all main information and assets are registered and assigned to a designated owner.

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

## Third-party Access to Data

Any information stored in SuperOffice CRM Online is treated as confidential and not disclosed or sold to any third party. All information is stored securely and can only be accessed by the customer and the trusted SuperOffice personnel for site administration purposes.

## 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.

## Suppliers

Please see our "Code of Conduct for Suppliers" for more details.

## **Charitable Contributions**

### *A need to engage in things that matter*

What has always mattered to the people of SuperOffice is the way we simplify our customers' lives with our product. After a while, we decided to look for other people, who needed our help in simplifying their lives too. This is why our shareholders, management and employees decided that we needed to engage with local organizations doing good things for the less fortunate people. Also, 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 exactly 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 consultancy 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!

## **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 apply safe work practices at all times 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 condition.

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# Anti-Corruption

## **Competition, Fair Dealings and Antitrust**

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

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 anti-competitive 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.

## **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 persons in government and in private business.

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

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.

## **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.

Please call us on  
**+47 2335 4000**  
Or you can email  
**info@superoffice.com**

Simple

Driven by a passion for customer relationship management, SuperOffice is one of Europe's leading suppliers of CRM solutions to the business to business market. Our software supports the individual user in achieving stronger sales, marketing and customer service productivity.