

Code of Conduct

Acando's code of conduct illustrates how our values shall be interpreted in everyday situations and how they guide us in our actions.



Acando is one of Northern Europe's leading management and IT consultancy companies

Acando is a consultancy company that in partnership with its clients identifies and implements sustainable business improvements through information enabled by technology.

Measurable improvements are generated by developing processes, organisation and IT. We understand and are deeply rooted in information technology, but our passion is improvements to our clients' operations.

One of Acando's greatest assets is our brand name, which must act as a guarantee that we always look after the best interests of our clients and carry out our assignments accordingly. We are duty-bound to ensure that confidence in us and our brand name is maintained. We ensure that this is the case by acting correctly in every given situation. We do, of course, comply with the applicable laws, rules and regulations, but this is not enough. And this is why we have drawn up a code of conduct with guidelines on how we should act and conduct ourselves, both internally and in dealings with our clients, partners and other interested parties. Our code of conduct is based on Acando's three core values:

- › Team spirit
- › Passion
- › Results

The code of conduct shows how our core values can be translated into concrete situations and how they can guide the way we act. Our clients must feel that they can rely on our work being based on sound competence and integrity. Our work with clients shall support and develop our reputation and thereby maintain confidence in us. A code of conduct cannot cover every conceivable situation that may arise, hence it is important at all times, to consult with a manager or other person in charge, in situations where any doubt exists.

As a consultancy company, we have an extra responsibility not only comprising the work directly related to our own organisation, but relating to our clients' organisations as well. Our responsibility means that we, at all times, act in accordance with our core values, and following the code of conduct shall, therefore, be viewed from both of these perspectives.

Carl-Magnus Månsson
Managing Director and CEO of the Acando Group



Policy

At Acando, we share a belief in the importance of always behaving in an honest and ethically correct way. Acting in this way enables us to maintain the confidence our clients, partners, employees, shareholders and other interested parties have in us. All employees must comply with laws, regulations, directives and with the company's own code of conduct – and we are all responsible for ensuring compliance.

As employees of Acando, we are all representatives of our company, and we should remember this fact and let it guide us in our conduct.

Compliance

All employees, including subcontractors of Acando, must comply both with the code of conduct drawn up by the company and with applicable laws, regulations and directives. Failure to comply with the code of conduct may result in disciplinary measures, which also may lead to dismissal.

We place extra responsibility on our managers. Our managers shall, through their conduct, demonstrate the importance of complying with the code of conduct. Setting a good example and practising what we preach is one of the cornerstones of our leadership values.

Every single one of us at Acando has an obligation to be familiar with, understand and comply with both our code of conduct and the basis for the code of conduct – our core values. It is also our duty to report any actions we see that are in breach of the code of conduct.

Employees should always contact their immediate superior, human resource representative or other responsible person in the event of uncertainty with regard to the application of the code of conduct.

Every single one of us at Acando has an obligation to be familiar with, understand and comply with both our code of conduct and the basis for the code of conduct – our core values.

For our clients

We endeavour to establish a long-term client relationship based upon trust and confidence. If we are able to achieve this, we must operate at all times, on the basis of the client's requirements to offer solely what we have the competence to deliver.

We must, at all times, utilise the full range of our competence in order to ensure our ability to provide optimum value for our clients. We shall deliver, as a minimum, what we have promised and shall, at all times, endeavour to deliver the greatest possible client value.

We must comply with the clients' regulations and guidelines in our assignments and projects. This means that we shall, as a minimum, follow our own code of conduct and, in cases where the client is obliged to comply with additional regulations, we shall observe and comply with these.

Working in partnership with Acando shall always be uncomplicated. We shall work closely with our clients and adopt a highly developed service-minded approach with shared working models to progress projects rapidly. An Acando employee shall be perceived as modest, unconcerned with personal prestige, and reliable – characteristics that make cooperation easy and flexible.

Our culture is based on a desire to help others succeed. We see ourselves, in partnership with the client, as a co-player with the constant focus on the client and the improvements we can achieve by working together.

Everything we do at Acando is characterised by a burning commitment to our assignments. Our clients and partners shall be fully aware that we never give up until we have brought about real improvements and concrete client values in our projects.

Passion permeates the organisation in the form of a burning fervour that can be clearly seen in our own development, in our undertakings to our clients, and in our willingness at all times to offer a better alternative than our competitors.

For our employees

All employees shall be treated with the same respect and be afforded the same opportunities for development, as stated in the Acando equal opportunity policy. No employee shall be discriminated against on the basis of gender, ethnicity, religion or other beliefs, sexual disposition, disabilities, age or political convictions. No form of discrimination, harassments, insults or reprisals is permitted.

It is incumbent upon every employee to ensure that he or she follow the laws applicable to the exercise of their duties. We must all ensure that we can live up to our undertakings as agreed with our clients.

No employee may give or accept bribes. Gifts or services may only be given or accepted within the framework of local laws and good occupational practice.

We are all responsible for supporting the practice of correct reporting by always ensuring that we submit correct and truthful supporting documentation at the prescribed times.



Information

Acando fully supports freedom of speech and every one's right to share his or her opinion. Many Acando employees are experts in their area of knowledge. Their views and opinions are highly valued by others. Therefore, we encourage all employees wanting to participate and express themselves through social networks and digital arenas like forums, blogs and open communities. This also applies for external gatherings such as fairs, seminars and exhibitions.

When acting on external forums, please keep in mind that internal conditions at Acando or any of Acando's clients may not be discussed.

For an Acando employee, the line between information reflecting personal opinions and conditions, and information reflecting conditions regarding assignments, clients or Acando's intellectual property or Acando's opinion should be clearly stated. If in doubt, please consult your manager, the Managing Director, Communications Manager or another designated individual.

Acando's employees have access to confidential information owned by Acando, our clients or our partners. Such information shall always be protected and handled in the prescribed manner. All confidential information obtained during the course of a project shall be treated in confidence for the duration of the project and for a period of three years thereafter, unless otherwise contractually agreed.

Financial communication

Financial communication and other public communication must only be handled by people appointed to do so. Individual employees shall refer external enquiries to the Managing Director, Communications Manager or another designated individual. (For a more detailed description of this process, please see Acando's communication policy.) Insider information, as it is known, comprises corporate information that is not public knowledge and which could, if it were known, have an effect on the share value. All employees must comply strictly with applicable laws regarding insider information, and shall not make use of such information, either for their own benefit, or that of any other party.

Conflicts of interest

Conflicts of interest can arise in a number of different situations. Every employee must identify whether a conflict of interest has arisen and, if so take steps such as raising the matter with their immediate

superior, or other person in charge. Conflicts of interest include:

Commercial opportunities

No employee may utilise a commercial situation that has arisen through Acando for their own benefit, if so doing would be in conflict with the best interests of the company.

Other employment

Employment outside of Acando, with or without remuneration, is not allowed unless decided by senior management and human resource responsible. Employment outside Acando shall not, in any way whatsoever, infringe upon the employee's performance at Acando, or in any other way constitute a competing activity.

Directorships

Directorships are not permitted if they, in any way whatsoever, entail a conflict of interest. All such positions must be approved by an employee's immediate superior. Directorships of non-profit-making organisations do not require approval if they do not give rise to a potential conflict of interest.

In public contexts, in which the individual employee is acting as a spokesperson for the company, the employee is expected to present the views of Acando only and not those of the individual employee.

To ensure the integrity of our employees and our clients, employees' opinions shall be respected such that they are not forced to work with assignments that, in the opinion of the employee, conflict with their personal ethical beliefs. The employee shall be entitled to decline to participate in assignments for clients whose operations he or she perceives as being in conflict with his or her personal, ethical beliefs.

Management of the company's assets

All employees shall protect and be responsible for the company's assets – both tangible and intangible. Acando's property shall not be used for purposes other than those of the company.

Acando's IT environment shall be used for purposes that are work-related. Examples of unacceptable use of the company's IT environment include all conceivable handling of material that is of an illegal, harassing, threatening, racist, political or sexually orientated nature, or in any other way are incompatible with professional conduct.

The same applies to any use of our clients' IT environments.

For our managers

Our managers bear an extra responsibility within the organisation, by setting a good example.

Active managers

Focus on the client – as managers, much of your time should be spent with clients, in the context both of commercial transactions and of projects.

All Acando activities shall be based on the client's requirements, and what the client is asking from us. We shall, at all times appreciate the client's situation and requirements and their decision-making process.

As a manager, you must set a good example and practice what you preach. Feedback is the basis for development, for individuals and companies alike. Acando needs continuous feedback from client personnel. All Acando employees shall be supported and confirmed through ongoing feedback in the form

of both positive and negative reports. It is particularly important to be able to and to have the courage to provide constructive feedback.

Cooperation

Focus on surrounding yourself within the organisation with good people who share our values. Create motivation in groups and teams. Invite people in and share across boundaries – forge interdisciplinary teams. Help others to succeed, both consultants and other managers. It is through participation and motivation that work becomes pleasurable and meaningful.

Our managers shall, through their conduct, demonstrate the importance of complying with the code of conduct. Setting a good example and practising what we preach is one of the cornerstones of our leadership values.



Acando as a member of society

We endeavour to be a responsible player in society. This means, amongst other things, that we play an active part in the societal development through participation in those bodies closest to our own sphere of operations.

- › We adapt ourselves in accordance with the business community's guidelines, including the corporate governance code.
- › Acando follows laws, regulations, rules and directives.
- › All financial accounting and financial information and reporting shall be carried out correctly at prescribed times.
- › We disassociate ourselves from all illegal and unfair restriction of competition.
- › Money from Acando may not be used for any form of political support, whether for political parties, political organisations or individual politicians.
- › We support the principles as expressed in the UN general declaration of human rights.
- › We actively oppose discrimination and disassociate ourselves from exploitation of people.
- › We make sure our operations are conducted in an ethically acceptable manner from an environmental viewpoint.

Practising good business morality and ethics

Our code of conduct cannot cover every conceivable situation. Hence, it is of utmost importance, that all employees, at all times, take personal responsibility to act in an honest and appropriate way. If there is any doubt as to what constitutes correct behaviour, employees shall always consult their immediate superior or other person in charge.

- › Could this have a negative consequence for Acando, the client or our partner?
- › Is it legal?
- › As a professional individual – does this feel right?

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