

Code of Ethics & Business Conduct

Principles

The present Code of Business Conduct serves as official RUNE Enia policy and all RUNE Enia employees are expected to understand and abide by its principles, which reflect the highest standards of ethics and integrity in terms of business conduct.

Ethical work environment

- As an employer, RUNE Enia values its employees' contributions and guarantees everyone equal opportunities to succeed in a diverse, inclusive and respectful working environment.
- RUNE Enia employees are expected to interact with customers, commercial partners, and colleagues in a respectful and ethical manner at all times.
- RUNE Enia is also committed to providing a work environment free of discrimination and harassment of any kinds.

Conflict of interest

- RUNE Enia employees are expected to avoid all situations of conflict of interest, which are defined as situations where the employee's objective and impartial judgement is hindered by personal, economic, political, etc. considerations.
- RUNE Enia employees are also expected to report any potential conflicts of interests observed to the Management.

Bribery and corruption

- RUNE Enia will act in compliance with all relevant anti-bribery and corruption laws and regulations.
- RUNE Enia employees are expected to refuse and report all bribes and/or gifts (with the exception of "menial gifts") from clients, suppliers, public officials, and commercial partners.
- RUNE Enia employees are also expected to refrain from offering bribes and/or gifts (with the exception of "menial gifts") to clients, suppliers, public officials, and commercial partners.

Competition

- RUNE Enia operates in a liberalised market and does not hold any legal monopoly.
- In this context, RUNE Enia will comply with applicable competition laws and regulations.
- RUNE Enia employees are therefore expected to refrain from engaging in an anticompetitive behaviour.

Protection of RUNE Enia Company assets

- RUNE Enia employees are expected to act to protect, to the best of their ability, Company assets, including physical, intellectual, and electronic or digital properties.
- Employees are also expected to comply with the Company's confidentiality requirements.

A handwritten signature in blue ink, appearing to be a stylized 'S' or 'J'.

Transparency and disclosure of information

- RUNE Enia will strive to achieve the highest possible level of transparency. This could imply the public disclosure of information (i.e. policies, guidelines, etc.) and consultation with its main external stakeholders.

Privacy and data protection

- RUNE Enia will comply with local regulation regarding data privacy in the countries where it operates. It strives to manage and protect confidential information and to use such information in an appropriate manner.
- In addition, RUNE Enia will implement all necessary procedures to handle personal information¹ (either of employees, clients, or commercial partners) in order to comply with the EU General Data Protection Regulation (GDPR).

Fabrice de Seze

A blue ink signature of Fabrice de Seze, consisting of a stylized 'F' and 'S'.

29 July 2019

Goran Živec

A blue ink signature of Goran Živec, featuring a large, circular, stylized 'G' and 'Z'.

29 July 2019

¹ Personal information is any information that could be used to identify someone, either directly or indirectly, such as a name, IP address, employee ID, email address or phone number.