



## **Code of Ethics & Business Conduct**

The present Code of Business Conduct serves as official RUNE Crow policy and all RUNE Crow 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 Crow values its employees' contributions and guarantees everyone equal opportunities to succeed in a diverse, inclusive, and respectful working environment.
- RUNE Crow's employees are expected to interact with customers, commercial partners, and colleagues in a respectful and ethical manner at all times.
- RUNE Crow is also committed to providing a work environment free of discrimination and harassment of any kinds.

### **Conflict of interest**

- RUNE Crow 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 Crow employees are also expected to report any potential conflicts of interests observed to the Management.

### **Bribery and corruption**

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

### **Protection of RUNE Crow Company assets**

- RUNE Crow 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.

### **Transparency and disclosure of information**

- RUNE Crow 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 Crow 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 Crow will implement all necessary procedures to handle personal information<sup>i</sup> (either of employees, clients, or commercial partners) in order to comply with the EU General Data Protection Regulation (GDPR).

Léo Leseney  
President of the management Board



Stojan Nikolić  
Member of the management Board



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<sup>i</sup> 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.