



DOC MAN 02 CODE OF CONDUCT AND ETHICS

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Nov 27th 2017	2.1	Initial Release	Security Officer MSc Knut Normann Egeland	Per Schulhus
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SOHOME AS
Knut Normann Egeland / MSc
Security Officer
Customer Project Quality and EH Manager



**DOC MAN 2 -CODE OF CONDUCT AND ETHICS v.3-1- June 17- 2023:
DOC owner: CSO Knut Normann Egeland.**

Our Commitment

Sohome AS maintains the highest levels of business ethics, personal integrity and compliance across our business. The Sohome AS Code of Conduct is the cornerstone of this commitment and defines the company's expectations for employees, members of the Sohome AS board of directors, and all subsidiaries, affiliates and joint ventures over which the company has management control. The company may take disciplinary action against employees who fail to comply with the Code of Conduct, applicable laws, or company policies and procedures'

Our People

Sohome AS is committed to maintaining a work environment that is culturally diverse and free from all forms of discrimination, harassment and retaliation. We comply with all applicable civil rights, human rights and employment laws. wherever we work. Sohome AS is committed to fostering an open dialogue with its employees and, when available, with their representatives, on important decisions directly affecting them. Consequently, we recognize that employees are free to lawfully establish or join organizations of their own choosing and will not discriminate against, or treat unfavorably, any employee due to membership or non- membership in a trade union.

Our Customers

As a customer-driven company, Sohome AS is committed to maintaining our customers' trust and respect by delivering high quality, secure and reliable products, services, software and solutions. We uphold the highest standards of ethics with regard to our customers, avoiding all corrupt, illegal, dishonest or deceptive business practices. We accurately and fairly describe our products and services. We do not misrepresent our products, services or capabilities, even if it means losing a sale.

Our Business Partners

We select our business partners, including our suppliers and contractors, based on merit, reputation and ability to help Sohome AS meet its business objectives, considering, among other things: price; quality; delivery capability; reputation for service; integrity; and social responsibility. We require our suppliers to abide by ethical standards and business practices.

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Our Competitors

Sohome AS competes fairly and complies with applicable competition (or antitrust) laws to ensure our products and services are judged solely on their merits. We engage in lawful means of obtaining information about our competitors. We comply with all international trade laws, including applicable export, import and sanctions laws and regulations in the countries where we conduct business.

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Our Communities

Sohome AS is socially responsible and is committed to enhancing and serving the communities where our employees and customers live and work. We protect the environment and the health and safety of our employees, contractors, customers and the communities wherever we conduct business.

Our interests

As Sohome AS employees, we promote and protect the company's interests. We do not compete with the company nor improperly use our relationship with the company for personal gain. We undertake all necessary efforts to avoid conflicts of interest and, where such conflicts are inevitable, we disclose and resolve such issues immediately. We do not offer or accept gifts, hospitality or entertainment that may be inappropriate or may affect or otherwise appear to influence our business judgment or the decision-making of our customers.

Our Information

Sohome AS complies with all applicable data privacy laws, regulations and company policies in the protection and management of personal information. We maintain only those employee records required for business, legal or contractual purposes and limit access to such data to those who need the information for legitimate business or legal purposes. We manage company records in a manner consistent with all applicable legal requirements, company policies and related record retention schedules.

At Sohome AS, we safeguard our proprietary information, intellectual property rights and goodwill. We share proprietary or confidential information only with authorized company employees having a legitimate need to know or with third parties subject to prior approval and appropriate safeguards. Similarly, Sohome AS respects the intellectual property assets of others. Internet access and e-mail are provided to Sohome AS employees for legitimate business use and employees must comply with all company policies and requirements governing their usage.

Our Assets

As Sohome AS employees, we safeguard the company's physical property and financial assets by following company policies and procedures to prevent their loss, theft or unauthorized use. All expenditures must be undertaken for legitimate business purposes and never for personal use. We always obtain proper authorization and approval before entering into financial or contractual commitments on behalf of the company. Every Sohome AS employee is responsible for ensuring the complete, accurate and timely internal and external reporting of financial information within their sphere of influence. We do not exploit for personal gain the company's financial and non-financial data or confidential, non-public information to buy or sell, directly or indirectly, the shares or options of Sohome AS.

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All employees are encouraged to report suspected or observed violations of law or company policy by contacting the appropriate manager or by using the company's approved *Compliance issues Reporting Methods*. Sohome AS will not retaliate against anyone who reports, in good faith, suspected violations of law or company policy.

Periodic Review

All Sohome AS employees, including new employees upon hire, are expected to read the Code of Conduct and comply with its standards. The company has established a process to support employees in undertaking a periodic review of the Code of Conduct to ensure continued knowledge of its contents.

In addition to the Code of Conduct, you, as an Sohome AS employee, are required to comply with the applicable laws, company policies and procedures that affect your job responsibilities.

To guarantee the company's continued success, each of us, working together, must continue to establish and meet the highest standards of business ethics and personal integrity in all that we do.

SOHOME AS
Knut Normann Egeland / MSc
Security Officer
Customer Project Quality and EHS Mⁿ



