# documaster

## ETHICS AND BUSINESS INTEGRITY IN DOCUMASTER



In Documaster we have established a framework for ethical decision making and a set of beliefs on how employees, customers and partners will be treated. Our company will always have a high level of integrity which we will always abide by, without exceptions.

The Documaster Code of Conduct is one of the ways we put Documaster's values into practice. It's built around the recognition that everything we do in connection with our work is measured against the highest standards.

Our commitment to the highest standards helps us hire great people, build great products, and keep loyal customers.

Please read the Code of Conduct bearing in mind that each of us has a personal responsibility to incorporate and to encourage others to incorporate the principles of the Code of conduct into our work.

We expect all our employees and Board members to know and follow the Code. Failure to do so can result in disciplinary actions, including termination of employment. The Code is specifically written for Documaster employees, but we expect the members of our extended workforce (temps, vendors, and independent contractors) to follow the Code in connection with their work. Failure to do so can result in termination of their relationship with Documaster.

If you have any questions or believe that one of your fellow Documaster or the company as a whole is falling short of our commitment, don't be silent. We want to hear from you.

Documaster will not permit retaliation against any employee who, in good faith, seeks advice concerning, or who reports or complains of violations of, the Code or other illegal or unethical conduct.

If, however, an employee makes a false report of a violation or of questionable behaviour for the purpose of harming another person, the reporting employee will be subject to disciplinary action. Reporting can be done to your immediate supervisor or Management:

## **Business Integrity**

Our customers value Documaster not only because we deliver great products and services, but because we hold ourselves to a higher standard in how we treat our customers and how we operate. We recognize the importance of adhering to the OECD Guidelines for Multinational Enterprises, which provide comprehensive recommendations for responsible business conduct in a global context. Keeping the following in mind will help us to maintain this standard:

1. Documaster will not tolerate any form of bribery or corruption. No direct or indirect requests, acceptances, payments or offers of bribery will be tolerated in Documaster. Hospitality or gifts that may improperly influence our business decisions will not be accepted in any circumstances.



- 2. Documaster will always comply with applicable legal requirements and understand the major laws and regulations applicable to our work.
- 3. We will conduct our business in compliance with competition laws and not participate in any form of manipulation of bids including bid rigging, cover bidding or any other mechanism that limit fair competition.
- 4. Any conflict of interest when representing Documaster will be avoided and notified to Management.
- 5. Our products, features and services should make Documaster more useful for all our customers and users. Our business model or any iteration of our business model will always have this as a guiding principle.
- 6. We are asking our customers to entrust us with their personal information. Preserving that trust requires that each of us respect and protect the privacy and security of that information. Know your responsibilities under these procedures, and collect, use, and access information only as authorized by our Policy and Governance document for Documaster as data processor.
- 7. Part of being useful and honest is being responsive. Recognize relevant feedback and do something about it. If something is broken, fix it.
- 8. Any time you feel that our customers or business partners aren't being well-served, let someone in the company know about it. Continually improving our products and services takes all of us.
- 9. Documaster is fully committed to comply with applicable economic sanctions, including those adopted by United Nations and the European Union. Documaster will not conduct business with embargoed nations that wage war in condemnation by NATO or its allies. We will not conduct business with nations that support terrorism, or that do not support equal rights based on sexuality, religion, gender or where people are persecuted will be excluded from our areas of business conduct.

## Respect for each other

Documaster promotes an inclusive culture. We have an unwavering commitment to prohibit and effectively respond to harassment, discrimination, misconduct, abusive conduct, and retaliation.

Documaster is a respectful, safe and inclusive working environment for all employees and members of the extended workforce. Our environment will have emphasis on respect for each individual at all levels in the organization, offering assistance and showing empathy to employees and members of the extended workforce.

Documaster will carry out employee surveys each year. In addition, employees are encouraged to participate in the equality check (equalitycheck.it).

Employment in Documaster will be based solely upon individual merit and qualifications directly related to professional competence. We strictly prohibit discrimination or harassment based on



race, colour, religion, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation or any other characteristics protected by law.

Documaster prohibits discrimination, harassment and bullying in any form- verbal, physical or visual. Any disrespectful behaviour within our organization will be met by harsh consequences and employees and/or extended workforce are encouraged to report any incidents to Management or to immediate supervisor.

We are committed to a safe, healthy, and violence-free work environment. Behaviour that poses risk to the safety, health, or security of Documasters, our extended workforce, or visitors is prohibited. If you become aware of any of the mentioned risk factors, please report this to Management.

### The environment

In Documaster we are aware of our environmental responsibilities and act accordingly. This is reflected across our company- from our employees to vendors we do business with. As a software company our direct impact on the environment is minimal, but we are fully aware of our indirect impact and the following are the measures we have taken to minimize these.

Our employees are encouraged to use public transport to our work offices and currently 80% of our employees do so. For business meetings, unless specifically required by our customers or deemed necessary, we utilize online video conference solutions rather than travelling by car or other means.

Our waste production in regard to food and office supplies is sorted into individual waste containers. Paper, degradable food, batteries, electronic equipment, printer toners and hardware are all sorted into separate containers and dealt with appropriately. Materials that can be recycled are dealt with accordingly. The offices are equipped with bottle and can recycling stations.

Electricity consumption is kept as low as possible. During office hours temperature and lighting is regulated automatically. Lighting is automatically switched off in office areas not in use. Traps are installed on all faucets to prevent unnecessary water usage in case of leakage.

Sanitary equipment used in lavatories are environmentally friendlier (Svanemerket) and so are the dish washing equipment in the office kitchen. Dishwashers are always run on Eco mode.

Through our software and services within digital archiving systems we enable our customers in minimizing paper production and usage.

Our production of Software has minimal to no direct impact on the environment. However, our software is run on computers and servers. The indirect impact is electricity and hardware consumption.



Documaster has all hosting outsourced. When selecting the vendor for hosting, Documaster has emphasized the importance of the environmental values to reflect our own.

## **Commitment to the 10 UNGC principles**

Documaster and its subsidiaries are committed to aligning our operations and strategies with the ten universally accepted principles of the United Nations Global Compact (UNGC) in the areas of human rights, labor, environment, and anti-corruption. By integrating these principles into our business practices, we aim to contribute to a more sustainable and inclusive global economy.

### **Human Rights**

- 1. **Principle 1:** Documaster supports and respects the protection of internationally proclaimed human rights.
- 2. **Principle 2:** We ensure that we are not complicit in human rights abuses.

#### Labor

- 3. **Principle 3:** Documaster upholds the freedom of association and the effective recognition of the right to collective bargaining.
- 4. **Principle 4:** We are committed to the elimination of all forms of forced and compulsory labor.
- 5. **Principle 5:** We advocate for the effective abolition of child labor.
- 6. **Principle 6:** We strive to eliminate discrimination in respect of employment and occupation.

#### **Environment**

- 7. **Principle 7:** Documaster supports a precautionary approach to environmental challenges.
- 8. Principle 8: We undertake initiatives to promote greater environmental responsibility.
- 9. **Principle 9:** We encourage the development and diffusion of environmentally friendly technologies.

## **Anti-Corruption**

10. **Principle 10:** Documaster works against corruption in all its forms, including extortion and bribery.