

BASEFARM CODE OF CONDUCT FOR EMPLOYEES

Introduction

Basefarm was founded in 2000 to support companies and organizations that wanted to build their success through the internet. Our mission is still to empower our customers with superior technological solutions. We specialize in the management and hosting of mission critical applications. We utilize cost efficient technology and customized design to ensure that our customers' solutions run as efficiently as possible.

Basefarm Values

Our core values describe who we are and what we represent.

Skillful

With our technical excellence and professionalism, we take full responsibility for our customers' business needs and requirements.

Dedicated

We care for our customers' business and are committed to ensuring the highest level of quality. We are energized by new challenges.

Close

We work in close collaboration with our customers. We have a deep understanding of our customers' requirements and together we secure future development of solutions.

Constructive

We are a solution oriented and constructive service provider. We focus on solutions rather than problems. With our systems and structured approach, we ensure stability.

About this Code of Conduct

This Code of Conduct is a guideline on how to behave in specific circumstances and how we want Basefarm to be represented. When speaking in a forum in which audiences would reasonably expect that we are speaking as representatives of Basefarm, we generally state only Basefarm's view and not our own. We treat our colleagues, clients and others with whom we do business, with respect and dignity.

Each and every one of us at Basefarm has the responsibility to read and familiarize ourselves with this Code of Conduct, and to conduct our tasks and responsibilities for Basefarm in accordance with the guidelines. We also have a responsibility to comply with the spirit of this Code and to help others do the same. As individuals, we are encouraged to raise any issues and concerns through appropriate channels.

While the Code provides a broad range of guidance about the standards of integrity and business conduct, no code can address every situation that individuals are likely to encounter. As a result, this Code is not a substitute for our responsibility and accountability to exercise good judgement and obtain guidance on proper business conduct. We are encouraged to seek additional guidance and support if needed.

This Code of Conduct applies to all employees in Basefarm and we expect all our suppliers to consider this and follow the same principles. By suppliers, we mean everyone who provides products and services to us, including those working for the suppliers and the subcontractors of the suppliers.

Human Rights

Basefarm as a company is committed to respecting all internationally recognized human rights. We will conduct our business consistently with the United Nations Guiding Principles on Business and Human Rights. In our business activities, we will comply with applicable laws, act in an ethical, sustainable and socially responsible manner.

Child and Forced Labor

Basefarm will not use child or forced labor, and will not tolerate working conditions or treatment that is in conflict with international laws and practices. We only engage in business with companies that also respect this requirement.

Working conditions

Basefarm is committed to creating working conditions, which foster fair employment practices, where ethical conduct is recognized and valued and by providing a safe and secure environment for all personnel on our facilities.

Working hours shall comply with national laws and benchmark industry standards, and not more than prevailing international standards. Basefarm acknowledges all employees' right to form and join trade unions of their own choice.

Anti-bribery and Corruption

A bribe occurs when someone attempts to influence a decision by offering some form of improper advantage, favor or incentive. You shall never offer, give, ask for, accept or receive any form of bribe. Corruption is both illegal and detrimental to society. All forms of corruption and bribery are unacceptable to us, our suppliers and those we cooperate with. All Basefarm personnel are requested to get familiar with the Anti-bribery and corruption policy which can be found in the CSR Policy section in Confluence, in the Basefarm Employee Handbook and in Introduction checklist for new personnel.

Money laundering

Money laundering occurs when the criminal origin or nature of money or assets is hidden in legitimate business dealings or when legitimate funds are used to support criminal activities. All forms of money laundering are unacceptable to us, our suppliers and those we cooperate with.

Gifts, Hospitality and Expenses

Generally, in Basefarm, we do not offer or accept gifts, except for items of minimal value. Basefarm does not allow gifts and hospitality where giving or accepting them could influence business decisions or enforcement of regulations, or cause others to perceive such influence.

Conflict of interest

A conflict of interest occurs when your personal relationships, participation in external activities or interest in another venture can influence, or could be perceived to influence your decisions when acting on Basefarm behalf. As an employee in Basefarm, conflicts of interest shall wherever possible be avoided, and service to Basefarm shall never be subordinated to personal gain or advantage.

Discrimination, Harassment and Intimidation

Respect is an important aspect of a healthy working environment and business dealings. We prohibit all forms of discrimination, harassment and intimidation that are unlawful or otherwise violate our policies, whether committed by or against a manager, co-worker, client, supplier or visitor. Discrimination and harassment, whether based on a person's race, sex, gender, pregnancy, gender identity or expression, color, religion, nationality, age or disability, is inconsistent with our tradition of providing a respectful, professional and dignified workplace. Never engage in harassment, bullying, workplace violence or other behavior that colleagues or business partners may regard as threatening or degrading. In addition, offensive messages/remarks and inappropriate jokes are never acceptable.

Alcohol and narcotics

Working at Basefarm under the influence of either alcohol or narcotics is not tolerated. Alcohol can be consumed together with colleagues and customers when etiquette or other special situations require it. Always be aware of the amount you drink and your behavior in such situations. Absence due to alcohol or drugs is not accepted and is not legitimate absence. Alcohol must never be combined with e.g. driving.

Environmental responsibility

Basefarm shall strive to reduce the negative impact of our own operations and demonstrate both externally and internally that we care about the environment. It sets the requirements for Basefarm's Management and employees and we show our suppliers, customers and partners that the Environmental work is taken seriously.

Confidentiality and Information security

Basefarm is committed to protect sensitive or confidential information. We will not misuse information belonging to ourselves, our customers or our partners. We will protect personal data. We will cooperate to maintain and improve information security by following Basefarm's Information Security Policies.

Competition

Basefarm will always compete in a fair and ethically justifiable manner. We will comply with all applicable competition laws. We will not engage in or tolerate anyone who engages in anti-competitive behavior, such as price fixing, bid rigging, market sharing or abuse of market power.

Social media

Always use common sense when expressing yourself, and be certain that you do not contribute to activity that undermine the interests/reputation of your workplace. Basefarm's Social Media Policy is available on the company's intranet.

Disciplinary actions

Anyone found to have violated Basefarm's Code of Conduct may face consequences depending on the particular situation. Where there are repeated or serious breaches, this can result in the termination of employment and/or legal actions.

Whistleblowing

Basefarm is committed to ensuring that employees can speak up with confidence if they have any concerns or need to ask for help. Should you become aware of an infringement of laws, from this Code of Conduct or other regulations, you shall raise this issue with your manager. Failure to do so itself is a

breach of this Code. Incidents may be reported and handled confidentially if desired. Basefarm does not allow reprisals of any kind against those who, in good faith, report an infringement or suspicion of an infringement of the rules or guidelines.

What this means to you acting on behalf of Basefarm

We set high ethical standards for everyone who acts on Basefarm's behalf. It is your responsibility to read, understand and act according to the Code of Conduct. You are also responsible for complying with other governing documents and applicable laws that are relevant to your work.

- Familiarize yourself with this Code of Conduct.
- Act comfortably within our ethical standards and within the law. Operating in a grey zone increases the risk of things going wrong. When in doubt, disclose the issue to your manager.
- Spend sufficient time on difficult decisions and raise issues early. The wrong decisions are often taken when things have not been properly thought through and you are pressured into taking a rash decision.
- If there is a difference between a legal requirement and the Code, apply the most stringent standard.

Getting help

If you are unsure about your obligations concerning any area in Code of Conduct for Employees, you should contact one of the following people for help:

- in the first instance; the local Country Manager

You can also contact:
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Approved by:
Fredrik Ohlsén
CEO Basefarm

