

# GTS Nordic

## Employee Code of Conduct

GTS Nordic is a payroll and employment service provider with high degree of integrity, professionalism, and ethics.

All employees are expected to act lawfully, ethically and in the best interest of GTS Nordic. This employee Code of Conduct sets out basic guiding principles.

### COMPLIANCE WITH LAWS, RULES AND REGULATIONS

Employees must follow applicable laws, rules, and regulations at all times.

Employees must not be convicted of any criminal offenses except for minor breaches of the traffic legislation or other breaches that, at the sole discretion of GTS Nordic are considered insignificant for employment.

### CONFLICTS OF INTEREST

In performing their job duties, employees are expected to use their judgment to act, at all times and in all ways, in the best interests of GTS Nordic. A “conflict of interest” exists when an employee’s personal interest interferes with the best interests of GTS Nordic.

#### Financial conflicts

It is a condition for continued employment that employees manage their own financial affairs properly and fulfill all commitments.

Employees must avoid conflicts between their personal financial interests and the interests of GTS Nordic, its clients, or suppliers. Employees must also avoid actions likely to be perceived as creating conflicts of interest.

No employee is allowed to use inside information material about GTS Nordic or its clients for his/her own benefit.

Employees must refrain from investing privately if this could lead to “insider trading” issues or “conflict of interest” issues.

### CONFIDENTIALITY

Employees are required to treat all information regarding GTS Nordic’s business as strictly confidential both during and after the employment. This information includes but is not limited to information concerning GTS Nordic’s clients, contact persons, intermediaries, cooperation, partners, suppliers, services, products, prices, financial information, employees and strategies.

It is required that employees observe this duty of confidentiality also under “private” circumstances.

As an exception to the confidentiality rule, general information regarding GTS Nordic’s activities and services may be disclosed when it is considered in the best interest of GTS Nordic, i.e., when the information serves the purpose of attracting new business, attracting new employees or in the general building of a positive corporate image.

## **LOYALTY**

Employees are required to observe loyalty and must not take any actions that may damage the interests of GTS Nordic.

The duty of loyalty must be respected both when communicating internally and externally with clients, intermediary’s corporation partners or other business relations.

## **DISCRIMINATION AND HARASSMENT**

GTS Nordic provides equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind.

## **BRIBERY, PAYMENTS TO GOVERNMENT PERSONNEL**

Employees may not bribe anyone for any reason, whether in dealings with governments or the private sector. Employees may not make illegal payments to government officials themselves or through a third party.

Employees shall not accept inappropriate personal gifts or payments from clients.

## **COMMUNICATION**

Communication with each other

GTS Nordic wishes to promote a friendly environment where all employees must be treated with respect and dignity, irrespective of their different backgrounds, cultures and experiences. Employees must support each other by being open, honest and by sharing information.

### **Communication with clients**

Employees are required to maintain the highest level of professionalism when communicating with clients. Employees are required to inform their manager in case that his/her relationship with a client develops in a way that could create a conflict of interest.

Employees are not allowed to communicate with clients via private electronic means or via private correspondence.

In case of termination of the employment, GTS Nordic will decide when, how and who should inform the

employee's clients of such termination and of the Employee's successor. Employees are not allowed to inform the clients of any such matter until it has been agreed with GTS Nordic.

#### Statements to the press

Only the CEO is authorized to give statements to the press. If the press contacts an employee in his/her capacity as director/manager of a client company, the response should be agreed upon with the CEO in advance.

#### **OTHER**

It is required that employees do not involve themselves in political, financial or personal activities that may attract negative publicity toward GTS Nordic.

#### **POLICIES AND PROCEDURES**

All employees must adhere to GTS Nordic's policies and procedures.