

Code of Ethics and whistleblower policy

Version 1

At Anonymous Copenhagen, we are committed to the highest standards of ethical conduct and integrity. Our Code of Ethics serves as a guide for all employees, officers and directors, in conducting business with integrity, respect and professionalism. We are committed to promoting diversity, equity, and inclusion in all aspects of our business. This includes conducting regular pay equity analyses to ensure that all employees are being compensated fairly based on their job responsibilities and performance, regardless of their gender, race/ethnicity, or other demographic factors. We believe that a diverse and inclusive workplace leads to better business outcomes and a more positive work environment for all. We have also established a whistleblower policy to provide a secure and confidential means for employees, officers, and directors to report any violations of our Code of Ethics, laws, or regulations.

1. Compliance with laws and regulations: We will comply with all applicable laws and regulations in all countries where we operate.
2. Fair competition and antitrust compliance: We will compete fairly and comply with all antitrust laws, and we will not engage in any conduct that would unreasonably restrain trade.
3. Conflicts of interest: We will avoid conflicts of interest and will disclose any potential conflicts to the appropriate persons.
4. Protection of company assets: We will protect and use company assets for legitimate business purposes and will not use company assets for personal gain.
5. Insider trading: We will not engage in insider trading or misuse of non-public information.
6. Accounting and financial reporting: We will maintain accurate and timely financial records, and we will comply with all accounting and financial reporting laws and regulations.
7. Protection of confidential information: We will protect all confidential information and will not disclose it to unauthorised parties.
8. Ethical conduct: We will conduct ourselves in an ethical and professional manner, and we will not engage in conduct that would reflect unfavourably on the company or its reputation.
9. Discrimination and harassment: We will not discriminate or harass any individual, and we will provide a working environment that is free from discrimination and harassment.
10. Environment: We will comply with all environmental laws and regulations, and we will strive to minimise our environmental impact.
11. Human rights: We will respect human rights and will not engage in any conduct that would violate human rights.
12. Reporting violations: Any employee, officer, or director who becomes aware of a potential violation of our Code of Ethics, laws, or regulations, is encouraged to report the violation to their supervisor or to the designated contact person in the company. Reports can also be made anonymously, and no employee will be retaliated against for making a good faith report.
13. Investigation and follow-up: All reported violations will be investigated promptly and thoroughly. The company will take appropriate corrective action if a violation is found to have occurred.
14. Confidentiality: The company will keep the identity of the whistleblower confidential, to the extent possible and consistent with the company's legal obligations. Stakeholders can report concerns anonymously by sending an email to reportconcerns@anoncph.com. The designated contact person will promptly investigate all reports and take appropriate corrective action if a violation is found to have occurred. We are committed to protecting those who report violations

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in good faith, and we will not tolerate retaliation against any employee, officer, or director who reports a violation. Any employee who believes that he or she has been retaliated against for making a report is encouraged to contact the designated contact person in the company.

15. Protection from retaliation: The company will not tolerate retaliation against any employee, officer or director who reports a violation in good faith. Any employee who believes that he or she has been retaliated against for making a report is encouraged to contact the designated contact person in the company.
16. Training and education: The company will provide regular training and education to employees, officers and directors on the code of ethics and whistleblower policy, and the importance of ethical conduct and compliance.

We believe that a strong code of ethics and whistleblower policy are essential for maintaining the integrity of our operations and for ensuring that any violations of our Code of Ethics, laws, or regulations are identified and addressed in a timely manner. We are committed to fostering an environment that encourages ethical behaviour and compliance, and to protecting those who report violations in good faith.

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