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# CBA CODE OF CONDUCT FOR EMPLOYEES

CBA's Code of Conduct for employees is included and detailed in the Personnel Handbook available internally to all employees. An outline of our Code of Conduct is shown here.

CBA's Code of Conduct applies to each employee of Commercial Banking Applications AS (CBA) regardless of start date, contractual agreement or employee rank. Failure to comply with the policies set forth may result in disciplinary action, which can include termination of employment.

Our Code of Conduct outlines our expectations regarding employees' behaviour towards their colleagues, customers and overall organisation.

We promote freedom of expression and open communication but do expect all employees to follow our Code of Conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organised, respectful and collaborative environment.

Company employees are bound by their contract to follow our Code of Conduct while performing their duties.

The main components of our Code of Conduct are outlined below.

### **COMPLIANCE WITH LAW**

All employees are required to protect our company's legality. They should therefore comply with all relevant fair trade, environmental, safety, human rights and equality laws. We expect employees to be ethical and responsible whenever dealing with our company finances, products, partnerships and public image.

### RESPECT IN THE WORKPLACE

All employees are expected to respect their colleagues. We will not allow for any kind of discriminatory behaviour, harassment or victimisation. Employees should also conform the company's policy for equal opportunities in all aspects of their job duties.

# PROTECTION OF COMPANY PROPERTY

All employees are expected to treat company property with respect and care.

This means that employees:

- □ Should not misuse company equipment or frivolously use it.
- Should respect all incorporeal property such as trademarks, copyright and other property. Employees should use them only to complete their job duties only.
- □ Should protect the company facilities and material property from damage and vandalism whenever possible.

### PROFESSIONALISM AT THE WORKPLACE

All employees are expected to act and show integrity and professionalism while in the workplace:

# □ Job duties and authority

All employees should fulfil their duties with integrity and respect toward customers, stakeholders and the community. Team leaders and managers must not abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner.

We encourage mentoring throughout our company.

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### □ Working hours

Employees are expected to follow their current agreed working hours and to be punctual when arriving and leaving work.

#### Collaboration

At the workplace, employees are expected to be friendly and collaborative. They should not disrupt the workplace or present obstacles to their colleagues' work.

#### Communication

All employees must be open for communication and dialogue with their colleagues, team leaders and team members.

### □ Good order

In general, employees should be well-dressed and adopt a gracious and polite demeanour.

At the end of the working day the employee's workplace must be left tidy.

#### Benefits

We expect employees to not abuse their employment benefits. This can refer to time off, insurance or other benefits we offer.

## Conflict of interest

Employees are expected to avoid any personal, financial or other interests which may hinder their capability or willingness to fulfil their job duties.

# □ Corruption

We strongly discourage employees from accepting gifts from outside parties. We also prohibit briberies that can benefit an external or internal party.

### Policies

All employees are required to read and follow all of our company policies. Any questions can be addressed to a member of the management team.

# **DISCIPLINARY ACTIONS**

We may take disciplinary action against any employees who repeatedly or intentionally fail to follow our Code of Conduct.

Possible disciplinary actions include:

- Reprimand
- Loss of benefits for a specific amount of time
- □ Termination of employment

CBA may take legal action in the event of corruption, theft, fraud or other unlawful behaviour.

# RETALIATION

CBA prohibits anyone from retaliating against employees because they have filed a Code of Conduct Policy complaint or have cooperated in any way in the investigation of a complaint.