



Code of Conduct

Purpose

At Nobly we work on the basis of a global code of ethics. It is a set of rules that guides us in how we run our business and helps employees maintain ethical behaviour internationally. We call this our Code of Conduct (hereafter "Code"). In short, it means that we honour our commitments and strive to create value in everything we do.

The purpose of this Code is to describe the core values that shape our interactions, decision-making, and daily operations. It is devised to ensure that every individual feels valued, safe, and supported while contributing to the success and well-being of the organisation. This document is not just a set of rules, but a reflection of our shared commitment to respect, equality, transparency, and accountability.

Our way of conducting business**Scope of the code**

This Code applies to all employees at Nobly, regardless of employment, including external consultants and service employees. We expect our business partners, suppliers and other stakeholders to adhere to this Code or to adopt similar ethical standards.

Commitment to compliance

We are committed to conducting our business with the highest ethical standards. Any violations of this Code, whether intentional or inadvertent, will be addressed seriously. Breaches will be treated as a disciplinary issue and could lead to disciplinary actions, including dismissal. Therefore, it is essential that this Code is thoroughly read and understood. Employees are encouraged to report any breaches of the Code in a confidential manner. We ensure a fair process for everyone involved and prohibit retaliation against those who report concerns or violations.

Sustainability and ethical practices

At Nobly, we are committed to conducting business in a way that is both environmentally responsible and ethically sound. We align our operations with the ten Principles of the UN Global Compact, ensuring that our business activities support sustainable development, human rights, fair labour practices, and environmental protection.

Environmental Responsibility

We are dedicated to minimizing our environmental impact. As part of our efforts, we take proactive steps to reduce waste, conserve energy, and implement

sustainable practices throughout our operations. This includes reducing our carbon footprint, promoting recycling, and using eco-friendly materials where possible.

For further information on Nobly's environmental efforts, please refer to our ESG policy.

Respecting human rights

Every day we work together to strengthen trust in society and help solve significant issues. Together we strive to fulfill our ethical responsibilities towards our employees and everyone we interact with. Our commitment to human rights is already a well-integrated part of our business practices.

Nobly combats any forced labor, child labor, and any kind of slavery, we eliminate discrimination and ensure safe and healthy working conditions. Nobly complies with every fundamental right of employees described by governing law in the countries we operate.

Equality

Every employee at Nobly can expect fair treatment and equal employment opportunities regardless of gender, race, ethnicity, disability, political beliefs, religion, or sexual orientation. At Nobly, we embrace and celebrate diversity.

Nobly upholds each employee's right to freedom of association and their preference within established and recognized employee organisations. We honour employee's rights to join, form or choose to not join an employee association of their choosing.

Harassment

We are committed to maintaining a workplace free from harassment, intimidation and bullying. All employees have the right to work in an environment where they are treated with respect and dignity. Harassment of any kind is strictly prohibited, regardless of what it is based on. This includes verbal, physical, sexual, or visual conduct that creates an intimidating, hostile or offensive work environment. We encourage employees to report any instance of harassment, intimidation or bullying and are committed to investigate and address any concerns promptly and confidentially. The responsibility for a workplace free of harassment lies with everyone.

Societal responsibility

Engaging in activities in the local community is a big part of Nobly's values – in all countries where we are located. Nobly is committed to supporting NGO organisations that are focusing on important areas in our society.

In addition, Nobly participates in local sport events, arrange social activities using local businesses and in general focuses on having local suppliers for our daily operation. We believe that supporting the local community in this matter will strengthen our shared societal responsibility.

Health and safety

It is a goal for Nobly to address all aspects of health and safety in context to the nature of the company. This means, as a minimum, complying by law and regarding both physical and mental health and safety. Furthermore, Nobly takes the wellbeing of employees very serious. Extended health insurance, focus on work/life balance, quarterly confidential employee dialogs, ergonomic office equipment, venting, and appropriate lunch/drinks are just some of the initiatives taken to support this. Being an IT company, hazardous and significant physical safety risks are not an issue. Nobly also has an emergency plan on how to handle any unforeseen incidents or accidents.

We prioritize that Nobly employees leave the office every day in the same shape and form as they entered the office in the morning.

Privacy

We ensure that personal data, whether related to our employees, clients, or third-party partners, is collected, processed, stored, and shared responsibly in line with the General Data Protection Regulation (GDPR). Data privacy is a core aspect of our operations, and we take steps to implement strong safeguards to protect the confidentiality, integrity, and security of all personal information.

For more information on our handling of personal data, please refer to our Privacy Policy.

Corporate integrity and governance Management

It is important to Nobly that our Code is anchored at management level and communicated to our employees when they join the company and regularly throughout the year. That way it becomes a natural part of our company standards and ethical values.

Nobly maintains communication, decision-making processes, and structures that support the integration of economic, social, and environmental factors in collaboration with relevant stakeholders. This includes e.g. internal assessment of concepts/initiatives and strategy by management.

Regulatory compliance

We are committed to maintaining the highest standards of cyber security, data protection and operational resilience. To achieve this, we align our practices with key regulations and industry standards such as DORA, GDPR, NIS2, CIS18 and ISO 27001. By integrating these frameworks into our operations, we ensure compliance, risk mitigation, and continuous improvement in security and data protection.

Competition law

Fair competition is essential to innovation, consumer welfare, and the long-term success of our business. By adhering to the applicable competition law in the markets where we operate, we ensure that our practices contribute to a level playing field, fostering trust and integrity in every aspect of our business.

We are dedicated to competing honestly and transparently, and we strictly prohibit any practices that could harm free and open competition. Employees must not engage in anti-competitive conduct such as price-fixing, bid, market allocation, or any form of collusion with competitors. These actions are not only unethical but also illegal and may result in severe legal penalties.

Conflict of interest

We expect all employees, external consultants, and business partners to avoid situations where their personal interests could conflict with the best interests of the company. We are committed to upholding transparency, honesty, and fairness in all of our business relationships.

In the event of a conflict of interest, employees must act in the best interests of Nobly and remove themselves from any decision-making process or situations where they have a personal stake.

Anti-corruption

Nobly takes measures to combat bribery and corruption. This by ensuring healthy business practices which covers both the way we run a business and the companies that we choose to collaborate with e.g. customers, suppliers, associations etc. Our company or our employees do not engage with people or organisations offering any kind of bribery to enter into any kind of agreement or arrangement. For example, we do not accept gifts, cash, lavish entertainment, or personal favours in return for awarding contracts or business deals. Similarly, employees are strictly prohibited from offering monetary incentives, excessive hospitality, or unofficial commissions to secure business advantages.

Nobly does not enter into contracts or

agreements with customers, partners or other organisations based on corruption. For instance, we will not participate in deals where a supplier demands an unofficial facilitation payment to expedite services or where a business partner suggests an under-the-table agreement for mutual financial gain.

Nobly strictly prohibits bribery, fraud, and money laundering in any form. Any kind of suspicion of corruption and bribery should immediately be reported to the management of Nobly. The relevant authorities will be notified, and the necessary actions will be performed, related to the situation.

Gifts and gratitude

Employees must not accept or offer gifts, favours, or other forms of gratuities that could influence, or appear to influence their professional judgment. While small, nominal gifts may be accepted if they are of modest value and do not create a conflict of interest, any gift that could be perceived as an attempt to gain preferential treatment must be declined.

Reporting misconduct

We are committed to maintaining a culture of transparency and accountability. Employees are encouraged to report any misconduct or unethical behaviour they witness or experience. Our Whistleblower

Scheme provides a confidential and protective way for employees to report concerns, including issues related to fraud, corruption, discrimination, or breaches of the Code.

Retaliation against anyone who reports misconduct in good faith will not be tolerated. Reports can be made anonymously if preferred, and all claims will be thoroughly investigated. Regardless, anonymity will be protected.

Employees can report misconduct via our Whistleblower Scheme [here](#).

Professional development and integrity

Continuous development of our employees' competencies and knowledge is essential for Nobly, which we strive to uphold by:

- Continuous learning: Nobly encourages ongoing professional development. Employees should take the initiative to stay current with the latest technologies, trends, and industry practices.
- Skill sharing: Employees are expected to actively share their knowledge and skills with colleagues to support team growth and foster a culture of continuous improvement.
- Honesty and transparency: Employees must demonstrate honesty and integrity in all

interactions, both internally and with clients. Transparency is vital in project reporting, communications, and decision-making.

Review and awareness

This Code of conduct is reviewed annually by management to ensure relevance.

New employees shall acknowledge this Code upon hiring and all staff will be attending periodic training on ethical conduct and compliance.