



# Code of Conduct



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# Message from the CEO

Acting responsibly matters. It is the license to operate for any modern company today. But for FORCE Technology, it means something special; it is the essence of who we are.

Being a Research and Technology Organisation, FORCE Technology has a special role in society and, therefore, also special obligations and responsibilities. We firmly believe that we should not only be measured on performance, goals, and results, but also on our general behaviour. Because we help others become

frontrunners, we must also be frontrunners ourselves when it comes to responsibility, professionalism, and integrity. Otherwise, we will lose our legitimacy.

Therefore, we will do our utmost to live up to the strong principles of our new code of conduct. Because it matters. To our customers and partners, to the society and to us.



Tommy Bysted





# Introduction

FORCE Technology is a technological consultancy and service company which strives to create positive technological change and create a more sustainable and safe future. We help our customers through specialist consulting and training, laboratory services and testing, on-site inspection, and measurement, as well as unique components and products.

FORCE Technology is one of the seven Danish government-approved Research and Technology Organisations (RTO) that are subject to supervision by the Danish Ministry of Higher Education and Science. We play a key role in the Danish innovation system, being an active, innovative partner in linking technology and business.

Being an RTO, FORCE Technology has a special role in society and therefore also special obligations and responsibilities. We are self-owned, impartial, and independent of business or political interests, and we place knowledge and facilities at the disposal of all businesses on equal terms. Any profits are reinvested in infrastructure, facilities,

and the creation of new technological knowledge, and it is our duty to lead the way for Danish companies and help them become technological and sustainable front runners.

As a company with strong values, and as an important player in Danish society and the world, we should not only be measured on performance, goals, and results, but also on our general behaviour towards customers, employees, other stakeholders, and the world around us. We are committed to conducting all business activities in full compliance with all applicable laws, regulations, rules, and industry standards. We strive to be a credible partner and to run our business in a responsible, ethical, and legal manner.

Therefore, our work is based on this Code of Conduct that guides us in good decision-making and is the foundation of our corporate culture, setting high standards of integrity for how we conduct business.

The Code of Conduct describes our approach to acting in an ethical and responsible manner, explains how we handle a number





of specific areas and helps management and employees to maintain integrity and ethical behaviour in all areas of our business.

The general principles of the Code of Conduct, as well as the specific requirements in the subsections constitute our most essential obligations. Our internal policies and manuals contain additional requirements that all employees must follow.

#### **Who does the Code of Conduct apply to?**

The Code of Conduct is global and applies to the entire FORCE Technology group - including all subsidiaries, all employees and everyone who acts on behalf of FORCE Technology, including the Board of Directors. All employees, managers and board members are required to familiarise themselves with our Code of Conduct and the values on which it is based. We must all adhere to the wording and spirit of the Code of Conduct - and help others do the same.

We expect our business partners to commit to and adhere to the same high ethical standards as we do, and they must follow

the principles laid out in this Code of Conduct and highlighted in the separate subsection for business partners.

#### **When in doubt ask for help**

The Code of Conduct cannot accommodate all dilemmas or situations we might experience in our daily work. Unforeseen challenges may occur and there may be uncertainty about the development of laws and regulations.

This does not mean that we are exempt from the obligation to follow high ethical standards in all situations, and employees are encouraged to contact their immediate manager or the Legal, Ethics & Compliance function if they have any questions or issues they would like to discuss.





# Ethics & integrity

At FORCE Technology we are committed to conducting all business activities in full compliance with all applicable laws, regulations, rules, and industry standards. Integrity and a high level of ethical standards are at the core of everything we do. We strive to be the trusted partner of our customers and other business partners, and we must, therefore, conduct our work with integrity and impartiality.

## Conflict of interest

As an impartial and independent RTO, we handle all potential conflict of interests with professionalism, and we take all necessary measures to ensure our credibility and impartiality.

The decisions made by employees, management and the board of directors must always be in the best interest of FORCE Technology and our customers.

A conflict of interest can occur if the personal interests of an employee, manager or board member - or the interests of someone they have a close relationship with - differ from

the best interests of FORCE Technology. This can include situations where an employee, manager, or board member:

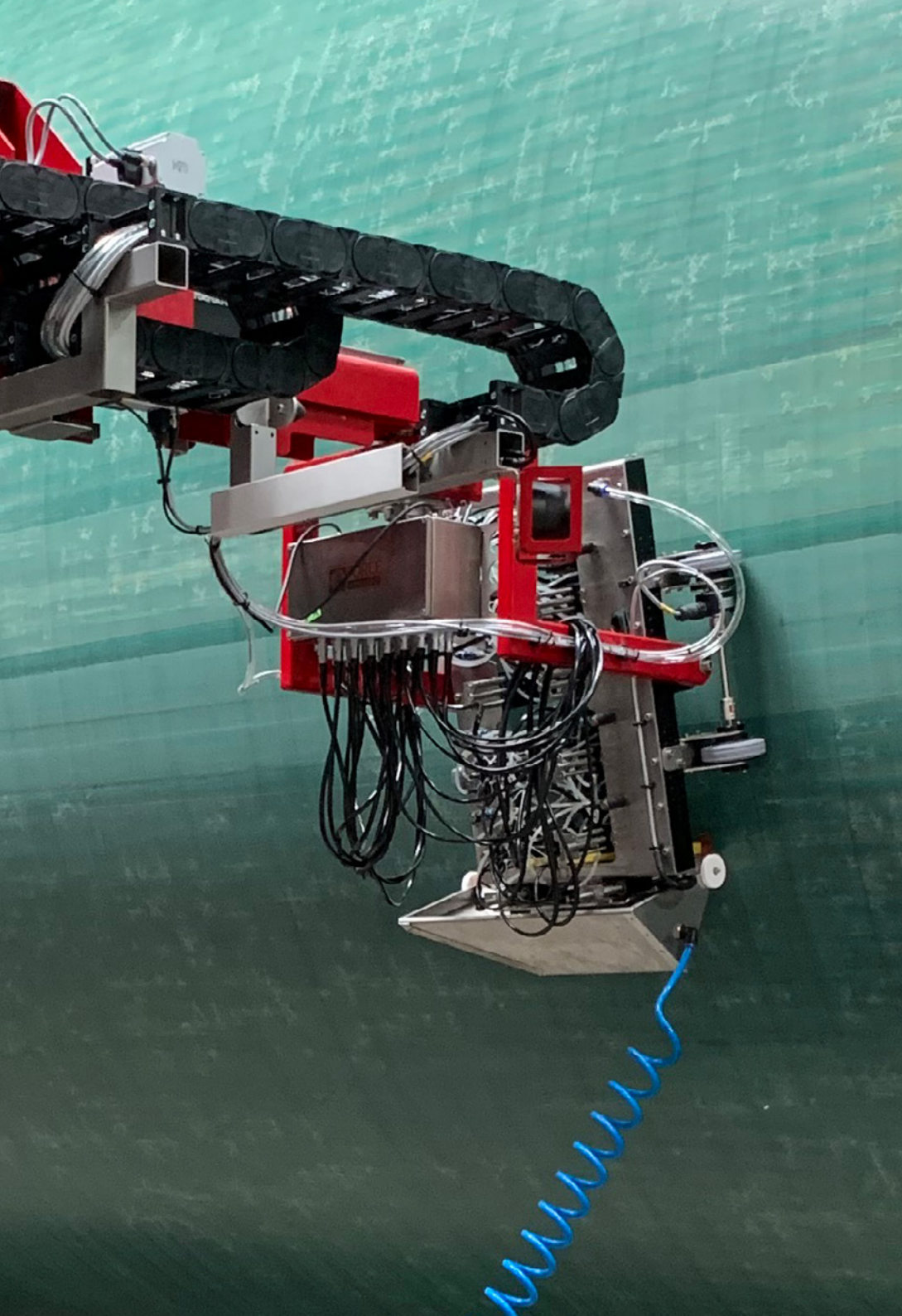
- holds a position to influence supplier selection, e.g., purchasing goods or services on behalf of FORCE Technology from a supplier owned by a relative or close friend;
- hires or offers temporary employment to a relative or close friend;
- receives gifts, entertainment or hospitality from business partners which may influence his or her decision-making.

In situations like these, the judgment of the employees, managers or board members concerned can be questioned, and FORCE Technology's impartiality and reputation may be put at risk. Employees, management, and the board of directors must, therefore, avoid all perceived, potential, or actual conflict of interests and involve their manager if a conflict of interest should occur.

## Fair competition

We support well-functioning market





conditions and do not in any way engage in any anticompetitive business practices. Competition laws ensure a fair and open market for all and prohibit:

- agreements that can impair or restrict competition;
- illegal terms and business practices towards customers and suppliers.

Through our commitment to free and fair competition, we ensure more innovation,

better products, and more competitive prices for our customers and, ultimately, consumers. Being an RTO, we are also committed to not distorting competition.

Non-compliance with fair competition can result in serious penalties for FORCE Technology as a company and for the employees, management, and board of directors.

**The main obligations of our employees, management and board of directors are to:**

- involve a manager if they become aware of any threat or incident of impartiality;
- avoid conflict of interest and immediately involve a manager if a conflict of interest should occur even if it is just potential or perceived, so that it can be managed;
- not exchange or share any information related to pricing, sales figures, bids, profits, costs, terms, research & development strategies, methods of distribution or any other parameters that determine or influence our competitive behaviour when interacting with competitors;
- never enter into anti-competitive agreements or understandings with competitors, such as agreements not to compete, coordinating tenders or sharing markets or customers;
- always act independently when competing for business, setting our prices, or planning our strategy.



# Sustainability, climate & environment

We create positive technological change and make society safer and more sustainable. But while solving one problem using technology, we must not create new ones.

That is why we strive to be sustainable in everything we do - environmentally, economically, and socially.

Environmentally, by minimising our emissions, optimising resources and energy consumption, and ensuring a global green foot and handprint.

Economically, by conducting a sustainable business with high integrity and emphasis on a positive impact on employees, communities, and reinvestment in technology.

Socially, by promoting diversity, equal rights and opportunities, safety, and compliance with existing frameworks.

We take pride in being a credible company that takes the lead with ambitions, initiatives, and actions behind our words. From our perspective, sustainability is not only a

management task, but is exercised at all levels and corners of the organisation.

We support the sustainability agenda broadly and we are committed to supporting the United Nations Sustainable Development Goals - internally within our organisation and by requiring sustainable cooperation from our suppliers, customers, partners, and other stakeholders. We are committed to supporting all goals globally and put special emphasis on goals with the highest impact on our surroundings.

For example, we prepare annual climate accounts in order to set ambitious goals for reducing our emissions on the basis of specific data.

By innovating, we support our customers and partners with technological solutions that improve the sustainability of their operations. We leverage technology to improve performance in our cooperation and make workplaces and surroundings sustainable and safe. We contribute to the twin transition, i.e., simultaneous digital and green transitions,







by developing and applying digital solutions to help solve climate and environmental issues.

### Environmental management

We comply with requirements in ISO 14001:2015 to environmental management systems and hold ISO 14001:2015 certificates for FORCE Technology in Denmark and in Norway.

Integrated into our environmental management system is compliance with all relevant legislation and regulations, including the European Union REACH and RoHS Directive and the Conflicted Minerals Regulation.

Compliance with legal regulations requires that all employees follow the routines and procedures in the environmental management system.

Employees, management, and the board of directors are encouraged to practice and support actions and initiatives that:

- minimise FORCE Technology's climate and environmental footprint;
- contribute to a positive handprint by delivering sustainable services and products to customers and partners;
- optimise our resource and energy consumption and reduce waste;
- are socially responsible to the benefit of our employees, suppliers, customers, and communities we take part in;
- support a financially sound business;
- are protective of the health, safety, and rights of all people.

### The main obligations of our employees, management and board of directors are to:

- raise any potential environmental issues or incidents with a manager;
- bring forward any ideas for potential improvement;
- follow all internal routines and procedures outlined in the environmental management system.



## Health & safety

We strive to develop a strong safety culture which encourages everybody to participate in a safe working environment. This applies at all FORCE Technology locations, as well as customer locations.

“Safety first” is a core value at FORCE Technology. We encourage leaders to recognise safe behaviour and our board of directors, management and supervisors are actively engaged in the safety management processes. Everybody must demonstrate their commitment to safety and must state expectations for safe behaviour among employees.

In this way, health and safety are integrated into every job we do. Our health & safety management system supports effective and efficient implementation of health and safety rules and procedures across FORCE Technology. Following the procedures in the management system ensures that risk assessments are established, risks are controlled, and internal audits are conducted periodically. Based on a systematic approach, we implement continuous improvements to health and safety.

At FORCE Technology we will comply with the requirements of health and safety management systems according to ISO 45001:2018. FORCE Technology in Norway holds an ISO 45001:2018 certificate. We will also comply with all health and safety regulations, and requirements set for us by customers and business partners.

We will proceed actively in developing our safety culture, by following simple rules:

- Think safety first. Integrate health and safety considerations when planning a job.
- If you see a problem, you own it. Act, if you see a problem in relation to your working environment. Solve the problem yourself or reach out to a colleague who can help you solve it.
- Support your colleague, say STOP when you see or sense danger. Always stop the job, when you see a hazardous situation and take care of your colleagues.



### The main obligations of our employees, management and board of directors are to:

- always start meetings with a Safety Moment. Use three minutes in every internal meeting to discuss a safety related issue;
- follow the simple safety rules above to help FORCE Technology develop a strong safety culture;
- follow the policies and procedures in our management system.





# Quality management

Competence, impartiality, and high-quality standards are crucial elements to FORCE Technology in promoting trust in our operations and deliveries to our customers.

To ensure high quality standards and excellence in the way we operate, we plan and implement actions to address risks and opportunities. Continuously addressing risks and opportunities gives us the basis for increasing the effectiveness of our quality management system.

At FORCE Technology we comply with the requirements of quality management systems according to ISO 9001:2015. Furthermore, our accredited services comply with additional requirements for:

- the competence of testing and calibration laboratories (ISO 17025:2017)
- the operation of various types of bodies performing inspection (ISO 17020:2012)
- bodies operating certification of persons (ISO 17024:2012)
- bodies certifying products, processes and services (ISO 17065:2012)





FORCE Technology in Denmark holds a common ISO 9001:2015 certificate along with several accreditations for our services. FORCE Technology in Norway holds an ISO 9001:2015 certificate and accreditations and our subsidiary in Sweden, Delta Development Technology is likewise accredited according to ISO 17025:2017.

The management team is committed to enforcement of and adherence to the above standards to the degree this is required as a condition for accreditation, notification, authorisation, certification or any other official recognition or for contractual reasons.

All employees, management and members of the board of directors are obliged to follow quality policies and procedures. By following quality policies and procedures we ensure activities are completed impartially and in a structured manner and managed to safeguard impartiality.

Our comprehensive quality management system sets out requirements for the availability of personnel, facilities, equipment, systems, and support services necessary to manage and perform activities.

**The main obligations of our employees, management and board of directors are to:**

- help improve effectiveness of the quality management system;
- help improve procedures in our management system to obtain certifications and accreditations.





# Human rights, diversity & inclusion

We believe that human diversity is a strength which provides us with different perspectives, ideas, and skills, allowing us to develop our company. We oppose all kinds of discrimination and harassment, including discrimination on the grounds of age, disability, gender, political opinions, race, religion, sexual orientation, union affiliation, or any other characteristic.

We comply with current diversity legislation, both national and international. Our culture is based on mutual trust and all employees are treated fairly and with dignity and respect. We take diversity seriously and have signed the Confederation of Danish Industry's Gender Diversity Pledge. We strive to have fair and representative inclusion of men and women in leadership and specialist roles, and we have developed a Gender Equality Plan, which is available on our website.

Our aspiration is for everyone to experience a culture where all employees have equal opportunities to realise their potential. One of the cornerstones in this is respect and

empowerment of our people, and a culture, where it is safe to speak up.

We are committed to supporting and respecting all internationally proclaimed human rights, and we take precautions to ensure that we are not complicit in human rights abuses, either directly or indirectly. We respect the freedom of association and collective bargaining and have a constructive dialogue with our employees and the union representatives.

We do not under any circumstances permit the use of child or forced labour. We support the effective abolition of child labour in accordance with the principles of the ILO conventions on child labour.



## The main obligations of our employees, management and board of directors are to:

- never to tolerate any kind of discrimination or harassment;
- act with ethics and fairness in every aspect of our business;
- support a culture where all employees have equal opportunities to realise their potential.



## Protecting information

Striving to create a more sustainable and safer future by driving the technology transformation means that we will be trusted with confidential business information and personal data from our business partners, other stakeholders, and from employees.

When conducting research and testing we will also be dealing with confidential information, intellectual property rights and personal data.

Confidential information, intellectual property, and personal data are valuable information for our business and can be sensitive, and we must protect and safeguard it to the fullest. When employees or management have access to such information, they must take appropriate actions to prevent disclosure and misuse. They should only access, collect and/or use information which they are authorised to handle, which is necessary to collect and handle for pre-determined, clear, and legitimate business reasons and which is allowed according to the terms and conditions for the task or project.

If we fail to do so, it could have serious consequences for our customers and suppliers, and for FORCE Technology as a company.

We respect the privacy of our employees and all others, and all personal data is collected and processed in compliance with applicable data privacy laws and policies.

Any unauthorised access or disclosure must be reported to a manager, and/or the IT or Legal, Ethics & Compliance department. Information includes a variety of different types of assets, such as:

- Trade secrets
- Intellectual property rights
- Patents and trademarks
- Know-how
- Copyright material, pictures, drawings, etc.
- Personal data



### The main obligations of our employees, management and board of directors are to:

- follow internal guidelines and policies when dealing with confidential information and data privacy;
- read our Personal Data Policy;
- only disclose confidential information as per instruction and agreement;
- report any unauthorised access to a manager or the IT or Legal, Ethics & Compliance department.





# Anti-bribery & anti-corruption

We conduct all aspects of our business activities in strict compliance with all applicable anti-corruption laws, rules, and regulations. We do not tolerate any form of bribery, corruption or corrupt practices, including fraud, extortion, embezzlement, money laundering or facilitation payments.

Corruption and bribery can occur when interacting with business partners, customers, and government officials. It can be cash payments, but can also constitute improper gifts, vouchers, hospitality, entertainment, and any other means which seek to secure an improper or undue advantage or affect the outcome of a business transaction. Corruption and bribery are unlawful and contrary to our values, and any violation can have severe consequences both, financially and reputationally, for employees and management, and for FORCE Technology as a company.

Giving or accepting gifts or hospitality can easily be perceived as trying to impact a decision or a transaction, so all employees are encouraged to pay special attention in

this regard and, if in any doubt, reach out to a manager.

When working with business partners, we want to work with partners who share our values, are honest and competent. We select our business partners in a fair and unbiased way.

We maintain accurate and transparent books and records of all business transactions and we ensure that all our financial dealings are conducted with adherence to the applicable financial standards.

## Donations

We are a company that contributes to the long-term development of society, e.g., through research and development activities and dissemination of knowledge. We are independent, impartial and must operate without influence from special interests, political or financial.

Therefore, all types of donations to and sponsorships of associations, clubs, individuals, or the like must be considered carefully.

FORCE Technology can choose to support - financially or otherwise - various causes that live up to our purpose, mission, and vision.

## The main obligations of our employees, management and board of directors are to:

- follow internal procedures when selecting business partners;
- report to the nearest manager or the Legal, Ethics & Compliance function if offered or asked for a bribe;
- not give or accept any gifts, entertainment or hospitality or other non-monetary items which can be perceived to influence or impact the transaction or secure an undue advantage. If in doubt reach out to a manager or the Legal, Ethics & Compliance function;
- reach out to the Head of Communication and Marketing when receiving a request or inquiry regarding sponsorships or donations.



# International trade compliance

We do business globally and are, therefore, committed to complying with all applicable national and international trade laws, such as export controls and sanctions.

Export controls regulate the transfer of certain goods, know-how and technology between countries and to some end-users. This includes dual-use items which can be used both for civilian and military purposes. In some situations, a license or an authorisation might be required before we can export certain items.

At FORCE Technology we will not, under any circumstances, export or transfer any goods, know-how or technology in violation of applicable export control regulations.

Embargoes and sanctions may restrict us from doing business with certain countries, entities, organisations, or individuals.

Non-compliance with the rules can have severe consequences for our license to operate, including penalties, fines, exclusion

from tenders, imprisonment, and reputational damage.

Employees and management can always seek advice from the Legal, Ethics & Compliance function.



## The main obligations of our employees, management and board of directors are to:

- know the customer or business partner, what is being exported and the intended use, the destination, and the end-user;
- pay special attention when dealing with countries, entities or individuals that might be sanctioned or considered high risk;
- immediately consult with a manager or the Legal, Ethics & Compliance function if any suspicious behaviour is identified.





# Reporting misconduct

At FORCE Technology we act with the highest level of professionalism, and we strive to do things right.

It is possible for employees, but also for business partners and other external stakeholders, to report irregularities, anonymously and securely through our Whistleblower Scheme.

We are committed to a culture of honesty, openness, and respect and, if employees become aware of any irregularities, misconduct, or breaches, they must speak up. Only in this way can we become aware of concerns that need to be remedied.

If employees become aware of any concerns - actual or potential - they are encouraged to reach out directly to their manager, HR, or the Legal, Ethics & Compliance function. If they are not comfortable doing so, they can make a report through our Whistleblower scheme, which can be done anonymously. All reports are taken seriously and will be handled quickly and in a professionally manner.

There is a no-retaliation policy and there must not be any fear of any repercussions if employees come forward with a concern or submit a report made in good faith or based on reasonable belief.

## What can be reported?

- Any kind of unethical or illegal behaviour and other irregularities - also solely based on a suspicion.

## What should not be reported?

- Dissatisfaction with the terms of employment or customer complaints. Terms of employment can be discussed with a manager or HR, while customer complaints are handled according to our internal procedures. If employees have any questions in this regard they should reach out to their manager.

A report can be submitted by accessing our [Whistleblower Scheme](#).



## The main obligations of our employees, management and board of directors are to:

- speak up if becoming aware of any misconducts or irregularities;
- talk to a manager about any concern or breaches and if they are not comfortable doing so, create a report through the Whistleblower Scheme.



## Business partners

At FORCE Technology we only engage with respectable and competent business partners, including customers, suppliers, consultants, agents, distributors, and any others who act on our behalf. We expect our business partners to share our values and comply with all applicable laws and regulations. We want to establish long-lasting relationships built on honesty, trust, and collaboration.

We expect all our business partners and their business partners to adhere to the principles stated in this Code of Conduct and be able to document compliance. This Code of Conduct is an integrated part of our contracts with our business partners.

We reserve the right to execute random controls and audits at business partners' premises with due notice to ensure compliance with the principles and rules set forth in this Code of Conduct. In case of any breaches, or if we have a reasonable reason to anticipate that a breach will take place, FORCE Technology reserves the right to terminate or amend all agreements with





the business partner without liability to avoid violation of applicable law or this Code of Conduct.

Business partners are obligated to cooperate in good faith with FORCE Technology to remedy or prevent a potential breach of this Code of Conduct.

### **Ethics & integrity**

- Avoid any conflict of interests and, if faced with a perceived, potential, or actual conflict, be open and transparent and inform FORCE Technology of the situation.
- Do not enter or engage in any anti-competitive agreements, understandings, or practices.
- Do not share or exchange any information that will distort competitive behaviour.

### **Sustainability, climate & environment**

- Optimise the resource and energy consumption and reduce waste.
- Minimise the environmental and climate footprint and contribute to a positive handprint.

- Have environmental management systems in place in accordance with ISO 14001:2015 or similar.
- Comply with the European Union REACH and RoHS Directive and the Conflicted Minerals Regulation.

### **Health & safety**

- Comply with all health and safety regulations and requirements and always put safety first in all situations.
- Have health and safety management systems in place in accordance with ISO 45001:2018 or similar.
- Ensure that employees always follow all policies and procedures regarding health & safety.

### **Quality management**

- Have quality management systems in place in accordance with ISO 9001:2015 or similar.
- Ensure that employees always follow all policies and procedures regarding quality management.

### **Human rights, diversity & inclusion**

- Oppose all kinds of discrimination and harassment.
- Comply with current diversity legislation and develop diversity plans to ensure inclusion and fair and equal rights for all.
- Support and respect all internationally proclaimed human rights.
- Prohibit child labour and forced labour and support the effective abolition of child labour in accordance with the principles of the ILO conventions on child labour.

### **Protecting information**

- Always respect and protect confidential information and intellectual property that belongs to FORCE Technology or others.
- Adhere to all applicable data privacy laws and protect the data privacy of suppliers and employees of FORCE Technology.

### **Anti-bribery & anti-corruption**

- Do not engage in or tolerate any form of bribery, corruption, or corrupt practices.
- Never give gifts or hospitality to secure an improper or undue advantage or affect the outcome of a business transaction.

- If gifts or hospitality are provided to FORCE Technology employees, they must have a clear and precise business purpose.

### **International trade compliance**

- Comply with all applicable trade controls, including export controls and sanctions.
- Immediately notify FORCE Technology if any violation occurs which involves FORCE Technology's services, products, or engagements.

### **Reporting misconduct**

- Report immediately to FORCE Technology's Whistleblower Scheme any unethical or illegal behaviour and other irregularities even only based on a suspicion.



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