

# Code of Conduct

## FOR BUSINESS PARTNERS

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## 1. Introduction

Code of Conduct for business partners of Heimdal Security A/S and its subsidiaries (together, “Heimdal”) (the “Code”) seeks to offer guidance for its Business Partners with ethical and social standards, applicable laws, integrity, respect for labour and human rights, data privacy, competition, corruption, money laundering, environment etc. This Code is a guide to the ethical business practices that will ensure both parties’ mutual success. Heimdal therefore expects its Business Partners to act honestly, responsibly and fairly.

This Code is a requirement for doing business with Heimdal and it applies to all of its Business Partners. Business Partners are defined as, but not limited to, the following entities: suppliers, affiliates, distributors, resellers, customers, consultants, agents and intermediaries and any other parties that enter a contractual relationship with Heimdal, for Heimdal, or on behalf of Heimdal.

This Code is an integral part of Heimdal’s relationships and part of all contracts with Business Partners. In Heimdal, we fully commit ourselves to the principles of the Code.

## 2. General expectations

Heimdal expects its Business Partners to uphold similar standards and to require the same from its own set of Business Partners, especially those that conduct business for Heimdal. Heimdal expects immediate notification from existing Business Partners of any suspicion or concern of breaches, or any other non-compliance with the standards set out in this document, allowing for joint verification of facts and remediation.

Through this Code, Heimdal sets out the key principles that are expected from its Business Partners but is not intended to be an exhaustive list of rules. This Code should be interpreted in the context of all applicable laws and regulations for each Business Partner. As this Code does not, and cannot, cover every applicable situation or provide answers to all questions that might arise, all Business Partners are expected to, in good faith, act in line with the principles of the Code and where necessary seek guidance from Heimdal.

Where local laws are less restrictive than this Code, you must comply with the Code, even if your conduct would otherwise be legal. On the other hand, if local laws are more restrictive than the Code, you must always, at a minimum, comply with those laws.

## 3. The principles of the Heimdal<sup>®</sup> Business Partner Code of Conduct

### 3.1. Human and labor rights

All Heimdal's Business Partners have a responsibility to respect human rights regardless of a government's ability or willingness to protect human rights. Human rights are rights inherent to all human beings, whatever nationality, place of residence, sex, national or ethnic origin, color, religion, language, or any other status.

Business Partners will not use involuntary labor, bonded or forced labor, child labor or accept anyone do so on their, or Heimdal's behalf.

Heimdal expects its Business Partners to respect and uphold their employees' right to freedom of association, involving trade unions or similar external representative organizations.

Business Partners should reward their employees adequately and in accordance with the applicable laws and industry standards. Employees shall be entitled to rest breaks and rest days in accordance with the law, industry standards or collective agreements.

Business Partners must stay up to date, and comply with, national and regional legislation as well as relevant and applicable international regulations and conventions. Business Partners are expected to comply and to set minimum standards in accordance with:

- UK Human Rights Act 1998, UK Modern Slavery Act 2015, UK Employment Rights Act 1996
- The Universal Declaration of Human Rights
- The principles set forth in the fundamental conventions of the International Labour Organization (ILO)
- The United Nations Guiding Principles on Business and Human Rights
- The Voluntary Principles on Security and Human Rights.

### 3.2. Equality of opportunity and diversity

Heimdal expects Business Partners to treat employees fairly and provide a workplace which supports diversity and is free from discrimination in hiring, compensation, benefits, access to training, job assignments promotion, termination, retirement, working conditions and discipline based on personal characteristics.

Business Partners should provide a workplace free from discrimination for reasons such as race, age, pregnancy, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, or marital status.

Business Partners must stay up to date, and comply with, national and regional legislation as well as relevant and applicable international regulations and conventions. Business Partners are expected to comply and to set minimum standards in accordance with:

- UK Equality Act 2010
- Council Directive 2000/43/EC of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin
- Council Directive 2004/113/EC of 13 December 2004 implementing the principle of equal treatment between men and women in the access to and supply of goods and services
- Directive 2006/54/EC of the European Parliament and of the Council of 5 July 2006 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation.

### 3.7. Money laundering and tax evasion

As Heimdal's Business Partner, you are expected to have a proper internal control systems in place to monitor your business for any indications of money laundering or tax evasion activities and thereby minimise the risk of being involved in such practices.

Heimdal expects you to have a company policy that requires you and your employees to always carry out your business in line with applicable anti-money laundering legislation, and you must regularly train your employees on how to act in compliance and detect signs of money-laundering. You must have a risk management process in place and appropriate due diligence measures to identify your customers and business partners and assess the risk of money laundering in all business relationships (also known as "KYC" procedure).

Heimdal expects that all its Business Partners to comply with Directive (EU) 2018/843 of the European Parliament on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing (AML Directive) and all other national legal laws, standards and requirements.

### 3.8. Complying with economic sanctions restrictions

You are expected to comply with all applicable laws and regulations concerning international sanctions and other trade restrictions, taking account of continuous developments of these measures. Heimdal expects its Business Partners to ensure that business is conducted in a manner that does not violate trade sanctions and to inform Heimdal should they ever become subject to international sanctions. For more details about this please also read [HEIMDAL'S CODE OF CONDUCT ON COMPLIANCE WITH SANCTIONS & EMBARGOES AND RESTRICTED INDUSTRIES](#), for more information please access Heimdal's site [HERE](#) or ask for a copy from your Heimdal contact.

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### 3.9. Violations of this Code and enforcement

Business Partners have a duty to report any known or suspected violation of this Code, including any violation of laws, rules, regulations, or policies. Prompt reporting of violations is in the best interest of everyone. Reports will be handled as confidentially as possible.

Failure to comply with this Code of Conduct for Heimdal's Business Partners may result in discontinuance of business relationships with immediate termination rights. Business Partners hereby agrees to abide by and comply with all the above requirements and standards, in case of non-compliance with the above Heimdal will consider it a breach of contractual relationship and will have the right to terminate the contract/ agreement in 30 days with a prior notification send to the Business Partner.

## 4. Conclusion, questions and suggestions

This Code contains general guidelines for the conduct of business with, or on behalf of Heimdal, consistent with the highest standards of business ethics. Further guidance can be obtained from your contact person at Heimdal. In addition, you always have the possibility to directly contact Heimdal's Compliance Manager.

### 3.3. Anti-corruption

Business Partner are required to conduct business in a fair, transparent and legal manner. Heimdal expects that its Business Partners do not engage, whether direct or indirect, in any form of illegal practices, including extortion, fraud, bribery or facilitation payments.

Heimdal's Business Partners will not provide any political support, make charitable donations or offer sponsorships with a view to gaining an unfair advantage or a view to influence decision-making. Hospitality offered must be linked to business purposes, must be of an appropriate value and must not be intended (or able to be perceived as such) to influence a business or public decision.

Business Partners must not attempt to obtain, directly or indirectly, from any source, sensitive information that is not publicly available or otherwise authorized for disclosure by the law and/ or regulations.

Business Partners are required to uphold all laws and regulations relevant to bribery and corruption and comply with all the relevant laws where they operate. However, all Heimdal's Business Partners will be bound by the international, UK and UE relevant laws listed, but not limited to:

- The Council of Europe Criminal Law Convention on Corruption, and the Organization for Economic Cooperation and Development Anti-Bribery Convention (OECD Anti-bribery Convention)
- UN Convention against Corruption (UNCAC)
- UK Bribery Act 2010

### 3.4. Intellectual property, confidentiality and privacy

Heimdal's Business Partners are expected to exercise care and attention and not to disclose any confidential information to unauthorized third parties.



Heimdal's Business Partners are expected to protect Heimdal company assets and comply with all relevant laws regarding intellectual property rights. Heimdal's Business Partner should never knowingly infringe the intellectual property of Heimdal or others.

Documents that contain confidential information or that are protected by privacy standards should be stored securely and shared only internally with employees on a need-to-know basis.

Business Partners are expected to acknowledge which of their business processes includes personal data, and have taken steps to prevent unauthorized access, disclosure, alteration, or destruction of personal data in line with privacy legislation applicable. Business Partners will maintain appropriate records of data processing activities and inform data subjects about the processing of their personal data. You are expected to have in place processes to detect and report data breaches, as required by applicable legislation.

Business Partners must stay up to date, and comply with all standards set forward by the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR).

### **3.5. Environment**

Business Partners shall strive to minimise adverse impacts on the environment, human health and livelihoods. Heimdal's Business Partners are expected to carry out operations with care for the environment, comply with all relevant local and national environmental regulations and maintain all applicable licenses, registrations or permits.

### **3.6. Compliance with Laws and Regulations**

Business Partners are expected to understand and comply with all relevant laws, rules and regulations. If any doubt exists about whether an action or a conduct of business is lawful, ethical, or contrary to the law, regulation or this Code, Business Partner should seek advice immediately from the Heimdal Compliance Manager.



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