

Code of Conduct

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1. Who We Are

Keepit A/S (“Keepit”) is a software company specializing in cloud-to-cloud data backup and recovery. Deriving from 20+ years of experience in building best-in-class data protection and hosting services, Keepit is pioneering the way to secure and protect cloud data at scale.

Our success relies on the confidence our stakeholders have in us when we provide our services as well as how we interact with our customers, suppliers, authorities, business partners, colleagues, and other stakeholders. Every Keeper to all suppliers has a crucial role in building and maintaining this trust in us.

Keepit strives to incorporate ethical, social, and environmental considerations into its business strategy. It is essential for our long-term business success that we carry out our business activities in a responsible way.

2. Our Code of Conduct

Keepit observes the ten principles of the United Nations Global Compact on human rights, labor rights, environment protection, and to combat all forms of corruption.

These principles constitute the minimum standards for Keepit and are integrated into this Code of Conduct (the “Code”).

Every person working for Keepit, whether permanently or temporarily employed, subcontracted, or volunteering, is subject to the Code, including management and board of directors (in the following referred to as “Keepers”). The Code applies to all countries in which we operate and to every Keeper working on behalf of Keepit within those countries.

It is the responsibility of each manager within Keepit to ensure that the Code is known and complied with by all Keepers within their respective area of responsibility.

Keepit requires suppliers and their subcontractors to comply with the Code or similar standards and to verify compliance by providing information hereof and allowing access to their premises when needed.

3. Data Protection

We believe our services support global digital cooperation and realize the potential of digital technologies to advance human well-being and mitigate the risks of misuse and missed use of data. We consider data security an essential element when providing our data backup service. Management of personal data is always handled in accordance with the UN Personal Data Protection and Privacy Principles.

We operate in good faith and follow applicable laws and requirements concerning our services. Keepit ensures that the data entrusted to us is handled with the utmost care and confidentiality. Regarding our operation in the European Economic Area, Keepit will ensure that the personal data is dealt with following the General Data Protection Regulation 2016/679 (“GDPR”).

4. Human Rights and Labor

Keepit respects fundamental and internationally recognized human rights in every area in which we operate. It is our responsibility to ensure that our company does not negatively impact human rights.

We take action to remedy adverse human rights impacts involving Keepit and to minimize the risk of us being complicit in the abuse and violation of human rights.

At Keepit, we consider ourselves as being an equal opportunity employer and base employment decisions on qualifications, experience, and potential.

No individual shall be subject to direct or indirect discrimination or harassment based on race, the color of skin, religion or belief, political affiliation, sexual orientation, gender identity, age, disability, or national, social, or ethnic origin.

No individual shall be the subject of ill or inhumane treatment, including physical and sexual abuse, as well as the threat hereof.

Keepit and our suppliers, and their subcontractors who take on the role of an employer, shall not make arrangements that will directly or indirectly require or pressure an employee to work against their will. We and our suppliers must ensure that there is no use of child labor and that young employees under the age of 18 are not subject to working late hours or under unsafe conditions.

All Keepers must be given their terms of employment in writing and must be informed about the terms and conditions of their employment in a language they understand.

Keepit respects keepers' right to form or be members of voluntary labor market organizations or trade unions and to negotiate collectively. Union representatives shall not be subject to discrimination and must, to a reasonable extent, be allowed to perform their representative functions in the workplace.

5. Environment

At Keepit, we commit to practice our business in an environmentally responsible way. Our environmental initiatives include increasing the energy efficiency of our operations (primarily data centers and offices), reduce waste, and minimize the impact on the environment.

As a supplier to Keepit, we urge you to 1) comply with all applicable environmental, health, and safety regulations, 2) use resources efficiently by applying energy-efficient and environmental-friendly technologies to reduce waste and emissions to air, water, and soil, and 3) minimize your negative impact on biodiversity, climate change, and water scarcity.

6. Competition and Anti-Corruption

Keepit is determined to maintain a high standard of integrity and work ethics across all our activities. We maintain a zero-tolerance policy of corruption and bribery in all forms. Corruption is the abuse of entrusted power; and bribery is the offering, promising, granting, accepting, or soliciting an advantage as an inducement for an action that is illegal, unethical, or a breach of trust.

Thus we, our suppliers or subcontractors must never accept, give, or promise gifts, hospitality, or anything of monetary value that could be interpreted as intending to improperly influence a decision or which could unduly affect proper business judgment or otherwise raise concerns about our integrity. Only moderate gifts, rewards, or benefits which do not affect the recipient's behavior are allowed, provided that the presentation, promise, or offer of such gifts, rewards, or benefits is out in the open.

Keepit supports free competition as the basis for all business development and innovation. We must compete within the applicable legal framework, designed to promote fair competition and encourage ethical and legal behavior. We will not engage in anti-competitive activities, such as illegal price-fixing, market division, abuse of a dominant position, or in other situations where free competition is unlawfully prevented, restricted, or weakened.

7. Contracting Practices

When Keepit is conducting business and/or entering other commitments, Keepit must embody the rights and obligations of each party in appropriate written agreements to be able to document the use of Keepit's funds and assets, define the rights and obligations of each party, establish protections against liability, and provide tools for handling disputes. If you are involved in negotiating with customers, partners, or other third parties, you are required to understand the basic principles of business transactions.

Be aware that you may not:

- commit Keepit to undertake any performance, payment, or other obligation unless you are authorized to do so by your manager.
- enter into any transaction that facilitates improper revenue recognition, expense treatment, or other accounting improprieties on behalf of either Keepit or our business connections.

8. Conflict of Interest

Keepers must be impartial, and all business decisions must be based on Keepit's interests without regard for personal circumstances or advantages. Conflicts of interest between Keepers and Keepit must be avoided.

If a conflict of interest arises, the Keeper must immediately inform their immediate manager in writing. Keepers must not use their connection to Keepit for unjust personal gain. Purchases from family members or personal friends must also be avoided. If such an action is still justified, it must be approved by a manager.

9. Professional Conduct

We will always maintain professional behavior. This involves, among other things, respecting common courtesy to other Keepers, applicants, customers, partners, visitors, etc. As a Keeper, you must ensure that you comply with all the procedures and policies of Keepit, including this Code.

10. Violation of the Code

Appropriate actions are taken against Keepers who violate the Code, other internal rules, laws, or regulations. Breaches may result in reprimands, warnings, and, in severe cases, dismissal/termination of the contract. Suspicion of crime is reported to the police or relevant authorities.

Concerns about possible violations of the Code must be raised promptly. Failure to raise a concern can lead to Keepit being exposed to unacceptable operational and financial risks, as well as reputational risk. All concerns will be evaluated for further investigation and handled with due care.

You may raise your concern by email: legal@keepit.com or directly to your manager.

11. Training

Our HR department will make sure that every Keeper is informed about and understands the Code and other relevant guidelines and policies. When deemed necessary, our HR department will have refreshing courses and specific training modules in addition to this.