

# Code of Conduct for Employees

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## INTRODUCTION

At Capture One we are committed to providing high quality and innovative products to our customers while being a responsible employer and corporate citizen. As a global company, we recognize that our responsibility extends beyond our own activities to include our entire supply chain.

This Code of Conduct represents the foundation and the guidelines for the way that we do business, it gives our employees guidance as to how you should conduct day-to-day business, and ensures that all employees and business partners have a clear understanding of the principles and ethical values that we want to uphold.

It is important that you familiarize yourself with this Code of Conduct, as we are all responsible for complying with the Code of Conduct and protecting our reputation as a responsible company through our actions and decisions. All employees including board members must comply with it without compromise or exceptions. Failing to do so can have consequences for us – both as individuals and for Capture One.

Whilst our Code of Conduct is a useful guide, it cannot address all the ethical issues that we encounter, therefore it is important that we always use good judgment and common sense. A number of the topics outlined in this Code of Conduct are further elaborated in our underlying policies and procedures (references included where relevant).

Capture One conducts business globally, and we are subject to international laws as well as the laws of every country where we operate. This Code of Conduct describes the principles for conducting business in Capture One and applies everywhere we operate. However, if local laws, regulations or standards are stricter than this Code of Conduct, you must always follow the stricter rules. In some cases, there may be more detailed internal policies, which you must also consult.

If you are in doubt about any aspect of the Code of Conduct or find yourself in an ethical dilemma, you can always seek guidance from your manager, the Senior Leadership Team, or our CEO.

We thank you for your commitment to our Code of Conduct.

Rafael Orta

CEO

Jacob Aqraou

Chairman of the Board of Directors

## HUMAN AND LABOUR RIGHTS

### Human & labor rights

We strive to create an environment of mutual respect, free from harassment and unprofessional behavior in the workplace & avoid infringing on the human rights of our employees, workers in our supply chains, communities, and other stakeholders. We strive to prevent and mitigate adverse impacts either on our own business operations or through business relationships.

At Capture One, we are committed to supporting proper terms of employment and working conditions. We support and respect the internationally proclaimed human rights stated in the International Bill of Human Rights, the UN Human Rights Declaration and the core labor rights from the International Labor Organization's Declaration on Fundamental Principles and Rights at Work and other ILO core conventions.

### Employment conditions

Each employee has the right to be treated fairly, equitably and with respect, and Capture One adheres to all applicable laws and regulations concerning employer/employee rights and obligations, including the right to freedom of association and the right to collective bargaining. Work is organized so that the rights of employees to a private life and leisure time with their family are respected, and employees shall not be required to act in a manner inconsistent with their personal values.

### Health and well-being

At Capture One, we work to provide colleagues with a safe and healthy work environment. We want to make sure it is possible to maintain a healthy work-life balance and prevent concerns related to health or working conditions from becoming problems.

All employees are entitled to a safe and secure workplace where no one is exposed to unnecessary risk. All managers are responsible for the safety of the employees, which also includes maintenance of equipment.

Although Capture One and its managers are primarily responsible, all employees are also responsible for their own safety when performing their work and must therefore comply with all safety regulations and processes as well as exercise proper care to prevent accidents.

#### *In practice this means we*

- Take care of your own and your colleagues health and well-being, and bring up related concerns, e.g., concerns related to stress or non-optimal working conditions.

→ **Please refer to our Sustainability Policy for more information**

### Parental leave

All employees have the right to parental leave. Capture One policy regarding parental leave is further described on the company intranet.

### Anti-discrimination & equal opportunities

Each employee has the right to a work environment that is open, accepting and inclusive.

Capture One employees will treat colleagues and external stakeholders, such as vendors etc., with respect regardless of age, gender, physical ability, ethnicity, religion, culture, sexual orientation, or political views. We have a Zero Tolerance policy for serious misconduct incl. harassment and discrimination of any kind.

*Discrimination is when individuals or groups are unfairly treated in a way which is worse than other people are treated, on the basis of their actual or perceived membership in certain groups or social categories. It involves restricting members of one group from opportunities or privileges that are available to members of another*

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*group. It is often subtle and can be unconscious.*

Each employee has the right to a work environment that is open, accepting, and inclusive.

*In practice this means:*

- When hiring, defining remuneration packages, or promoting, the basis should be qualifications, experience, and performance.
- Avoid unconscious bias

*Harassment is unwelcome conduct which makes a person feel offended, humiliated and/or intimidated. Harassment can involve one or more incidents and actions constituting harassment may be physical, verbal, and non-verbal. Sexual harassment is a specific type of harassment that constitutes any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation.*

Harassment, disrespectful treatment, and discrimination are not tolerated. Instances of harassment, disrespectful treatment, or discrimination shall be reported through the relevant channels.

Instances of harassment, disrespectful treatment, or discrimination will be reviewed, and action will be taken to remediate the situation (i.e., make amends for the harm caused).

*In practice this means*

- Consider how our behavior may affect those around us.
- Provide feedback to colleagues if we are concerned about their behavior.
- Raise our voice if we feel uncomfortable.

→ **Please refer to our Anti-Harassment & Non-discrimination Policy for more information.**

Right to privacy

Each employee and/or contractor has the right to expect the privacy of their personal information. All personal data belonging to our employees and contractors and collected by Capture One is handled with caution and in accordance with our procedures and applicable laws in the field.

→ **Please refer to our Privacy Policy for Employees for more information**

Child labour, forced labour and human trafficking

Capture One does not tolerate child labour, forced labour or any form of human trafficking.

## ANTI-CORRUPTION AND BUSINESS ETHICS

Anti-corruption:

Capture One operates under strict anti-corruption principles. These principles do not prohibit normal and appropriate hospitality given or received.

- You must not accept or offer a bribe of any kind.
- You must not make facilitation payments or accept such practice in any country by any parties.
- Kickbacks are also considered bribery and are therefore prohibited for employees to either give or receive.
- Furthermore, you can't engage in money laundering or any activity that facilitates money laundering or the funding of terrorism or any other criminal activities.

Gifts, entertainment, and business hospitality

We do not receive or give payment, gifts, or any other form of indemnity from and to third parties that may affect or give rise to doubts about our impartiality in business decisions. This is also the case for sponsorships

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and donations. As a main rule, we do not give or receive gifts to or from customers, business partners or other stakeholders, and gift must never be cash or cash equivalent. Reasonable personal gifts within normal practice are accepted. Before accepting any gift or courtesy be aware that you must always obtain manager approval.

## *In practice this means*

- You must never accept gifts or other types of compensation from third parties that could influence or call into question our impartiality in business decisions. If you are offered gifts or entertainment that cause doubt, please always obtain prior approval from your manager
- You must never offer anything of value to a third party, e.g., public officials, to obtain improper advantage.
- Never offer or receive anything of value that contradicts the Gifting check list below and rules outlined in Capture One Anti-Corruption & Bribery Policy.

## *Gifting check list*

- Given for the right reason: The gift or hospitality has been given openly and to show appreciation and genuine business purposes.
- Without obligations: A gift or hospitality does not impose any obligations on the recipient.
- Without expectations: The person giving the gift or attached persons have no expectations of the gift recipient and they do not associate more significance with the gift than the recipient.
- Given openly: If it is given in secret, suspicions arise.
- Reporting: Gifts or payment of expenses must be appropriately recognized in accounting.
- Reasonable monetary value: The monetary value of the gift and hospitality is within 500 DKK.
- Legality: the act is legal in the country where it takes place.
- Complies with the recipient's own guidelines: The gift or hospitality is compliant with the recipient's ethical guidelines.
- Irregularity: Giving or receiving gifts is not regular between the giver and the recipient.

Any gift received that does not comply with above requirements, must be reported, and handed over to People Operations.

## Bribery and facilitation payments

We do not tolerate bribery. Bribery refers to any offer, kickback, or acceptance of a gift, loan, fee, remuneration or any other thing of value to or from another person or entity as an incentive to influence or promote a certain act or omission which would not have been appropriate in the absence of bribery. We furthermore do not accept facilitation payment, i.e., paying extra to public authorities to speed up routine duties to avoid undue delays.

## *In practice this means:*

- You must not accept or offer a bribe of any kind.
- You must not accept or offer kickbacks of any kind.

## Conflict of interest

We make business decisions based upon the best interests of Capture One – not upon personal interest. A conflict of interest arises when two or more interests are in conflict, i.e., a personal interest conflicting with the company's interests. We do not tolerate nepotism e.g., regarding hiring, procurement etc. If ever in doubt, or you have conflict of interest or suspect a conflict of interest, contact your manager.

## *In practice this means*

- You must make decisions based on professional judgment and must never be improperly influenced by personal interests or relationships.
- Avoid participating in decision-making regarding business relationships that involve your relatives, spouse, partner, close friends or other relations that might create a conflict of interest scenario when you are part of decision making.

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- You cannot participate in any commercial transactions between a Capture One company and a supplier or customer in which you have direct or indirect personal relations, financial or otherwise, unless the transaction is made on market conditions.
- There must be no direct or indirect reporting relationship between related parties employed by Capture One.

→ **Please refer to our Anti-Corruption & Bribery Policy for more information**

## Responsible tax

We pay responsible tax, and we always comply with applicable law in the area. We do not engage in aggressive tax planning.

## Money laundering

Capture One does not tolerate money laundering. Money laundering is the act of concealing or disguising money obtained from criminal activities and making them appear to have originated from legitimate sources or constitute legitimate assets.

### *In practice this means*

- You must not engage in money laundering or any activity that facilitates money laundering.
- You must take immediate action if you suspect that funds have a criminal origin. Possible red flags include exceptionally high cash payments, incoming payments from third parties who are not recognisably involved in the business relationship, and refusal of a business partner to provide complete and truthful contact information.

## Fair competition

We support fair competition in the market, and we never coordinate or cooperate with competitors in any way to fix prices, establish a minimum price level, or to unify other significant condition of supply.

You should therefore not engage in any contracts or agreements, formal or informal, that have the purpose or are likely to have the effect of substantially limiting competition such as price-fixing, market sharing or similar.

### *In practice this means*

- Never discuss, exchange or agree prices or terms with competitors or in any way disclose this information.
- Competitive information regarding products or pricing must always be found via publicly available sources.
- Always be careful when discussing market situations in general, e.g., when attending trade fairs. If a discussion comes close to a prohibited subject, then stop the situation immediately.
- Be aware that our prices are recommended only and that our resellers are free to set their own prices.
- Remember that fixed or minimum prices are prohibited.

## PROCESSING OF INFORMATION

You must respect and protect the confidentiality of information belonging to Capture One, our customers, suppliers and other business partners.

### *In practice this means*

- Always consider whether information is confidential before disclosing it.
- Enter into non-disclosure agreements (NDA) where necessary.
- Manage and protect confidential and proprietary information received from others.

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- Protect Capture One confidential and proprietary information even after your employment has ended.
- Never insert any confidential or sensitive data into AI generative models, such as Chat GPT or online translators.
- Never leave confidential information unattended.

## *What is an example of confidential information?*

- technical information
- information about current or future products (including features, source code, future pricing etc.)
- financial information
- strategic and commercial information (strategic business alliances, business partnerships or marketing plans)
- information about current and prospective clients, customers and suppliers
- know-how, trade secrets, inventions, operations, processes, unpublished information related to intellectual property rights

## PROCESSING PERSONAL DATA

Capture One regularly handles personal data relating to, both current and former employees, recruitment processes, customers, suppliers, vendors, business partners and other individuals and entities with whom we conduct business. Personal data may include contact information, product preferences and transactional data, personal details and information related to employment, corporate information/ organization documentation etc. All personal data must always be securely stored, access limited to the appropriate Capture One employee(s) and only given to them for the purposes of carrying out the duties of their role.

### *In practice this means*

- Use the least amount of personal data needed.
- Only use personal data if you are allowed to.
- Be transparent towards individuals about how you use their personal data.
- Only use personal data for the intended and informed purposes.
- Only collect, use and share personal data that is relevant and on a need-to-know basis.
- Ensure to keep the personal data accurate and up to date.
- Delete personal data that is no longer needed.
- Ensure that personal data is securely stored.
- Ensure that you can document that you do the right thing.
- Never leave personal data unattended.

## TRADE RESTRICTIONS AND EXPORT CONTROL LAWS

We are committed to conducting business in accordance with sanctions obligations and sanctions laws and regulations applicable to us ("Sanctions"). Trading with certain sanctioned countries considered to be "high caution" areas is subject to prior written approval from the CEO.

### *In practice this means*

- Always involve Legal & Compliance specialist when reached out by a party linked to High-Risk sanctioned country.
- Undertake screening of suppliers, vendors, consumers and other business relations in accordance with the Policy on Sanctions and Export Controls.

→ **Please refer to our Policy on Sanctions and Export Controls for more information.**

## ENVIRONMENTAL IMPACT

Capture One seeks to reduce the adverse impacts of its business activities on the environment. We are committed to:

- Measuring and reducing our environmental and climate footprint related to our own operations (scopes 1 and 2) as well as in our value chain (scope 3)
- Reducing our use of energy, water and waste generation.

*As an employee you are expected to protect environment through your daily actions:*

- Reducing unnecessary consumption of energy and resources in your activities.
- Reduce non-essential business travel, when possible, especially by air, by using technologies such as video conferencing.
- Minimise the creation of (food) waste.
- Consider more sustainable options, such as biking or walking, in the daily commute to and from the workplace.
- Promote climate change and environmental impact when selecting suppliers.

→ **Please refer to our Sustainability Policy for more information**

## COMPLIANCE WITH THE CODE OF CONDUCT

We expect all our employees, business partners and board members to know and follow our Code of Conduct.

Capture One will not tolerate any wrongdoing with respect to the Code of Conduct. Failure to follow the Code of Conduct can result – depending on the severity of the violation - in civil damages, reporting to the police, criminal prosecution, financial liability and may have legal consequences for the employee's employment including termination of employment.

Corrupt and illegal activities by members of Capture One organization can expose the company and/or the offender(s) to criminal prosecution, reputational harm and other serious consequences. Capture One considers an employee's participation in corrupt and illegal activities as a material breach of employment terms and the employee's obligations towards Capture One and will lead to termination of employment with Capture One. In addition, the employee may be subject to criminal prosecution.

## RAISING A CONCERN

At Capture One, we encourage you to be open and honest, and we will support all employees who report violations as well as those who request assistance or have concerns. As an employee, you are responsible for reporting violations and expressing concerns regarding non-compliance with this Code of Conduct.

If you detect or suspect any concerns or illegal or unethical business behavior you can report it to your manager, the Senior Leadership Team, or our CEO. You can also make a direct and anonymous report via our "Case Management Portal".

To ensure the process connected to the Case Management Portal is clear, we have added a Whistleblower Policy.

## APPROVAL

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This policy was most recently approved by the Board of Directors on 22<sup>th</sup> May 2024.