

Forenom

Code of Conduct

Introduction

Forenom Group wants to promote the long-term interests of Forenom Group and its stakeholders, Forenom lives up to highest legal and ethical standards in its business.

The values, vision and mission as well as the strategy of Forenom together with its solid operational and financial performance are the platform for sustainable development of Forenom Group internationally. Forenom Management Team is strongly committed to responsible actions and sustainable development.

Every employee within Forenom Group is expected to live according to, behave and act in line with this Code without exception

Values of Forenom Group – Respecting the individual, being a fearless friend/ brave problem solver, and doing it together – are an integral part of this Forenom Code of Conduct. The values form the foundation for our behavior. They also remarkably influence all decisions made and actions taken in relation with business partners, personnel, society and nature.

Forenom operates in many countries. Everyone wants to do the right thing. Thus, we believe that this Code enables us to conduct our business in the right way.

In certain regions or countries more detailed or stricter guidelines may be necessary, but they shall not be in contradiction to this Code of Conduct.

This Code of Conduct is annually reviewed by Forenom and presented to the Board for acceptance. We are committed to making adjustments or changes to the content of this Code of Conduct and implement them as needed.

Mission, Vision and Values of Forenom

We help companies move their workforces and find accommodation solutions during times of change.

By 2020, we want to be the strongest and most enthusiastic corporate accommodation provider in Northern Europe.

Forenom culture is based on three core values. We respect the individual, be that a customer, a guest or an employee of Forenom. We cherish brave problem solvers of any kind of challenges in work related matters to make life easier. We do it together as one team.

Ethics and Law

Forenom is conducting business with the highest ethical standards and in full compliance with the applicable laws. Forenom does business according to the requirements of good citizenship in all countries by conducting business in line with their respective legislation, covering all business transactions, agreements, procedures and other activities conducted by Forenom.

This approach includes, but is not restricted to, those laws relating to antitrust and promoting fair competition, corporate governance, bribery prevention, illicit payments and corruption, labor laws and practices, the environment, human rights laws and internationally recognized standards. This also covers safety in the intended use of the products and services Forenom delivers to its customers, as well as protection of copyrights, company assets and other forms of intellectual property.

Forenom respects the privacy and integrity of its stakeholders. We follow relevant standards to protect privacy in processing personal data and service or product information. All personal data collected and held by Forenom is processed fairly, lawfully and carefully in a way that protects the privacy of the individual.

Respect of Human Rights

Forenom respects the human rights. Human rights are considered fundamental and universal. These are manifested and accepted in international laws and practices such as those of the United Nations' (UN) Universal Declaration of Human Rights, the International Labor Organization (ILO) and the UN's Global Compact principles.

Among those rights that we view as fundamental and universal are freedom from any discrimination based on race, religion, age, color, nationality, ethnic origin, gender, sexual orientation, marital status, connections with a national minority, disability, freedom from execution or torture, freedom of peaceful assembly and association, freedom of thought, freedom of opinion and expression respecting the privacy and integrity of its stakeholders. Forenom does not use child or forced labor.

Conflict of Interests

Forenom expects loyalty from all its employees and avoidance of any conflict of interest. Thus, the employees of Forenom must avoid situation where their personal interests may conflict with those of Forenom or its stakeholders. This includes, but is not restricted to, acceptance and giving of personal gifts, entertainment or hospitality to or from Forenom stakeholders, other than gifts of a nominal value of up to 70€ on an occasional basis or reasonable hospitality given in the ordinary course of business.

Any agreement regarding favors or benefits in exchange for the gifts must be avoided. Gifts with value exceeding the above-mentioned criteria may not be accepted without full disclosure to and prior relevant clearance from the employee's supervisor.

Forenom and its employees do not offer or pay bribes or illicit payments to customers or other parties to obtain or retain business. Forenom and its employees do not solicit or accept bribes or illicit payments in exchange for business favors.

Forenom employees must not profit, nor assist others to profit, from opportunities that are discovered from the usage of corporate information or the position. Forenom employees must not use corporate assets other than for legitimate business or other authorized purposes. Forenom supports and adheres to local legislation and internationally recognized principles against corruption and bribery.

Environmental Sustainability

Environmental sustainability is taken seriously by Forenom. Forenom is ensuring an appropriate valuation and appreciation of environmental aspects and preservation of nature as part of operational planning.

The environmental activities and improvement of environmental performance of Forenom is based on compliance with relevant legislation and customer requirements.

Environmental development to reduce the usage of energy, water and materials is one of Forenom's focus areas. For this Forenom has received a LEED certification for some of its properties. We also aim at prolonging the life-time of existing buildings by reusing them for accommodation.

Forenom makes efforts to use environmentally friendly materials and technologies. Environmental aspects are crucial for Forenom in decision making about investments into new products or technologies.

Our environmental performance of business operations, products and services are under continuous improvement and development.

Workplace Practices

In all employment practices, policies and procedures Forenom is committed to equal opportunity. Every employee or candidate receives equal and fair treatment, free from harassment or discrimination based on any grounds such as race, nationality, ethnic origin, age, gender, religion, sexual orientation, marital status, connections with a national minority, disability or other status.

Forenom pays fair compensation and provides a safe and healthy workplace for all employees. Forenom invests in the personal and professional learning and growth of its employees. Forenom encourages all employees to lead balanced personal and professional lives.

Forenom recognizes the right of employees to stand up for their rights at their place of work. Therefore, Forenom has a practice for taking up grievances to ensure safety and a fair treatment of all employees.

Suppliers and Customers

An integral part of the business of Forenom and its total supply chain are the suppliers of Forenom. They are expected to conduct their business in compliance with the same high legal, ethical, environmental and employee-related standards Forenom itself is adhering to.

Forenom takes reasonable efforts to contract only with suppliers or service providers who themselves enhance international human rights and environmental laws and practices.

Forenom commits to observing the ethical performance of its suppliers and will take immediate needed steps in cases where the ethical performance of its suppliers comes into question.

All relationships between Forenom and customers are based on trust, integrity and our values. Forenom communications with customers are accurate, timely and truthful.

The information of its customers is protected by Forenom like it was our own information. Forenom does not disclose any confidential customer information to third parties without the consent from the customer.

Forenom wins business legally and ethically. Forenom does not offer bribes or kickbacks of any kind or engage in other illegal cooperation with customers or competitors. Forenom does not give misleading messages or false information about its competitors.

Implementation of Code of Conduct

This Code of Conduct defines the ethical way of working in Forenom and in all its activities. Forenom expects its management, employees and business partners to comply with the standards in this Code. The Code of Conduct deals with the important and most likely situations that could give rise to legal or ethical problems, but cannot be observed as fully exclusive. It is the responsibility of each Forenom employee to follow and promote this Code of Conduct.

The Forenom way of implementing this Code of Conduct is active, open and ethically sound. Forenom aims to prevent violations against Forenom values and ethical principles set in the Code of Conduct by providing policies and instructions.

In difficult interpretations, Forenom recognizes that the above commitment means that Forenom will take reasonable efforts to resolve any identified ethical, legal, environmental, employment, and human right issues that are not consistent with this Code of Conduct.

In doubtful situations of application or meaning of this Code of Conduct, all questions should be brought to the Head of Business Unit, to the Head of Country or to the head of Functional area.

If serious allegations regarding potential violations of this Code arise, a fair and comprehensive investigation will be conducted by line management closest to the issue with the assistance of Forenom Group functions. Top management and the corporate-wide leaders of these functions should be notified and oversee any investigation.

Acts inconsistent with this Code of Conduct must be promptly corrected and may be subject to disciplinary action up to and including termination of employment and legal prosecution. Forenom ensures that there will be no adverse working-related consequences as result of any employee bringing up complaints of violations of this Code of Conduct.