



BDO
Code of Conduct

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A message from our CEO

At BDO, we strive to make a difference. A difference for firms in need of a supplier or a business partner that establishes trust and security and provides insight. A difference for our employees as they pursue their dreams.

As a company, we are continuously growing. This requires us to create new opportunities – shifting the trajectory of our people, our customers, and our own business. With that comes a responsibility to deliver services of the highest quality and ethical standards, regardless of what role we have in BDO Norway.

We are committed to honesty and transparency in all our relations. Our Code of Conduct encourages us to be open about our actions and to make the right choices – even when facing pressure to do otherwise. This establishes a foundation of trust that is invaluable to our business and our relationships with our clients.

We aspire to be a workplace where each and every one of us feels included, heard and respected. Respect and empathy should be shown by all our employees and partners in every interaction, working together to create an inclusive and diverse work environment.

At BDO, we make wise and courageous decisions. We must be courageous in our choices and dare to challenge when necessary. Our Code of Conduct promote determination and initiative in all we do.

At the core of BDO we find our three values – open, close, and brave – which provide us with a clear direction in maintaining our integrity and ethical conduct.

Everyone representing BDO is expected to adhere to the Code of Conduct. This helps us fulfil our responsibility to the public, provide quality to our clients and create an inclusive work environment.

Together, we build trust.

MARTIN AASEN
CEO of BDO AS

About the Code of Conduct in BDO

BDO's Code of Conduct applies to BDO AS and BDO Advokater AS, hereafter referred to as BDO. BDO shall adhere to principles of integrity, professionalism, and ethical conduct in all aspects of our business. The Code of Conduct sets out the principles that govern the conduct of our partners, employees and others representing BDO, regardless of their position or role in the company. All representatives of BDO are required to act in accordance with these principles.



Our People

Integrity and Professional Conduct

All representatives of BDO are to act with integrity, honesty and fairness. This applies in professional and business contexts, as well as in any situation associated with BDO.

We are to stand firm and be confident in our actions and decisions. Integrity is about making the right choices and having the strength to withstand pressure in any situation.

We shall comply with relevant laws and regulations, act professionally and avoid actions that could harm BDO or the trust in the profession that we represent.

Professional Competence and Due Care

All representatives of BDO are to possess and maintain professional competence in line with expectations related to their role. This is to ensure that our clients receive high quality services in accordance with applicable laws and standards.

By investing in skills and professional competence through our own training programs, we ensure the proper care of our clients and that we stay at the forefront of our industry.

All representatives of BDO are to exercise due care. This means that we will act and make decisions in a thoughtful manner and comply with applicable regulations and methods.

Loyalty

All representatives of BDO are to show consideration and respect. We shall be aware of our role, act in accordance with the organization's interests, and contribute to maintaining our good reputation.

All communication, whether internal or external, is to be fact-based and consistent with these principles.

One BDO

At BDO, we will help each other succeed across levels, service areas, and geography. We are to foster a culture that ensures that we work together for the common good.

Our clients should be able to expect the same high-quality delivery and client expertise regardless of where the service is delivered from within BDO.

Our employees should feel that BDO is a great place to be, and that the exercise of leadership should be of high quality – across service areas and geography.

Inclusion and Diversity

We are to create and promote an inclusive and diverse culture at BDO, and do not tolerate discriminatory behaviour. We shall be a company composed of people with diverse backgrounds, education, skills, personal qualities, ideas, and perspectives. At BDO, everyone should be valued and respected -and feel a sense of belonging.

At BDO, we encourage everyone to be themselves, regardless of gender, sexual orientation, age, ethnicity, disability, or any other differences.



Our Commitments

Objectivity and Independence

All representatives of BDO shall make unbiased decisions, without being influenced by conflicts of interest or individuals, organisations, technology, or other factors. We are to be independent in fact and in appearance, and we shall avoid actions and situations that may undermine our trust.

At BDO, independence is key. BDO has strict guidelines to ensure our independence and to avoid conflicts of interest. These guidelines apply to partners, employees and others representing BDO. Our guidelines regarding directorships and financial interests are therefore stricter than required by law.

In cases where doubts arise about our independence and objectivity, we have established guidelines to deal with these situations.

Laws and Regulations

BDO shall conduct its business in accordance with applicable legislation, standards, key UN and ILO conventions on human and labour rights, as well as the ten principles of the UN Global Compact.

In order to clarify our expectations towards our suppliers, business partners and other business relationships, BDO has established a Suppliers Code of Conduct.

Fundamental Principles - UN Global Compact

BDO is committed to supporting and promoting the ten principles of the UN Global Compact relating to human and labour rights, environment, and anti-corruption.

The Ten Principles of the UN Global Compact

Human Rights:

- 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- 2: make sure that they are not complicit in human rights abuses.

Labour:

- 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- 4: the elimination of all forms of forced and compulsory labour;
- 5: the effective abolition of child labour; and
- 6: the elimination of discrimination in respect to employment and occupation.

Environment:

- 7: Businesses should support a precautionary approach to environmental challenges;
- 8: undertake initiatives to promote greater environmental responsibility; and
- 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption:

- 10: Businesses should work against corruption in all its forms, including extortion and bribery.



Anti-corruption, Gifts and Benefits

BDO has zero-tolerance for corruption and trading in influence.

Those representing BDO shall not offer, request, promise, receive or give any form of undue advantage, service, or incentive to anyone, in connection with the performance of their duties, for the purpose of gaining personal or business advantages. This applies regardless of whether the benefit is offered directly or indirectly through others.

All representatives of BDO must follow our policies for Gifts and Benefits to ensure that such offers do not affect our objectivity, independence or integrity. Transparency and reporting of gifts or benefits helps maintain this.

Sustainability

We are committed to integrate and promote sustainability as a part of how we and our clients operate.

We have chosen four sustainable development goals that are central to our sustainability strategy:



Our sustainability goals represent areas where we can make a significant difference on the climate and the environment, our value chain and society at large, or which significantly affect BDO and its employees. To ensure we achieve our goals, we have prepared binding sustainability commitments to encourage sustainable choices in our daily work.

BDO's Board and Management are required to justify and describe the impact of decision-making matters on our sustainability goals.



Health, Safety, and Environment (HSE)

HSE is embedded within our work at BDO. BDO has established an internal control system which incorporates the systematic measures that ensure activities are planned, organized, executed, and maintained in accordance with requirements set forth in, or in accordance with, the health, safety, and environment legislation.

We regularly assess the work environment and take any necessary measures. We emphasize a balance between work and leisure and have a wide range of services related to both mental and physical health. Furthermore, we conduct thorough training of managers regarding their role and responsibilities, which involves getting to know, to care and follow up with those individuals that are under their management.

Confidentiality, Privacy and Information Security

At BDO, we respect and protect all personal and confidential information entrusted to us and handle such data in accordance with applicable laws, internal policies, and procedures.

Access to personal and confidential information is limited to what is necessary. We shall not disclose this information unless we are legally obligated or authorized to do so, or unless we obtain permission to disclose.

At BDO, misuse of personal and confidential information is prohibited, and we shall never use such information in breach

of our obligations. All our employees receive training in privacy and information security, and must regularly confirm that they comply with the duty of confidentiality.

Anti-Money Laundering (AML)

We take our responsibility as an obliged entity for AML seriously. We commit to comply with the Money Laundering Act and associated regulations, as well as keeping updated on guidance documents from relevant stakeholders.

We must know our clients, suppliers, and Business Partners - and our guidelines shall support this. We will have continuous in-house training to be well equipped and prepared to detect and handle risks related to money laundering and other financial crimes.

Sanctions

BDO is committed to complying with the Norwegian sanction regulations. In addition, we commit to follow BDO Global's Sanctions Policy.

The sanctions regulations are constantly changing. BDO shall stay updated on this and ensure a good communication flow and internal training is in place, as well as reporting to relevant authorities as necessary.



Breaches and whistleblowing

BDO takes non-compliance with our policies and procedures seriously. Breaches may result in disciplinary action and, ultimately, termination of employment and/or police reports.

Clients and others who wish to report breaches of our Code of Conduct, can do so by e-mailing klage@bdo.no.

BDO have a whistleblowing channel that is known to all representing BDO. We encourage our people to report issues of concern without fear of reprisals. BDO shall ensure the protection of whistleblowers. We will also ensure that the reported cases will be handled in an appropriate and proper manner.

Maintenance and Updates

We will review our Code of Conduct regularly to ensure it is up-to-date and relevant. All representing BDO are responsible for staying informed about changes to the Code of Conduct and confirming compliance at commencement of employment and annually thereafter.

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