

# Code of Conduct – Virinco Group

Effective: 8 April 2026

Our Code of Conduct defines the standard for how we operate, collaborate, and conduct business. It applies to all employees, contractors, and representatives within the Virinco Group\*, reinforcing our commitment to integrity, security, and compliance as outlined in our [ISO/IEC 27001-certified Information Security Management System \(ISMS\)](#).

## 1. Compliance with Laws and Regulations

We play by the rules. We respect and comply with all applicable laws, regulations, and internal policies, including those outlined in our ISO/IEC 27001 certification and applicable safety, security and quality requirements.

## 2. Accountability

We take responsibility for our actions and decisions. Every member of the Virinco Group is responsible for upholding our ethical standards and organizational commitments.

## 3. Transparency

We act with openness and honesty in our communication and decision-making. Transparency is foundational to building trust, both internally and externally.

## 4. Anti-Corruption

We have a strict zero-tolerance policy towards corruption and bribery. We do not offer, give, ask for, or accept any improper advantages in any form.

## 5. Fair Competition

We compete fairly and ethically. We do not engage in practices that illegally limit competition or manipulate markets.

## 6. Confidentiality, Information Security and Privacy

We handle all data and information responsibly, in accordance with our internal policies and ISO/IEC 27001 standards. Personal data is managed respectfully, ensuring compliance with applicable privacy regulations.

## 7. Conflicts of Interest

We avoid situations where personal interests could conflict with those of the company. Decisions are made in the best interest of Virinco Group.

## 8. Health, Safety and Security

We provide a safe, secure, and healthy working environment for all. We follow our safety policies and proactively address risks.

## 9. Inclusion and Respect

We foster an inclusive culture that values diversity and mutual respect. We have a zero-tolerance policy for discrimination, harassment, or exclusion of any kind.

## 10. Human Rights and Labour Standards

We respect fundamental human and labour rights, including freedom of association, fair wages, and non-discrimination, aligned with the OECD Guidelines for Multinational Enterprises.

## 11. Environmental Responsibility

We take a precautionary approach to environmental challenges and actively work to reduce our environmental footprint.

## 12. Safeguarding Company Assets

We protect physical, digital, and intellectual assets. Risk-based security is embedded in everything we do, in line with the requirements of ISO/IEC 27001.

## 13. Reporting Concerns (Whistleblowing)

We encourage employees and partners to speak up if they witness misconduct or unethical behaviour. Concerns can be reported confidentially without fear of retaliation. Concerns should be reported through the established internal reporting channels or to management.

## 14. Social Responsibility and Ethical Use of Technology

We commit to developing and utilizing technology ethically and responsibly, carefully considering its societal impacts and avoiding potential misuse.

## 15. Compliance and Training

We regularly train employees on compliance, security, and ethical conduct. Understanding and adhering to this Code of Conduct is a shared responsibility.

## Conclusion

Our commitment to integrity guides every aspect of our daily operations. This Code of Conduct is more than just a policy—it embodies our values and our dedication to building a sustainable and responsible business.

\*The Virinco Group includes The WATS Company AS, Virinco Technology AS, Virinco Americas Inc. and Virinco Czech s.r.o.