

Code of Conduct

Onix AS, a Norwegian software company specialising in equipment compliance management systems (ECMS).

1. Purpose

At Onix AS, our mission extends beyond developing innovative software solutions - we strive to be a trusted global partner by operating with integrity, transparency, and accountability in everything we do. This Code of Conduct sets out the standards for ethical and professional behaviour that we expect from all employees, executives, and representatives, regardless of role or location.

As a Norwegian-based SaaS company with a global footprint, we recognize the responsibility that comes with delivering our products to clients and users across borders, cultures, and industries. Our reputation is built on trust - and trust starts with how we act.

2. Our Core Values

Onix's values guide the entire business. They represent what we stand for and what we strive for. The values are the basis for our ethical guidelines.

- **Driven** – Onix is made up of go-getters – people who are determined to reach their goals. We work to exceed expectations, because we know that passion is what makes our progress possible.
- **Thorough** – The best way to avoid accidents is extreme attention to detail. It's at the heart of Onix. Dedicated to transforming workplace safety, we know that small details may have big consequences.
- **Empathetic** – Onix is a software company but its value stems from its people. We know that being human and understanding the needs of others makes our workplace more inclusive, and improves our products and services.

These principles guide our work and relationships with clients, partners, and colleagues.

3. Legal and Regulatory Compliance

Onix AS is committed to upholding all relevant laws, regulations, and industry standards wherever we operate. This includes, but is not limited to:

- **Data protection laws**, including the EU General Data Protection Regulation (GDPR)
- **Export control and trade sanctions**, as applicable to our software and services
- **Anti-corruption and anti-bribery laws**, such as the UK Bribery Act and the U.S. Foreign Corrupt Practices Act (FCPA)

We maintain a zero-tolerance policy toward bribery, fraud, and any form of illicit financial activity.

4. Data Privacy and Security

Trust is central to our relationship with customers. We protect their data as if it were our own. To ensure this, we:

- Collect and process only the data that is strictly necessary
- Implement robust security protocols and technologies

- Train our team in responsible data handling
- Provide transparency around data use and respect user rights at every step

Safeguarding privacy and digital trust is a cornerstone of our business.

5. Fair Business and Market Conduct

Onix AS competes in a fair, ethical, and responsible manner. We:

- Communicate truthfully about our products and services
- Avoid disparaging competitors or misleading claims
- Comply with all marketing and advertising standards
- Respect intellectual property, trademarks, and copyrights—ours and others'

Our success is earned through merit, not manipulation.

6. Diversity, Equity, and Inclusion

We are proud to foster a workplace that is inclusive, safe, and empowering. At Onix AS:

- Discrimination, bullying, or harassment in any form is strictly prohibited
- We celebrate diversity in all its forms, and we recruit and reward based on merit
- We work actively to create an environment where every team member feels valued, heard, and supported

Everyone deserves to thrive.

7. Conflicts of Interest

All employees shall take necessary actions to minimize the risk of conflicts of interest arising. We must avoid situations where personal interests conflict - or appear to conflict - with those of the company. Further, we act in accordance with the legitimate interest of the Company, and we do not make decisions based on what will benefit us/me personally.

Employees shall not use the Company's name, business contacts or otherwise exploit their position in the Company in connection with actions that are not specific to the Company's business activities.

Whether it's business relationships, outside employment, or investments, any potential conflicts must be disclosed to a manager or compliance officer for review.

Transparency protects both the company and the individual.

8. Reporting Misconduct (Whistleblowing)

Speaking up is an act of courage - and a sign of a strong company culture. Onix AS provides:

- A secure and anonymous channel for raising ethical concerns
- Full protection from retaliation for whistleblowers
- A fair and confidential investigation process

We encourage a speak-up culture where concerns are addressed, not silenced.

9. Accountability and Enforcement

This Code of Conduct applies to all Onix AS employees, contractors, board members, and business partners. Failure to uphold these principles may result in disciplinary measures, including termination of employment or contracts.

Ethics is everyone's responsibility.

10. Review and Updates

We regularly review and update this Code of Conduct to reflect changes in law, best practices, and our evolving business environment. Any updates will be communicated clearly to ensure continued awareness and compliance.