Business Ethics Policy

February 2026

Business Ethics Policy

Introduction

emagine Consulting A/S, Reg-no. 26 24 96 27, and its subsidiaries and associated companies (collectively the "Group") and employees are required to comply with this Business Ethics Policy.

Our Goal

emagine Group´s scope is supplying resources and expertise within IT, tech and business management and our Business Ethics Policy must be read in that context.

The goal of this Business Ethics Policy (the "Policy") is to ensure that all business activities of the Group comply with our company standards. Our business ethics guidelines permeate how we do business with our customers and suppliers. Our vision is to be a trusted partner in providing electronics solutions with high added value, and to be a part of your success! It describes our intention in how to behave when we do business and how we interact with our stakeholders.

Governance & Responsibilities

To comply with applicable laws and ESRS G1 expectations, the Group maintains a clear governance structure:

- The Executive Management oversees implementation of this Policy and reviews key business conduct risks.
- The Group CFO / Group Legal (depending on internal structure) is responsible for compliance processes, reporting, and internal controls.
- Managers must communicate this Policy, ensure awareness, and address concerns promptly.

Employees must comply with the Policy and report concerns in good faith.

Policy

Responsibility

It is the responsibility of all employees to follow emagine Consulting A/S´s Business Ethics. It is the responsibility of Managers to communicate and demonstrate the content as well as the spirit of this document within the organization, and to encourage employees to reveal behavior that may be non-compliant with our Business Ethics.

Fraud and Anti-Corruption

It is important for each individual to adhere to ethical and legal standards in business processes to ensure fair competition and to promote transparency and accountability Influence the business processes through indirect and/or direct bribery or other provision of sponsorship is illegal and can result in severe legal consequences for both the supplier and the purchaser.

No form of fraud, extortion and bribery, including improper offers for payments to or from employees, or organizations, is tolerated. Deals with business partners are characterized by fairness. We shall not offer customers, potential customers, agencies of governments or any representatives of such entities, any rewards, or benefits in violation of either applicable laws or reasonable and generally accepted business practices.

The employees are not allowed to accept payments, gifts, or other kinds of reimbursement from a third party that could affect their objectivity in their business decisions. Emagine Consulting A/S will never offer or accept bribes or other corrupt payments in any form.

We maintain internal controls, approval routines, and periodic risk assessments to prevent, identify, and address fraud and corruption risks within the Group.

Privacy

We protect and store all our data against GDPR regulations. We do not use or reveal content related personal data or reveal any other personal data without our customers, suppliers, or personnel's explicit, separate, and individual consent.

Financial responsibility

All payments and transactions must follow all applicable laws, requirements of our parent company, established accounting policies, and Authorization routine. We will never tolerate money laundering, dishonesty or false recordkeeping. Financial processes are subject to periodic monitoring and internal controls to ensure accuracy, transparency, and compliance.

Disclosure of Information

We ensure that required information, other than confidential business information, is disclosed to investors, employees, customers, and other relevant parties in a timely, accurate, complete, understandable, convenient, and affordable manner.

Fair competition and anti-trust

At emagine we believe in free and open competition and will never engage in improper practices that may limit competition. We never look to gain competitive advantages through unethical or illegal business practices. emagine is always honest in competition based on product quality, price, integrity, and customer service. We practice this in our day-to-day business and fully comply with the antitrust laws of each country we operate in. We fully adopt these principles in all our operating processes.

- Always proceed carefully whenever interacting with competitors.
- If emagine would get exposed to anti-competitive offers or suggestions, we must make it very clear that we will never be involved and then end the discussion or contact and ensure that all responses are kept on file.

- Ensure that the suppliers we are collaborating with are complying with our Business Ethics and have a Code of conduct & Business Ethics policy or similar.
- Never share sensitive information of business partners or other third parties with competitors
- Never discuss and agree to share customers, volumes, supplies or divide geographic markets with competitors.
- Never impose a non-compete restriction prohibiting a purchaser from buying from another supplier.

All employees at emagine are expected to understand and conduct their activities in strict accordance with this Policy and the antitrust laws.

We periodically assess competition law risks and provide training to employees in relevant functions.

Conflicts of interest

All employees must avoid any interest that conflicts or appears to conflict with the interests of emagine or the parent company or that could reasonably be determined to harm emagine reputation. All employees within emagine are bound through our Code of Conduct to act in the interests of emagine and never for their own personal gain. Employees must disclose potential conflicts to their manager or HR, and appropriate measures will be taken to ensure objective decision-making.

Counterfeit parts

We expect all our suppliers to develop, implement, and maintain methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products. There should be effective processes in place to detect counterfeit parts and materials, and mark parts obsolete as appropriate.

Export controls and economic sanctions

We respect and obey the laws, rules and regulations applying to our businesses around the world. We should never deal with sanctioned entities.

Protection of Intellectual property

Our suppliers must respect intellectual property rights and safeguard customer information; transfer of technology and know-how must be done in a manner that protects intellectual property rights.

Supplier and Business Partner Due Diligence

We expect all suppliers and business partners to comply with applicable laws and our ethical standards.

We carry out risk-based assessments of relevant suppliers and contractors, including:

- Screening for ethical, legal, and compliance risks
- Requiring adherence to our Supplier Code of Conduct
- Follow-up in cases of suspected non-compliance

Corrective actions or termination if violations occur

Whistleblowing and protection against retaliation

We do not accept wrongdoings such as financial misconduct, discrimination, or any type of retaliation in our organization.

emagine maintains a whistleblower mechanism that allows confidential and—where permitted—anonymous reporting of concerns. No employee or stakeholder will face retaliation for reporting in good faith. All reports are investigated impartially, and appropriate actions are taken if wrongdoing is confirmed.

Annexes

- Annex 1: Document Specification
- Annex 2: Actions and KPIs

Annex 1: Document Specification

Business Ethics Policy

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Last validated by:	

REVISION HISTORY

This Business Ethics policy is reviewed to ensure its continuing relevance to the systems and processes that it describes. A record of contextual additions or omissions is given below:

Version	Summary of Changes	Revision Author	Date
1.0	Document Creation	Claus Flinck	03.2022
1.1	Review and update	Claus Flinck	04.2023
1.2	Policy review	Claus Flinck	03.2024
1.3	Policy review, classification changed to public	Claus Flinck	03.2024
1.4	Targets adjusted	Kenneth Wegner	03.2024
2.0	Review and update – format, purpose, goal, removed policy review, miscellaneous, policy objective paragraph	Kenneth Wegner	11.2024
2.1	Review and update published	Kenneth Wegner	02.2026

APPROVAL

Name	Position	Signature	Date
Anders Gratte	CEO		

Annex 2: Actions and KPIs

Engaging our employees and stakeholders in Business Ethics

At a basic level we ensure our employees and stakeholders understand the company's stand on Business Ethics and Anti-Corruption.

Capability Building

In 2023 we built and communicated our Business Ethics Policy. In 2024 we have planned to implement:

- Business Ethics training for all employees.

Our target is to have min. 50% of our employees through the training before August 2024. And 100% of all new employees before 1 January 2025.

Assessment

emagine will on a regular basis assess the risk of being involved in fraud and corruption and take reasonable steps to reduce identified risks.

We will make sure to Integrate the principles in relevant internal procedures

We have a written procedure (and a policy) for how to handle potential complaints from employees and external stakeholders through normal manager channels. On top of this we have built a Whistleblower solution (anonymous by choice) both for internal and external stakeholders.

Targets

emagine will:

- Implement Anti-Corruption assessment on all vendors (+4.000 EUR) in 2024. And all vendors in 2025.
- Implement business ethics framework in all large high-risk supplier agreements – 20% of our supplier portfolio by 01.08.2024. And 50% by 31.12.2024.
- monitor compliance with the requirements through internal sustainability reporting and in/external reporting channels.
- monitor our internal Gift Log
- review the status of the company' Business Ethics activities as part of the business reviews. Both targets and results will be part of the annual ESG reporting.
- Keep number of Whistleblower incidents at 0 in 2024.