



Code of Conduct Policy for 2Lift ApS

The company of 2Lift ApS is committed to the highest principles of integrity, honesty, and fair play in all its businesses and activities.

All employees and representatives are to work to ensure that all businesses of 2Lift ApS are dealt with in an open and fair manner.

This code of conduct policy will serve as a guide for proper business conduct for all employees who we expect to observe the highest standards of ethics and integrity in their conduct.

Acting with Integrity

Acting with integrity is fundamental to 2Lift ApS and imperative in order to build trust and credibility both inside and outside the company. Integrity means doing what is right and to use good judgment - even when this may prove difficult.

This code of conduct addresses the employees' responsibilities to 2Lift ApS, to each other, and to customers, suppliers, and governments. Employees of 2Lift ApS are expected to understand and comply with the code of conduct and the law wherever they are.

When considering any action or course of conduct, it is recommended to ask:

- Is it consistent with this code of conduct (is it ethical)?
- Is it in compliance with laws (is it legal)?
- Will it create a healthy working environment for 2Lift ApS short term and long term?
- Will it enhance trust and credibility for 2Lift ApS and thus benefit its businesses?

Being able to answer "yes" to these questions strengthens the integrity, trust and credibility associated with 2Lift ApS.

Integrity must thus be the leading principle of all areas of ethical behaviour. This code of conduct deals with building and upholding integrity within the following areas:

1. Cultivating a respectful and decent working environment
2. Promoting a culture of open, honest and respectful communication

- 3.** Accepting the responsibility of raising concerns
- 4.** Reinforcing ethical behaviour by leading by example
- 5.** Properly dealing with conflicts of interest
- 6.** Engaging in the proper use company assets and resources
- 7.** Ensuring the accuracy of business and financial records
- 8.** Safeguarding nonpublic information
- 9.** Handling the acceptance and offering business courtesies
- 10.** Compliance with the code of conduct

1) Cultivating a Respectful and Decent Working Environment

It is 2Lift ApS' responsibility to cultivate a working environment where all employees strive towards treating all individuals inside and outside of 2Lift ApS with proper dignity and respect.

2Lift ApS believes that mutual respect and demonstration of the recognition of individual strengths and resources is integral to releasing the full potential of each individual and bringing out the best in every employee. Individual support and growth are thus considered major factors to the success of 2Lift ApS as a business.

2Lift ApS is also deeply committed to providing a working environment that is free of discrimination of all kinds: abusive, offensive or harassing behaviour.

Any employee who feels harassed or discriminated against should report the incident to 2Lift ApS management / leadership who will then take appropriate action.

2) Promoting a Culture of Open, Honest and Respectful Communication

At 2Lift ApS it is natural and essential that everybody feels comfortable giving his or her opinion and speaking his or her mind - also when it comes to ethical issues.

Here leaders and managers have a special responsibility to create a working environment where employees feel comfortable raising concerns or posing potentially critical questions without having to fear inappropriate, demeaning or even retaliative responses.

It is also the responsibility of leaders and managers to create opportunities where the code of conduct and its reinforcement is discussed in a calm and respectful atmosphere.

3) Accepting the Responsibility of Raising Concerns

It is the responsibility of all employees to uphold the ethical standards of 2Lift ApS. Any mode of behaviour that causes concern or may violate the law or code of conduct should be raised as an issue immediately.

It is the responsibility of 2Lift ApS to ensure that all instances of improper behaviour will be appropriately investigated. In every case where unethical behaviour is considered to have occurred, 2Lift ApS will see to it that proper action is taken.

4) Reinforcing Ethical Behaviour by Leading by Example

To lead by example is considered the best way for leaders and managers to promote a healthy culture of trust and proper behaviour.

Through their actions leadership and management have an added obligation to stimulate ethical behaviour with their employees. The upholding of this code of conduct is considered the product of clear communication of behavioural expectations demonstrated through the actions of managers and leaders.

5) Properly Dealing with Conflicts of Interest

A conflict of interest situation may arise when private interests (both personal and financial) of employees compete or conflict with the interests of 2Lift ApS. Employees are to avoid any activity or relationship that might damage any ability to make objective and impartial decisions in relation to their work.

When the course of action that is best for the employee personally is not the best course of action for 2Lift ApS, employees owe a duty to 2Lift ApS to advance its legitimate interests.

Faced with a potential conflict of interest employees must seek advice from a leadership authority.

6) Engaging in the Proper Use of Company Assets and Resources

Company resources, including time, material, equipment and information, are provided for company business use.

Nonetheless, the occasional personal use of 2Lift ApS resources is allowed as long as it does not affect job performance or have any detrimental effect on the workplace. The first guiding principle here is common sense of the individual employee.

The use of company materials or equipment to support personal interests requires prior approval from a supervisor who has the right to grant such favours.

Employees and those who represent 2Lift ApS are trusted to behave responsibly and to use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

2Lift ApS will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, and abusive or otherwise offensive or inappropriate.

7) Ensuring the Accuracy of Business and Financial Records

The creation, retaining and disposing of all 2Lift ApS' business and financial records should follow all 2Lift ApS' corporate guidelines as well as all accounting principles and legal requirements.

All corporate records must be accurate and complete and pertaining to this is everybody's responsibility, not just finance personnel. All reports to regulatory authorities should be accurate, timely, and full.

No one is to improperly influence, manipulate or mislead any audit, nor interfere with any auditor engaged to perform an independent audit of 2Lift ApS' books, records, processes or internal controls.



Personnel is instructed to never engage in any falsifications or distortions of any documents or transactions.

All employees must strive for optimal accuracy when preparing, presenting and distributing any information for 2Lift ApS. However honest mistakes will occasionally happen. Only intentional efforts to misrepresent or improperly falsify 2Lift ApS business records are considered code violations.

8) Safeguarding Nonpublic Information

Safeguarding confidential company information (information that is not available to the general public, also known as 'nonpublic' information) entrusted to us by employees, customers and other business partners is integral to 2Lift ApS and required to build trust with its employees and business relationships.

Nonpublic information include such things as personal data, other companies' data, inventions, contracts, strategic and business plans, major management changes, new product launches, pricing, proposals and financial data.

Employees are obligated to protect 2Lift ApS' nonpublic information at all times, including outside of the workplace and working hours, and even after employment ends.

Employees are not to disclose nonpublic information to anyone outside of 2Lift ApS (including friends and family) except when granted by an authoritative representative of 2Lift ApS. When / if disclosure of nonpublic information is felt pertinent, always take appropriate steps by acquiring proper authorization to prevent the misuse of information.

2Lift ApS will not disclose confidential and nonpublic information without a valid business or legal purpose and proper authorization.

9) Handling the Acceptance and Offering Business Courtesies

Employees at 2Lift ApS may be offered occasional unsolicited business courtesies during their employment with the company. However, employees at 2Lift ApS should not feel any obligation to accept a business courtesy irrelevant of whether the sender is 2Lift ApS or a business relation of 2Lift ApS.

Courtesies that employees may accept include occasional meals, refreshments and gifts or other courtesies considered customary within the industry as long as they conform to reasonable ethical practices (not too excessive or frequent).

There are certain circumstances that require particular caution and prudence when considering acceptance of business courtesies. These are situations when accepting courtesies may create the appearance of favoritism which may reflect badly on 2Lift ApS' reputation for impartiality and fair dealing.

In circumstances such as when e.g. negotiating contracts or choosing suppliers it is considered wise to kindly refuse business courtesies if there is a risk that the acceptance of courtesies could lead to the impression that it is a way to influence the placement of 2Lift ApS' business.

The same logic applies when it comes to 2Lift ApS employees offering business courtesies on behalf of the company. Any employee offering business courtesies must act with highest prudence to avoid any interpretation that the business courtesy is a way to manipulate i.e. to gain unfair business advantage, the action of which will reflect negatively on 2Lift ApS' reputation.

2Lift ApS may offer business relations non-monetary gifts such as company logo apparel or similar promotional items. Leadership may approve other business courtesies such as meals and refreshments as long as it is not lavish, too regular and is consistent with common industry practice.

10) Compliance with the Code of Conduct

Compliance with the principles delineated in this code of conduct is an essential element to the business success of 2Lift ApS.

It is the day to day responsibility of leadership to ensure that the content of this code is communicated, understood and adhered to by all employees and representatives.

Employees are expected to bring to leadership attention any breach or suspected breach of these principles. Any reports will be treated in confidence.

Any questions that employees will have regarding how to carry out this code of conduct in specific situations should be discussed with relevant leadership parties.