

# CODE OF CONDUCT

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## LETTER FROM THE CEO: THE FOUNDATION OF OUR BUSINESS IS TRUST

Atea is a leading provider of information technology, with a clear vision and mission for success. Our company was founded in 1968, at the start of the information technology revolution. Today we have expanded to over 7,000 employees across 87 cities in the Nordic and Baltic regions, and continue to break new growth records every year.

Our vision for Atea is to be “The Place to Be” – a center of gravity for IT professionals where customers, employees and partners collaborate on the most important IT challenges in our region.

Our mission is to “Build the Future with IT”. We believe that information technology, combined with knowledge and creativity, can transform productivity and living standards across society. It is with this purpose that we set out to build a company to be the market leader in IT infrastructure across the Nordic and Baltic regions.

Atea designs, implements and operates IT infrastructure solutions for the largest and most vital organizations in our regions. Most of our sales are to national and local government agencies, including highly sensitive customers such as the military and police. We also provide mission-critical IT solutions to the biggest corporations in our regions.

Our success in winning these customers is based on the competence and professionalism of our entire organization. Atea employees take responsibility for their work commitments and build trusting

relationships with our customers and technology partners. They conduct themselves with the highest standards of integrity and respect for others.

The nature of our business means that Atea is a highly visible company and is held accountable for the actions and decisions of every employee. For this reason, our continued success is dependent on all employees following a strong code of ethical and professional conduct.

In short – the foundation of Atea’s business is trust.

Trust at Atea covers a wide area of behavior. Trust means that we are open and honest in how we communicate, but maintain privacy and confidentiality when the situation requires. Trust means that we comply with the policies of our organization and with relevant laws. Trust means that we treat one another with respect, so that everyone can contribute to the best of their abilities. Trust means that we seek to make a positive impact on society and the environment when taking decisions or acting on behalf of Atea. Trust means that we ask questions, express concerns and seek advice when we face a difficult situation and are unsure how to respond.

At Atea, trust is also a two-way street. As an Atea employee, you can rely on the fact that your trust will be returned in kind, and that the company will listen to any concerns you may have about workplace issues. You can feel secure that there will be no retaliation if you



**Steinar Sønsteby**  
CEO

report your concerns in good faith. If you are facing a challenging situation at work involving conduct, business ethics or compliance, we want to know and help. We promise to listen and respond as necessary to uphold our Code of Conduct.

The Code of Conduct provides standards for business practices at Atea to help guide conduct and decision making for all Atea employees. The Code of Conduct is not exhaustive, and there will be many situations where you wish to discuss or report a workplace issue. If you are facing a difficult situation at work, you should first speak with your direct manager or HR manager in the region in which you work. They are the ones who are closest to your issue and are most able to quickly respond with direct assistance and support.

If you do not feel comfortable raising an issue with your local managers or if you seek additional guidance, the Atea compliance organization is also available to hear and address any concerns or questions you may have. The Atea compliance website - [atea.com/trust](https://atea.com/trust) - provides all contact information if you wish to escalate an issue to your national and group compliance officers. The website also provides additional reference information directly relevant to the Code of Conduct.

Finally, if you have a concern which you wish to report anonymously, you can submit a report to the Whistleblower Hotline. A link to the Whistleblower hotline can also be found on the Atea compliance website: [atea.com/trust](https://atea.com/trust). Concerns reported to the Whistleblower hotline are sent to an independent law firm, who will summarize and report your concern to the appropriate level of the Atea organization.

For over 50 years, Atea has built its business by earning the trust of its customers and partners, and creating an environment where talented professionals can collaborate, learn and grow. With everyone's support for this Code of Conduct, we will continue to successfully build our business on this foundation for the next 50 years.

Thank you for your contribution to Atea, and for making our company "The Place to Be".

A handwritten signature in black ink that reads "Steve Smilly". The signature is written in a cursive, flowing style.

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# 1. INTRODUCTION

The Code of Conduct is the foundation of how we work at Atea. It provides a summary of the values, ethical guidelines and basic rules which govern our conduct and decision making. It sets the principles with which Atea employees act toward each other and toward outside stakeholders.

## 1.1. Employee Responsibilities

It is the personal responsibility of every employee of the Atea group and each of its subsidiaries to review, sign and follow the Code of Conduct. This responsibility to abide by the Code of Conduct also pertains to all who act on behalf of the company, including contracted consultants.

Any violation of the Code of Conduct will not be tolerated, and may lead to internal disciplinary measures, notice, dismissal, or – in the event of illegal behavior – criminal prosecution. Failure by an employee to report a violation of the Code of Conduct is itself a breach of the Code.

The Code of Conduct is not meant to be exhaustive, and there may be situations where this code does not provide explicit guidance. For example, employees of Atea must always comply with applicable laws and regulations, even if these laws are not expressly stated in the Code of Conduct. In situations where the Code or law does not provide clear guidance, the employee should exercise good judgement consistent with the business ethics promoted by the Code.

In order to ensure that all employees understand the Code of Conduct, employees are required to take a brief online self-test concerning the main provisions of the Code. Upon successful completion of the self-test, the employee may electronically sign the Code of Conduct. This electronic signature will be returned to the HR function of each national organization for record-keeping. It is the responsibility of line managers to ensure that their employees review, successfully complete the self-test, and then sign the Code of Conduct.

## 1.2. Raising issues or concerns

If an Atea employee seeks additional guidance regarding a challenging business, legal or ethical situation, or is concerned about a potential violation of the Code of Conduct, law, or business ethics by another Atea employee, the employee should first discuss the situation with their direct manager.

If the manager does not provide a satisfactory response, or if the employee is not comfortable in discussing the topic with their direct manager,

the employee can escalate their concern to the compliance organization through Atea's compliance website - [atea.com/trust](https://atea.com/trust). The Atea compliance website provides contact information for the compliance organization, including the Compliance Officer of each national organization and the Group Compliance Officer.

The role of the Compliance Officers is to counsel employees on matters related to the Code of Conduct, relevant laws, and business ethics, and to govern that the organization remains compliant with the Code of Conduct. The Group Compliance Officer can also be reached by email at the following address: [trust@atea.com](mailto:trust@atea.com).

If the employee is concerned about a potential violation of Code of Conduct or law and wishes to communicate this anonymously, the employee can submit a report to the Whistleblower Hotline. A link to the whistleblower hotline can be found on the Atea compliance website. The function of the whistleblower hotline is to provide employees with the opportunity to raise concerns about potential violations of the Code of Conduct, law or business

ethics in a confidential manner to an independent third party with legal skills outside of their local organization and management structure.

Reports submitted to the to the Whistleblower Hotline are handled discretely and confidentially by a law firm Atea has entered into agreement with, with total anonymity for the reporter. The law firm no other business with Atea, aside from the whistleblower function. The law firm will follow up on whistleblower reports discretely and confidentially with relevant persons in the Atea organization.

Atea will not tolerate retaliation against anyone who in good faith reports a concern about conduct within Atea. A good faith report is one that an employee believes to be true and not with the aim of harming others. An employee does not have to know all the facts before reporting a concern, as long as the employee reports their concern in good faith.

## 2. PERSONAL CONDUCT

The personal conduct of every Atea employee shapes the work culture and defines our reputation as a company. A common commitment to ethical behavior, inclusiveness and sustainability is essential for us to pursue our vision of being “The Place to Be”.

By consistently demonstrating high standards of ethics and integrity, we build trusting relationships – across Atea, and with our customers, technology partners and investors. By conducting our business in a socially responsible manner, we play a positive role in society at large. By embracing diversity within our workforce, we ensure that the entire organization can contribute to its full potential.

### 2.1. Integrity

Our mission at Atea is to “Build the Future with IT”. Atea employees are expected to demonstrate the highest standards of integrity and professionalism when fulfilling their job responsibilities. We are committed to listening to the needs of our clients and stakeholders, and to delivering products and services to the best of our competence.

Our success as a company is dependent on open and honest communication, and a dedication from all team members to do the right thing. We commit ourselves to upholding the trust placed in us by others. We reject unethical or illegal business practices.

All employees must comply with laws and regulations when acting on behalf of Atea. Violations of laws and regulations will not be tolerated.

### 2.2. Diversity

At Atea, we appreciate that all people are unique and are to be respected for their individual talents. For this reason, we strive to attract a diverse workforce and to create an inclusive work environment which allows everyone to contribute. By embracing diversity, we open Atea to new ways of thinking, new skills and new opportunities.

Any form of harassment, discrimination or other behavior that may be perceived as threatening or degrading will not be tolerated. This includes – but is not limited to – discrimination on the basis of gender, religion, national or ethnic origin, cultural background, social affiliation, functional

disability, sexual orientation, marital status, age or political conviction.

Atea personnel are committed to fair and respectful treatment of all employees or other business associates with whom they interact. Employees will base personnel-related decisions solely on relevant qualifications such as personal suitability, education, experience, results and other professional criteria.

### 2.3. Confidentiality

All Atea employees have a responsibility to safeguard sensitive information relating to Atea, as well as its customers, partners and stakeholders. The duty of confidentiality is critical to building trust and strong relations with outside parties and across Atea. The principle of “need to know” shall always apply when handling sensitive information.

Atea employees shall exercise caution when discussing and handling information, to avoid this information being received by unauthorized persons. If sensitive information is to be shared with third parties, a written confidentiality agreement should be in place. The duty of confidentiality also applies after the termination

of employment or contractual relationship with Atea for as long as the information is considered to be of a sensitive nature or in any other way confidential.

### 2.4. Privacy

At Atea, we believe that all individuals have a right to privacy, and we are committed to handling personal data with due care. Personal data is defined as any information which can be referenced to a specific and identifiable person.

Atea is subject to strict legal requirements when handling personal data, as defined by the General Data Protection Regulation (GDPR) of the European Union. All Atea employees must understand the company’s requirements under the GDPR when handling personal data. These requirements are summarized in the document “Atea Global Information Security: Risk Management Policies for Employees” which can be found on the Atea compliance website: [atea.com/trust](https://atea.com/trust).

When handling personal data, Atea must have a process to notify the individual whose data will be processed. Atea must have documented

measures to protect personal data from breach. The company must inform the data protection authorities in the event of a serious data breach, and is subject to heavy potential penalties if it has not managed personal data responsibly.

When Atea processes personal data on behalf of its clients – for example, when Atea provides data center services to a client – Atea must have a valid data processing agreement with the client. Atea must also have a valid data processing agreement with companies that process personal data on behalf of Atea – for example, when Atea uses cloud-based applications to process personal data which are operated outside of Atea.

Based on the requirements of GDPR, it is critical that all processes involving personal data are documented, and all internal applications and contracts which involve personal data are identified. This information must be available to the Chief Information Security Officer of each country. The Chief Information Security Officer of each country and of the Group can be found on the Atea Compliance website.

Due to the importance of data protection and IT security issues at Atea, all employees are required to have read the document “Atea Global Information Security: Risk Management Policies for Employees” as part of their Code of Conduct training.

### **2.5. Sustainability**

At Atea, financial and corporate sustainability goals are not at odds with each other in growing a successful company. They are complementary. Together, they allow us to run a profitable business while making a positive contribution to society.

Atea is a member of the UN Global Compact (UNGC) and observes the Global Compact’s 10 principles within Human Rights, Labor, Environment, and Anti-corruption. Atea establishes sustainability objectives according to these principles and reports its progress to the UNGC each year.

Atea’s environmental initiatives are an integral part of its operations. Atea employees actively promote sustainable IT solutions to customers to minimize the negative impact of IT operations on the environment. One such solution is Atea’s GoITLoop recycling program, which efficiently collects its customers’ used IT hardware and processes this equipment for recycling and reuse.

All Atea employees have a role in supporting Atea’s sustainability objectives, and are encouraged to report opportunities to improve environmental performance to the Compliance Officers. By promoting IT recycling and other “Green IT” programs externally, we offer our customers solutions to meet their environmental targets. At the same time, we strive to reduce unnecessary waste and emissions internally at Atea.

## 3. ANTI-CORRUPTION

Atea believes in fair competition, and is firmly opposed to all forms of corruption. Employees should never offer or provide improper benefits to business contacts, government agencies or other third parties in order to influence a business decision or facilitate a legal/regulatory process. Nor should employees solicit improper benefits as the basis for transactions with Atea.

Corruption and bribery may consist of either direct payments or indirect benefits, if the intention for granting the benefit is in exchange for influence over a business decision or legal/regulatory process. Examples of indirect benefits may include sponsorships of favored organizations, donations to political groups, and excessive spending on hospitality, travel and entertainment. This applies irrespective of whether the benefit is offered from Atea or through an intermediary.

Atea employees must also avoid conflicts of interest between their work in Atea and their interactions with outside organizations.

### 3.1. Gifts and business courtesies

Atea employees must always exercise caution when offering or accepting gifts and business courtesies, including invitations to meals or events. Gifts and business courtesies should only be offered or accepted when they are of modest value and with limited frequency, and are in accordance with local practice and national guidelines within the Atea organization.

There are some differences in national guidelines across the Atea geographies. For this reason, all Atea employees must read, understand, and follow the national guidelines in the countries in which they work.

When offering anything of value, including a meal or other courtesy, Atea employees should understand whether the offer would violate any rules for professional conduct by the recipient. If this is the case, the recipient's rules apply and the offer should not be made. Atea employees

should be especially cautious when dealing with the public sector. Regardless of their value, gifts and business courtesies must never be offered or accepted if it could be perceived that the gift or business courtesy is offered in exchange for influencing a business decision.

If an Atea employee is offered or has accepted gifts and business courtesies in excess of normal tokens of appreciation, he should immediately notify his immediate supervisor, who can decide with the local Compliance Officer whether the employee's integrity and independence may be perceived as being influenced.

### 3.2. Events and conferences

All events involving customers or business partners must have a clear business agenda. Business courtesies such as meals and entertainment provided during the conference must be limited, and not overshadow the business content.

When organizing or participating in events and conferences, Atea employees must evaluate the value of business courtesies which are offered during the event. If these business courtesies exceed the maximum level allowed under guidelines for Atea or for the customer, the excess amount must be invoiced as a participant fee to the recipient.

Specific rules on events and conferences for each country can be found on the intranet sites of each country.

### 3.3. Conflicts of interest

Atea employees will not seek to attain personal benefits for themselves (or closely related persons) that may be perceived as a conflict with the interests of Atea. Situations which may result in a potential conflict of interest should be avoided. To ensure impartiality, Atea employees should not participate in decisions in which there may be a conflict of interest.

Conflicts of interest are not always obvious. If an employee becomes aware of a potential conflict of interest, or has questions about a conflict of interest, he should notify his superior immediately.

### **3.4. Private interests in other businesses**

Atea employees must avoid having personal interests – direct or indirect – in other businesses or organizations if these may be perceived as negative to the employee's relationship with Atea.

An employee must inform and receive consent from his direct superior before undertaking external duties or positions which may impact the employee's work at Atea (including Board positions with another company).

An employee must inform and receive consent from his direct superior before undertaking an

investment in a company that competes with Atea or does business with Atea. (Investments of less than 5 % of the share capital in a listed company are exempt from this requirement.)

### **3.5. Compliance with antitrust laws and regulation**

Competition or antitrust laws are designed to protect free and effective market competition. Atea is committed to competing in a fair and ethical way, in compliance with the laws and regulations in the markets in which we operate.

Competition law prohibits companies from collaborating with competitors against the interest of potential customers. This includes a range of prohibited activities including price fixing, sharing of price information with competitors, restricting the supply of goods or services, submitting false bids or tenders and dividing markets or territories.

All Atea employees must comply with competition and antitrust laws. This means that Atea employees are prohibited from:

- being involved in any agreements, arrangements or practices that have as their object or effect to prevent, restrict or distort competition;
- discussing pricing or other competitive information with competitors, fixing prices with competitors or entering into any other arrangements with competitors that might restrict free competition.

Employees involved in a private or public tender process must always comply with applicable tender regulations, and provide correct, transparent and non-discriminatory data.

## 4. INTERNAL CONTROL

The market for IT infrastructure is evolving rapidly, and Atea needs to continuously adapt and be flexible in order to meet the needs of its customers. To succeed in this dynamic environment, Atea believes in a decentralized approach to decision making which empowers employees to solve problems for customers on a local level.

Atea's internal control routines enable the Group to execute strategy and operate in a coordinated nature while providing employees the flexibility to make customer decisions on a local level. Internal controls ensure that Atea's business processes are efficient and run within an acceptable level of risk, that Atea's assets are safeguarded and utilized, that financial information is correct and timely, and that laws, regulations and guidelines are followed.

Internal controls are the responsibility of management, but every employee must contribute to ensure that these control routines are effective. Most control routines are of a highly operational nature, but the Code of Conduct provides guidelines on major control routines within authorization and reporting of transactions, contract management, communications and insider trading.

### 4.1. Authorization of transactions

All national organizations have a written document that outlines which persons or levels in the organization have the authority to approve various types of transactions relating to personnel staffing, contracts, and cash disbursements.

Transactions above a specific size must be approved by Group management, or by the Board of Directors. These maximum amounts allowed for approval at each level of the organization are stated in the Authority Matrix for the Atea Group. The Authority Matrix is provided as a supplemental document to the Code of Conduct and is available on the local intranet.

### 4.2. Contract management

Any contract or agreement which an Atea employee enters on behalf of the company must be registered and stored in electronic format in the contract database of the applicable country or business unit. This includes all contracts with customers, suppliers and business partners.

It is the responsibility of the individual who signs or executes the agreement on behalf of Atea to ensure that the contract is correctly registered

and stored electronically in the contract database. Information regarding access to the contract database in each country can be found on the intranet sites of each country.

Certain types of contracts will create additional compliance obligations. Contracts involving the processing of personal data require a supplemental data processing agreement, see Code of Conduct 2.4. Other contracts may have restrictions which are relevant for other stakeholders.

It is the responsibility of the individual who signs or executes the agreement to ensure that any compliance obligations are met or are otherwise notified to key stakeholders.

### 4.3. Reporting and disclosure

Atea's financial and legal reporting shall comply with all applicable laws and regulations, and be full, fair, accurate, timely and understandable. This requires that all transactions are correctly reported in accordance with local law and good accounting practice.

All Atea employees share a responsibility for registering transactions in a correct and properly documented nature, so that Atea can accurately

report on these transactions in its financial and legal statements. If any Atea employee becomes aware of transactions which have not been reported accurately, they should report this information immediately to their manager and if necessary, to the Compliance Officer.

### 4.4. "Price sensitive information" and Insider trading

As a publicly traded company, Atea ASA is subject to strict laws concerning the handling of sensitive information which may have an impact on the share price of Atea ASA.

Sensitive information which is not generally known in the market and may have an impact on the share price of Atea ASA is called "price-sensitive information". Employees holding price-sensitive information are subject to special legal requirements on confidentiality, documentation, and restrictions on trading in the shares of Atea. Violation of these legal requirements is subject to prosecution under the Norwegian Securities Trading Act.

Price-sensitive information may include information on large new contracts which have been awarded to Atea, but which are not generally

known to the public. The Group has set a policy that all new contracts with expected sales over NOK 350 million per year (approximately 1 % of Group revenue) are automatically considered price-sensitive information if the outcome of the contract has not already been announced to the public. The Group may decide to publish information on new contracts below this size through a stock exchange notice as information to investors without the contract being considered price-sensitive information.

Price-sensitive information may also include information on Atea's local financial performance or operations, which has not been reported to the public, but can significantly impact the overall financial performance of the Group. Furthermore, price-sensitive information may include other events or transactions which could impact Atea's financial performance and share price, such as the acquisition of another company.

Determining whether sensitive information is price-sensitive information is not always clear. Employees which are holding sensitive information (for example, regarding a large contract) and are uncertain whether this is "price-sensitive information" should contact the CFO of their local organization with the details of this information so that the specific situation may be evaluated.

Employees who are holding "price-sensitive information" must:

- Register as an Atea "insider": this involves contacting the Group CFO and providing information on (1) what price-sensitive information the employee is holding, (2) when and how he received the price-sensitive information.

Based on this information, Atea will register the case in the Computershare Insider Management System "CIMS". Once the case is registered, the insider has to confirm in the system that they will comply with the insider rules described in this Code of Conduct. Atea ASA will maintain this information for at least five years after the date in which the case is created or updated, and will provide this information to the Norwegian Financial Authority (Finanstilsynet) upon request.

- Keep price-sensitive information confidential: Price-sensitive information cannot be communicated to anyone who is not an Atea insider without the express consent of the Group CEO or Group CFO. If an Atea employee becomes aware that another person has received price-sensitive information without being registered as an insider, this must be reported to the Group CFO immediately.

- Abstain from trading in the financial instruments of Atea ASA: Employees holding price-sensitive information must abstain from trading in the financial instruments of Atea ASA, including purchasing or selling Atea shares / bonds, and exercising Atea stock options. This trading prevention does not prevent the normal exercise of option or future contracts which were previously entered into upon expiry of such contracts.

An Atea insider remains subject to the above requirements until the price-sensitive information is publicly available, or is otherwise no longer considered to have an impact on the share price of Atea ASA. All employees who have been registered as an Atea insider should receive a confirmation that they are no longer considered an insider in Atea before assuming that they are no longer subject to the above requirements.

It is the duty of all employees to investigate whether they are holding price-sensitive information before trading in the financial instruments of Atea ASA. Employees which are uncertain whether they are holding price-sensitive information should contact the CFO of their local organization.

#### 4.5. Public communications

In order to ensure that public reporting on Atea is correct, consistent and reliable, only a limited number of people are authorized to speak with news media. All queries from the media must be referred to the country manager or local press contact.

In principle, only the Group CEO, Group CFO and country managers are authorized to communicate with the media. Only the Group CEO and Group CFO can comment on financial issues. However, other people may be authorized to communicate with media in specific cases. This must always be clarified with the country manager in advance.

All price-sensitive information (defined in 4.4. above) must first be disclosed to the Oslo Stock Exchange in a stock exchange announcement before it can be communicated externally or internally to those who are not company insiders. All announcements to the Oslo Stock Exchange are the responsibility of the Group CEO and Group CFO.

In the event of an emergency or serious incident at Atea, the Group has a crisis management plan which includes policies on communication. The crisis management plan is provided as a supplemental document to the Code of Conduct.

# CRISIS MANAGEMENT PLAN

## 1. Introduction

Atea's *Code of Conduct* provides guidelines for conduct in the ordinary course of business. In the event of an emergency or serious incident at Atea, additional governance routines are necessary for Atea management and employees to respond to an unpredictable situation.

The Emergency response plan provides the foundation for Atea's emergency response and crisis management work. In case of emergency, the plan provides clear routines and procedures which enable the organization to react in an effective and coordinated manner.

### 1.1 "Crisis" definition

A crisis is a serious, unwanted incident which falls outside of the scope of regular operations.

Examples of scenarios which may lead to a "crisis" include but are not limited to:

#### Physical crises

- Physical harm or threats to employees, customers, partners or external consultants
- Fire or other accidents causing damage to Atea's facilities
- Burglary or cybercrime

#### Other crises (e.g., business, legal issues)

- Breach of laws and ethics (e.g., corruption, bribery, embezzlement)
- Serious disruption in operations (e.g., data center)
- Strikes

A crisis may involve consequences such as loss of life, health, value, reputation and/or stoppage of day-to-day operations.

When an incident is so critical and serious that ordinary management routines at Atea are incapable of properly handling the situation, the emergency response organisation comes into force.

### 1.2 Emergency response plan

Atea's Emergency response plan is available to all employees on the Atea intranet for each country in which Atea operates.

The Group Compliance committee is responsible for ensuring that the Emergency response plan is current and that necessary expertise regarding the Emergency response plan exists across the country organizations.

## 2. Organisation of responsibility

There are three levels of emergency response at Atea. These are:

1. **Group level - Crisis management:** Overall responsibility for all crisis management at Atea
2. **Country management level - Emergency response:** Handling the crisis itself
3. **Local office level – Operational response:** Liaison/accident site function

Critical incidents that are more physical in nature must be managed locally. Other crises involving business or reputational issues must initially be handled at the country management level, with the support of regional offices.

### 2.1 Group level - Crisis management

The CEO holds strategic responsibility for dealing with crises at Atea. Upon receiving notification of a crisis, the CEO is responsible for mobilising the group-level strategic crisis management team.

The CEO works in partnership with the country manager to determine which parts of the organization should be mobilized in responding to the crisis.

The CEO must approve all information and media relations strategy in a crisis. The CEO is the spokesperson for Atea on a Group level, or on a country level if justified by the situation.

The CEO will appoint an assistant crisis manager to act as a supporting resource for the crisis manager, and lead the crisis management on a Group level when the CEO is not present.

### 2.2 Country level - Emergency response management

The Country manager holds tactical responsibility for dealing with crises at Atea in their respective regions. When addressing a crisis, the Country manager reports directly to the CEO or assistant crisis manager in the group management team.

All serious incidents must be reported to the Country manager. Upon receiving notification of a crisis, the Country manager must notify the CEO immediately. Based on the actual or potential scope of the incident, the Country manager works in partnership with the CEO to decide on which functions and resources are to be mobilised within the emergency response management.

The Country manager should appoint the following Emergency response management team within each country:

- **Assistant emergency response manager:**

The Assistant emergency response manager acts as an additional resource for the Country manager. The assistant emergency response manager must take minutes of meetings to address the crisis and will distribute these minutes as necessary until the crisis is resolved.

- **Communications officer:** The Communications officer must develop an information strategy to deal with the crisis, in coordination with the Country Manager and Emergency response management team. The information strategy must be reviewed and approved by the Group CEO.

The Communications officer is responsible for ensuring the distribution of information, in coordination with HR and the central switchboard.

- **HR:** If the crisis includes the company's own employees and their relatives, HR is responsible for the tactical handling of communication with employees, in partnership with the communications officer.

- **Other support functions:** The Country Manager will add other support functions (IT, administration/legal) to the Emergency response team on an as-needed basis.

### 2.3 Local level - Operational management

Within each Atea office, the local manager holds operational responsibility for dealing with crises at Atea. When addressing a crisis, the local manager reports directly to the Country manager. The local manager may also appoint other support resources on an as-needed basis.

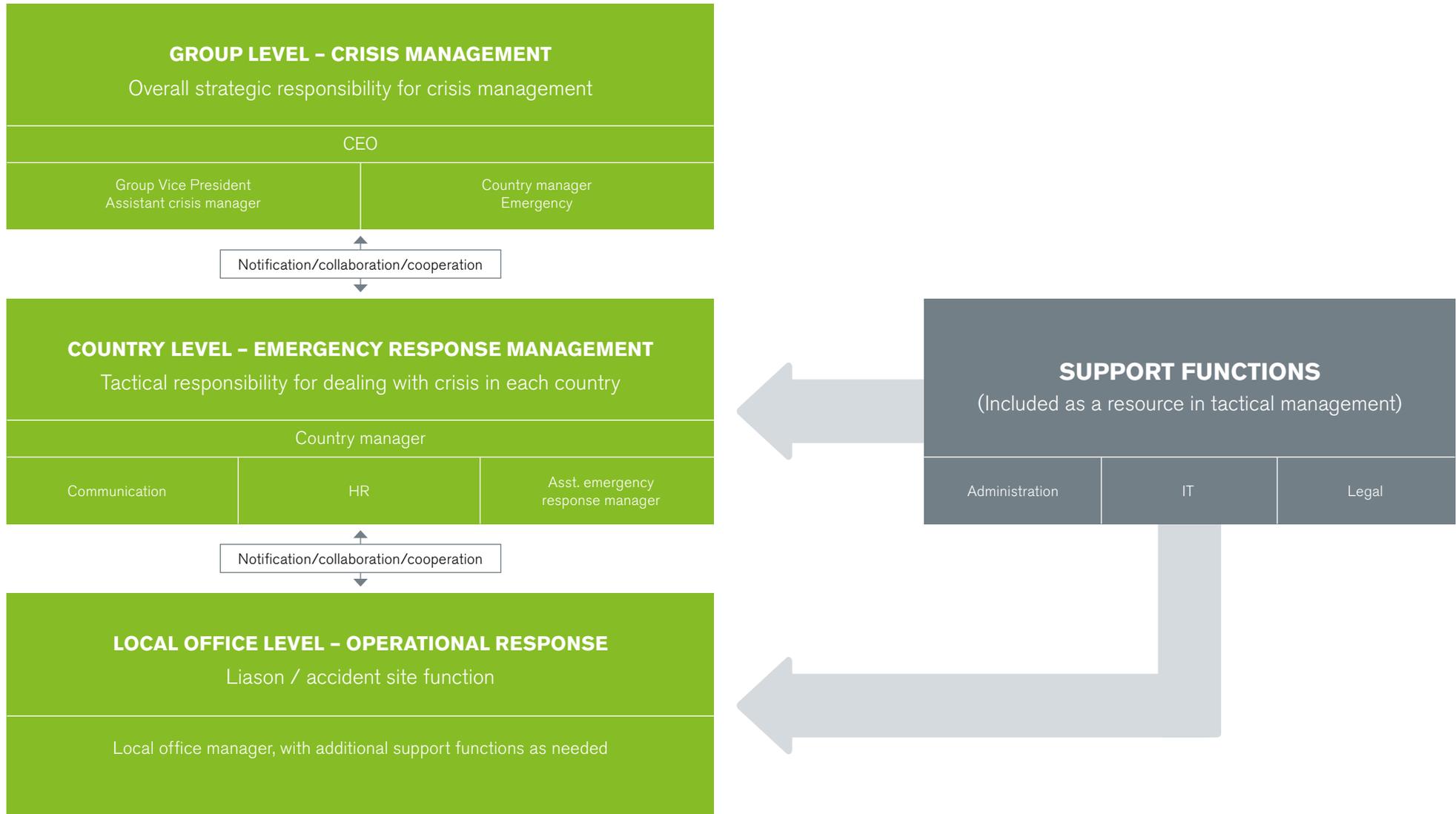
### 3. Communications responsibility

The Country manager will act as media spokesperson in the event of a crisis. All country managers are required to complete training sessions in media and communications. All public communications regarding the crisis must be approved by the CEO in coordination with the Country manager.

If justified by the situation, the CEO may make a statement in the media on behalf of the Group or the local country. Strategic assessments should be carried out if the CEO is to be the spokesperson. Three possibilities:

- The CEO remains in the background during the initial phase of the crisis, until the case is clearer
- The CEO comments on the seriousness of the matter initially and then takes a step back
- The CEO is exposed as the primary source from the outset

The emergency response system at Atea is illustrated as follows:



## AUTHORITY MATRIX - ATEA GROUP

Limits represent maximum levels to be approved by each position, according to Group policy. Countries may set lower limits, as they choose.

Amounts above specified levels are subject to Board approval. For customer frame agreements, the authorization limits stated below are the estimated value per year, unless otherwise specified.

Authorization limits (currency in thousand krone <sup>1)</sup>)

	Transactions	Comment	Group CEO	Group CFO	Local CEO	Local CFO	Local exec team member	Head of department	Employee/Sales staff
Customer Agreements <sup>2)</sup>	Customer agreements:								
	Products		300,000	N/A	75,000	50,000	10,000	8,000	1,000
	IT as a Service (Data Center outsourcing)	Total Contract Value of sales agreement. Capex subject to separate approval (below).	300,000	N/A	75,000	50,000	10,000	8,000	-
	IT as a Service (Client outsourcing)	Total Contract Value of sales agreement. Sublease loans subject to separate approval (below).	300,000	N/A	75,000	50,000	10,000	8,000	-
	Fixed Price consulting projects	Total Contract Value of sales agreement.	300,000	N/A	75,000	50,000	10,000	8,000	-
	Time and Material consulting projects	Total Contract Value of sales agreement.	300,000	N/A	75,000	50,000	10,000	8,000	1,000
	Extended payment terms (e.g., >15/30 days)	Approval from Local CEO or CFO + exec team member		-	-	x	x	x	-
	Other deviation from standard terms	Approval from Local CEO or CFO. May delegate specific authority (e.g., AOS) to other staff.	-	-	x	x	-	-	-
COGS	Purchases directly associated with revenue	Tied to revenue approval above, plus specific controls on low margin deals (locally defined)	-	-	-	-	-	-	-
Opex/purchases (associated with ordinary operations)	Purchases within approved budgets		40,000	-	15,000	1,000	250	100	-
	Purchases outside of approved budgets	Requires Local CEO approval to spend in excess of budgets.	40,000	-	15,000	1,000	250	100	-
	Special purchases:								
	External consultants	Same as other purchases + "managers manager"	40,000	-	15,000	1,000	250	100	-
	Marketing/Representation	Same as other purchases + repr. > 1000 kr/pers to be approved by "managers manager"	40,000	-	5,000	1,000	250	100	-
	Major travel expenses (incl. conferences, training)	Same as other purchases	40,000	-	5,000	1,000	250	100	-
	Inventory (buffer stock for warehouse)	Special routine incl. head of procurement	40,000	-	15,000	1,000	250	100	-
Personnel	Staffing approvals (new positions)	Local CEO on new positions, if temporary local HR (one of the local exec team members)	-	-	x	-	-	-	-
	Salary & benefit changes	Local exec team member (region director) if within approved FC	-	-	-	-	x	-	-
	Promotions (mgmt employees)	Local exec team member (region director) if within approved FC	-	-	-	-	x	-	-
	Promotions (non-mgmt employees)	Local exec team member (region director) if within approved FC	-	-	-	-	x	-	-
Capital Expenditure (investments)	Fixed assets (IT equipment, office furniture)	If budgeted, then according to limits as follows. Otherwise, local CFO must also approve.	40,000	-	10,000	1,000	250	100	-
	Systems and development projects	If budgeted, then according to limits as follows. Otherwise, local CFO must also approve	40,000	-	10,000	1,000	250	100	-
	Customer specific investments	If budgeted, then according to limits as follows. Otherwise, local CFO must also approve.	40,000	-	10,000	1,000	250	100	-
M&A	Acquisition/sale of enterprise	Requires group CEO or Board. Divesture of dormant company can be approved by local CEO.	50,000	-	x	-	-	-	
Disbursements	Authority to disburse cash	Dual approval required (basic control).	-	-	-	30,000	-	-	
	Credit note issuance		100,000	-	20,000	1,000	250	100	
Facility lease	Lease of premises	Must be approved by Group CEO, according to Board policy	x	-	-	-	-	-	
Finance	Loans/financing	ATEA ASA CFO approval + execution by subsidiary Board.	-	x	-	-	-	-	
	Guarantees		-	x	-	-	-	-	
Sale of assets	Sale of assets (per sale)		15,000	-	5,000	1,000	-	-	
	Sale of assets (per year)		50,000	-	10,000	1,000	-	-	

1) All amounts can be converted to EUR by dividing by 10

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# ATEA