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AMC

CODE OF CONDUCT

UK version



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## 1 SIGNATURES

AMC-Consult A/S

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Signed by: Peter Makki, CEO

Company (Name)

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Signed by: \_\_\_\_\_ (Name / Title in capital letters)

## 2 GENERAL

We operate in accordance with internationally recognized standards of human rights, work and society.

This Code applies to all AMCs, contractors, consultants, agents, sub-contractors and other providers of goods and services as well as customers (“business partners” or “partners”) of Customer and all of its subsidiaries. It is based on the same principles as Customer’s employee Code of Conduct. Of course, no section of the Code will apply where or to the extent that it would violate applicable law.

Each business partner is responsible for becoming familiar with the Code and complying with its standards. Violations of the Code can lead to termination of the partner’s engagement with Customer. It is also important to keep in mind that many Code sections are based on the legal requirements of the countries in which Customer operates, so that a violation of the Code may also involve breaking the law, which could mean civil or criminal prosecution of the violator.

A business partner’s responsibility for compliance with this Code means that “following orders” will not excuse a violation of the Code: No Customer employee at any level of the organization is authorized to violate Customer’s Code of Conduct, or direct a business partner to violate this Business Partner Code of Conduct.

### 3 COMPLIANCE WITH LAWS

Business partners must follow all applicable laws, rules and regulations while conducting Customer business. If you encounter a situation where this Code conflicts with a local law this should be brought to Customer's attention. Keep in mind that Customer is a publicly traded, U.S.-based company, and that our operations throughout the world are subject to certain U.S. laws in addition to those of the country in which they are located.

#### 3.1 MONEY LAUNDERING

- Money laundering means the introduction of assets (not only cash) from crimes into the regular financial and economic cycle.
- Money laundering is a crime in EU Member States, the United States, China and many other countries.
- No employee, independently or in cooperation with third parties, may take actions that violate applicable money laundering regulations.
- In the event that doubtful financial transactions involving the transfer of cash or cash equivalents are required, prior verification and approval by the treasurer is required.

#### 3.2 ANTITRUST AND COMPETITION

All business partners, agents and sub-agents must abide by their national laws and Customer's policy governing competition and antitrust.

Customer's policy prohibits:

- Setting or even discussing prices, terms of sale, or other competitive information with competitors, or attending meetings with competitors at which such topics are discussed.
- Dividing customers, markets, or territories with competitors.
- Attempting to dictate or control a customer's resale prices, or allowing a supplier to dictate our resale prices.
- Engaging in any other conduct that violates any applicable antitrust or competition law.

Business partners making decisions on behalf of Customer in the marketplace such as where or how much to buy or sell, with whom to deal, what price to pay or charge and what advertising, promotion and credit terms to offer, must do with Customer's cooperation only and without any agreement or understanding with competitors, and without imposing

requirements which unduly restrict the freedom of our suppliers and customers to make their own independent decisions.

### **3.3 INTEGRITY OF CUSTOMER RECORDS**

As an Customer business partner you are responsible for the accuracy of any information you report, data you enter, or document you generate for or regarding Customer. Intentionally entering or providing any false, misleading or inaccurate data in any form is prohibited.

All business records and written communications are considered Customer's official company documents and may become public.

### **3.4 INSIDER TRADING - [HTTPS://AMCBANKING.COM/AGREEMENTS/](https://amcbanking.com/agreements/) - NDA AGREEMENT**

Business partners who have access to confidential information about Customer, our customers, competitors or suppliers are not permitted to use or share that information for trading in stocks or for any other purpose except the proper conduct of Customer business. All information about Customer, any of our customers, competitors or suppliers that has not been made available to the general public should be considered confidential or "non-public" information.

AMC's code of conduct covers a wide range of business practices and procedures. It does not cover all issues that may arise, but defines the basic principles that should guide all employees and officers of all entities in the AMC group. All our employees and officials must act accordingly and try to avoid even the appearance of inappropriate behavior. The code should also be provided and followed by AMC agents and representatives. In addition, our policies apply to various operations and you must know and follow these policies that apply to your daily work.

If the law is contrary to the principles contained in this Code, you must obey the law. If you have questions about these conflicts, you should ask your manager how to deal with this situation. Employees and officers are responsible for understanding the legal and political requirements that apply to their work and reporting any suspected violation of law, this Code, or AMC policies.

Persons who violate the norms contained in this Code will be subject to disciplinary proceedings, including possible dismissal. In addition, violations of this Code may also constitute a violation of law and may result in civil or criminal penalties for you, your superiors and / or AMC. If you find yourself in a situation that you believe may violate or lead to a violation of this Code, follow the procedures set forth in this Code.

### **3.5 CONFLICT OF INTEREST**

It is expected that you will act in the best interest of our company and protect your reputation by avoiding a conflict of interest.

Personal relationships or interests cannot affect business. This means that you must not create or maintain personal interests that may create or create a semblance of conflict with the interests of AMC, or may influence or appear to influence your judgment in the performance of official duties. You should, for example, avoid investments, interests, connections or activities that may cause others to doubt your honesty, integrity or the ability to objectively perform their duties.

Each employee must inform his manager about an existing or potential conflict of interest and seek a solution with the manager to avoid or at least minimize the conflict of interest.

### **3.6 PRIVACY PROTECTION - [HTTPS://AMCBANKING.COM/AGREEMENTS/](https://amcbanking.com/agreements/) - GDPR AGREEMENT**

AMC commits to respect the privacy and integrity of its employees and business partners.

We comply with strict standards when processing personal data of our employees and the data of our business partners. All personal data collected and stored by AMC will be processed in a fair, transparent, carefully and in accordance with the applicable data protection regulations.

Access to personnel registers is limited to AMC employees and agents who have the appropriate permissions and need business information. Confidential information about employees cannot be disclosed to anyone outside the company without proper authorization or unless required by law.

## **4 MANAGEMENT**

The AMC corporate governance practice consists of guidelines and principles of the AMC Group. The board of directors of the parent company is responsible for the implementation of good corporate governance in the group.

### **4.1 VALUES AND ETHICAL GUIDELINES**

The Board of Directors of AMC has defined the company's corporate values. These values have been fully disclosed and are known throughout the AMC Group. The values are listed below:

#### **4.1.1 RESPECT**

Show respect to colleagues, clients and their companies. Always represent AMC in the right way.

#### **4.1.2 RELIABILITY**

Be loyal to the AMC directives and honor contracts with clients, colleagues and others.

#### **4.1.3 INNOVATION**

Quickly adapt new solutions when they are turned on. They help to improve the efficiency of the client's business processes.

#### **4.1.4 COMPETENCE**

Rely on your own skills and be eager to learn as well as help. Make sure you know your products and services well, while focusing on the customer's processes.

#### **4.1.5 TEAM SPIRIT**

Share knowledge and resources with others and use your strengths to cooperate in the best interest of the company.



## 5 CODE OF CONDUCT

The AMC Code of Conduct is the foundation for all employees and provides guidelines for doing business globally.

The Code of Conduct also applies to persons who undertake tasks and act on behalf of AMC, including board members, auditors, resellers, partners, consultants and others, as well as many others. All activities and decisions at AMC must comply with the Code of Conduct. In cases where normal rules can not be applied, all actions and decisions must meet the highest possible standards of ethical behavior.

The AMC code of conduct has been accurately communicated and understood in all entities throughout the Group. All managing directors have signed the Code to ensure its implementation of in companies they manage. All managers and employees are required to report any incidents that do not comply with the Code.

### 5.1.1 MAIN AIMS

- Keep complete confidentiality regarding information about colleagues, clients and business partners.
- Respect should be demonstrated in all relationships, both external and internal, based on principles such as equality and diversity.
- Situations that may create an external or internal conflict of interest should be avoided.
- AMC maintains diversity in the appointment of people from different cultural, ethnic and religious backgrounds. As a workplace, AMC has a neutral attitude to religion and the philosophy of life. To avoid conflicts in the workplace, no forms of religious instruction, agitation or religious provocation are forbidden.
- Zero tolerance applies to services or gifts that may be considered inappropriate or may create a sense of duty.
- Actions and decisions must be considered in such a way that they can conduct both external and internal investigations.
- Employees, management and their close relatives can not receive loans or other benefits from customers and suppliers.
- Each employee and manager is individually responsible for revealing the bias and doubts about his supervisor.

### 5.2 SUSTAINABLE DEVELOPMENT AND RESPONSIBILITY

The goal of AMC is to maintain the competitive advantage of European, American companies and government bodies. AMC defines its responsibility as a way of operating the company; this includes ethics and respect for the environment, as well as a commitment to a positive social impact.

AMC is constantly expanding its operations thanks to technological innovations and related skill sets. The main goal of the company is to provide its clients with the best available skills. The primary goal of AMC is to secure and manage the everyday business processes of its clients.

**5.2.1 WE WORK ON:**

- Providing IT solutions that keep our clients one step ahead of the competition.

**5.2.2 WE ARE HERE TO:**

- Promoting competitiveness and contributing to the creation of growth and efficiency for our clients.