ASP DC AS
CODE OF CONDUCT

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1. Message from the Chairman

At ASP DC, sustainability is at the heart of how we design, build, and operate our data centers across the Nordics. The energy we use comes entirely from renewable and sustainable hydropower, leaving our customers with a net zero carbon footprint.

Second, we strive to reuse the excess heat generated in our data centers. Where possible, we aim to recycle this heat into nearby production buildings, offices, and the local district heating network, giving our customers a carbon-negative impact on the environment by reducing CO_2 emissions.

Thirdly we aim to be a responsible actor and to do our part to safeguard human rights, workers' rights, and fair working conditions.

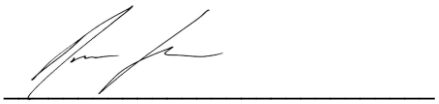
Our mission and our values define who we are.

This Code of Conduct sets out how we do that—simply, clearly, and with practical examples of risks to watch for—so we can serve our employees and customers the right way, every day.

Trust is the foundation of our relationships with customers, partners, suppliers, and with one another; without it, we cannot succeed.

Let this Code guide our decisions and strengthen that trust. And if something does not feel right, speak up.

Together, we will continue our growth—doing things the right way, the ASP way.



Chairman of the Board, Magnus Asp

2. Introduction

As Asp DC is committed to ensuring that the Asp DC management and employees act in a lawful, ethical and professional manner this Code of Conduct establish some minimum requirements for the behavior of the management and the employees.

The company and the employees are always expected and required to act in accordance with applicable law. In the case of a conflict between the code and the law, the employee is generally required to act in accordance with the law.

The code applies to all employees of the company, as well as the management and the Board of Directors.

Suppliers are covered by our Supplier Code of Conduct.

3. Responsibility and implementation

3.1 The Board of Directors

This Code of Conduct has been approved by the Board of Directors and can also be amended by the Board of Directors.

3.2 Implementation

Chief Legal Officer, Magne Bakke Unhjem, is responsible for implementing and maintaining the Code of Conduct.

3.3 Employees

Our employees are a key resource, and we must at all times make sure that all are treated with dignity, respect and fairness.

Implementation of, and adherence to, workplace standards contained in this Code will help guarantee basic human values in the workplace.

To ensure this, all employees are responsible for knowing, understanding and complying with the Code of Conduct.

4. Human rights and labor rights

4.1 Prohibition of forced labor

Asp DC shall refrain from all forms of forced labor. All employment shall be based on free will and no form of force or threats shall be used in connection with employment.

4.2 Prohibition of child labor

Asp DC will not employ any persons defined as a “child” under human rights law and labor law. This includes people under the age of 15, or under the age of completing compulsory education. This does not restrict the possibility to participate in lawful internship programs that have a legitimate aim. Asp DC will in these cases make sure that all applicable law is complied with.

4.3 Right to freedom of association and collective bargaining

Asp DC recognizes and respects that all employees have a right to freedom of association and collective bargaining. This includes the option to organize and to join unions, or to refrain from doing so. The workers have a right to seek representation and to collective bargaining. These rights shall not be restricted in any way.

4.4 Fair and equal payment and working hours

All employees shall be paid in accordance with applicable laws concerning minimum wage. Asp DC is committed to ensuring fair and equal pay for employees. Difference in payment should only be based on legitimate criteria such as positions, experience, competence and performance.

Asp DC will at all times comply with applicable laws concerning overtime, overtime payment and breaks.

4.5 Discrimination

Asp DC will not discriminate on the basis of age, gender/sex, ethnicity, disability, sexual orientation, political affiliation, pregnancy, marital status, or any other protected characteristic under the law. Such discrimination is prohibited under the hiring process and in all other work-related decision making, for instance for decisions regarding promotions, payment and training. Difference should only be made on the basis of legitimate criteria, such as experience, competence, achievements and performance.

4.6 Health and safety

The working environment shall uphold the necessary health and safety standards. Asp DC has a duty to provide a healthy and safe environment for the employees, both physically and psychologically. The work environment shall be in accordance with applicable laws and standards.

Employees are responsible for acting in accordance with the company’s health and safety rules and shall inform the management if the environment is in any way unsafe or unhealthy.

4.7 Treatment of employees and colleagues

Employees shall always be treated with kindness and respect. There shall be no tolerance for bullying or harassment. Harassment includes all forms of unwanted behavior towards another person that creates an unwelcoming, intimidating, degrading or uncomfortable work environment.

5. Protection of company property, information and reputation

5.1 Property

All Asp DC property shall be handled with necessary caution and care. Property intended for work shall in general not be utilized for personal purposes.

5.2 Confidentiality

All Asp DC employees will sign a confidentiality agreement when employed. It is of high importance that confidential information is not disclosed to external persons or unauthorized internal personnel. All employees who gain access to confidential information have a duty to protect this information from such disclosure.

5.3 Intellectual property

Asp DC's intellectual property is a valuable asset, and it is important that this is protected. All employees have a duty to protect and maintain the company's intellectual property. This property includes trademarks, patents, models, know-how, trade secrets, designs and materials protected by copyrights.

Employees are generally expected to act in accordance with relevant intellectual property rights law.

5.4 Communication from Asp DC's devices

All communication from Asp DC's devices, or users, shall be appropriate and not be capable of reflecting badly on the company in the event of disclosure of such communication.

5.5 Communication with the media

Employees shall not speak on behalf of the company to the media unless they are specifically authorized to do so. Inquiries from the media shall be redirected to employees with such authorization.

5.6 The company reputation

All employees shall refrain from acting in a manner that is likely to cause harm to Asp DC name and reputation. Acting in accordance with this code is part of ensuring this. The company brand and logo shall not be used for other than business purposes.

5.7 Conflict of interest

The employees are expected to act in the company's interest when acting on its behalf. Asp DC recognize the possible risk of a conflict of interest where personal views differentiate from the company's views. In cases of conflict of interest, the employee is encouraged to discuss the situation with the management.

6. Responsible business conduct

6.1 Anti-corruption and bribery

Asp DC has no tolerance for corruption or bribery acts by employees. All employees must act in accordance with applicable anti-corruption laws. Corruption includes the acts of giving, receiving, accepting, or such, an improper advantage because of one's position. The advantage can be

considered improper if it has no legitimate business purpose and/or it could influence the receiver's ability to make objective decisions. Any attempts at corruption or bribery shall be reported.

6.2 Giving and receiving gifts

At Asp DC it is generally preferred that employees do not give or receive gifts in their professional role. Gifts that can influence decisions shall not be accepted. Cash gifts or excessive or frequent gift giving shall also not be accepted. Gifts that have no relevance to business or to creating good working relationships shall also not be accepted.

6.3 Supplier Code of Conduct

Asp DC will only conduct business with suppliers that accept the rules and principles set forth in the Supplier Code of Conduct.

Asp will not engage in business with partners or suppliers before having conducted a due diligence of the partners or suppliers making sure the partners or suppliers are reputable and professional.

6.4 Respect for IP

Asp DC will respect other parties' intellectual property rights and will act in accordance with intellectual property law.

6.5 Marketing and statements about services

Asp DC will refrain from using untrue or misleading statements regarding their services or prices for marketing purposes or in other circumstances. The same applies to statements about competitors' services.

6.6 Protection of privacy

Asp DC is committed to protecting the privacy and personal data of their colleagues, business partners, suppliers and others who may give Asp DC access to such data.

6.7 Antitrust and fair competition

Asp DC shall comply with applicable antitrust and fair competition law.

6.8 Economic crimes

Employees at Asp DC shall refrain from all kinds of economic crimes. This includes, but is not limited to, money laundering. There is no tolerance for crime and attempts at this will be reported.

6.9 Sanctions and export control

Asp DC shall at all times comply with applicable sanctions and export control regulations. All employees are responsible for ensuring that the business they conduct is in line with such restrictions.

7. Sustainability and social responsibility

7.1 Quality of services

Asp DC will provide their services in a safe manner.

7.2 Environment

Asp DC will strive to provide their service in the way that has the lowest negative impact on the environment.

Asp DC will at all times comply with applicable environmental laws.

8. Compliance with the Code

8.1 Report of violations and prohibition of retaliation

To ensure compliance with the Code it is important that violations are reported. All employees are therefore encouraged to report cases of violations of the Code.

There will be no retaliation in connection with any reports on violations of this Code.

8.2 Seek guidance

Employees are encouraged to seek guidance in cases where they are unsure of how they should act. Such guidance shall always be given to the employee.