

Tusass

Code of Conduct

Good Conduct at Tusass

A Code of Conduct is a set of guidelines that describes how we conduct business at Tusass. It outlines the expectations for our behavior and how we interact with each other and our surroundings. The purpose of the Tusass Code of Conduct is to establish the framework for a positive and safe working environment for our employees and stakeholders. It ensures that Tusass conducts responsible business and acts professionally, regardless of where we operate.

As a Greenlandic Government owned company, we have a special role and responsibility in society. We contribute to national cohesion as a provider of telecommunications and postal services throughout Greenland. Our mission is to ensure infrastructure that drives digital development in society. We aim to deliver strong networks and positive customer experiences for the benefit of the Greenlandic community.

We share a collective responsibility to demonstrate good business ethics through openness, integrity, credibility, and transparency—internally in our company, among colleagues, and externally with partners, suppliers, and consumers.

For each of the specific topics described in this Code of Conduct, there are separate company policies and guidelines. Each section provides a link to the relevant policy, defining the obligations we adhere to through regulations and memberships in the field of sustainability at Tusass.

Social Responsibility

Link to policy: [Social-Responsibility.pdf](#)

Tusass takes part in the responsibility for future generations, our future workforce, the environment, and sustainable development, both globally and locally. Our future as a company depends on the people and the environment we collectively create in this country. Each of us has a shared responsibility to contribute to sustainable development that adds value to the society of which we are a part.

Tusass is a member of CSR Greenland and Transparency International Greenland, working to promote sustainability and responsible business practices in Greenland. Our responsibility extends not only to our local community nationally but also to our relationships with stakeholders internationally. Therefore, we have joined the UN Global Compact's 10 international principles, which also aim to promote social and environmental sustainability and responsible business behavior in human rights, labor rights, the environment, and anti-corruption. This commitment obligates us to work on sustainability in our operations and in our value chains in accordance with international principles. In line with this, we also engage in contributing to the UN's 17 Sustainable Development Goals.

Our Code of Conduct ensures that we, as a company, support and respect these commitments.

Human Rights and Labor Rights

Link to policy: [Human-Rights.pdf](#)

We must respect human rights as described in the UN Universal Declaration of Human Rights and the International Labour Organization's (ILO) conventions.

We must comply with local laws regarding employment and occupational health and safety. Tusass condemns offensive actions, including bullying or sexual harassment. No employees should be subjected to discrimination based on nationality, culture, gender, age, or sexual orientation, among other factors. If such issues are observed at the company, they must be addressed immediately.

Anti-Corruption and Bribery

Link to policy: [Anti-corruption.pdf](#)

At Tusass, we must refrain from all forms of corruption, bribery, or other unethical behavior in business. As a general rule, we may not give or receive gifts or other benefits in connection with business that are or could be perceived as bribery. To ensure an objective basis for procurement decisions, the responsibility for all contract negotiations lies with the Procurement Department, which acts as the impartial party.

Conflicts of Interest and Nepotism

Personal interests should not influence decisions made in business among suppliers and other stakeholders, including favoritism of family members or friends solely based on personal relationships. HR is involved in all hiring processes and acts as the impartial party to ensure that conflicts of interest and nepotism do not arise.

Data Protection and Information Security

Link to policy: [privacy_policy](#)

Tusass works systematically to continually improve the level of data protection and information security in accordance with applicable standards.

We must ensure compliance with relevant legislation regarding data protection and information security. We are obligated to protect the personal information we handle and ensure that it is used in a secure and responsible manner.

All personal data we handle must be processed lawfully, fairly, and transparently. We should only collect and process personal information that is relevant, appropriate, and limited to what is necessary for our purposes.

We must implement appropriate technical and organizational measures to ensure the integrity, confidentiality, and availability of our data. This includes, but is not limited to, the use of encryption, access control, and data backups.

Environment and Sustainable Energy

Link to policy: [Environment-and-climate.pdf](#)

We work every day to ensure the best opportunities for the Greenlandic businesses and all citizens, regardless of where they live in the country. This is a challenge in a country like Greenland with relatively few customers, very large distances, and extreme weather conditions. We need to use significant amounts of energy to ensure telecommunications, making one of our main focus areas achieving even greater use of renewable energy sources such as solar and wind power.

We must minimize and prevent negative impacts on the environment and climate. We should contribute to preventing environmental challenges and promoting environmental responsibility locally and globally. We take on this responsibility in our environmental policy.

Violation or Breach

If Tusass becomes aware of behavior or actions that violate this Code of Conduct, it should be reported to your immediate supervisor or the HR department. Violations can have consequences depending on the severity of the breach. It may lead to employment-related consequences, and in cases of serious criminal offenses, it will be reported to the police. If you are unsure whether a specific action aligns with this Code of Conduct, you should contact our data protection officer or HR.

In the case of violations by HR or executive/management levels, this should be reported through Tusass's whistleblower system, which can be found on the company's intranet or website.

Whistleblower System

Link to policy: [whistleblowerordning](#)

A whistleblower system allows employees, board members, and other internal and external stakeholders to make an anonymous report of individuals associated with the company in case of or suspicion of ethical, business, or legislative violations committed in our business.

Follow-up

To ensure that the company's Code of Conduct is up-to-date and meets the requirements to which we are committed, it will be evaluated annually.

Responsible Department

Strategy & Sustainability.

Approvals

Approved by Management on December 20, 2023.

For questions, you can contact the sustainability team at sustainability@tusass.gl