


Working environment & ethical guidelines



**CODE
OF
CONDUCT**

— INTRODUCTION

HallMonitor is a data driven IoT and software technology company, founded in Denmark in 2019. Our strategic aim is to optimize the utilization of sports facilities through data insights, primarily as a strategic partner to councils and municipalities. With this Code of Conduct, we emphasize a common understanding of what it means to act responsibly and with integrity as an employee in the HallMonitor organisation.

Our Code of Conduct defines the ethical standards for our daily work and operations - and extends to our network of suppliers and business partners.

The scope of our Code of Conduct includes quality management, customer relationships,

workplace conduct, business integrity as well as corporate responsibility. The framework and rules defined by our Code of Conduct provides all of us with the necessary security and orientation in our day-to-day operations.

The Code of Conduct also communicates to our customers and business partners that HallMonitor is a reliable, trustworthy technology company, aiming to combine excellent, personal service with a strong sense of responsibility.

From dream to reality, our vision has been and remains to inspire and create the best IoT innovation workplace within our core business. With great staff comes great service - a goal that binds HallMonitor together.



We ask of our staff and business network that you help us stay on course, maintaining integrity and the highest ethical standards, echoing our company values at all times.

SUSANNE INGEMANN, CEO

Denmark, 2024

TABLE OF CONTENT

01 WORKING ENVIRONMENT	4
02 ETHICS	5
03 INTEGRITY	6
04 SUSTAINABLE DEVELOPMENT	10
05 SUPPLIERS AND SUBCONTRACTORS	11

01 — WORKING ENVIRONMENT

Human rights are fundamental rights and should be protected at all times. Anyone working for or on behalf of HallMonitor, can always be sure of decent treatment as regulated by the country / location of employment.

We do not discriminate or tolerate discrimination with respect to gender, race, religion, age,

disability, sexual orientation, national origin or any other characteristic protected under law.

We aim to provide a safe and healthy working environment in all our offices, at all times adhering to national legislation for working environment in the countries in which we operate.

Our staff is our greatest asset. Every staff member brings special skills and unique benefits to HallMonitor. As a company, we invest in our staff and ensure that existing skills are updated through increase in responsibility, training and further education.

Regular interviews are held between staff member and managers, ensuring that the career and welfare of each staff member is addressed and followed up on.

WE RESPECT THE INDIVIDUAL

HallMonitor views our staff members as complete persons. In order to thrive, work and family life must be in harmony. We encourage an open dialogue and trust concerning all matters, ensuring a stress free environment to the widest extent possible.

With careful consideration and full respect of a staff member's privacy, we offer assistance in case of personal or family related issues.

RIGHTS AND RESPONSIBILITIES

Rights and responsibilities in the workplace are outlined in staff work contracts as well as our staff handbook.



02 — ETHICS

HUMAN RIGHTS

HallMonitor respects the principles of the International Labour Organization “Declaration on Fundamental Principles and Rights at Work” in accordance with national law and practice.

Our employees have the right to join a union and to collective bargaining.

We stand firmly against any type of forced or compulsory labour as well as child labor.

FORCED LABOUR

We expect from all HallMonitor organisations as well as any supplier, agent or business partner acting on behalf of HallMonitor to be committed to the fight against human trafficking and forced labour.

Forced labour is defined as work or service provided by a person against his or her will and under the threat of punishment.



No person should be forced to work against his/her will.



All employees must have the right to move freely in connection with their employment.

Any staff member learning of human trafficking or forced labour in our supply chain, must immediately report this to management.

CHILD LABOUR

No child is permitted to work if in violation with the ILO Convention C138.

We do not tolerate any involvement in child labour from a business partner, directly or indirectly.



RIGHTS AT WORK

Adopted in 1998 and amended in 2022, the ILO Declaration commits Member States to respect and promote principles and rights in four categories, whether or not they have ratified the relevant Conventions.

03 — INTEGRITY



HallMonitor does not accept any violation of anti corruption laws.

REPORTING

The accounting standard of HallMonitor is to ensure complete and accurate records and statement. All transactions are executed according to management's authorization to prevent unauthorized use of funds.



BRIBERY

Bribery is the unlawful giving or receiving of money or gifts with the intention of obtaining an illegal advantage in business.

No person employed by or acting on behalf of HallMonitor must accept or provide a bribe of any kind.

Violating our rules for bribery is considered a very serious act, regardless if the act has been committed by a person directly employed by HallMonitor or a person employed by or acting on behalf of a supplier to HallMonitor.

We do not wish to be associated with corruption and will not allow bribery under any circumstance. If any staff member finds him or herself in a situation, either asked for or being offered a bribe, the individual must immediately inform management.

HallMonitor suppliers must not accept or offer bribes of any kind.

INTEGRITY — CONTINUED

FACILITATION PAYMENTS

Facilitation payments are intended to secure or speed up a request made to a public authority for a service, which is otherwise legal. This type of typically cash payment, is illegal in many countries.

HallMonitor does not permit facilitation payments. If any staff member finds him or herself in a situation, being asked for a facilitation payment, the individual must immediately inform management.

It makes no difference whether facilitation payments are permitted or commonly accepted according to local law or local practice.

We do not condone HallMonitor suppliers making facilitation payments.

KICKBACK

Kickbacks are considered bribery. For this reason, it is not permitted for any HallMonitor staff member to give or receive kickbacks from business partners.

Bonus programmes are not considered kickback.

MONEY LAUNDERING

Money laundering is a way of hiding illegal funds or making such funds appear to be legally obtained.

Money transactions including bank transfers are routinely monitored by national and international authorities, as such transactions are considered highly illegal.

HallMonitor does not tolerate any kind of money laundering. Should any staff member be unsure of the origin of a payment, he or she must report this to management immediately.

Staff members should be cautious of customers unwilling to give all required information or insisting on payments in cash, unless this is common practice in a specific country.

GIFTS AND DONATIONS

HallMonitor staff members are allowed to accept and offer gifts, if the value does not exceed a reasonable level, and the purpose of the gift is not intended to influence a decision maker.

Under no circumstance should gifts be money gifts.

A reasonable level gift will vary from country to country. If in doubt, always consult your manager.

We hold suppliers to the same standards of ethics and integrity as those of own staff.

INTEGRITY — CONTINUED



The internal handling of sensitive data as well as IT conduct is outlined in the HallMonitor staff handbook.

DATA PROTECTION

Under no circumstance must a staff member disclose any confidential or proprietary information received during or after employment at HallMonitor to anyone not employed by HallMonitor, unless required by law.

Confidential information includes any information that is not available to the public and any information leaked that could be harmful to HallMonitor, our customers, suppliers and business partners.

The internal handling of sensitive data as well as IT conduct is outlined in the HallMonitor staff handbook.

100%

**WE STRIVE TO PROVIDE THE
HIGHEST LEVEL OF INTEGRITY**

04 — SUSTAINABLE DEVELOPMENT



3 GOOD HEALTH AND WELL-BEING

By evaluating sports facility utilisation, HallMonitor systems contribute to the advancement of health and well-being by ensuring safe and accessible facilities that support active lifestyles.



11 SUSTAINABLE CITIES AND COMMUNITIES

By evaluating and optimizing sports facilities, we can collectively contribute to sustainable cities and communities by creating better infrastructure and inclusive spaces for everyone.



12 RESPONSIBLE CONSUMPTION AND PRODUCTION

HallMonitor systems evaluate the utilisation of facilities with the aim to promote responsible resource use and waste reduction.



13 CLIMATE ACTION

Energy consumption optimisation and sustainable management of sports facilities may assist in climate impact reduction.



17 PARTNERSHIPS FOR THE GOALS

Collaboration with municipalities, sports associations and other stakeholders can strengthen sports and other physical initiatives offered by municipalities, creating positive change.

05 — SUBCONTRACTORS AND SUPPLIERS



SUBCONTRACTORS, SUPPLIERS, AGENTS AND BUSINESS PARTNERS ARE CAREFULLY SELECTED.

Our Code of Conduct is distributed to suppliers where applicable and available for download from our websites.

At all times, any supplier to HallMonitor is required to comply with all relevant legislation, ordinances, tax requirements,

rules, regulations in any applicable jurisdiction and apply for, obtain and maintain all necessary licences, permits, approvals, insurances and other authorizations required in relation to the performance of the obligations towards our mutual business cooperation.

All suppliers must have in place procedures in order to ensure compliance with this Code of Conduct in all levels of the supplier's business as well as ensure that these standards apply to subcontractors of the supplier.

We reserve the right to physically inspect compliance.

HallMonitor.



HallMonitor ApS

Stormgade 50

6700 Esbjerg

Denmark

VAT-no/CVR: DK-40789170

www.hallmonitor.dk / www.hallmonitor.eu

Ph. +45 9395 9388