

NORDIC CAPITAL VENTURES
COUNTERPARTY CODE OF CONDUCT

1. Introduction

Nordic is a financial and business consultancy firm seeking to bridge the gap between traditional trading companies and digital business methods and systems becoming available through the internet.

We are committed to act in accordance with core values, internal policies and applicable legislation. The reputation and credibility of Nordic are based on these core values; craftsmanship, integrity, curiosity and commitment. Our Counterparty Code of Conduct is developed based on our values, to embody our expectations and requirements from those who do business with us (our “Counterparties”). We take responsibility for our actions and expect our Counterparties to do the same.

2. Scope and applicability

We expect our Counterparties to implement the principles described in this Counterparty Code of Conduct in their businesses or have at least equivalent standards adopted and conduct their business in accordance therewith. We also expect our Counterparties to establish systems to ensure compliance, hereunder periodical self –assessments. We reserve the right to conduct Counterparty audits and reviews to verify compliance, and our Counterparties must make relevant information available accordingly.

3. Principles

Nordic expects its Counterparties to:

- conduct their business fairly and openly and base their business dealings on honesty and transparency;
- reflect all business transactions accurately and correctly in their accounts and comply with internationally accepted accounting rules and practices;
- operate according to applicable legislation concerning data protection;
- comply with applicable national and international laws and regulations;
- continuously maintain, improve and develop healthy working conditions and environment;
- act responsibly and avoid harm to the environment by complying with, and using high standards, for the benefit of our global environment;
- ensure proper environmental policies and procedures for recycling of waste materials
- oppose and contribute to counteract all forms of corruption and conduct their business in compliance with applicable anti-corruption and anti-bribery laws and regulations. Under no circumstances is any direct or indirect offer, promise, giving or demand for gifts, bribes, kickbacks or other unlawful advantages to secure business, improper preference or personal advantages acceptable;
- respect fundamental human rights, hereunder the freedom of association;
- not use child labor, and not accept harassment, discrimination, intimidation or other behavior which may be regarded as disrespectful, threatening or degrading;
- compete in a fair and ethical manner and adhere to global competition rules and practices;
- adhere to applicable money laundering rules;
- be open about and inform us about potential conflicts of interests;
- comply with applicable sanctions regulations and ensure the eligibility and corresponding compliance of its agents and sub-contractors.

4. Consequences of non-compliance

Non-compliance with our Counterparty Code of Conduct is a breach of our trust and may render the Counterparty un-eligible as a contractual counterparty in the future. It may also constitute a breach of contract, enabling us to terminate the relationship and/or claim damages.

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