

# Code of Conduct

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# Code of Conduct

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**Abstract:** This document describes the principles of conduct that direct everyone, employees and subcontractors, who work on DemTech Group projects.

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## Introduction

Every person employed by DemTech Group, and those subcontracted to work on DemTech Group projects, share a common responsibility to uphold DemTech Group's reputation for integrity. Each person must demonstrate commitment to the highest standards of ethics and professional behavior in dealings with our customers, communities and each other. We are each accountable for our own behavior and will work in compliance with the law, with this Code of Conduct, with DemTech Group's policies and with the policies and procedures of our respective clients and legal entities. We must never compromise our integrity for personal benefit or for DemTech Group's benefit.

## Anti-Bribery and Corruption

DemTech Group employees and subcontractors may not give, offer or promise anything of value to a government official, a family member of a government official, or a third party or charitable organization suggested by the recipient, for the purpose of influencing the recipient to take or refrain from taking any official action, or to induce the recipient to conduct business with DemTech Group without the prior written approval of management. This includes, presents, money, loans, and employment opportunities. Payments made indirectly through an attorney, consultant, broker, contractor, or other third parties are subject to the same restrictions. Every employee or subcontractor is subject to the anti-bribery laws of the countries in which DemTech Group operates.

## Privacy and Security of Customer Information

DemTech Group is committed to protecting our clients' personal and confidential information by the appropriate use of technical and operational security measures. We also require our subcontractors to protect our client's personal and confidential information at the same levels. DemTech Group is subject to national laws and regulations directed toward privacy and information security.

DemTech Group, its employees and subcontractors must ensure that customer information is used only for authorized purposes relating to the work order and only shared with authorized persons and organizations and is properly and securely maintained. DemTech Group provides access to legal counsel regarding the interpretation of national data protection and privacy laws that affect the collection, use, storage and transfer of personal and confidential customer information.

DemTech Group employees and subcontractors are required to:

- properly secure access to work area, computer, laptop, telephones, voice-mail, backup, mobile phones;
- follow good operational security practice, i.e. never to share passwords or other credentials;
- access confidential information only through cryptographically secured channels.
- refrain from discussing sensitive matters or proprietary or confidential information in public places, including open workplace areas such as cubicles or on speaker phones, public transportation or the internet;
- be cautious when using mobile phones or other communication device or messaging services and ensure that the usage is compliant with local and national law.

## **Conflict of Interest**

The DemTech Group's commitment to remaining impartial and objective is a key competitive advantage and we must never do anything to put that reputation at risk. Our employees and subcontractors must be sensitive to any activities, interests or relationships that might interfere with, or even appear to interfere with, our ability to evaluate and consult objectively on practical and technical implementations of election and voting management. Because it is impossible to describe every potential conflict, DemTech Group employees and subcontractors are required to exercise sound judgment, to seek advice when appropriate, to disclose activities as required by policy, and to adhere to the highest ethical standards.

## **Gifts and Entertainment**

DemTech Group employees or subcontractors may not accept gifts or the conveyance of anything of value (including entertainment) from current or prospective DemTech Group customers. The same applies to close family members of DemTech Group employees or subcontractors, who may not accept gifts, services, loans or preferential treatment from customers in exchange for a past, current or future business relationship with DemTech Group. Cash gifts or their equivalent (e.g., gift cards or vouchers) may not be accepted under any circumstances. Non-cash gifts may only be accepted when explicitly permitted under applicable law.

## Outside Business

All DemTech Group employees and subcontractors must disclose any outside business engagement, if for or not for profit, including self-employment, political activities, or pro bono work. They are also required to comply with any applicable laws, regulations and business and legal entity policies; they are responsible for identifying and raising any such activity or relationship that may pose an apparent or potential conflict of interest with the management of DemTech Group. To avoid any legal violation and to ensure proper regulatory disclosures are filed for DemTech Group, and/ or its employees and or its subcontractors, political activities s require approval by the management of DemTech Group.

## Employment of Relatives

Employment of immediate family members or other relatives of DemTech Group employees, whether on a full-time, part-time, or temporary basis, can create actual or perceived conflicts of interest and may be restricted. Employment of individuals who are related to a government official may be subject to additional restrictions.

## Conclusion

The DemTech Group aspires to the highest standards of ethical and professional conduct. We demonstrate our commitment to this Code of Conduct through our decisions and actions. This Code highlights the key policies every DemTech Group employee and subcontractor needs to follow. We are all responsible for putting this Code into practice.