

Code of Conduct

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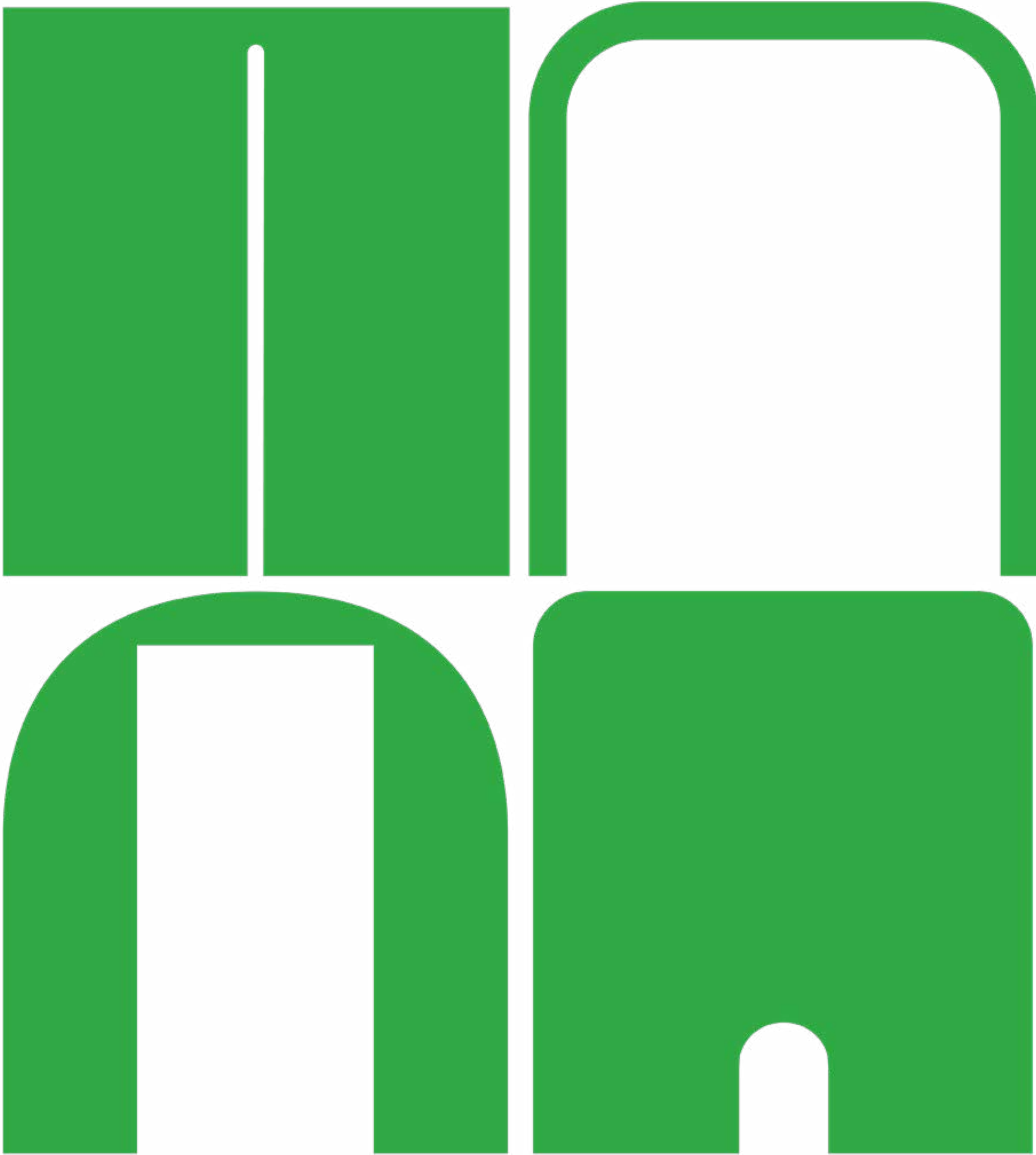
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A message from our CEO

At Vend, we're more than a collection of marketplaces. We're a family—united by a shared vision, a long-term purpose, and a belief in smarter ways forward.

In a world that never stands still, we turn to smarter. Smarter choices. Smarter connections. Smarter solutions that make life easier and more meaningful for people, businesses, and society. Our vision is simple but powerful: Smart choices made easy. As a pure-play marketplaces company, we're building seamless digital experiences that remove friction, unlock value, and meet people where they are—today and tomorrow. Everything we do is guided by this vision. But a vision is only as strong as the people who live it. That's why we've defined not just where we're going, but how we get there: together.

The **Vend Code of Conduct** sets out the shared principles that guide how we act, no matter your role, title, team, or location. It's about doing things the right way. And it's a reminder of the kind of company we are—and aspire to be. These principles are here to support you. They help us make smart

decisions, uphold integrity, and stay true to our purpose even when the path isn't clear. They're not about checking boxes. They're about building trust.

Our impact at Vend doesn't come from what we say, it comes from what we do. From the trust we earn through the products and services that become a part of people's lives. That's why integrity matters so deeply. It's how we protect what we've built. It's how we keep growing. And it's how we ensure that people continue to turn to Vend—not just because it's easy, but because it feels right.

I expect every person at Vend to stand by our Code of Conduct—and live it, every day. These principles unite us. They elevate us. And when we bring them to life, we unlock our full potential—not just as a business, but as a force for good. Let's keep raising the bar. Let's keep doing the right thing.

Let's make smart choices easy.

Christian Printzell Halvorsen
CEO, Vend



**Being a part of Vend
means following the code**

Being a part of Vend means following the code

Trust is essential to our business, and to gain it we must earn it. This means that in everything we do, we aim to be fully compliant with all legal requirements, follow best practices and act with integrity.

Within our Code of Conduct (the “Code”), we describe the norms, responsibilities and proper practices that are required from all of us. The principles laid out in this document define how we act and what it means to do the right thing in Vend. We believe that by establishing clear, ethical standards and clarifying what is expected of us when doing business, we are more likely to make good decisions.

Our Code explains Vend’s stance and values for areas of risk that are particularly relevant to us. It guides us through everyday dilemmas and explains how and when to get more information and ask for help. It’s not possible to cover every possible

scenario that we may encounter, but by reading and understanding the Code, we will all be better equipped to handle unexpected situations and do the right thing.

What is Vend’s commitment?

As a responsible company, Vend operates lawfully, with a high degree of integrity and transparency, in accordance with the existing and emerging regulations and standards of a sustainable business.

For us, sustainability means taking responsibility and being transparent about both the positive and negative impact we may have on society and the environment, in the short- and long-term.

Our Code of Conduct is grounded in internationally recognized expectations for ethical business, and helps us act consistently and responsibly across all parts of our company and marketplaces.



The Code applies to all of us

This Code applies to all of us in Vend, including all employees, leaders, and our Board of Directors, as well as all companies that are part of the Vend family.

Our Code gives an overview of the most relevant governing principles for Vend and our subsidiaries. All subsidiaries are expected to implement this Code so that we all follow the same principles and guidelines.

We also expect our partners, contractors and other hired personnel who work with us in our operations to meet our standards and respect our values as outlined in the Code.

What is expected of leaders?

- Ensure that all employees know and understand our Code and ensure their understanding is maintained.
- Create a culture in which ethical conduct is recognised and valued.
- Ensure a safe working environment in

which all employees feel comfortable raising concerns.

- Ensure appropriate organisational structures to effectively handle legal, ethical and sustainability issues and performance.

- Lead by example always.

What is expected of everyone?

- Read and understand our Code.
- Implement the principles outlined in our Code in day-to-day work activities.
- Attend relevant trainings.
- Actively seek out information from your manager or the policy owners if you have questions, face dilemmas or simply want to know more about the policies and guidelines in place.
- Know and understand all policies and guidelines that may be relevant for your work.

- Raise concern if you suspect illegal or unethical business conduct.

Speak up if you suspect breaches

Violations of the Code are not accepted and may result in liability for both the company and individuals.

If you believe that a behaviour or condition is not in line with our Code or our values, we encourage you to report your concern. How and when to report concerns is described in the Speak Up chapter.

Any questions or doubts related to the understanding, use or implementation of the Code can be raised to your manager or to Vend’s Group Compliance Officer.



We don't tolerate corruption

Anti-corruption

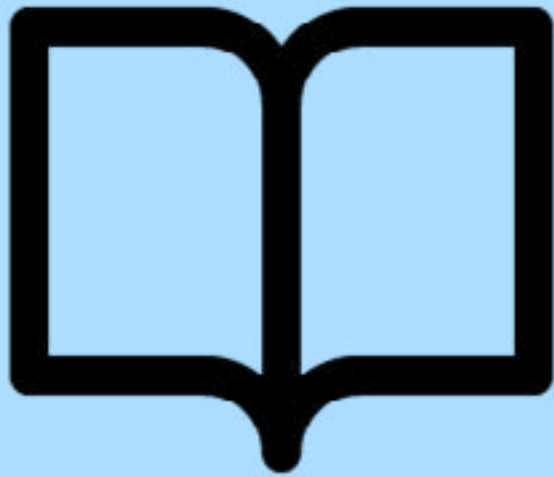


We don't tolerate corruption

Corruption erodes trust and undermines legitimate business activities and fair dealings. It has a negative impact on companies, people, and society, which is why it's illegal according to international and local laws.

Any type of corruption or bribery will have an adverse impact on our company, culture and reputation, and it poses a significant risk to running a sustainable and responsible business.

We have a zero-tolerance policy for corruption and other economic crimes.



Defined

Corruption is the abuse of entrusted power for private gain. It may include acts such as bribery, trading in influence and facilitation payments, among others.

Bribery is the act of offering, providing, authorising or receiving an improper financial or other advantage intended to influence a transaction or decision, or to encourage misuse of a person's position.

Trading in influence is bribery of an intermediary/third party in relation to his/her work to influence someone.

Facilitation payments are payments offered to or made to a public official to secure or speed up a public decision or approval process that is both routine and necessary.

What is Vend’s responsibility?

We are committed to act professionally and fairly in all our business activities and relationships wherever we operate.

We act with a high degree of transparency and integrity to ensure our actions and decisions are always in the best interest of our customers, our business and society.

We will continue to implement and enforce effective systems to counter corruption.



Explained

Corrupt payments often have certain characteristics:

- Personal enrichment of decision makers (in public or private sector) or of someone in Vend
- Not offered or given in a transparent manner
- Given with the intent of influencing certain decisions, such as a tender, contract negotiations, a permit or license from a public office, or the decision to enter a joint venture
- Measures are taken to hide or disguise the money trail

What is expected of me?

- Comply with anti-corruption laws and regulations, nationally and international-ly. Engaging in corrupt behaviour is pro-hibited.
- Strive for the highest standards of transparency and integrity, always.
- Maintain books and records to reflect our business accurately and fairly.
- Assess and discuss potential or actual corruption risks transparently.
- Evaluate potential corruption risks and mitigate any potential identified risks when entering new relationships with business partners.
- Ensure that everyone we work with un-derstands that bribery and corruption are unacceptable to us.
- Raise concerns promptly if corruption or other economic crimes are suspected or known in Vend or to any party with whom we do business.



Guidelines

How to handle gifts and hospitality when representing Vend:

- Ensure all expenses comply with ap-plicable laws and internal guidelines.
- Have a proper business context when accepting, offering or receiv-ing business hospitality.
- Gifts and business hospitality must never be extravagant and should be in line with customary business practices.
- No gifts or business hospitality may be given or received during a ten-der or bidding process.
- Cash or cash equivalents may nev-er be offered, given or received.
- When assessing whether business hospitality offered is appropriate, assess not only monetary value but also the frequency.

We compete fairly

Antitrust



We compete fairly

Antitrust regulations are in place to protect and enhance fair competition in the market.

We follow the antitrust rules that are intended to promote economic welfare and ensure efficient allocation of resources across the market.



Explained

Antitrust rules are designed to target anti-competitive agreements and concerted practices between companies, unilateral abuse of market power by dominant companies, as well as anti-competitive mergers and acquisitions.

What is Vend's responsibility?

We have principles and guidelines in place to safeguard fair competition.

We expect our employees to be committed to reducing the risk of antitrust violations and sanctions.



What is expected of me?

- Exercise great caution when dealing with actual or potential competitors in any setting. We don't exchange sensitive information, neither directly, through associations, nor via any other third party.
- Safeguard that all commercial agreements we enter are within the boundaries of applicable anti-trust rules.
- Use caution when entering into supplier or customer agreements, when cooperating with direct or potential competitors, and when acting in markets where our position is strong (typically 35-40% market share or higher), as well as M&A opportunities or joint ventures.
- Use caution when operating in areas where there may be additional restrictions related to competition.
- Raise concerns if uncertain about how the principles and ground rules may affect activities in Vend. This topic is complex, so do not hesitate to reach out for advice.



Did you know

The highest fines issued by Nordic and European authorities are related to antitrust breaches. Fines in the range 100 million to several billion Euros are being used.

We work with responsible partners

Business partners



We work with responsible partners

The conduct of our business partners may negatively impact our reputation and expose us legally.

We expect our values and ethical standards to be respected and upheld by our business partners. Therefore, we work with business partners that demonstrate satisfactory standards of responsible business and respect our ethical values.



Defined

The term **business partners** include individuals and entities such as our suppliers, contractors, joint venture partners, agents, distributors, franchisees, customers, consultants, professional advisors and other relevant partners.

What is Vend's responsibility?

We aim to build long-lasting relationships with our business partners based on mutual trust.

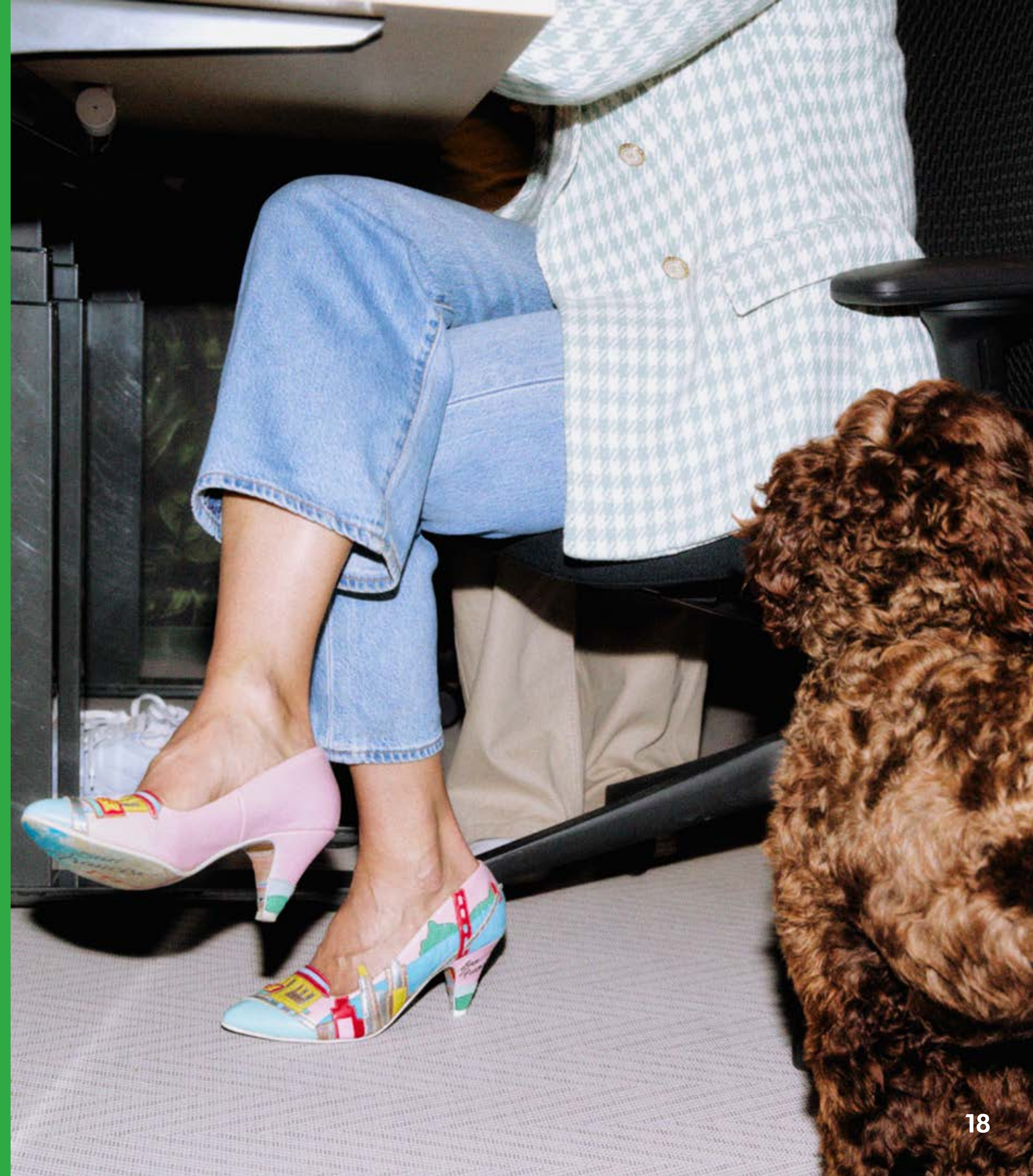
We comply with local and international standards and legislation, and we are committed to promoting human rights protection throughout our value chain.

Our suppliers must conduct their business in line with internationally recognised and endorsed standards in key legal areas, such as human rights, labour rights, environmental law, sanctions and restrictive measures, export-control, anti-corruption, and other compliance areas.



What is expected of me?

- Exercise caution when selecting business partners and evaluate compliance and sustainability risk in the decision-making process.
- Exercise particular caution if a business partner, their management or owners are in a high-risk region, such as offshore jurisdictions, jurisdictions rated as high risk for corruption, and/or countries subject to sanctions regimes.
- Conduct third-party due diligence in accordance with internal procedures when deemed necessary and comply with applicable trade controls, including sanctions regimes and requirements related to import and export.
- Expect business partners to comply with our Business Partner Declaration or equivalent standards.
- Raise concern if made aware of a business partner that conducts business in a manner that could reflect negatively on Vend.
- Raise concerns if uncertain about how the principles and ground rules may affect activities in Vend. This topic is complex, so do not hesitate to reach out for advice.



We communicate openly and respectfully

Communication



We communicate openly and respectfully

At Vend, communication is more than information—it's how we build trust, connect with others, and move forward together. We're open, warm, and curious. We speak clearly, listen with intention, and express ourselves in a way that reflects who we are and what we stand for.

We communicate with integrity, grounded in respect, transparency, and the values that guide our work. Every message, whether internal or external, plays a part in strengthening our reputation and bringing our brand to life.

Protecting sensitive information is essential. In everything we share, we safeguard Vend's people, brand, and business.



What is Vend's responsibility?

We share information responsibly, in line with all applicable laws, regulations, and industry standards. As a listed company, we also follow strict rules for market-sensitive information.

Our brand platform and guidelines help us communicate with consistency and confidence across every message, channel, and audience.



What is expected of me?

- Keep confidential information safe. This includes anything not yet public, like strategies, results, or future plans.
- Be thoughtful and respectful on social media, especially when posting about Vend, our work or your colleagues.
- Be a positive voice for Vend—upholding our reputation in the market, media, and public space.
- If asked to speak on Vend’s behalf—whether by media, online forums, or in-person—check in with Group Communication before responding.



Guidelines

Your voice on social media:

We encourage you to share stories, experiences, and public updates that reflect the Vend spirit. When you post:

- Be mindful. What you share should reflect our values and support our reputation.
- Use good judgment. Avoid sharing anything that might compromise security, confidentiality or trust.
- Only designated spokespeople should speak on behalf of Vend. If you are contacted by a journalist or asked to comment publicly, reach out to Group Communication for guidance.

We make fair decisions

Conflicts of interests



We make fair decisions

Our decisions are based on objective and fair assessments of Vend’s interests.

Even the suspicion of a conflict of interest can challenge our integrity and may have a negative impact on our reputation and business.



Explained

Conflicts of interest arise when our personal, social, financial or political activities affect the work we do or our loyalty to the company. Personal interests include financial interests, business opportunities, outside employment or directorships, as well as the interests of close family and friends.

What is Vend's responsibility?

We don't allow decisions that are made on behalf of Vend to be influenced by our own personal interests.

We don't use confidential company information that we may become aware of (as representatives of Vend) for personal benefit or for the advantage of others.

We are committed to being open and transparent to prevent actual, potential or perceived conflicts of interest.

We adhere to conflict-of-interest rules in relation to relevant press ethics criteria.



What is expected of me?

- Remain impartial and professional in any dealings with business partners.
- Be transparent in any actual or potential conflict of interest situations.
- Always disclose any actual or potential conflicts of interest to your supervisor.
- Actively avoid and eliminate conflicts of interest or situations that may appear to be a conflict of interest.
- Maintain zero-tolerance for making personal gain from Vend’s business transactions.
- Conduct fair, transparent and well documented procurement processes.
- Before making personal investments in other companies, consider whether such investments could lead to a conflict of interest.



Guidelines

Be aware of certain situations that may be a conflict of interest:

- Holding a job or performing services on behalf of one or more of our competitors, customers or suppliers.
- Operating a business on your own time that is similar to your work in the company.
- Having a personal or financial interest in a company that has transactions or business with Vend, such as one of

our competitors, customers, suppliers or where Vend has an ownership interest in the company.

- Having family members or another person with whom you have a close personal relationship do business with the company.
- Having family members or another person with whom you have a close personal relationship that invest in one of the company's competitors, suppliers or customers.

We make work a safe place for everyone

Diversity and inclusion



We make work a safe place for everyone

Vend is dedicated to creating an inclusive work environment for everyone.

Different perspectives are inherent in diversity. We strive to foster an environment in which our employees feel respected and valued.

We want our employees to have a sense of belonging and be at the forefront in helping to promote and sustain an inclusive workplace.

We believe that our diversity is a key driver of innovation in Vend, and we can create business value when we combine our diversity and inclusivity focus with a work environment that encourages everyone to participate and contribute.



What is Vend's responsibility?

We don't tolerate any form of discrimination against our colleagues, contractors, suppliers, customers or anyone with whom we do business.

We work to ensure that everyone has equal opportunities, and we recruit, select, train, promote and reward our employees based on facts and fair criteria.

All decisions that apply to our employees are based on unbiased evaluation of qualifications, demonstrated capabilities, performance or other professional criteria.

We ensure that our leaders contribute to greater awareness and knowledge about diversity, inclusion and belonging.

We always work to prevent unlawful or unethical behaviour.



What is expected of me?

- Always treat others with dignity and respect.
- Address and report inappropriate behaviour and comments that are discriminatory, harassing, abusive, offensive or unwelcome.
- Foster teamwork and employee participation and encourage different employee perspectives.
- Seek out insights from employees with different experiences, perspectives and backgrounds.
- Support flexible work arrangements for co-workers who have different needs, abilities and/or obligations.
- Be open-minded about giving and receiving constructive feedback to enhance the culture of inclusion.



Guidelines

Vend’s responsibility for creating an inclusive workplace:

- Conduct regular and sustainable competence upliftment of all employees on diversity, equity and inclusion topics.
- Support flexible work arrangements that accommodate the different needs of all employees.
- Provide all employees with a safe channel to voice concerns regarding diversity, equality and inclusion in our workplace.
- Conduct periodic employee surveys and potential studies to identify the areas in which our company supports inclusive practices, as well as where there is room for growth.

We care for our planet

Environment



We care for our planet

At Vend, we know our work has an impact on the world around us. From the energy we use in our offices and servers, the products we help circulate, the technology we use, and the value chains we influence – everything leaves a footprint.

We are committed to minimising any adverse impact that our operations may have on the environment, and we work to run our business as sustainable as possible.



Defined

Environmental footprint is the impact a company has on the environment throughout its value chain. For example, this includes the amount of natural resources that the company uses or the amount of greenhouse gasses it emits through its operations.

What is Vend's responsibility?

We take responsibility for our impact on the environment.

We continuously evaluate our environmental footprint in all parts of our operations.

We are transparent on how we perform and progress on reducing the negative environmental impact of our operations in line with internationally recognised standards. We align with the EU's Green Deal and with European sustainability standards, which guide how companies like ours must report and improve on environmental and social impact.

We take a precautionary approach to all materials and processes used in our operations that may damage the environment.

We empower circular consumption and enable for users to choose more responsible options through our platforms.



What is expected of me?

- Assess and address the environmental impact of your daily decisions.
- Always consider whether travel is necessary, and when it is, do your best to choose the most sustainable travel option.
- Consider environmental impact when buying products or services and evaluate suppliers based on our responsible business criteria.
- Share good ideas and best practices related to environmental efforts and opportunities so that we can all improve.



We respect people's rights

Human rights and labour rights



We respect people’s rights

At Vend, people come first. Everyone has the right to fair, safe and respectful treatment at work. This means no tolerance for forced labour or discrimination – and always fair pay and decent working hours.

We are guided by the UN Guiding Principles on Business and Human Rights, the ILO Conventions, and national legislation including the Norwegian Transparency Act. In Vend, respect for human and labour rights is built into all our activities, wherever we operate.



Defined

Human and labour rights are the basic rights and freedoms everyone should have in society and at work — like fair pay, safe working conditions, freedom from discrimination, and the right to speak and organise.

What is Vend's responsibility?

We work actively to ensure that all our employees have safe working conditions, fair pay, and a respectful workplace.

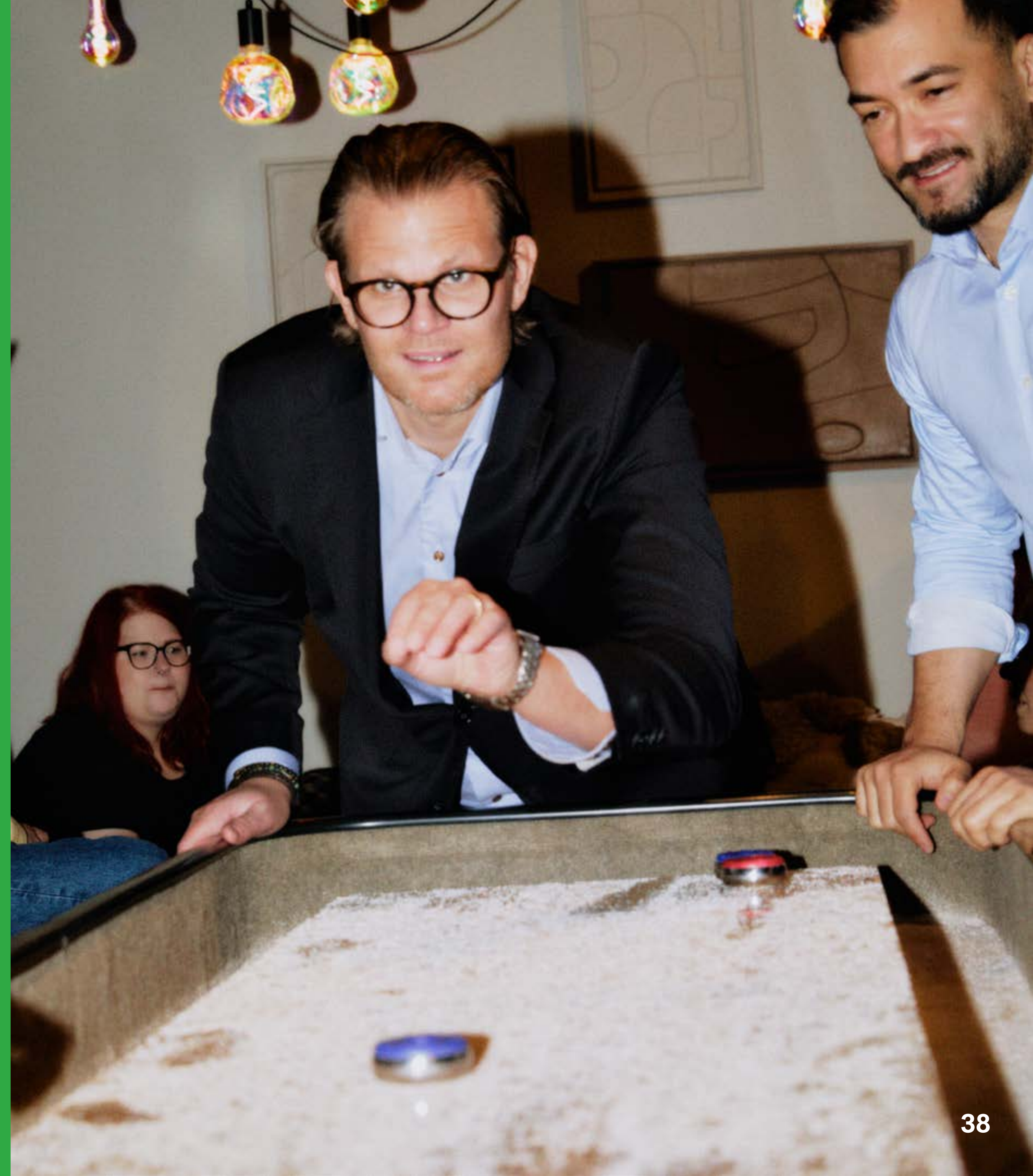
We always strive to uncover any risks of violation in our businesses or across our value chain, and encourage everyone to report concerns if violations are suspected.

We set clear expectations for our suppliers and partners, to ensure that human and labour rights are respected across our value chain.



What is expected of me?

- Work actively against any negative impact on human rights and labour rights related to our activities.
- Expect suppliers and business partners to respect human rights and labour rights in accordance with our principles and standards.
- Recognise the right to collective wage negotiations and the freedom of organising.
- Speak up if you suspect a violation — whether at Vend, with our business partners, suppliers, customers or anyone impacted by our operations.



We protect our information

Information Security



We protect our information

At Vend, information is more than just numbers and text – it’s how we create value, build trust, and keep things moving. Whether it’s powering marketplaces or safeguarding customer information, keeping information safe, accurate, and available is critical to our success.

We don’t wait until something goes wrong – we design security into our tools, processes, products, services and daily habits from the start. This “security by design” approach is required by the EU’s NIS2 Directive and other information protection regulations.



Did you know

Cyber threats don’t knock. They sneak in. And businesses – especially digital ones like Vend – are top targets for attacks such as phishing, ransomware, or information theft. A single incident can stop operations, damage trust, and even expose us to regulatory penalties.

That’s why protecting our information and systems is everyone’s responsibility– and why we invest in smart, layered security to stay one step ahead.

What is Vend's responsibility?

We follow clear rules and proven standards, including the NIST Cybersecurity Framework 2.0 and the EU's NIS2 Directive, to ensure that our security stays strong and consistent. In practice this means:

- Identify risks through regular assessments and shared threat intelligence
- Protect devices, data, and people with strong controls
- Detect issues early with 24/7 monitoring
- Respond fast to incidents with clear processes
- Recover quickly thanks to tested backup and recovery plans

These capabilities are documented in the Vend Security Policy and the Security Handbook.



What is expected of me?

- Adhere to the Vend Security policy and the rules described in the Security Handbook as your go-to reference for day-to-day practices.
- Do not use personal devices (such as laptops, tablets, or phones) to conduct company work, unless explicitly authorised.
- Keep your laptop, phone, tablets and apps up-to-date.
- Use strong passphrases and our approved password manager (1Password).
- Turn on Multi-Factor Authentication (MFA) on all systems.
- Complete your mandatory security training on time.
- Report suspicious emails, information loss, or system issues immediately via [#servicedesk-support](#) or support@vend.com



We don't share or trade on inside information

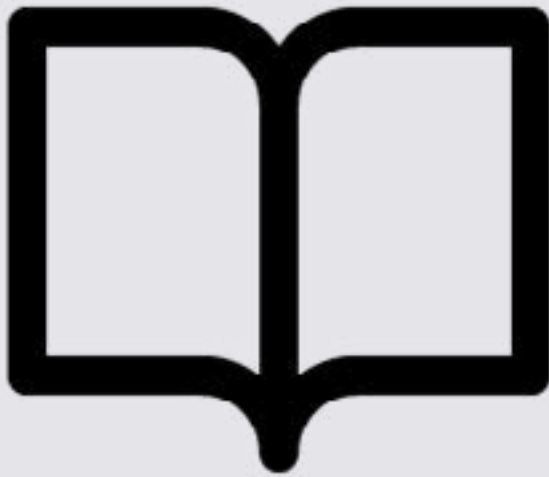
Insider rules and insider information



We don't share or trade on inside information

We comply with the securities laws and stock exchange regulations.

Vend employees may receive insider information about Vend, listed companies in which Vend owns shares and other listed companies that we relate to in business. Sharing insider information with unauthorized external parties without a legitimate reason, is considered a violation of our policies and laws.



Defined

Insider trading means trading of shares or other financial instruments, or the incitement of others to trade shares or financial instruments, while in possession of insider information.

Insider information is any non-public information that is expected to impact the stock price of a company if it was made known to the public, such

as financial results not yet disclosed publicly, information about planned mergers and acquisitions, material investments, senior management changes and significant business disruptions or material legal matters.

What is Vend’s responsibility?

We are committed to the proper administration of our financial accounts, and we meet the requirements of financial laws and regulations.

We are required to disclose the company’s results openly and accurately, and to submit financial reports or other statutory public reports.



What is expected of me?

- Keep insider information confidential and never share with anyone internally or externally unless you have been authorised to do so.
- Handle insider information with the highest degree of care to ensure it is neither mis-used nor comes into the possession of unauthorized external parties.
- Do not trade shares or other financial instruments in the company to which the information relates.
- Never advise or make suggestions about the trading of shares or other financial instruments in the company to which the information relates.
- Be aware of the business or legal issues that may impact the price of Vend stock or that of a business partner or customer.



Explained

We may receive or become aware of **insider information** that could impact the share price. Some examples of this type of information include the following:

- Unpublished information on financial results
- Significant acquisition or investments
- Business-critical issues or incidents
- Other, similar information concerning the company in question

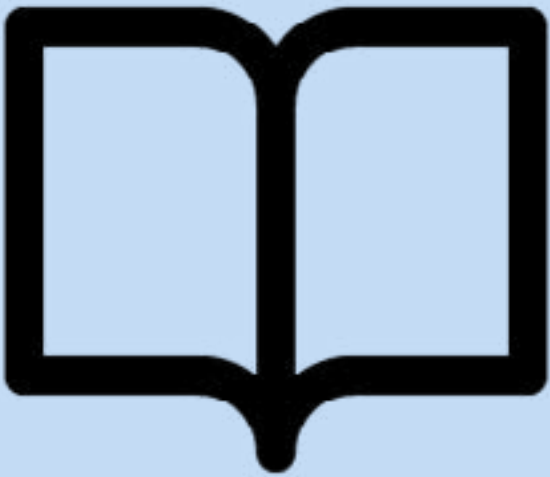
We don't launder money

Money laundering



We don't launder money

We comply with the rules on anti-money laundering to prevent Vend from being used by third parties to launder money or to make funds available for terrorism or other criminal activities.



Defined

Money laundering can be defined as transforming the proceeds of crime into a legitimate economy. The proceeds of a crime can be anything of value, including money, goods, assets and real estate. It can often appear in connection to other types of crime, including fraud, corruption and tax evasion.

What is Vend's responsibility?

We comply with local and international laws and take necessary action to prevent money laundering in our financial transactions.



What is expected of me?

- Be familiar with the basic principles that apply to anti-money laundering.
- Ensure that any business partner/customer is legally established and runs law-abiding business before entering into any agreement.
- Be familiar with and adhere to additional requirements that apply to regulated entities when working for or representing Vend.
- Report any suspicious transactions, including third-party payments, large cash purchases or the use of cash equivalents, to the appropriate internal channels.
- Notify in accordance with our procedures if there is reason to suspect, or discover, that money laundering has taken place.



We protect people's privacy

Privacy



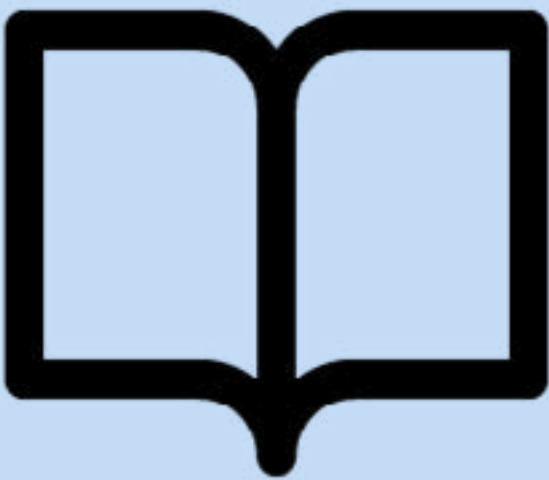
We protect people's privacy

We protect the personal data we process about our customers, users, partners and others with whom we engage in our business activities.

Data is one of Vend's most important assets and an essential part of our business model.

We are transparent about how personal data is processed, and we provide choice and control for managing the use of data in an effort to make smart choices easy.

We aim to create value for our customers and users with the data, always ensuring that their trust is maintained, as well as the reputation of our valuable marketplace brands.



Defined

Privacy means protecting the individual's ability to know how their personal data will be collected, shared and used, and to allow them to exercise choice and control over the use of their personal data.

Personal data is defined as any information that can be linked to an individual, such as customers, users or employees.

What is Vend's responsibility?

We comply with relevant data protection rules, including the General Data Protection Regulation (GDPR) and its founding principles.

We have a clear and communicated privacy governance structure to assess risk and protect the rights and freedoms of our customers, users and employees.

We train employees in privacy and expect everyone to take responsibility for the personal data we handle in our work.

We provide user controls and choices that are effective, understandable and easy to access. This includes providing users easy access to their data subject rights.

We do what we say and say what we do, and we are transparent about how personal data is processed.



What is expected of me?

- Ensure that access to personal data is on a strict, need-to-know basis.
- Delete or anonymise personal data as soon as it is no longer necessary for the purpose it was collected for.
- Strictly refrain from sharing personal data with third parties unless the sharing of data has a valid legal basis and reason.
- Assess and document all new personal data processing before processing is started and follow the “privacy by design” principles.



Explained

- **General Data Protection Regulation (GDPR)** is a legal framework that sets guidelines for the processing of personal data about individuals in the European Union (EU).

We use technology responsibly

Technology



We use technology responsibly

We believe that the responsible use of technology is key to delivering value to our users.

If we fail to develop and use technology in line with our users’ best interests and expectations, we risk undermining the trust in our brands and products.



Defined

Technology is the practical use of scientific discoveries.

For Vend, computational technologies and applications, such as programming, algorithms and artificial intelligence (AI), are especially important.

What is Vend's responsibility?

We recognise that technology is a product of human decisions and can be biased, for example, through conscious or unconscious encoding of human prejudice and stereotypes.

We work to minimise the risk of bias in technology by adhering to regulations, our internal standards and internationally recognised human rights.



What is expected of me?

- Conduct appropriate risk and impact analyses when working with and/or using technology.
- Consider topics such as fairness, accountability, sustainability and transparency (FAST) when working with emerging technologies such as AI, or resource consuming technologies.
- Use resources in an efficient way to solve actual user problems, right size workloads that you are responsible for as part of a team.
- Take action to mitigate any risks or overuse identified.



We speak up

Reporting of concerns



We speak up

We believe that an open and respectful working environment is crucial for our development and success.

A culture in which we all feel comfortable to raise our questions and concerns is a prerequisite for creating a safe environment, transparency, and is an important tool for achieving our goals and improving our business.

When we speak up about concerns regarding behaviours or conditions that are not in line with our Code, we are able to take action and improve the situation.



Explained

What and when to report? If you believe that a behaviour or condition is not in line with our Code or our values, we encourage you to report your reasoned concerns.

If you believe that a behaviour or condition is illegal or can endanger for example the safety of a person or product, you are expected to speak up.

Questions about or issues with your employment conditions or performance reviews or a personal grievance are generally not considered a report of concern and should be discussed with your manager or your HR contact.

What is Vend's responsibility?

All reported concerns are taken seriously and followed up in a fair and objective manner.

We ensure that no one who reports responsibly (and does so in good faith) will be met with negative reactions.

We have implemented a digital Speak Up channel as a supplement to internal reporting. In this channel, reporting can be done anonymously.

We have implemented a Speak Up Procedure to ensure that all handling of reports are in accordance with relevant legal requirements and best practice.



What is expected of me?

- Speak up if there is reason to suspect any illegal or unethical conditions.
- Do so in good faith.
- The intention should always be to support Vend in doing business the right way
- While anonymity is always an option, we encourage you to include contact details, when possible, as personal follow-up helps ensure the best possible handling of a report.



Explained

Where to report?

Please discuss your concern openly with your line manager.

You can report concerns to one or more of the following: Vend’s Legal department, Vends’s Group Compliance Officer, Vend’s Executive Management or Vend’s Speak Up channel.

About Vend

Vend Marketplaces ASA ("Vend") is a family of marketplaces with a strong Nordic position and approximately 1,730 employees. As a leading marketplaces company within Mobility, Real Estate, Jobs and Recommerce, we provide effortless digital experiences designed for the needs of tomorrow. We do it with a clear sense of purpose, to create sustainable value and long-term growth, for all our stakeholders and society as a whole.

Removing friction drives everything we build, design, and deliver—creating meeting points where real needs meet real solutions. That's how we move the world forward: Not by pushing harder, but by making it easier. Easier to choose well. Easier to live sustainably. Easier to turn to smarter. Smart choices made easy.

vend.com



