

Corporate Social Responsibility

ComposeToGo AS (CTG AS) is the creator of Compose low-code platform for building responsive business applications. Learn more about our products for e-Government, banks, and finance on www.onctg.com



TRANSPARENCY

It is our responsibility to empower the positive effects of our business and minimize the negative.

Business Ethics is a wider term used about CSR (Corporate Social Responsibility) and Sustainable Business. It has been seen merely as a trend or a means to market brands in a new way. Although there is some truth in this statement, business ethics has evolved to become more of an expectation from consumers, on how business affects the society. It is challenging industries for the better change. CSR is a transparency layer, that allows costumers, collaborators, and employees to trust in your work.

For ComposeToGo (CTG), CSR is about conducting ethical, transparent business practices that holds us as a company accountable for our actions. Giving actual value to business ethics means to infuse believe in its value across a whole organization. CSR is only transmitting to society when the effect is a win-win. Although, how can CTG as a SMB make a difference? CTG believes in the practice of “thinking big, and starting small”. This strategy takes us one step closer to exploit our true potential. Only by confronting business conduct with ethics, we can promote responsibility and solidarity.

CSR policies are not a formality of disclaiming responsibility for other parties. It should be of a common interest to act and agree upon a shared understanding of good business ethics. It is important to remember that there are no such things as “the obvious”, and that global business always requires a wider understanding of culture and context. Culture should never be used as an excuse for not complying with CSR, but it is important to have the cultural context in mind when introducing CSR-policies.



Your personal & professional RESPONSIBILITY

This Conduct Policy is directed towards everyone working with CTG AS. It is applicable to you as an employee, employer, partner, reseller, customer, and to all personnel employed by or engaged to provide services to you.

Reliability and credibility for CTG's technology, business and customers is crucial to the value of our company. CTG's high commitment to e-Government and legislation in IT makes this CSR policy vital for the CTG-way of doing business.

CTG has worked hard to attain credibility and respect for our business, products, and services. Our recognition is a result of high performance by all involved parties. It is your personal and professional responsibility as an employee, partner or customer to maintain good business ethics.

We kindly ask you to read the following document carefully. Your contribution is vital for our continuing success.



Best regards,

Frode Preber Ettesvoll
CEO ComposeToGo AS

SUSTAINABLE GOVERNMENT

Online services allow more efficient reporting and documentation in everyday processes and enable government and business to allocate money in a more sustainable way. Online services are also about creating trust in terms of more transparent operations. Transparency and good information sharing culture makes tracking and controlling government processes easier, and eventually minimizes the chances of breach with government regulations.

Interoperability fighting poor data management

CTG has been working closely with government for more than 10 years. One of the biggest challenges in digital strategies today is interoperability. Lack of standards on a joint platform often results in isolated IT systems, both within organizations and between departments. This makes collaboration relatively difficult. Instead of creating an efficient information flow, we build digital barriers defended by poor data management. CTG has a high engagement in the field of semantics and metada-

ta (data about data). Strategic usage of metadata makes producing, saving and exchanging data between different systems possible, without the need for manual interpretations.

Information Security for legit data

Semantics is also crucial to avoid weaknesses such as errors, duplicated or damaged data. By minimizing manual input, duplication, and interpretations, we can also increase the quality and integrity of data. In terms of protecting confidentiality and availability of sensitive data, CTG has long experience in facilitating the acts to protect citizen's personal information. Building online services are equivalent to placing law-based processes into IT, which makes semantics and metadata highly important in application development. CTG continuously strives to assure the same legal status and validity as traditional paper documents.

SOCIAL IMPACT

By making public services available online, we can facilitate broader participation from businesses and citizens. Improved coordination will foster growth for all involved parties. Clear and accessible information enables better communication of obligations and rights in a society. A simplification of the process dealing with government will eventually improve the general impression of a service-minded state, accessible for all citizens.

HCI: A necessity for some, useful for everybody
Laws regarding universal design is normally stated in laws on non-discrimination and equality. Universal design means to design or facilitation of a product allowing the largest possible majority to use the products. In accordance with Norwegian law, private and the public is obligated to secure universal design when delivering solutions to the public.

CTG has achieved status as highly proficient in fields of standards, semantics, and legislation. Our dedication to international standardization and research projects in EU and UN has given CTG the benefit of developing up to date technology focusing

on Human-Computer Interaction. By developing technology that focuses on people, we can create equal possibilities for usage. This will decrease the gap between different user groups, regardless of cognitive challenges.



ENVIRONMENTAL IMPACT



CTG strives to contribute to a better environment locally and globally. By making software that replaces and streamline paper processes, we aim to decrease the massive paper consumption in Norwegian and international enterprises. Online processes also minimize emissions related to logistics of moving papers.

We are responsible for a sustainable use of resources, and promote change in production and consumption patterns towards a justifiable level. It is a long-term goal and obligation for CTG to safeguard green growth in e-Government strategies.

Environmental management system

CTG is consequently following the general and specific industry requirements to make sure our environmental impact is minimized.

Already implemented routines includes:

- CTG is compliant with all legal requirements
- Annual appraisals with the employees
- Neat and environmentally cleaned facilities
- Ensuring low energy use for heating ventilation, lighting, and production
- Comprehensive usage of phone-/web-meetings and remote work to reduce the amounts of travels
- Company travels shall be carried out with public transportation when possible
- Minimal production and usage of paper
- Garbage is sorted for recycling purposes
- Eco-labeled detergents

CODE OF CONDUCT

The CTG Code of Conduct includes a set of rules outlining the responsibilities and practices for employees and collaborative partners of CTG AS.

On the next pages, you will find several specific national and international regulations (from EU and UN). As borders become increasingly irrelevant for business and trade, international regulations become even more important and pertinent to facilitate global cooperation.

Market & Competition

CODE

We believe that great business connections are established through professional relationships based on mutual understanding of fair business acts. The long-term sustainability of business depends on free and fair competition. CTG expects you to compete fairly and ethically for all business opportunities.

CONDUCT

This excludes all unfair methods of competition and deceptive practices to gain market advantage. E.g. but not limited to misleading statements about our products, sales tactics or other arrangements that can arise antitrust and risks towards your company and CTG.

ATTENTION

The people involved in the sale of our licensing of products/services and other agreements are expected to make sure that all statements, communications, and representation to customers are accurate and truthful as they relate to CTG.

Public Procurement

CODE

Public procurement is spending public money to deliver goods, services, and works. This requires particular strict regulated processes, both from suppliers and customers. This is to assure that public procurement is conducted in a way that benefits society and allocates public money in a sustainable way.

CONDUCT

The Norwegian government has developed regulations for public procurement. Some of these fundamental regulations are based on the EU Treaty and EU Procurement Directive from 2014. The regulations guide the legal and practical dimensions of public procurements:

Competition

The procurement should as far as possible be based on competition, regardless of the procurements type and value.

Proportionality

The competition should be conducted in a way that matches the procurement's proportionality. The competition methods should be in proportion with the size and value of the procurement, e.g. numbers of suppliers is required to participate, and not make requirements that is beyond necessary or unreasonable for the proportion of the procurement.

Transparency

Assure Transparency in the procurement process, mainly in terms of public announcements regarding competition and accessible documentation describing the procurement process and decisions.

Predictability

Predictability is closely related to Transparency and assures that suppliers have access to sufficient information regarding the competition to be able to evaluate justifiable

decisions regarding their offer. E.g. procurement methods, qualification requirements and emphasized requirements.

Verifiability

Verifiability of the procurement process is important to allow suppliers and third parties to verify the evaluation methods and documentation that has been made throughout the process. This again requires transparency and predictability.

Business Ethics

Assure good Business ethics in the procurement process; a justifiable and objective case management process in addition to an economically efficient way. Good business ethics also includes the issues regarding conflicts of interest, duty of disclosure, confidentiality, and negotiation methods.

Equal treatment

Assure that all suppliers are treated equally throughout the procurement process.

Click [here for full Norwegian Version.](#)

Click [here for full European Version.](#)

Corruption

CODE

Corruption is a key element in economic underperformance and a major obstacle to poverty alleviation and development. It is a misuse of power and position and has a disproportionate impact on the poor and disadvantaged. It undermines the integrity of all involved and damages the fabric of the organizations to which they belong. As many of CTG's and Partner's customers involves government, it is highly important to notify the law regulations for dealing with government employees and officials, as they often are stricter than standards for dealing with commercial company employees. Nevertheless, the private sector shares responsibility for the challenges of eliminating corruption. Laws about corruption also applies to private industries.

CONDUCT

You can under no circumstances participate in any corrupt actions, directly or indirectly. This includes all passive and active corrupt actions, - from minor use of influence to institutionalized bribery. This applies to any government or public international organization officials, political parties, or candidates for political office, or any company director, officer, employee, or agent of a commercial customer or supplier, for the purpose of obtaining or retaining business or securing any improper advantage.

Corruption

The abuse of entrusted power for private gain. This can mean not only financial gain but also non-financial advantages.

Bribery:

An offer or receipt of any gift, loan, fee, reward or other advantages to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of the enterprise's business.

Extortion

The solicitation of bribes is the act of asking or enticing another to commit bribery. It becomes extortion when this demand is accompanied by threats that endanger the personal integrity or the life of the private actors involved.

Other forms of corruption

Embezzlement, theft, and fraud, abuse of function, favoritism, and nepotism, creating or exploiting conflict of interests, improper political contributions.

ATTENTION

To avoid such circumstances always pay attention to:

- Always accurately document all transactions related to your contract with CTG
- Avoid and prevent side agreements, whether oral or written
- Documents must not be inappropriately altered or signed by those lacking proper authority

The United Nations Convention against Corruption is a global legally binding anti-corruption instrument. The convention also calls for preventive measures and the criminalization of the most prevalent forms of corruption in both private and public sector.

Click [here to read the United Nations Convention against Corruption.](#)

Confidentiality

CODE

CTG respects the intellectual property rights of others and expects other companies to respect our intellectual property rights. All information belonging to CTG must be protected in accordance with its level of classification. As a CTG partner, the level of confidentiality of the information entrusted to you or created by you should be defined.

CONDUCT

Corporate proprietary information is not allowed to come into the possession of unauthorized parties, be passed on to others in the course of discussions or eavesdropped upon by those for whom it is not intended. Confidential information may include, but is not limited to: source code, software, and other inventions or developments (regardless of the stage of development) developed or licensed by or for CTG, marketing and sales plans, competitive analyses, product development plans, non-public pricing, potential contracts or acquisitions, business and financial plans or forecasts, internal business processes and practices, and prospect, customer, and employee information.

ATTENTION

To prevent that these types of information get in the wrong hands you are committed to protecting your systems against the loss of confidentiality, integrity, and availability of all data and information created, processed or stored for CTG.

Working Environment

CODE

CTG aims to facilitate a good working environment for our employees, customers, and partners. Our policy is that all are treated equally, regardless of sex, religion, and age. Culture differences are treated with respect and understanding. We believe that great business connections are established through a professional relationship based on mutual understanding. CTG also expect partners to comply with the same guidelines as we apply to them.

CONDUCT

CTG comply with international and national laws to promote rights at work, encourage decent employment opportunities, enhance social protection and strengthen dialogue on work-related issues. In Norway, we are bound by the Norwegian Government to comply with The Working Environment Act, which protects workers' rights by law. Please visit www.arbeidstilsynet.no for a complete overview of The Working Environment Act in English.

Key points to sustain a strong working environment:

1. Provide safe and healthy working conditions for all employees.
2. Respect human rights, including the following:
 - No physical, psychological or other abuse
 - Zero tolerance for sexual harassment
 - No discrimination due to race, color, religion, creed, gender, social status, and physical or mental disability.
3. Comply with applicable laws regarding wages and working hours, rules and employment regulations including minimum wage, overtime and maximum hours allowed in the jurisdiction concerned.
4. Provide training and learning opportunities.

CTG also supports the International Labor Organization Declaration (ILO), which is developed by the United Nations on labor issues and international labor standards.

The Declaration covers fundamental principles and rights at work:

- Freedom of association and the effective recognition of the right to collective bargaining
- Elimination of all forms of forced or compulsory labor
- Effective abolition of child labor
- Elimination of discrimination in respect of employment and occupation

Click [here to read about ILO and the declarations.](#)

Reporting Financials

CODE

An important policy for CTG is to be a transparent company that reports financial results and other developments fully, fairly, accurately, timely and understandable.

CONDUCT

Financial assets are stated every year in annual reports. Visit WWW.ONCTG.COM to find our reports, or send a request to INFO@ONCTG.COM

Reporting Breach

CODE

When becoming a Partner of CTG, it also gives you a responsibility to promote and imply good business conduct and business ethics. Our standards can be met only with your cooperation. CTG trusts you will recognize that you must adhere to the standards of this policy.

CONDUCT

Any violation of it will constitute the basis for the immediate termination of your distribution agreements with CTG and the cancellation of any pending fees payable to you, pursuant to applicable laws and without any liability to CTG. If you suspect or have witnessed any breach with laws, regulations or CTG's business conduct, you are obligated to report to your leader. If this is not possible or appropriate, you shall contact CEO of CTG AS. In case of failure to report infringements, you can be held responsible for holding important information back.

Thank you for your cooperation!

Please do not hesitate to contact us if you have questions.

