

# CODE OF CONDUCT

## Code of Conduct

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# 1. INTRODUCTION

At Atea, our vision is to be «The Place to Be» - a place where employees, customers, technology partners, and investors meet and collaborate to build the future with IT.

We believe that information technology, combined with knowledge and creativity, can transform productivity and living standards across society. It is with this purpose that we set out to build a company to be the market leader in IT infrastructure across the Nordic and Baltic regions.

This collaboration between employees, customers, technology partners, and investors cannot succeed however without trusting relationships that bind people together. For this reason, a strong code of ethical and professional conduct must be the foundation upon which Atea is built.

The Atea Code of Conduct sets the principles with which Atea personnel work together and with outside stakeholders. It provides guidelines for our business practices which must be followed by all Atea personnel, and is a source of governance for decision making across Atea.

## 1.1. Employee Responsibilities

It is the personal responsibility of every employee of the Atea group and each of its subsidiaries to review, sign and follow the Code of Conduct.

This responsibility also pertains to all who act on behalf of the company, including contracted consultants.

Any violation of the Code of Conduct will not be tolerated, and may lead to internal disciplinary measures, notice, dismissal, or – in the event of illegal behavior – criminal prosecution. Failure by an employee to report a violation of the Code of Conduct is itself a breach of the Code.

The Code of Conduct is not meant to be exhaustive, and there may be situations where this code does not provide explicit guidance. For example, employees of Atea must always comply with applicable laws and regulations, even if these laws are not expressly stated in the Code of Conduct. In situations where the Code or law does not provide clear guidance, the employee should exercise good judgement consistent with the business ethics promoted by the Code.

In order to ensure that all employees understand the Code of Conduct, employees are required to take a brief online self-test concerning the main

provisions of the Code. Upon successful completion of the self-test, the employee may electronically sign the Code of Conduct. This electronic signature will be returned to the HR function of each national organization for record-keeping. It is the responsibility of line managers to ensure that their employees review, successfully complete the self-test, and then sign the Code of Conduct.

If an Atea employee seeks additional guidance regarding a challenging business, legal or ethical situation, or is concerned about a potential violation of the Code of Conduct, law, or business ethics by another Atea employee, the employee should first discuss the situation with their direct manager.

If the manager does not provide a satisfactory response, the employee should raise the situation with the Compliance Officer of the national organization in which they operate. Each national organization has a Compliance Officer, whose role is to ensure that actions taken by the local organization are in accordance with the Code of Conduct, good

business ethics, and the legal framework of the local Atea organization and Atea Group.

In the event that the employee is still concerned about a potential violation of Code of Conduct or law, the employee should then send a message to the “Whistleblower Hotline” at [whistle@atea.com](mailto:whistle@atea.com). The function of the “Whistleblower Hotline” is to ensure that employees have the opportunity to raise concerns about potential violations of the Code of Conduct, law or business ethics in a confidential manner, to a Compliance Officer outside of their local organization and management structure.

Messages sent to the Whistleblower Hotline will be handled discretely and confidentially by the Group Compliance Officer, in consultation with legal counsel. If the employee wishes to send a message anonymously, the employee can use the scanner function on an Atea printer to send a message to the Whistleblower email address.

## 2. PERSONAL CONDUCT

The personal conduct of every Atea employee forms the culture of our company. Atea employees are expected to demonstrate the highest standards of integrity and professionalism when fulfilling their job responsibilities.

The personal conduct of Atea employees is critical to building trust and strong relationships across the company, and with our customers, technology partners and investors. In this manner, high standards of ethics and integrity are essential to pursue our vision of being “The Place to Be”.

### 2.1. Equal treatment

Atea aims to have an inclusive work culture. At Atea, we acknowledge – and appreciate – that all people are unique and valuable and are to be respected for their individual talents.

Any form of harassment, discrimination or other behavior that colleagues or business associates may perceive as threatening or degrading will not be tolerated. This includes – but is not limited to – discrimination on the basis of gender, religion, race, national or ethnic origin, cultural background, social affiliation, functional disability, sexual orientation, marital status, age or political conviction.

Atea personnel will work actively for the fair treatment of all employees and other business

associates with whom they interact on behalf of Atea. Employees will base personnel-related decisions solely on relevant qualifications such as personal suitability, education, experience, results and other professional criteria.

### 2.2. Conflicts of interest

Atea employees will not seek to attain personal benefits for themselves (or closely related persons) that may be perceived as a conflict with the interests of Atea. Situations which may result in a potential conflict of interest should be avoided. To ensure impartiality, Atea employees should not participate in decisions in which there may be a conflict of interest.

Conflicts of interest are not always obvious. If an employee becomes aware of a potential conflict of interest, or has questions about a conflict of interest, he should notify his superior immediately.

### 2.3. Corruption and bribery

Atea believes in fair competition, and is firmly opposed to all forms of corruption. Employees should never offer or provide improper benefits to business contacts, government agencies or other third parties in order to influence a business decision or facilitate a legal/regulatory process. Nor should employees solicit improper benefits as the basis for transactions with Atea.

Corruption and bribery may consist of either direct payments or indirect benefits, if the perceived intention of such benefits is to influence a business decision or legal/regulatory process. Examples of indirect benefits may include sponsorships of favored organizations, donations to political groups, and excessive spending on hospitality, travel and entertainment. This applies irrespective of whether the benefit is offered from Atea or through an intermediary.

### 2.4. Gifts and business courtesies

Atea employees must always exercise caution when offering or accepting gifts and business courtesies. Gifts and business courtesies should only be offered or accepted when they are of modest value and with limited frequency, and are in accordance with local practice and national guidelines within the Atea organization. Gifts and business courtesies should never be given or accepted if they can be perceived that they are for the specific purpose of influencing a business decision.

If an Atea employee is offered or has accepted gifts and business courtesies in excess of normal tokens of appreciation, he should immediately notify his immediate supervisor, who can decide with the local Compliance Officer whether the employee's

integrity and independence may be perceived as being influenced.

### 2.5. Private interests in other businesses

Atea employees must avoid having personal interests – direct or indirect – in other businesses or organizations if these may be perceived as negative to the employee's relationship with Atea.

An employee must inform and receive consent from his direct superior before undertaking external duties or positions which may impact the employee's work at Atea (including Board positions with another company).

An employee must inform and receive consent from his direct superior before undertaking an investment in a company that competes with Atea or does business with Atea. (Investments of less than 5% of the share capital in a listed company are exempt from this requirement.)

### 2.6. Compliance with laws and regulations

All employees must comply with laws and regulations when acting on behalf of Atea. Violations of laws and regulations will not be tolerated.

## 3. INTERNAL CONTROL

The market for IT infrastructure is evolving rapidly, and Atea needs to continuously adapt and be flexible in order to meet the needs of its customers. To succeed in this dynamic environment, Atea believes in a decentralized approach to decision making which empowers employees to solve problems for customers on a local level.

Atea's internal control routines enable the Group to execute strategy and operate in a coordinated nature while providing employees the flexibility to make customer decisions on a local level. Internal controls ensure that Atea's business processes are efficient and run within an acceptable level of risk, that Atea's assets are safeguarded and utilized, that financial information is correct and timely, and that laws, regulations and guidelines are followed.

Internal controls are the responsibility of management, but every employee must contribute to ensure that these control routines are effective. Most control routines are of a highly operational nature, but the Code of Conduct provides guidelines on major control routines within authorization and reporting of transactions, treatment of confidential information and communications.

### 3.1. Authorization of transactions

All national organizations have a written document that outlines which persons or levels in the organization have the authority to approve various types of transactions relating to personnel staffing, contracts, and cash disbursements.

Transactions above a specific size must be approved by Group management, or by the Board of Directors. These maximum amounts allowed for approval at each level of the organization are stated in the Authority Matrix for the Atea Group. The Authority Matrix is provided as a supplemental document to the Code of Conduct and is available on the local intranet.

### 3.2. Reporting and disclosure

Atea's financial and legal reporting shall comply with all applicable laws and regulations, and be full, fair, accurate, timely and understandable. This requires that all transactions are correctly reported in accordance with local law and good accounting practice.

All Atea employees share a responsibility for registering transactions in a correct and properly documented nature, so that Atea can accurately

report on these transactions in its financial and legal statements. If any Atea employee becomes aware of transactions which have not been reported accurately, they should report this information immediately to their manager and if necessary, to the Compliance Officer.

### 3.3. Confidentiality

All Atea employees have a responsibility to safeguard the confidentiality of sensitive information relating to Atea, its employees and outside parties with whom we interact. The duty of confidentiality is critical to building trust and strong relations with outside parties and across Atea. The principle of "need to know" shall always apply when handling confidential information.

Atea employees shall exercise caution when discussing and handling sensitive information, to avoid this information being received by unauthorized persons. If sensitive information is to be shared with third parties, a written confidentiality agreement should be in place.

The duty of confidentiality also applies after the termination of employment or contractual relationship with Atea for as long as the information is

considered to be of a sensitive nature or in any other way confidential.

### 3.4. "Price sensitive information" and Insider trading

As a publicly traded company, Atea ASA is subject to strict laws concerning the handling of sensitive information which may have an impact on the share price of Atea ASA.

Sensitive information which is not generally known in the market and may have an impact on the share price of Atea ASA is called "price-sensitive information". Employees holding "price-sensitive information" are subject to special legal requirements on confidentiality, documentation, and restrictions on trading in the shares of Atea. Violation of these legal requirements is subject to prosecution under the Norwegian Securities Trading Act.

"Price-sensitive information" may include information on large new contracts which have been awarded to Atea, but which are not generally known to the public. The Group has set a policy that all new contracts with expected sales over NOK 450 million per year (approximately 1.5%

of Group revenue) are automatically considered "price-sensitive information" if the outcome of the contract has not already been announced to the public. The Group may decide to publish information on new contracts below this size through a stock exchange notice as information to investors without the contract being considered "price-sensitive information".

"Price-sensitive information" may also include information on Atea's local financial performance or operations, which has not been reported to the public, but can significantly impact the overall financial performance of the Group. Furthermore, "Price-sensitive information" may include other events or transactions which could impact Atea's financial performance and share price, such as the acquisition of another company.

Determining whether sensitive information is "price-sensitive information" is not always clear. Employees which are holding sensitive information (for example, regarding a large contract) and are uncertain whether this is "price-sensitive information" should contact the CFO of their local organization with the details of this information so that the specific situation may be evaluated.

Employees who are holding "price-sensitive information" must:

- **Register as an Atea "insider":** This involves contacting the Group CFO and providing information on (1) what price-sensitive information the employee is holding, (2) when and how he received the price-sensitive information. The insider registration form is provided as a supplemental document to the Code of Conduct on the local intranet.
- **Keep "price-sensitive information" confidential:** "Price-sensitive information" should not be communicated to anyone who is not an Atea "insider" without the express consent of the Group CEO or Group CFO. If an Atea employee becomes aware that another person has received "price-sensitive information" without being registered as an "insider", this must be reported to the Group CFO immediately.
- **Abstain from trading in the financial instruments of Atea ASA:** Employees holding "price-sensitive information" must abstain in trading in the financial instruments of Atea ASA, including purchasing or selling Atea shares / bonds, and exercising Atea stock

options. This trading prevention does not prevent the normal exercise of option or future contracts which were previously entered into upon expiry of such contracts.

An Atea "insider" remains subject to the above requirements until the "price-sensitive information" is publicly available, or is otherwise no longer considered to have an impact on the share price of Atea ASA. All employees who have been registered as an Atea "insider" should receive a written confirmation by the Group CFO that they are no longer considered an "insider" in Atea before assuming that they are no longer subject to the above requirements.

It is the duty of all employees to investigate whether they are holding "price-sensitive information" before trading in the financial instruments of Atea ASA. Employees which are uncertain whether they are holding "price-sensitive information" should contact the CFO of their local organization.

### 3.5. Public communications

In order to ensure that public reporting on Atea is correct, consistent and reliable, only a limited number of people are authorized to speak with the press. All queries from the press must be referred

to the country manager or local press contact.

In principle, only the Group CEO, Group CFO and country managers are authorized to communicate with the media. Only the Group CEO and Group CFO can comment on financial issues. However, other people may be authorized to communicate with the press in specific cases. This must always be clarified with the country manager in advance.

All "price-sensitive information" (defined in 3.4. above) must first be disclosed to the Oslo Stock Exchange in a stock exchange announcement before it can be communicated externally or internally to those who are not company insiders.

All announcements to the Oslo Stock Exchange are the responsibility of the Group CEO and Group CFO.

In the event of an emergency or serious incident at Atea, the Group has a crisis management plan which includes policies on communication. The crisis management plan is provided as a supplemental document to the Code of Conduct on the local intranet.

## 4. SOCIAL RESPONSIBILITY

At Atea, we aim to build the future with IT. By pursuing this mission, we believe that Atea can make a positive contribution to society, as information technology improves productivity and living standards across the population.

At the same time, we understand that good practices in one area do not offset harm in another. We need to ensure that all of our business practices are principled and sustainable in a global context, and that Atea promotes social responsibilities in its daily operations in such areas as human rights, labor, environment and anti-corruption.

For this reason, Atea is a member of the UN Global Compact (UNGC) and observes the Global Compact's 10 principles of corporate sustainability and social responsibility. Atea reports its progress according to these principles to the UNGC each year.

Furthermore, Atea monitors its supply chain for compliance with corporate sustainability guidelines based on the Electronic Industry Citizenship Coalition's (EICC) code of conduct. The EICC is

a coalition of the world's leading electronics companies formed to improve working conditions and environmental stewardship throughout the electronics supply chain.

Atea's vendors shall deliver goods and services to Atea which are produced in accordance with the EICC guidelines, and monitor that these guidelines are followed by their own subcontractors.

### 4.1. Human rights

Atea and its employees respect and support internationally proclaimed human rights, including the Universal Declaration of Human Rights adopted by the United Nations.

Atea does not condone or conduct business with organizations which are complicit in human rights abuses. As part of its effort to promote human rights, Atea actively monitors its supply chain for the use of "conflict minerals" from areas where human rights violations may occur.

All employees should notify their manager or Compliance Officer if they have any concerns about human rights abuses within Atea's supply chain.

### 4.2. Labor

Atea is committed to creating a work environment based on principles of fairness and ethical behavior. It is the responsibility of all employees to promote a positive work environment, and report any concerns or potential violations to their manager or Compliance Officer.

Atea's terms of employment are based on fair practice and shall be understandable for employees. Employees shall receive full, timely and direct compensation on a regular basis, in accordance with their employment agreements.

Atea employees shall have access to a healthy and safe workplace. Working conditions shall meet or exceed legal requirements in the countries in which Atea operates, as well as the conventions of the UN Global Compact and International Labor Organization.

Hazards shall be identified and monitored to prevent accidents and occupational illness. Guidelines for the workplace will be published and monitored to ensure a healthy and safe environment.

Atea upholds the rights of workers to freedom of association and to collective bargaining within national laws and regulations.

Atea shall not employ or contract child labor, as defined by the International Labor Organization conventions.

Atea shall not employ or contract forced labor. Employees will be free to terminate employment after a period or notice, in accordance with national laws and their employment contract.

Atea values diversity in its workforce, and is opposed to discrimination or harassment. Atea's management will promote equality of opportunity within its employment practices. Further information is stated in Section 2.1 of this document.

### 4.3. Environment

Atea is committed to minimize the impact of its operations on the environment. Atea's national organizations are in compliance with local environmental laws and regulations, and are cautious in their approach to the environment. The Group strives to monitor and continually improve its

environmental performance through participating in efforts such as the Carbon Disclosure Project.

Furthermore, Atea actively promotes “Green IT” initiatives such as IT recycling within the company and its customer base to reduce the negative impact of IT equipment on the environment.

Finally, Atea is a leader in the sale of environmentally friendly technologies such as video meeting solutions, which may reduce the emissions and pollution associated with business travel.

Atea employees should contribute to minimizing waste and harmful emissions during their work, and report opportunities to improve environmental performance to the Compliance Officer.

#### 4.4. Anti-corruption

Atea believes in fair competition, and is firmly opposed to all forms of corruption. Atea will work against corruption in all forms, including extortion and bribery, in accordance with the UNGC principles. Further guidelines for personal conduct by Atea employees are stated in Sections 2.3. and 2.4. of this document.

#### 4.5. References

Workers rights	ILO Convention, nr. 29 and 105
Freedom of association and collective bargaining	ILO Convention, nr. 87, 98, 135 and 154
Child labor	UN Convention on the rights of children ILO Convention, nr. 79, 138 and 182 ILO recommendation, nr. 146
Discrimination and human rights	ILO Convention, nr. 100 and 111 UN's Convention on Discrimination against Women UN's Declaration on Human Rights
Health, safety and the environment	ILO Convention, nr. 155, 164 and 187
Salary	ILO Convention, nr. 94, 95 and 131
Work hours	ILO Convention, nr. 1 and 14



# CRISIS MANAGEMENT PLAN

## 1. Introduction

Atea's Code of Conduct provides guidelines for conduct in the ordinary course of business. In the event of an emergency or serious incident at Atea, additional governance routines are necessary for Atea management and employees to respond to an unpredictable situation.

The Emergency response plan provides the foundation for Atea's emergency response and crisis management work. In case of emergency, the plan provides clear routines and procedures which enable the organization to react in an effective and coordinated manner.

### 1.1 "Crisis" definition

A crisis is a serious, unwanted incident which falls outside of the scope of regular operations.

Examples of scenarios which may lead to a "crisis" include but are not limited to:

#### Physical crises

- Physical harm or threats to employees, customers, partners or external consultants
- Fire or other accidents causing damage to Atea's facilities
- Burglary or cybercrime

#### Other crises (e.g., business, legal issues)

- Breach of laws and ethics (e.g., corruption, bribery, embezzlement)
- Serious disruption in operations (e.g., data center)
- Strikes

A crisis may involve consequences such as loss of life, health, value, reputation and/or stoppage of day-to-day operations.

When an incident is so critical and serious that ordinary management routines at Atea are incapable of properly handling the situation, the emergency response organisation comes into force.

### 1.2 Emergency response plan

Atea's Emergency response plan is available to all employees on the Atea intranet for each country in which Atea operates.

The Group Compliance committee is responsible for ensuring that the Emergency response plan is current and that necessary expertise regarding the Emergency response plan exists across the country organizations.

## 2. Organisation of responsibility

There are three levels of emergency response at Atea. These are:

1. **Group level - Crisis management:** Overall responsibility for all crisis management at Atea
2. **Country management level - Emergency response:** Handling the crisis itself
3. **Local office level – Operational response:** Liaison/accident site function

Critical incidents that are more physical in nature must be managed locally. Other crises involving business or reputational issues must initially be handled at the country management level, with the support of regional offices.

### 2.1 Group level - Crisis management

The CEO holds strategic responsibility for dealing with crises at Atea. Upon receiving notification of a crisis, the CEO is responsible for mobilising the group-level strategic crisis management team.

The CEO works in partnership with the country manager to determine which parts of the organization should be mobilized in responding to the crisis.

The CEO must approve all information and media relations strategy in a crisis. The CEO is the spokesperson for Atea on a Group level, or on a country level if justified by the situation.

The CEO will appoint an assistant crisis manager to act as a supporting resource for the crisis manager, and lead the crisis management on a Group level when the CEO is not present.

### 2.2 Country level - Emergency response management

The Country manager holds tactical responsibility for dealing with crises at Atea in their respective regions. When addressing a crisis, the Country manager reports directly to the CEO or assistant crisis manager in the group management team.

All serious incidents must be reported to the Country manager. Upon receiving notification of a crisis, the Country manager must notify the CEO immediately. Based on the actual or potential scope of the incident, the Country manager works in partnership with the CEO to decide on which functions and resources are to be mobilised within the emergency response management.

The Country manager should appoint the following Emergency response management team within each country:

- **Assistant emergency response manager:**

The Assistant emergency response manager acts as an additional resource for the Country manager. The assistant emergency response manager must take minutes of meetings to address the crisis and will distribute these minutes as necessary until the crisis is resolved.

- **Communications officer:** The Communications officer must develop an information strategy to deal with the crisis, in coordination with the Country Manager and Emergency response management team. The information strategy must be reviewed and approved by the Group CEO.

The Communications officer is responsible for ensuring the distribution of information, in coordination with HR and the central switchboard.

- **HR:** If the crisis includes the company's own employees and their relatives, HR is responsible for the tactical handling of communication with employees, in partnership with the communications officer.

- **Other support functions:** The Country Manager will add other support functions (IT, administration/legal) to the Emergency response team on an as-needed basis.

### 2.3 Local level - Operational management

Within each Atea office, the local manager holds operational responsibility for dealing with crises at Atea. When addressing a crisis, the local manager reports directly to the Country manager. The local manager may also appoint other support resources on an as-needed basis.

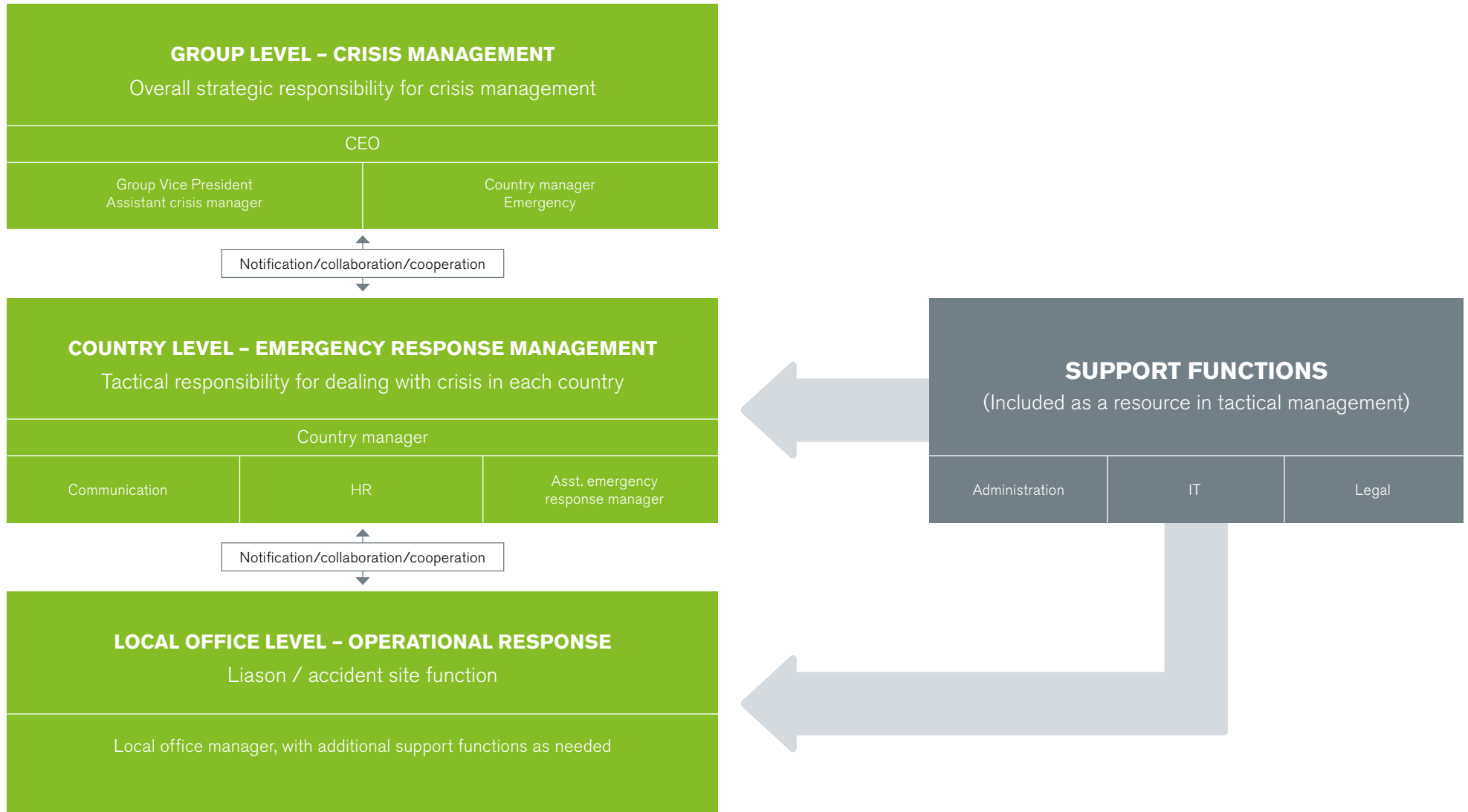
### 3. Communications responsibility

The Country manager will act as media spokesperson in the event of a crisis. All country managers are required to complete training sessions in media and communications. All public communications regarding the crisis must be approved by the CEO in coordination with the Country manager.

If justified by the situation, the CEO may make a statement in the media on behalf of the Group or the local country. Strategic assessments should be carried out if the CEO is to be the spokesperson. Three possibilities:

- The CEO remains in the background during the initial phase of the crisis, until the case is clearer
- The CEO comments on the seriousness of the matter initially and then takes a step back
- The CEO is exposed as the primary source from the outset

The emergency response system at Atea is illustrated as follows:



# INSIDER REGISTRATION

## Summary

In accordance with the Norwegian Securities Trading Act (verdipapirhandelloven) § 3, Atea ASA will register information on all individuals with access to Price-Sensitive Information on the company, and will inform them of their obligations under the Norwegian Securities Trading Act

## 1. Definitions

### 1.1 Financial Instruments

"Financial Instruments" shall mean transferable securities (i.e. shares and other securities equivalent to shares, bonds, other negotiable debt instruments and any other transferable securities) and options and financial futures/forward contracts or equivalent rights relating to such securities that are issued by Atea ASA ("the Company").

### 1.2 Price-Sensitive Information

"Price-Sensitive Information" shall mean any information of precise nature relating to Financial Instruments, the Company or other circumstances which has not been made public and is not commonly known in the market and which is likely to have significant effect on the price of Financial Instruments or of related financial instruments.

## 2. Insider obligations

### 2.1 Registration

All persons with access to Price-Sensitive Information will contact the Chief Financial Officer of Atea ASA and submit the Insider Registration Form provided on the following page (Exhibit 1).

Atea ASA will maintain this information for at least five years after the date in which the form is received or updated, and will provide this information to the Norwegian Financial Authority (Finanstilsynet) upon request.

### 2.2 General Trading Prohibition

Anyone with access to Price-Sensitive Information must not subscribe, purchase, sell or trade in Financial Instruments, or advise others to do the same. Violation of this policy is subject to sanctions under the terms of the Norwegian Securities Trading Act.

This prohibition does not prevent the normal exercise of option or future contracts previously entered into upon the expiry of such contracts.

### 2.3 Duty of Confidentiality

Any person with access to Price-Sensitive Information must not pass such information to unauthorized parties, and shall exercise due caution to avoid such information from being passed on to unauthorized parties.

## EXHIBIT 1 - INSIDER REGISTRATION

**I have access to Price-Sensitive Information in Atea ASA, and understand my obligations according to the Insider Registration policy, in accordance with the Norwegian Securities Trading Act.**

Name:

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Function:

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Time of receiving Price-Sensitive Information:

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Nature of Price-Sensitive Information:

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Reason for receiving insider information:

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Date in which Price-Sensitive Information was no longer held:

**Signature:**

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**This form should be passed immediately to Robert Giori: [robert.giori@atea.com](mailto:robert.giori@atea.com)**

## AUTHORITY MATRIX - ATEA GROUP

Limits represent maximum levels to be approved by each position, according to Group policy. Countries may set lower limits, as they choose.

Amounts above specified levels are subject to Board approval. For customer frame agreements, the authorization limits stated below are the estimated value per year, unless otherwise specified.

Authorization limits (currency in thousand krone <sup>1)</sup>)

	Transactions	Comment	Group CEO	Group CFO	Local CEO	Local CFO	Local exec team member	Head of department	Employee/Sales staff
Customer Agreements <sup>2)</sup>	Customer agreements:								
	Products		300,000	N/A	75,000	50,000	10,000	8,000	1,000
	IT as a Service (Data Center outsourcing)	Total Contract Value of sales agreement. Capex subject to separate approval (below).	300,000	N/A	75,000	50,000	10,000	8,000	-
	IT as a Service (Client outsourcing)	Total Contract Value of sales agreement. Sublease loans subject to separate approval (below).	300,000	N/A	75,000	50,000	10,000	8,000	-
	Fixed Price consulting projects	Total Contract Value of sales agreement.	300,000	N/A	75,000	50,000	10,000	8,000	-
	Time and Material consulting projects	Total Contract Value of sales agreement.	300,000	N/A	75,000	50,000	10,000	8,000	1,000
	Extended payment terms (e.g., >15/30 days)	Approval from Local CEO or CFO + exec team member		-	-	x	x	x	-
	Other deviation from standard terms	Approval from Local CEO or CFO. May delegate specific authority (e.g., AOS) to other staff.	-	-	x	x	-	-	-
COGS	Purchases directly associated with revenue	Tied to revenue approval above, plus specific controls on low margin deals (locally defined)	-	-	-	-	-	-	-
Opex/purchases (associated with ordinary operations)	Purchases within approved budgets		40,000	-	15,000	1,000	250	100	-
	Purchases outside of approved budgets	Requires Local CEO approval to spend in excess of budgets.	40,000	-	15,000	1,000	250	100	-
	Special purchases:								
	External consultants	Same as other purchases + "managers manager"	40,000	-	15,000	1,000	250	100	-
	Marketing/Representation	Same as other purchases + repr. > 1000 kr/pers to be approved by "managers manager"	40,000	-	5,000	1,000	250	100	-
	Major travel expenses (incl. conferences, training)	Same as other purchases	40,000	-	5,000	1,000	250	100	-
	Inventory (buffer stock for warehouse)	Special routine incl. head of procurement	40,000	-	15,000	1,000	250	100	-
Personnel	Staffing approvals (new positions)	Local CEO on new positions, if temporary local HR (one of the local exec team members)	-	-	x	-	-	-	-
	Salary & benefit changes	Local exec team member (region director) if within approved FC	-	-	-	-	x	-	-
	Promotions (mgmt employees)	Local exec team member (region director) if within approved FC	-	-	-	-	x	-	-
	Promotions (non-mgmt employees)	Local exec team member (region director) if within approved FC	-	-	-	-	x	-	-
Capital Expenditure (investments)	Fixed assets (IT equipment, office furniture)	If budgeted, then according to limits as follows. Otherwise, local CFO must also approve.	40,000	-	10,000	1,000	250	100	-
	Systems and development projects	If budgeted, then according to limits as follows. Otherwise, local CFO must also approve	40,000	-	10,000	1,000	250	100	-
	Customer specific investments	If budgeted, then according to limits as follows. Otherwise, local CFO must also approve.	40,000	-	10,000	1,000	250	100	-
M&A	Acquisition/sale of enterprise	Requires group CEO or Board. Divesture of dormant company can be approved by local CEO.	50,000	-	x	-	-	-	-
Disbursements	Authority to disburse cash	Dual approval required (basic control).	-	-	-	30,000	-	-	-
	Credit note issuance		100,000	-	20,000	1,000	250	100	-
Facility lease	Lease of premises	Must be approved by Group CEO, according to Board policy	x	-	-	-	-	-	-
Finance	Loans/financing	ATEA ASA CFO approval + execution by subsidiary Board.	-	x	-	-	-	-	-
	Guarantees		-	x	-	-	-	-	-
Sale of assets	Sale of assets (per sale)		15,000	-	5,000	1,000	-	-	-
	Sale of assets (per year)		50,000	-	10,000	1,000	-	-	-

1) All amounts can be converted to EUR by dividing by 10

## **Holding**

### **Atea ASA**

Atea ASA  
Brynsalleen 2  
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