

# Code of conduct

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## Background and purpose

This policy aims to support and ensure that we live up to the standards and expectations companies have of us. It has been adopted to emphasize the values and principles that guide our relationship with employees, customers, business partners, and other stakeholders.

The Code of Conduct presents the most important business principles that are based on our core values. These principles and values define our identity.

The code of conduct applies to all employees within Nordicon. Here it is clarified what can be expected of us and what behavior is expected of everyone who works with us.

We prefer to work with customers, suppliers, consultants, and other business partners who share our code of conduct.

## Our core values

Our fundamental values must be a compass for how we should act and react, both internally and externally. Our core values are:

- BIS (Best in Service)
- IT development and innovations
- Team spirit (the staff in focus)
- Financial growth
- Sustainability

The values are at the heart of our organization; whether stated or not, the culture is in the employees and the walls.

Our core values help us in everyday life and our long-term work, they set the benchmark for how we conduct our business and the way we do business. Our values and behavioral standards, described below, are about how we should behave ourselves, towards each other, our customers, partners, and our environment.

## Examples of values

### Openness

We welcome opinions from both employees and customers, and we communicate openly and constructively. We accept everyone.

### Self-reflection and self-insight

Everyone must remind each other, but at the same time also reflect on how our behavior affects our colleagues and customers.

### Involvement

We strive always to involve employees in topics related to the work and long-term goals. Everyone contributes to the development and improvement of our way of working.

### Honest and straightforward communication

Everyone's opinions are valuable to us. We view comments about improvements, opportunities, or new ideas from employees, suppliers, and customers in a positive way. Criticism of the business can be raised internally without the risk of negative consequences.

## Competence

### Service and quality responsibility

We strive to always provide the best service to our customers and at the same time deliver the highest quality.

### Professional competence

Our competence is our strength. To maintain a high level of competence, we offer several internal and external training courses to our employees. We also learn from each other, develop new ways of working, and dare to challenge the boundaries to improve our product.

### Accuracy and structure

We show forward thinking and always try to exceed the customer's expectations. We feel satisfaction in a job well done.

### Dare to ask for help

Through lack of prestige, we utilize each other's strengths and competencies and create a strong total solution for the customer.

## Community

### Respect and humility

The key to community is acceptance. Together, we show respect for each other and that it's okay to make mistakes, as long as we learn from them.

### Positive treatment

We are proud of what we do and of being part of the company. We work as a team and support each other.

### Joy, humor, and laughter

We believe in having fun at work. Therefore, the entire operation must be characterized by well-being, energy, and an inspiring environment where we lift each other.

## Human rights and working environment

We respect human rights and must be aware of how our operations may affect the fulfillment of this obligation. We take responsibility for the rights in our business that apply to our employees and the society in which we operate.

### Equality and equal rights

All our employees must be treated with respect. We do not tolerate discrimination, physical or verbal harassment, or any form of threat or violence towards our employees. We must always protect workers from retaliation when they report incidents, hazards, risks, and opportunities.

All current and potential employees must be treated fairly and without prejudice regardless of gender, gender identity or expression, sexual orientation, religion or other beliefs, ethnicity, disability, or age. This means that we do not discriminate in recruitment, salary setting, skills development, promotion, dismissal, or in our daily work with each other. Correspondingly, customers and other stakeholders are treated fairly and without prejudice.

No employees shall be subjected to offensive special treatment such as bullying, psychological violence, social ostracism, sexual harassment, or other forms of harassment. Recruitment, development efforts, and promotion take place based on competence, qualification, merits, and performance.

We comply with applicable laws and trade union guidelines regarding working hours and compensation.

#### Abuse

We neither tolerate nor allow the abuse of alcohol or drugs. Our goal is to keep the company free from abuse. An alcohol- and drug-free workplace is a necessary condition for our employees' safety, working climate, health, and safety.

#### Working environment

We are each other's work environment and must ensure a good one, and work proactively when it comes to ensuring the safety and health of the employees. A good and safe working environment is a strategically important part of our and our employees' development. The objective is to create a physically, psychologically, and socially healthy and developing workplace for employees.

All employees have a work environment and personal responsibility by following safety regulations and pointing out risks and deficiencies in the work environment. Work adaptation and rehabilitation issues must be included as an important and natural part of the work environment work.

#### Business ethics

##### Healthy business relationships

Our business relationships must be characterized by honesty and business ethics with a focus on the customer's best interests. This means that all employees within the company must behave responsibly and that agreements entered into and promises made are kept. We shall treat our business relationships with respect.

We comply with laws, regulations, and industry requirements in all areas where we operate.

##### Healthy competition

We work for healthy competition in procurement and purchasing. We oppose manipulated competition in the form of price collusion, cartels, and tender manipulation.

##### Anti-corruption

Our operations operate based on prevailing laws, standards, and internal guidelines for anti-corruption. This means that we neither support nor allow any form of corruption.

Representatives of the company may not give, promise, or offer a benefit that is contrary to applicable laws, to customers, suppliers, partners, or authorities and their representatives. The benefit is also impermissible if it is directed to someone else, for example, the recipient's next of kin.

What has been stated regarding the company's ability to provide benefits also applies inversely in terms of what companies may allow employees/contractors to receive as benefits. This means that no employee may, through their position or role in the business, demand, accept, or receive personal benefits in the form of gifts, offers, or goods.

We conduct customer events with customers to create or maintain good business relationships. This must be conducted according to internal guidelines and comply with applicable tax laws in a way that does not risk influencing the recipient's decisions or way of fulfilling their duties.

#### Conflicts of interest

A conflict of interest occurs when something or someone influences an employee's judgment to act in the best interest of the company. The company's representatives must never make decisions based on personal interests or personal relationships.

As an employee, you must be observant of possible conflicts of interest and avoid those where a family member, relative, or close friend is involved. In case of doubt, the employee must always ask the nearest manager.

Everyone who represents the company must manage their private and external activities and financial interests in a way that does not conflict or appear to conflict with our interests.

#### Accounting and financial reporting

We correctly report financial transactions by applicable laws and good accounting practices.

#### The company's assets and resources

The company's assets and resources must only be used for the company's business operations.

Assets owned by the company, such as office supplies, IT systems, applications, software, and other assets, are to be used only in the business of the company.

Employees must not have a side job that could disturb the trust in the employee or the company, about our customers and suppliers. Employees may not, without the special consent of their immediate manager, run activities of any kind on their own or other behalf, or undertake employment or assignments, which may adversely affect the work within the company.

#### Communication and social media

Everyone who works for us represents the company. We do this both at work and outside. Therefore, all communication we write and speak is part of the company's brand. We all represent the values, policies and guidelines that the company stands for. Therefore, all communication is important to consider, so that it is accurate, honest, and represents the core value that is the spirit of the company.

Only designated people at the company have the right to release official information about the company.

If you own a computer, telephone, or other electronic equipment that the company owns, you as an employee are responsible for responsibly using this from a communication perspective.

#### Social media

If you indicate that you are an employee of the company on social media, the information you write about your work or the company, its products, and/or services is considered official information about the company. If you write about opinions about the company, its services, or its products, you must clarify that these are your personal opinions and not the company's.

As an employee, you must take the following into account when writing about the company on social media:

- Your responsibility not to spread confidential information about the company, its suppliers, or customers.
- You must avoid offending other employees, customers, dealers, or business partners in your communications.
- You must not use the company's brand or logo in a way that could mislead the public.

For more details, please check our Social media policy.

#### Handling of confidential information

It is the responsibility of each employee to follow our policy and internal procedures regarding the handling of confidential information, which is owned by us or third parties must protect it from unauthorized access. Examples of such information can be financial information, business plans, technical information, information about personnel and/or customers, and other sensitive information.

#### Sustainability

We work actively to contribute to the global sustainability goals with a focus on the social, environmental, and economic goals.

#### Gifts and bribes

The company does not tolerate corruption or bribery in any form. It is strictly forbidden to use this type of method in any kind of business dealings.

Consult with the immediate manager regarding gifts to customers, suppliers, or authorities. Gifts should never be used to create business advantage in any context.

You must not accept gifts that could affect your objectivity or your professional decision-making in business and you must consult your immediate manager on questions related to this.

#### Sponsorship and gifts

Donations to charities and other organizations that wish to be sponsored by the company must be able to confirm that they are not under any circumstances part of any form of corruption and that they can demonstrate that they sustainably run their business both in terms of finances, social work, and the environment.

#### Political interests

The company is politically neutral. The company's name, brand, products, and services may not be used for political purposes by political parties, political organizations, party politicians, or candidates.

We do not sponsor political organizations, parties, or candidates/politicians.

If employees wish to get involved politically in their spare time, this must not affect the employee's judgment in the workplace and the company's policies and guidelines must be followed regardless of political opinion.

#### Insider trading

The company is registered on the stock exchange, thus we are regulated by laws regarding "insider trading". Thus, all information that could affect the company's price on the stock market must be kept confidential.

All employees must therefore keep all internal information, which could affect the above, strictly confidential to external parties.

## Money laundering

The company undertakes to comply with anti-money laundering and anti-terrorist financing laws established in most of the world's countries. Money laundering occurs in most cases when the assets of criminal activities are put into circulation in the market to start making the money flow seen as legal.

Financing of terrorism occurs when payment or financing that can lead to criminal actions in the form of terrorism is made. Being guilty of money laundering does not necessarily mean that the person or organization involved automatically knows where the money comes from.

## Fair working conditions

Employment conditions, wages, and benefits must be fair and, according to the market span, applicable to the place where the company is located. We follow the laws and regulations that exist for the industry in the country where we operate and strive to follow, for example, working time rules. All employees, even part-time employees, must have their working conditions documented in an agreement and be aware of both their rights and obligations as employees of the company.

The company does not tolerate child labor, either internally, with suppliers, customers, or partners, in any form or at any point in the supply chain. We do not tolerate forced labor in any form, human trafficking, or any form of slave trade or slave labor, either internally, with suppliers or partners at any point in the supply chain.

## Health and Safety

All employees must be aware of the company's regulations regarding health and safety. This means training and information about health and safety upon introduction, but also regular updates and information during employment. It is the responsibility of every manager and employee to always keep up to date with health and safety information.

The use of drugs and alcohol in the workplace is not permitted. Consumption of alcohol may be permitted in special contexts, such as staff parties, then according to guidelines from the company's management.

## Compliance with the Code of Conduct

HR managers in each department are responsible for informing employees of their rights, obligations, and responsibilities according to this code.

When new employees are introduced, they are informed about the code of conduct. Each employee is expected to follow the company's code of conduct, applicable laws, regulations, and other policies, and to take responsibility for complying with them in action and conduct.

If you are in doubt as to whether an action or behavior conflicts with our Code of Conduct, use your common sense and consider whether it is in line with our Code of Conduct. If in doubt, always be transparent and ask your manager for advice.