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# Code of Conduct

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## Revision history

<b>VERSION</b>	<b>DATE</b>	<b>REVISION AUTHOR</b>	<b>SUMMARY OF CHANGES</b>
1	Date	Sam Olnén	New Document
2	03.11.25	Andrew Gilmour and Ellie Mabbett	Amendments to make the Code of Conduct Public for Customer internal review only.

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# **1 GOVERNANCE AND BUSINESS ETHICS**

## **1.1 Anti-bribery and corruption**

We have zero tolerance for corruption, including bribery, kickbacks, facilitation payments and fraud. We refuse to accept or retain business through bribery and exercise fairness and transparency in all dealings with business partners.

No one representing the Company may directly or indirectly offer, promise, grant, or authorize the giving of money or anything of value (including travel or hospitality) to someone in order to unduly influence the recipient in the performance of professional duties or in order to obtain or retain an improper business advantage. We make sure gifts and hospitality always support a clear business objective and are openly disclosed and accurately recorded, of reasonable value, and appropriate to the nature of the business relationship.

We neither ask for, nor accept, improper benefits from others for performance of our duties to the Company.

*For more information, see our Anti-bribery Manual.*

## **1.2 Fair competition**

We support the principles of free enterprise and fair competition and believe that free and fair competition leads to the best outcomes for consumers, society and our business.

Employees do not engage in discussions or otherwise take any illegitimate actions with competitors regarding pricing, market allocation, production and sales quotas, or bid rigging, or any other sensitive topics. Employees do not make any arrangements with the intention to prevent, restrict or distort competition.

*For more information, see our Competition Manual.*

## **1.3 Trade compliance**

We comply with relevant export controls and sanctions laws, including the United Nations sanctions and applicable sanctions under the laws of the European Union, the United States and the United Kingdom. Employees never attempt to circumvent applicable trade sanctions.

*For more information, see our Trade Compliance Manual.*

## **1.4 Anti-money laundering**

We know our customers and make sure all our financial activities are carried out in ethical, transparent and legal ways. Our accounting records show the nature of all transactions in a correct and non-misleading way. We report any suspicious transactions.

Employees carry out all deals and financial activity with complete transparency and in line with standard processes.

## **1.5 Conflicts of interest**

We avoid situations in which our personal interests, or the interests of our family members or others, affect our ability to make business decisions that are in the best interests of the Company. We declare any actual or potential conflict of interest situations to relevant superiors so that it can be solved.

## 1.6 Inside information and confidential information

Inside information is non-public information that, if made public, would likely have a significant effect on the price of a security, or the price of a related security. We never trade shares or other securities when in possession of inside information.

We never disclose inside information to anyone, except where the disclosure is made in the normal exercise of employment in accordance with applicable internal procedures.

All information received from the Company are handled in a secure and confidential manner according to applicable confidentiality undertakings.

## 1.7 Communications and social media

Our external communications are accurate, transparent, and straightforward.

When using social media, employees avoid giving the impression that they are speaking on behalf of the Company, unless they are authorised to do so.

## 1.8 Artificial intelligence

We use artificial intelligence responsibly and ethically, with awareness of the inherent risks in using artificial intelligence. We only use vetted and approved artificial intelligence for the completion of work related tasks.

For more information, see our *Artificial Intelligence Acceptable Use Policy*.

## 1.9 Relationship with suppliers and other business partners

Where relevant, we perform risk based due diligence on potential suppliers and other business partners before we enter into business relationships. Such due diligence may include considerations of impacts on sustainability matters. We ask our suppliers and where relevant, other business partners, to comply with our Supplier and Business Partner Code of Conduct as a minimum requirement. We exercise fair behaviour with suppliers, including taking measures to prevent late payments.

# 2 HUMAN RIGHTS AND LABOUR STANDARDS

## 2.1 Human rights

We understand that our business may have an impact on the enjoyment of human rights, particularly in relation to people's working and living conditions and the local communities affected by our business operations. We consider respect for human rights to be a minimum standard for conducting business with legitimacy. To this end, we commit to respect the UN Guiding Principles on Business and Human Rights and we recognise our responsibility to conduct our business with respect for all internationally recognised human rights<sup>1</sup>.

Our commitment to UN Guiding Principles on Business and Human Rights means that we prioritise our human rights efforts based on saliency. We are committed to identify instances where our business could cause or contribute to adverse human rights impacts and, as effectively as possible, to prevent, neutralise and mitigate any such impact(s) and, if necessary, provide remediation to affected persons.

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<sup>1</sup> Human rights include those set out in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Labour Organisation's core conventions.

## **2.2 Modern slavery and children's rights**

We do not tolerate any forms of modern slavery, including forced, bonded or compulsory labour, or human trafficking.

We respect children's right to personal development and education, and do not employ persons below 15 years of age or, if higher, the legally prescribed minimum age. Persons under the age of 18 are not allowed to perform hazardous work (i.e. work that is mentally, physically, socially or morally dangerous or harmful), night work, or work that interferes with their mandatory schooling.

## **2.3 Healthy and safe working environment**

Our work environment is healthy and safe for all employees. We take adequate steps to prevent accidents and injuries to the physical and mental health of our employees.

## **2.4 Diversity, equity and inclusion (DE&I)**

All employees are treated with dignity and respect. We provide equal opportunities to everyone and strive to have a diverse workforce. All employees with the same qualifications, training, and skill set receive equal pay for equal work.

Discrimination or harassment is not tolerated. Any form of physical, sexual, or psychological harassment or abuse is strictly prohibited.

## **2.5 Freedom of association and collective bargaining**

Employees are free to join associations and unions to represent their interests as employees, to organize, and to bargain collectively or individually, without discrimination, harassment or retaliation.

Employees are free to express their political views and engage in political activities outside of working hours without retribution or discrimination in the workplace. Employees may not, however, use the Company's name or property to further their personal political interests.

## **2.6 Privacy and personal data**

We safeguard and take steps to protect the privacy of our employees, customers and others. This includes complying with applicable laws when we process personal data. Personal data is disclosed to third parties only when legitimate grounds to do so have been established and appropriate measures have been taken to protect the information to be transferred.

*For more information, see our Data Protection Manual and Information Security Policy.*

## **3 Environmental sustainability**

We conduct our business in compliance with applicable environmental laws and regulations and we integrate sustainability considerations into our business strategy and value creation plans.

We recognize that climate change mitigation and climate change adaptation are fundamental for any companies' long-term business success. We continuously strive to ensure that our operations are conducted with the least possible negative impact on the environment, climate, water, biodiversity and ecosystems. We also strive to adapt considering the climate and the environment's inevitable impact on our business.

In our day-to-day operations, we create plans to meet our climate and environmental targets. This includes finding ways to lower our greenhouse gas emissions, protect biodiversity and to choose sustainable materials

when sourcing. Also, the environmental impact of travel is always considered and we organise business travel with sustainability considerations.

Ideas from employees that reduce the climate and environmental impact of our activities are supported and encouraged.

## **4 IMPLEMENTATION, COMPLIANCE AND ENFORCEMENT**

It is the personal responsibility of every employee, manager, executive officer, and member of the board of directors to understand and comply with the Code of Conduct. Managers should ensure that their subordinates fully understand and comply with the standards and requirements stipulated in the Code of Conduct.

The Company provides adequate training on the Code of Conduct for all employees, consistent with the Company's risk profile and appropriate to employee responsibilities.

We do not tolerate illegal or unethical behaviour. Suspicions of violations of this Code of Conduct including business conduct incidents, will be investigated promptly, independently and objectively. Anyone violating the Code of Conduct may be subject to disciplinary action, up to and including termination of employment.

## **5 REPORTING**

Violations of the Code of Conduct should be escalated in line with standard reporting procedures, and if appropriate, to the CEO.

If you suspect a person has violated the Code of Conduct, or engaged in other serious misconduct, and you would prefer to file an anonymous report, you may report a concern through the whistleblowing system.

The Company will not tolerate any attempt to take adverse action against an employee for reporting a genuine concern regarding wrongdoing. Any such retaliation may be subject to disciplinary action, up to and including termination of employment.

## **6 RELATED DOCUMENTS**

This Code of Conduct should be read in conjunction with the following manuals and policies:

- *Anti-bribery Manual*
  - *Competition Manual*
  - *Data Protection Manual*
  - *Trade Compliance Manual*
  - *Information Security Manual*
  - *Whistleblowing Manual*
  - *Supplier and Business Partner Code of Conduct*
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