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## ENSURING ETHICAL BUSINESS CONDUCT AT THE HIGHEST STANDARDS

The Inteno Group AB (hereinafter “Company”) is committed to conducting its business at the highest ethical levels. We have adopted this Code of Conduct to ensure all employees and affiliates are aware of what is expected from them.

### Scope of the Code

It is important that goods and services handled by Company are produced and provided in an ethical way. Therefore, the Company expects this Code to be applied and upheld in the organizations’ every affiliate, Suppliers, sub-Suppliers and Vendors and producer to the Company, notwithstanding if the Suppliers and Vendors delivers services or goods.


### Legal compliance and the Code

The Company complies with local laws and regulations of each country in which we operate. This Code sets up a minimum requirement. If provisions in other laws, regulations or rules, be it local, national or international, have a more stringent position to the Corporate Responsibility matters mentioned in this Code, those shall be observed and complied with.

## SUPPLIERS AND VENDORS

Our contractual relationships with suppliers and vendors, dealers and customers are important elements of the Company’s success. Supplier, vendor selection and purchasing decisions must be made objectively and in the Company’s best interests, striving for the best deal by evaluating costs, requirement fulfillment, expected delivery capability, quality and other relevant factors. Any agreement with a supplier and vendor should be concluded according to the Company Purchasing Procedures and Ethical Principles.

Negotiations with suppliers, vendors and dealers should be conducted in a professional manner, engaging the Company employees and with the use of the four-eye principle. Our people must always be sure that business decisions are made without any unjustified influence from a third party. Suppliers and vendors which are proven to attempt to unduly influence the Company’s purchasing decisions may be excluded from any future transaction with the Company.

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## BUSINESS INTEGRITY

### Anti-corruption

No Company employee or member of our Management Team may offer, ask, give or accept, directly or indirectly, any undue advantage for personal gain from any third party, unless it can be constituted as being within the boundaries of accepted business practices such as representation and reasonable hospitality given in the ordinary course of business.

As guidance, no single gift or benefit should exceed the value of 50 Euro. When In doubt, employees are expected to seek advice from their managers.

In most countries gifts or benefits to government employees or public officials are considered a violation of law or regulation. Company employees must not offer money or any gift to an official or employee of a governmental entity, except for symbolic gifts of insignificant monetary value provided this is allowed by local law.

### Fair competition

The Company is firmly committed to fair competition and open markets. We remain firm believers that free and fair competition works in our favor allowing us to provide the Best Deal, i.e. we deliver expected quality and price leading communication solutions to our customers.


### Conflict of interest

Business decisions are always made in the best interest of the Company. The power invested in us by the Company may not be used for other goals than furthering Company's interests. Personal relations or considerations may never influence our decision making. This includes not only potential gains for us, but also for our relatives and friends.

To avoid risk of conflict of interest the following applies: - Employees may not, without the Company's written consent, work outside the Company in any capacity (e.g. employment, consultancy, Board membership). - If there is any risk, however small, for conflict of interest, employees are expected to immediately inform their manager.

### Grandparent and "4 eyes" principle

To further limit the risk of conflicting interests and to make sure that business decisions always are made in the best interest of the Company, all contractual relationships of material significance between the Company and a third party (e.g. suppliers, vendors, dealers and partners etc.) needs to be negotiated and approved in writing by at least two persons (=four-eyes principle) prior signing of the final agreement. Whenever possible the second person approving the contractual relationship should be the manager of the first approver (=grandparent principle). Final agreements shall be approved and signed in

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accordance with the local legal policy, however never signed by less than by two signatories jointly. In certain cases, as outlined in other policies and guidance, the grandparent principle is mandatory.

## Financial reporting

The integrity of the Company's financial records is critical to the operation of the business and is a key factor in maintaining the confidence and trust of our shareholders. We must ensure that all transactions are properly recorded, classified and summarized in accordance with the Company accounting policies. No employee may enter or remove information in the Company's books or records that intentionally hides, misleads or disguises the true nature of any financial or non-financial transaction or result.

Employees involved in financial reporting shall always provide full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, government agencies, tax authorities and in other public communications. Comments about financial reporting and prospects to external parties shall only be made by authorized official spokespersons.

## Corporate Governance


The Company strongly believes in transparent and consistent corporate governance practices and abides with the applicable regulations and standards in each of its geographical markets. This protects the legitimate interests of all the Company shareholders and stakeholders.

## TREATING PEOPLE WITH RESPECT

### Fair working conditions

The Company employees are entitled to fundamental human rights which shall be known, understood and respected and be applied equally. No one shall be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. Forced labour, exploited or bonded labour is strictly forbidden. Employees shall not be required to lodge deposits or original identity papers as a condition for employment. Employees shall not be forced to work more than the limits on regular and overtime hours allowed by the law of the country in which they are employed.

Overtime shall be compensated at the legally required rate. All employees shall have contracts specifying the terms of employment. Children under the minimum working age established by local law or fifteen (15) years, whichever is greater, shall not be used as labour force. Employees under eighteen (18) years shall not be engaged in hazardous or heavy work, or on nights shifts. Company does not accept discrimination, whether active or by means of passive support, whether based on ethnicity, national origin, religion, disability, gender, sexual orientation, marital or parental status, union membership,

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political affiliation or age. The Company regards diversity as a lever for profitability. The ambition is to focus on behaving in a way that attracts diversity.

The rights of employees to freely associate and to bargain collectively, in accordance with the laws of the countries in which they are employed, shall be recognized and respected.

**Compensation and benefits**

Employees shall be paid at least the minimum total wage required by applicable national law or minimum wage agreed with trade unions including all mandated wages, allowances and benefits. All employees shall have the right to equal pay for equal work, as well as periodic holiday with pay.

Occupational health and safety Safety at work is a prioritized concern of Company. Adequate steps to prevent accidents and injury to health shall be taken by minimizing the causes of hazards inherent in the working environment and by providing appropriate safety equipment.