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Elastisys Code of Conduct

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Owner: CEO

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Change Log

Author:	Version:	Date:	Change History:
Henrik Enberg	1.0	2024-10-10	<i>Initial release of document.</i>
Hans Olof Edblom	1.1	2026-03-05	<i>Annual review - minor corrections.</i>

Classifications:

| Public: Okay to put on our website. **| Internal:** Elastisys use only.

| Confidential: As needed internally depending on working group **| Customer data:** Never shared

Introduction

Welcome to Elastisys AB. Our Code of Conduct establishes the ethical framework and principles that underpin our business practices and interactions. It is our commitment to operate with integrity, transparency, and respect for all stakeholders. This Code provides guidance on how we conduct ourselves in various scenarios and serves as a foundation for ensuring compliance with both legal requirements and ethical standards. Elastisys has developed a set of company policies, applicable to all employees, that govern our everyday work and ensure compliance with the Code of Conduct.

1. Legal and Ethical Compliance

1.1 Compliance with Laws and Regulations

We are dedicated to operating in full compliance with all applicable laws and regulations at the local, national, and international levels. This encompasses a broad range of legal requirements, including but not limited to employment laws, environmental legislation, anti-corruption statutes, and data protection laws.

1.2 Ethical Conduct

Our commitment to ethical conduct is unwavering. We strive to uphold the highest standards of honesty and integrity in every aspect of our business. This means avoiding practices that could compromise our ethical standards or reputation and making decisions that are not only legal but also morally sound. Each employee is expected to act with integrity and to be mindful of the ethical implications of their actions.

2. Respect for Human Rights

2.1 Diversity and Inclusion

We embrace and promote a culture of diversity and inclusion within our workforce. It is our firm belief that a diverse team enriches our perspectives and contributes to our success. Discrimination, harassment, or any form of bias

based on race, gender, age, religion, sexual orientation, disability, or any other protected characteristic will not be tolerated. We are committed to creating an environment where every individual feels valued and respected.

2.2 Fair Labor Practices

Our organization is committed to fair labor practices and ensuring that all employees work in an environment that is safe, healthy, and free from exploitation. We are dedicated to providing fair wages, adhering to labor standards that respect the rights of our employees and employ a collective bargaining agreement.

2.3 Children's Rights

We are committed to upholding and respecting the rights of children, in alignment with international standards such as the United Nations Convention on the Rights of the Child. Our organization strictly prohibits any involvement in or support of child labor. We ensure that our business practices and supply chain are free from practices that exploit or harm children. We advocate for the protection of children's rights in all areas of our influence and will take action to address any violations or concerns that arise.

2.4 Respect for Privacy and Personal Data

We are committed to safeguarding the privacy and personal data of all humans and in particular our customers, employees, and partners.

3. Integrity in Business Relationships

3.1 Anti-Corruption

We maintain a zero-tolerance policy towards corruption in any form. Our business dealings are conducted with the utmost transparency and fairness. We do not engage in, nor do we condone, bribery, kickbacks, or any other unethical practices that could influence or distort business decisions. Every employee is expected to uphold these standards and report any concerns related to potential corruption.

3.2 Conflicts of Interest

Employees are required to avoid situations where their personal interests could conflict with the interests of the company. Any potential or actual conflicts of interest must be disclosed to management to ensure that they are managed

appropriately. This includes financial interests, personal relationships, and any other factors that could affect impartial decision-making.

3.3 Fair Competition

We are committed to conducting business in a manner that fosters fair competition. Our practices are designed to comply with all relevant competition laws and regulations, and we promote a competitive environment that benefits consumers and the market as a whole. We do not engage in anti-competitive practices such as price-fixing, market manipulation, or collusion with competitors. We also respect the intellectual property rights of others and do not seek to gain unfair advantage through unlawful or unethical means.

4. Protection of Company Assets

4.1 Use of Company Resources

Company resources—including physical assets, intellectual property, and confidential information—are to be used responsibly and exclusively for business purposes. Employees are entrusted with these resources and are expected to protect them from misuse, theft, or unauthorized access. Any wasteful or improper use of company assets is strictly prohibited.

4.2 Information Security

We are committed to maintaining the confidentiality, integrity and availability of sensitive and proprietary information related to our business operations and clients. Employees must handle such information with care and ensure that it is not disclosed without proper authorization. This obligation extends beyond the duration of employment and encompasses all forms of communication and documentation.

5. Environmental Responsibility

5.1 Sustainability

We are dedicated to reducing our environmental impact through sustainable and responsible practices. This commitment includes minimizing waste, conserving resources, and complying with all relevant environmental regulations. We continually seek ways to improve our environmental performance and encourage employees to contribute to our sustainability goals.

5.2 Reporting Environmental Issues

Employees are encouraged to report any environmental issues or concerns that may impact our sustainability efforts. Prompt reporting allows us to address these issues effectively and implement corrective measures to mitigate any adverse effects on the environment.

6. Health and Safety

6.1 Workplace Safety

We are committed to providing a safe and healthy work environment for all employees. This includes adhering to safety guidelines, maintaining equipment, and ensuring that workplace conditions meet health and safety standards. Elastisys employs two safety representatives and complies with Swedish labor laws. Employees are required to follow safety protocols and report any hazards or unsafe conditions to ensure a safe working environment.

6.2 Well-being

We recognize the importance of employee well-being and strive to support a balanced and healthy lifestyle. Our initiatives include promoting physical and mental health, providing access to wellness programs, subsidies and fostering a work-life balance that contributes to overall employee satisfaction and productivity.

7. Implementation and Enforcement

7.1 Training and Awareness

To ensure that all employees understand and adhere to this Code of Conduct, we provide comprehensive training programs. These programs cover the principles outlined in this document and emphasize their importance in daily operations. Regular updates and refresher courses will be provided to reinforce compliance and ethical behavior.

7.2 Reporting Violations

We encourage employees to report any violations or suspected breaches of this Code. Reports can be made confidentially to Human Resources via HR Systems or per Employee Handbook instructions. We are committed to

investigating all reports thoroughly and fairly, with a focus on resolving issues in a transparent manner.

We are committed to creating an environment where employees can report violations without fear of retaliation. Any employee who reports a violation in good faith will be protected from adverse consequences, such as disciplinary action or retaliation. The company will thoroughly investigate any allegations of retaliation and take appropriate action to address and rectify any issues.

7.3 Consequences of Non-Compliance

Violations of this Code of Conduct will be addressed promptly and may result in disciplinary action, which could include termination of employment. In cases where legal infractions are identified, appropriate legal actions will be pursued. We are dedicated to ensuring that our standards are upheld and that any breaches are dealt with effectively.

8. Review and Updates

This Code of Conduct will be reviewed annually to ensure its relevance and effectiveness. Any updates or changes will be communicated to all employees to keep them informed of new or revised policies. We are committed to continuously improving our practices and maintaining a culture of integrity and excellence.