



This code of conduct applies to and must be followed by everyone working within the Sdipotech group. If you have any questions regarding a specific matter you should contact your manager



CODE OF CONDUCT

COMPLIANCE

The operations are based on close and long-term relationships with customers, suppliers and other business partners, and we want to be a trustworthy, long-term and reliable partner. Besides commercial goals and principles, the business operations should also be conducted with high standards of integrity and ethics. We thus attach great importance to acting in professional, honest and ethically correct manner.

We naturally comply with applicable legislation in all business areas and on all markets where we conduct business. We respect rules and recommendations and strive to remain at the forefront by keeping ourselves updated about coming requirements in relevant jurisdictions.

We expect as a minimum requirement that customers and suppliers have knowledge of and comply with current legislation.

The Managing Director of each individual company in the Group is responsible for ensuring that the day-to-day work is conducted in accordance with our Code of Conduct.

BRIBERY AND CORRUPTION

Bribery is to offer or accept payments, gifts or favours to influence a business outcome. Sdiptech complies with the Swedish Business Code issued by the Swedish Institute Against Bribes (IMM), which aims to guide companies in questions of how gifts, remuneration and other benefits may be used in the business sector to promote the company's operations. All sales and marketing of our products and services shall also take place in accordance with the relevant laws and regulations in each country.

We must never, either directly or through third parties, offer any improper advantage to secure a business and not accept such advantage to give preferential treatment to suppliers or others. All activities that could give rise to suspicion of such behaviour must be avoided. This is especially important when dealing with government employees and officials, such as persons employed in the public health care sector.

Don't accept personal gifts of benefits, such as leisure trips, discounts etc from someone who could be interested in influencing your business decisions.

If you are offered or asked for a bribe, you must not only reject it but also report the event to your manager.

COMPANY PROPERTY

All company property shall be used for legitimate business purposes only. We have a responsibility to our shareholders to use our resources efficiently and not for our own personal gain.

Expenditures for traveling, representation and entertainment must be reasonable, relevant and proportionate to the business objective being sought. only reject it but also report the event to your manager.

CONFIDENTIAL INFORMATION

The main rule is that all non-public information concerning your work shall be treated as confidential. Such information must not be disclosed to third parties or used for one's own personal benefit. For instance, this applies to information that there is or has been a relationship between us and a customer/supplier. Information about services and products that customers/suppliers buy, or sell, is also confidential unless anything else has been agreed.

Exercise care when discussing such information in public places such as restaurants, taxis or public transport.

Documents containing work related information shall be securely stored and handled. Private email accounts and computers shall not be used to process company information.

In addition to the above, all employees are bound by confidentially clauses in their employment agreements and Sdiptech's insider and information policies.

Involvement in external activities shall be reported to and approved by the immediate manager. Examples of such activities are if employees at Sdiptech accept employment outside Sdiptech (part-time or full-time), are on the board of directors or similar body of another company or different organisation or conduct business activities of another kind.

SOCIAL MEDIA

At our workplaces, most of us have access to the Internet and social media. They are — in the same way as the telephone and email — tools for our work and are intended for communication in a business context. Employees who in their professional capacity communicate using social media always represent their company and Sdiptech. Therefore, all communication must be aligned with our values and be consistent with how we communicate in other channels. As employees we also must draw a clear distinction between a private and professional presence on the Internet and on social media.

COMMUNITY

Each company within the Group strives to have a positive influence in the communities where the Group operates. Business decisions that may be considered to have an impact on the wider community shall as far as possible always be preceded by, or promptly followed by, discussions with community representatives for the purpose of identifying possible need for collective measures.

We maintain neutrality in relation to political parties and candidates. Neither the name Sdiptech Group, the company name of each group company, nor any resources under the control of group companies shall be used to promote the interests of political parties or candidates.

MONEY LAUNDERING

Money laundering is a process by which the origin of money generated from crime is concealed in legitimate dealings. The purpose of money laundering is to make the “dirty money” appear as though they have been legally obtained.

Money laundering is a criminal act and we will never take part in such activities or omit to report an action that contravenes applicable regulations.

When receiving or handling someone else’s money, always make sure that you know who you are dealing with (including the ultimate beneficial owner of a company) and what the funds are being used for.

In the event of doubt, involve the relevant financial department.

COMPETITION

We comply with relevant competition rules and regulations. We do not take part in activities such as price-fixing, arranged market segmentation, cartels or monopolistic behaviour which aims to reduce competition. Take extra care when discussing and setting prices.

EQUAL OPPORTUNITY

We grant everyone equal opportunities regardless of gender, ethnicity, sexual orientation or political or religious beliefs.

We have zero tolerance of discriminatory behaviour and sexual harassment. Any such observations shall be immediately reported.

We offer equal employment opportunities regardless of race, religion, gender, disability, family circumstances or sexual orientation. We work to counter all forms of discrimination at the workplace or in dealing with employees when it comes to setting of salaries and career advancement. We strive to introduce appropriate processes for discovering and remedying each case of discrimination.

Employees should be treated with respect and dignity. No employee should under any circumstances be subject to physical punishment or other forms of physical, sexual, psychological punitive measure, harassment or coercion.

We do not accept any form of forced labour, involuntary or unpaid work. The UN’s Convention on the Rights of the Child, the ILO’s Convention on the Minimum Age for Employment, and the Convention on Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, are guidelines for all business activities that are conducted in our name.

Employees should have the freedom to exercise their legal right to be a member of, organise or work for organisations that represent their interests as employees.

ENVIRONMENT

Recycling considerations and economising on natural resources are an important basis of our business operations. The environmental perspective should be part of every important decision, with the aim of creating long-term value for the Group's customers, employees, shareholders and for the wider community.

The environmental work shall also be conducted within the framework of our business concept and should be well-integrated in our operational work. By extension, this means that the entire life cycle of the products and services we supply should be taken into consideration.

We can take a holistic view of environmental issues through our highly skilled employees and by continually developing our know-how regarding environmental impacts. Measures to improve the environment should be taken as far as technically possible, commercially reasonable and environmentally motivated. Customers and suppliers are expected to be familiar with and meet requirements under national legislation, regulations and industry standards. Customers and suppliers as a minimum requirement should ensure safe handling of hazardous substances and waste.

WHISTLE BLOWING

All employees are encouraged to report any deviations from the Code of Conduct primarily to their immediate supervisors, and secondarily to any member of the executive management or via the Group's whistle blower function on: whistleblower@sdiptech.com

Sdiptech does not tolerate retaliation in any form against employees who point out issues of non-compliance or in good faith report deviations from the Code of Conduct. Any such retaliation will be regarded with the greatest severity.

Sdiptech's executive management will ensure that any approach by an employee who asks for advice on or reports any issue covered by Sdiptech's Code of Conduct is treated confidentially.

CONFLICT OF INTEREST

All employees shall always have the group's best interest in mind and avoid situations where you (or a friend or relative) could benefit at the expense of the group.

This could be the case if a group company is doing business with another company in which an employee, its friend or relative has a financial stake through shareholding or employment.

If you find yourself in a conflict of interest, you must report it to your manager so that the situation can be resolved in a fair and transparent manner.