CODE OF CONDUCT

Our Code of Conduct reflects the core values that guide our business practices. It outlines the principles that everyone associated with the company should understand and provides guidance on expected behaviour in our daily work and interactions with others.

The Code of Conduct applies to all individuals working for the group including employees, trainees, students, consultants, and anyone representing the company in any country. We also expect everyone we do business with to follow the principles stated in our Code of Conduct.

FOLLOW THE LAW

1. Stay informed and act to ensure that you and the company comply with laws and regulations in the countries where the company operates.

ACT RESPONSIBLY FOR THE COMPANY

2. Ensure that costs you incur and obligations you assume on behalf of the company are necessary, appropriate and in line with relevant policies and authorizations.
3. Keep confidential information and intellectual property safe from theft or inappropriate access.
4. Take particular care to safeguard sensitive information about people. Follow GDPR regulations.
5. Ensure that any public communication on behalf of the company is coordinated and approved. Clearly distinguish whether you act in a professional or personal capacity in public settings and on social media.

AVOID CONFLICTS OF INTEREST AND CORRUPTION

6. Avoid situations that create or can be perceived to create a conflict between your personal interests and the interests of the company. Avoid putting others in a situation of conflict of interest. Disclose any conflict of interest to your supervisor if it arises.
7. Do not engage in any corruptive action or action that can be perceived as corruption or bribery.
8. Do not receive or give gifts of excessive value. Seek guidance if you are in doubt.
9. Ensure any sponsoring or donation by the company is tied towards its goals and never is motivated by the potential influence on parties with conflicted interests.

CONTRIBUTE TO A POSITIVE AND SAFE WORKING ENVIRONMENT

10. Contribute to a workplace that is enjoyable for all. Encourage diversity and inclusion.
11. Do not partake in any discrimination, harassment or bullying in any form.
12. Adhere to all safety rules and act to minimize any safety hazards. Report hazardous conditions, accidents, injuries and illnesses.
13. Consumption of alcohol is not permitted during working hours. Avoid creating pressure for others to consume alcohol.
14. Respect and support the protection of internationally proclaimed human rights. Do not become complicit in human rights abuses, and avoid all forms of forced, compulsory and child labour. Uphold the freedom of association.

TAKE ENVIRONMENTAL RESPONSIBILITY

15. Seek to develop and deliver products and services that contribute to increasingly sustainable customer activity. Seek to make products and perform services in an increasingly sustainable way.
16. Seek to reduce the negative environmental impact of our activities and those activities that you can reasonably influence at suppliers and customers. Prefer to implement direct improvements instead of buying carbon offsets or similar indirect measures to compensate for negative impact of activities.

ENCOURAGE BUSINESS PARTNERS TO UPHOLD SIMILAR STANDARDS

17. Give preference to suppliers who operate in line with this code of conduct. Encourage and help suppliers to improve any non-aligned practices. Do not accept any breaches of law by suppliers.
18. Inform any agents or other intermediaries who provide services on behalf of the company that they are obliged to follow this Code of Conduct. Make reasonable endeavours to control that no part of any payment is passed on as a bribe or other form of circumvention of this Code of Conduct.

We encourage employees, business partners and others interacting with us to speak up whenever any concerns or questions arise, including any misconduct or violations of this Code of Conduct. If you witness a possible violation of the Code of Conduct related to breach of any anti-competitive laws or anti-competitive behaviour, bribery or corruption, or discrimination, harassment or bullying, you are obliged to report it promptly.

Employees are to report primarily to their immediate supervisor, secondarily to any member of the company's management team and thirdly to relevant authorities as deemed necessary. Alternatively, employees and external parties can make an anonymous report through our external whistleblower function: https://report.whistleb.com/en/vindgroup

All reports will be handled with confidentiality, ensuring protection for the reporter. Speaking up or raising a concern should never have any negative consequences for the individual. Any retaliation towards a person reporting is strictly forbidden.

Täby 12 juni, 2024

Ghazal Fogeby
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