



# Code of conduct

## Inwido AB

*For employees*

## Introduction

The reputation of Inwido and the trust and confidence of our customers, partners, employees and other stakeholders is of vital importance to Inwido. Consequently, it is decisive for the continued success of our business that the organization and its employees, acts financially, socially and ethically in a conscious and responsible way.

These guidelines are applicable to members of the Board as well as all employees of the Inwido Group (Inwido AB and its subsidiaries). Board members and employees are expected to be aware of, and to conduct their activities in accordance with these guidelines and are encouraged to report incidents of non-compliance. Any incident, or suspected incident, of non-compliance shall be reported to either the local manager or, if preferred or if such manager is deemed to have any conflict of interest, to the CEO or Senior Vice President Human Resources of the Inwido Group. Any report of an incident of non-compliance may also be made anonymously via the email address [ethics@inwido.com](mailto:ethics@inwido.com). All reports are considered and shall, if necessary, be investigated. No forms of reprisals are allowed (termination of employment, harassment, discrimination etc.) as a result of reporting in good faith or participation in Inwido's investigation of a report.

2019 Inwido joined and signed the UN Global Compact to further underline the importance of the code of conduct.

Inwido will continuously strive towards working with business partners who have a high ethical standard and who act in the spirit of the code of conduct for Business Partners.

### 1. Legal compliance

All employees and board members shall in all their business activities endeavor to comply with all applicable laws, rules, regulations, guidelines and policies. It is the responsibility of each employee to seek appropriate advice on relevant legal requirements and other legal issues.

### 2. Human rights

Inwido expresses support and respect for fundamental human rights and recognizes our responsibility to honor those rights when we conduct our business. Inwido will endeavor to ensure that we do not violate the United Nations' Declarations of Human Rights adopted by the General Assembly of the United Nations and we must always consider health, safety and the environment in order to contribute to a sustainable development.

### 3. Business ethics

All business of Inwido shall be characterized by professionalism and a high ethical standard. Inwido requires honesty and integrity in all its business and expects the same from all its business associates.

Inwido does not accept offering or giving money or anything else of value either as an inducement to make, or as a reward for making, any decision favorable to the interest of Inwido. We must not accept gifts or hospitality that may compromise our independence or judgment regarding a third party. This includes hospitality or entertainment with a value that exceeds locally established limits, that is not customary or that is otherwise likely to be seen as inappropriate. Corruption, bribery and unfair anti-competitive actions shall be avoided at all times. Business decisions must always be based on the best interest of the company and not on personal considerations or relationships. It is the responsibility of Inwido's management to uphold an adequate anti-corruption strategy. A breach of Inwido's business ethics will most likely result in a termination of employment.

Inwido shall comply with all applicable rules on export control, which includes not to violate economic sanctions or to collaborate with any person targeted by economic sanctions. Inwido shall not be involved in any trade of sensitive goods without appropriate export declarations.

Inwido believes in fair competition. Inwido's employees shall comply with competition laws and refrain from entering into any agreement - written, oral or consensual - which may negatively impair fair competition. Inwido's employees may not exchange information on pricing and the market with Inwido's competitors.

Inwido does not favor any political position, wherefore Inwido does not fund any political campaigns or other political ends.

## 4. Personal data

Employee's and business partners of Inwido must always comply with the General Data Protection Regulation (EU) 2016/679 ("GDPR") on the protection of individuals with regard to the processing of personal data and on the free movement of such data, (hereafter referred as " GDPR").

Inwido shall only process personal data on equipment that is physically located in EU/EES. Inwido and its business partners shall take all reasonable technical and organizational measures to protect the personal data against unauthorized access, destruction and alteration.

Inwido shall gather information regarding how the Inwido products are used and whether any problems or error occur in connection to such usage. The information will for example be used for the purpose of improving the customer service and for provision of customer adapted offers regarding other Inwido products. In each case of processing a clear purpose and legal reason should be documented. To the extent possible processing should be anonymized. If the purpose does not allow anonymity the person (customer, employee, etc.) should be informed of the processing. In the case of marketing activities, the customer has the right to stop receiving any additional offers from Inwido., Upon notifying Inwido the processing must immediately stop.

Inwido or its business partners will not disclose the identity or any other personal information of the customer to any third parties.

## 5. Accounting

Inwido strives towards that Inwido's information shall be open, correct, continuous, expeditious and of high quality. Inwido's accounting shall be correct and compliant with applicable laws, policies and accounting norms. Financial information and other information which may affect the share price shall be communicated in accordance with applicable laws, stock market regulations and other provisions.

## 6.1 Work ethics

The relationship with our employees is built on mutual respect and dignity. We strongly believe in the connection between the competence of our employees and the result we achieve. To attract skilled people, we have to be an attractive employer that offers good working conditions, fair wages and appropriate training. Below follow some key areas of responsibility towards employees:

- All employees will be treated equally, fairly and with respect and no employee will be discriminated against because of, for example, ethnic origin, gender, sexual orientation, marital status, pregnancy, parental status, religion, political opinion, nationality, disability, age or union membership. Inwido also strives towards diversity when recruiting new employees.
- Inwido promotes a productive environment and does not tolerate any form of harassment or violence at the workplace.
- Inwido will not use forced or any form of involuntary labor or employ any person below the age of 15 or below the legal minimum age if higher than 15.

- Inwido endeavors to continuously develop the professional skills and competence of the individual employee in order for the employee to achieve job enrichment and promotion possibilities.
- It is the responsibility of Inwido's management that Inwido's processing of its employees 'personal data is made in accordance with applicable law.
- Inwido respects the right of all employees to form and join a trade union at their own choice and to participate in collective bargaining.
- Inwido recognizes the importance of providing a safe and healthy working environment and taking necessary reasonable steps to prevent accidents.
- Inwido recognizes the importance of a continuous social dialogue in the context of its overall corporate responsibility.
- Inwido recognizes the importance of fair wages. Inwido's strategy is to raise wages to a level that meets or exceeds a "living wage" and wages and benefits shall at least equal the local, legal or industry minimum standards.
- Inwido shall comply with applicable working time regulations reflected in national legislation or industry standards.

## 7. Environment and safety

Environmental issues are an integrated part of Inwido's business operations and overall sustainability shall continuously be the guiding principle in all processes throughout the entire life cycle of our products and services. Inwido will work actively with environmental issues and consistently endeavor to reduce the use of substances that may be harmful to the environment and strive towards a minimum environmental impact. Inwido will also strive to continuously improve the use of chemical substances and other resources effectively so that the company's impact on the environment is minimized in this respect as well. For further information we refer to our environmental policy.

Inwido's products shall comply will all applicable rules on product safety. It is imperative that Inwido's employees are acquainted with the applicable and relevant rules on product safety and that compliance is monitored.

## 8. Communication

Inwido will strive to maintain an open communication with those that are affected by our operations, whether they are employees, customers, suppliers, investors or the public and their representatives. Transparency and openness will be encouraged, provided that business secrets that might damage the competitiveness of Inwido and/or relations with customers and partners are not revealed. We will always strive to respond in a timely manner to inquiries.

Employees of Inwido must never disclose confidential company information to any person not employed by Inwido or to colleagues who do not need the information to perform their work-, except with a prior permission from Inwido. Confidential information includes but is not limited to; Inwido's financial and commercial relationships, buying, offers, strategies, supplier information, information on suppliers' capacity, IT solutions, campaigns, new sales markets, analysis, sensitive personnel data, information concerning Inwido and/or the business carried on within Inwido and which is not generally known outside Inwido; in other words, has not been published or otherwise communicated by or through Inwido. Inwido requests that employees and others performing work for Inwido, where relevant, enters into a non-disclosure agreement, according to the Inwido standard. Provided it is in line with applicable collective bargaining agreements.

## 9. Company assets

Inwido's employees shall respect company assets. Inwido has both tangible assets (machinery, equipment etc.) and intellectual property rights (software, concepts, trade secrets, trademarks etc.). Inwido's assets, including IT systems, may be used solely for legitimate business purposes and may not be used for employees' own or others' personal benefit. All use of IT equipment shall comply with Inwido's IT policy. Inwido's employees shall protect Inwido's assets against damage, theft and misuse.

## 10. Implementation

These guidelines set out the main principles of corporate responsibility, but do not aim to address all possible dilemmas that may arise. It is the responsibility of each Inwido employee to read, observe and promote these guidelines.

Special responsibility rests with all managers to enable their teams to understand the requirements of these guidelines.

Inwido insists that these guidelines are respected and applied by all employees and its Board Members. Employees and Board Members shall continuously keep themselves updated on any changes to these guidelines.

***Breach of these guidelines may result in disciplinary action, redeployment and termination of the employment of the party in breach. Furthermore, Inwido will report breach of laws and regulations to the authorities.***