

Code of Ethics

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The Centiro Spirit

The spirit within Centiro Group goes beyond values that can be put down in writing, but in this Code of Ethics, you will find the cornerstones of our culture – our values, ethics and boundaries.

In our ecosystem, we include Centiro colleagues, partners, suppliers, and other relevant business parties who conduct work with, or for Centiro. We expect everyone working with us to adhere to and respect the values and principles expressed in this Code of Ethics.

We must all work together to infuse the spirit of our values in everything we do. We must all be our best selves when it comes to business conduct and bring our commitment, energy, and ourselves into our work. We must all work to create a spirit that lasts, all the way. This is what has shaped our success so far and what will continue our success into the future.

Why We Have a Code of Ethics

This Code of Ethics has been adopted to emphasize the values and principles that govern our relationship with our colleagues, customers, business partners, and other stakeholders. It serves as a starting point for Centiro Group's relevant policies and rules. Business runs from person to person. The way you act, how you approach situations and challenges, and the way you treat other people makes a difference. Professional competence, integrity and personal commitment are the qualities that build our reputation. Our business is based on trust, common sense, fair play, and integrity.

This Code of Ethics is founded on internationally agreed regulations, primarily **the Ten Principles of the UN Global Compact**. According to the Ten Principles, all companies must support several basic guidelines pertaining to human rights, labor, the environment and anti-corruption within their sphere of influence. As members of **United Nations Global Compact**, six of the **2030 Agenda for Sustainable Development** goals are also in progress. We enact the same values and principles wherever and whenever we operate.



This is Centiro Group

Centiro Group is a family of tech brands and businesses, challenging traditional norms to envision new possibilities and determined to reach sustainable outcomes on many dimensions – by design and DNA. Driven by the desire to be the best company for colleagues and customers alike, the group offers a full-service portfolio of products and services that inspire and enable customers to be agile and resilient with a competitive edge for company growth.

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Core Values

Discover and Renew

Relaxed Seriousness

Transparency

You + We

A Sustainable Future

Stronger Together

We believe businesses are a key driving force in striving towards a sustainable world. Businesses are as recognized and rewarded for their sustainability commitment as for their products, solutions, and financial achievements.

We exist to make ourselves and our customers part of the solution for better commerce, and a better world. We help our customers to impactful and actionable insights on where they can change for the better. We work together to identify areas for improvement and continuously work towards a better environment. We make sustainable choices in our everyday work as well as in equipment and materials.

Centiro's sustainability engagement is rated by EcoVadis.

Business Integrity

We strive towards meeting the highest standards of business ethics and integrity. This is a shared responsibility for all of us working at Centiro and we expect our suppliers and business partners to apply similar standards for themselves as well as in relation to their partners and suppliers.

- We treat each other, our clients, partners, and other business relations with kindness, integrity, and respect.
- We comply with the laws and regulations in all jurisdictions where we do business.
- We do not offer or accept any rewards or benefits that violate any applicable legislation or this Code of Ethics.
- We have zero tolerance for any type of corruption.
- We do not make decisions based on personal considerations or relationships.

We are committed to comply with this Code of Ethics and to adhere to international standards and conventions, including the United Nations' Declaration on Human Rights, the United Nations' Global Compact, the OECD Guidelines for Multinational Enterprises, and relevant ISO standards.

Legal Compliance

At Centiro, we are committed to follow applicable laws and regulations in the jurisdictions in which we operate. In any situation where there is a conflict between the Code and the law, the law prevails over the Code unless the Code stipulates a higher requirement than the law.

Anti-corruption

We comply with local laws and international anti-corruption conventions and shall not engage in, or cause Centiro to engage in, any form of corrupt practices. Centiro does not tolerate any illegal contributions, directly or indirectly, to any third parties or public officials. No Centiro employee may offer or provide, directly or indirectly, any undue advantage in exchange for personal gain of any kind. Be aware that Centiro will not accept any benefit intended for a Centiro employee to facilitate the supplier's business with Centiro. Accepting a modest gift or hospitality is legitimate in the pursuit of a good business relationship, the accepted gift must be an item of little commercial value.

Labor and Human Rights

CHILD LABOR

Centiro does not tolerate any form of child labor and child exploitation, by use or support thereof.

FORCED LABOR

No form of forced, compulsory or illegal labor, including trafficking, prison labor or bonded labor is accepted.

WORKING HOURS

We comply with applicable laws and industry standards on working hours. Employees shall not, on a regular basis, be required to work overtime.

FREEDOM OF ASSOCIATION

Employees shall have the right to freely associate, organize and bargain collectively in accordance with the laws of the countries in which they are employed. In the Centiro spirit, open communication and direct engagement between employees and management are encouraged.

EMPLOYMENT CONDITIONS

Employees shall be informed of their employment conditions, including rights and obligations, in the employee's native language or a language they understand, for example in a written labor contract.

REMUNERATION

We comply, at a minimum, with all laws and regulations relating to wages, including minimum wages, overtime wages and other elements of compensation, and provide legally mandated benefits, including social insurance.

Discrimination and Harassment

Centiro is committed to the fair and equal treatment of all individuals. We do not tolerate any form of discrimination or harassment. We do not tolerate discriminatory behavior. Discrimination based on gender, race, age, ethnicity, nationality, religion, disability, sexual orientation, citizenship, genetic information, or other, is unacceptable. At Centiro, we do not tolerate any form of physical, sexual, racial, psychological, verbal, or any other form of harassment.

Health and Safety

We strive to provide a safe and healthy working environment. We believe you will perform at the highest level if there is an equal balance between work and private life. At Centiro we live by the philosophy "**Life-Life Balance**", to embrace balance in life and treat work as an integral part of that.

Protection of Assets and Confidential Information

Centiro's most important assets are our intellectual property assets such as computer systems, software solutions and all the information and data that is put in our trust by our clients. It is of utmost importance that this is handled in the most strict and confidential manner.

CONFIDENTIAL INFORMATION

We handle information carefully to protect the interests of Centiro, our clients and business partners.

PRIVACY

Centiro is committed to handling the personal information of our employees, clients, partners, and others responsibly and in compliance with applicable privacy laws around the world. Applicable security measures have been implemented to maintain the safety of this information.

Speaking up Policy

You are encouraged to report suspicions of serious irregularities, misconduct and unfair business practices in breach of laws and regulations or the Centiro Code of Ethics. You may speak up to anyone in the management of Centiro Group. The roles listed below have the possibility to bypass management and report directly to the board of directors.

- Chief Human Resources Officer
- Chief Information Security Officer (CISO)
- Legal Counsel & Compliance Officer



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