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Code of Conduct

Hallgruppen Code of Conduct

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Introduction

We recognise our responsibility as a reliable and responsible partner. We work in line with due diligence approach, in accordance with international frameworks such as the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises.

We are committed to responsible business practices, sustainability, respect for human rights, decent working conditions, international humanitarian law, as well as preventing environmental damage and combating corruption.

Hallgruppen supports the UN Global Compact. This reflects our long-term focus on sustainability, regulatory compliance and social responsibility.

Purpose

Our **Code of Conduct** establishes a common standard for acceptable behavior and practices. It is based on our fundamental values, principles, and expectations for the company and its employees, providing guidance on handling various situations and challenges.

Our Code of Conduct helps ensure compliance with applicable laws and regulations while following best ethical practices for sustainable business operations. We aim to foster a culture of transparency, accountability, and social responsibility, and these guidelines support that goal.

Our Code of Conduct applies to Hallgruppen, its subsidiaries, and everyone associated with Hallgruppen, including board members, management, employees, hired consultants, and agents.

Code of Conduct

1

Ethical conduct and compliance with the law

Hallgruppen is committed to act in an ethical manner and maintain high integrity in all our business activities. We shall act honestly, fairly, and in compliance with the applicable laws and regulations in the countries where we operate.

We engage exclusively with customers and business partners involved in legitimate business activities. We are committed to conducting our operations in an ethical and responsible manner, meaning that all transactions must be contractually agreed upon, lawful, and in the normal course of business.

**We will act
ethically
and in
compliance
with the
law.**

2

Fair business conduct and fair competition

We shall conduct our business in compliance with all applicable competition laws and regulations at all times. We shall refrain from entering into agreements that may restrict competition, such as price-fixing or market-sharing. Additionally, we shall not share competitively sensitive information.

**We comply
with
competition
laws and
avoid anti-
competitive
behavior.**

3

Anti-corruption, AML, bribery, gifts and hospitality

Hallgruppen has a zero-tolerance policy for bribery and corruption. Employees and representatives of Hallgruppen are prohibited from demanding, receiving, or accepting an offer of an undue advantage through their position, duties, or assignments. Likewise, it is forbidden to give, offer, or facilitate such activities. This applies to all business relationships, both public and private.

We expect everyone in Hallgruppen to exercise caution when dealing with business partners, suppliers, customers, and others regarding the giving or receiving of gifts or hospitality. If you are uncertain whether a gift or hospitality constitutes an undue advantage, you must consult your immediate supervisor.

Hallgruppen shall never engage in activities that could contribute to money laundering or terrorist financing. We comply with all laws and regulations related to anti-money laundering. To prevent involvement in money laundering or terrorist financing, it is essential that we (i) Know who our business partners, suppliers, and customers are, and (ii) ensure that the funds involved do not originate from illegitimate sources.

All our business partners, suppliers, and customers must be legally established and conduct lawful business. We expect you to remain vigilant regarding unusual payment, invoicing, and banking arrangements, as well as irregular tax statuses from our business partners, suppliers, and customers. If you identify any such irregularities, you must report them to your immediate supervisor.



We have a zero-tolerance policy for bribery and corruption, ensuring compliance with all relevant laws and regulations.

4

Sanctions and trade control

We must comply with all applicable laws and regulations related to sanctions and export control. We must ensure that we do not make assets and economic resources available to individuals or companies listed on sanctions lists or to companies owned or controlled by such entities.

To ensure compliance with sanction regulations, we must, in accordance with applicable guidelines, investigate whether the parties we do business with—including customers, suppliers, and other business partners—are subject to sanctions. Furthermore, we must assess whether exported goods and services are subject to export restrictions and whether imported goods or services are subject to import restrictions.

If you suspect that any party we conduct business with is subject to sanctions, you must contact your immediate supervisor.

We will follow all relevant sanctions and trade control laws.

5

Quality, professionalism, and counterfeit parts

Hallgruppen is committed to delivering high-quality products and services on time. We will maintain professionalism in all our customer interactions and work to uphold a strong reputation in the industry. We will continuously strive to improve our products and services, taking into account feedback from our customers and partners.

We will only purchase and supply products from approved and reliable suppliers, and we do not accept counterfeit or fraudulent components. If you encounter or have any doubts about the reliability or authenticity of a product or supplier, you must contact your immediate supervisor.

We ensure quality, respect, and trusted suppliers.

6

Financial responsibility

We must always act responsibly, honestly, and in compliance with laws and regulations regarding finance and accounting. All financial transactions must be recorded accurately and transparently. False or misleading bookkeeping is strictly prohibited.

Employees must use the company's resources responsibly and only for purposes that support the company's objectives. All employees must follow established approval processes for expenses, procurement, and contracts.

7

Confidential information and privacy

We shall handle confidential information with strict care and take all necessary precautions to protect it from unauthorized access, use, or disclosure.

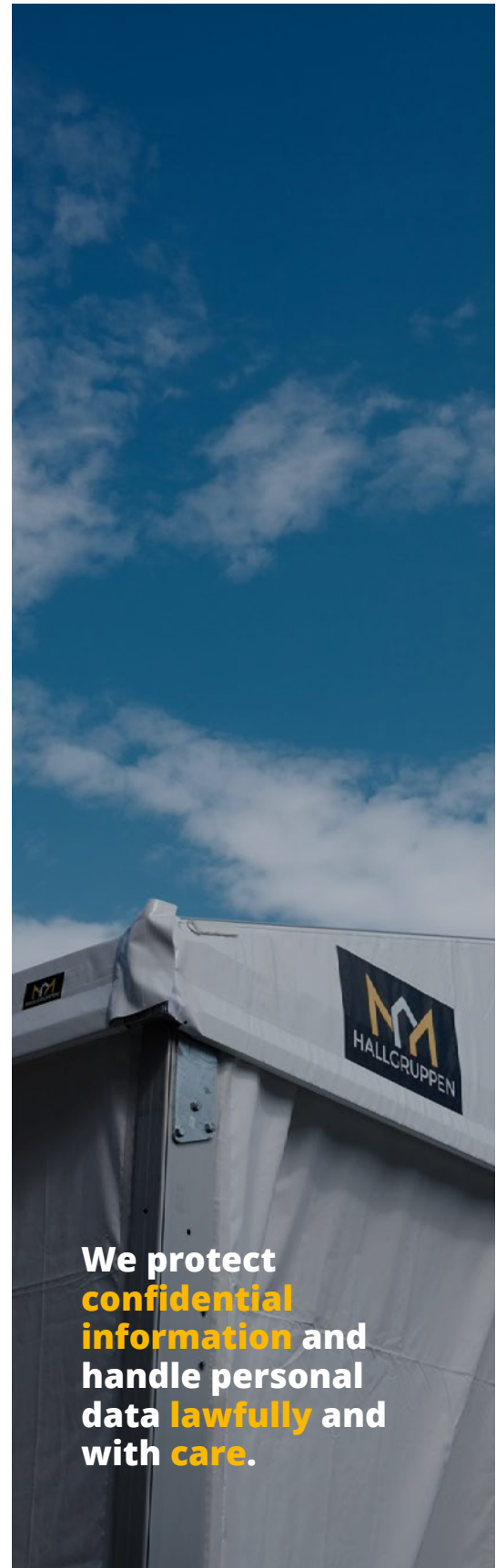
We respect everyone's right to privacy and ensure that personal data is processed in accordance with applicable laws and guidelines.

8

Conflict of interest

We expect you to consistently prioritize Hallgruppen's best interests when representing us. This means you must refrain from engaging in situations where you, your family, or closely connected individuals have personal interests that may conflict with those of Hallgruppen or its business partners.

If you find yourself in a situation where you are uncertain about your ability to act impartially and make decisions in the company's best interest, you must contact your immediate supervisor.





9

Diversity and inclusion

We are committed to respecting and valuing the diversity of our employees, customers, and partners. We are committed to creating an inclusive and diverse workplace where everyone has the opportunity to succeed and is treated fairly.

We do not tolerate discrimination based on gender, age, ethnicity, religion, sexual orientation, or any other factors.

**We value
diversity,
inclusion,
fairness,
and do not
allow bias.**

10

Sustainability, responsibility and environmental impact

We operate in compliance with applicable environmental and climate laws, promoting sustainable practices to reduce emissions and pollution. We handle hazardous materials, waste, and emissions responsibly, ensuring safe management, treatment, and disposal while prioritizing waste reduction and recycling.

We take responsibility for our impact on society and the environment, implementing all necessary precautions to protect it. We are committed to reducing our climate footprint and adhering to Hallgruppen's guidelines in our projects and activities.

**We follow
eco laws,
cut waste
and care
about the
environment.**

11

Human rights, child labour and forced labour

Hallgruppen is a member of the UN Global Compact, a global network for companies committed to corporate social responsibility. We recognize and comply with core conventions on human rights and the prohibition of child labor and forced labor. We will never contribute to any violations of fundamental human rights or decent working conditions.

We do not employ children under the age of 15 and adhere to minimum age regulations in the countries where we operate. We ensure that no one under 18 performs work that poses risks to health, safety, or the environment.

Hallgruppen strongly opposes all forms of forced labor. Employees must not be required to provide deposits or surrender identity documents to their employer and must be free to leave their job with reasonable notice. We do not engage in human trafficking in any part of our business operations.

**We support
human rights,
fair work, and
oppose forced
labor.**

12

Freedom of association

As an employee of Hallgruppen, you have the right to join—or refrain from joining—a trade union and to be represented in collective bargaining agreements. We will not prevent the formation of trade unions or interfere with the right to organize.

**We respect
your right to
unionize and
organize freely.**

13

Wages, working hours and other employment conditions

Hallgruppen is committed to ensuring fair working conditions in accordance with applicable laws and regulations. All employees receive a written employment contract outlining their terms of employment in a language they understand.

All employees are paid on time, regularly, and in legal currency. Deductions from wages are only permitted under conditions and to the extent specified by applicable laws, regulations, or collective agreements, and employees will be informed of such deductions with each payment.

We ensure that working hours are reasonable and comply with local laws and agreements. We provide holidays, leave, and public holidays in accordance with applicable local laws and agreements.

✓ **All employees receive clear, written contracts in a language they understand.**

✓ **Wages are paid on time, legally, and with transparent deductions.**

✓ **Working hours, holidays, and leave follow local laws and agreements.**

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Health and safety

Our goal is that no employee should be injured or suffer reduced health as a result of our operations. We are committed to prioritizing health and personal safety in all our projects and activities.

Our employees must follow applicable guidelines for health, personal safety, and fire protection, as well as complete mandatory training in these areas. Management and safety representatives work together to ensure that our employees operate in a safe environment and have the necessary competence to perform their tasks safely.

✓ **We prioritize health and safety to prevent injuries and health risks.**

✓ **Employees receive training and follow safety guidelines to ensure a secure workplace.**

15

Violence, threats and harassment

We are committed to maintaining a safe work environment where violence, threats, and harassment are not tolerated. This includes physical, verbal, and psychological violence, as well as all forms of harassment, including sexual harassment, bullying, and discrimination.

All employees have both the right and the duty to report incidents of violence, threats, or harassment to their immediate supervisor or the HR department.

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Substance abuse and alcohol

Hallgruppen is a drug-free workplace. It is strictly prohibited to be present at work under the influence of alcohol or drugs, or to be impaired due to prior consumption that affects work performance. The use, possession, or sale of illegal substances in the workplace will not be tolerated.

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Whistleblowing

All employees of Hallgruppen and its subsidiaries, as well as anyone associated with Hallgruppen, have both the right and the duty to report any misconduct they become aware of. Reports can be made regarding violations of laws, regulations, or our internal guidelines and procedures.

Hallgruppen values transparency and ensures a safe environment for whistleblowing across all parts of the company. We do not tolerate any form of retaliation against individuals who report concerns in good faith. Guidelines on how to report and how reports are handled are detailed in Hallgruppen's Whistleblowing Policy.





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