

Code of Conduct

This Code of Conduct defines the basic requirements placed on Alemtek AB (“Alemtek”) concerning their responsibility towards stakeholders and the environment. Alemtek require the same standard of behavior from third parties and their personnel that we require from our own people. To the extent any applicable law or regulation is more restrictive than this Code of Conduct, such law or regulation shall govern. Alemtek reserves the right to reasonably change the requirements of this Code of Conduct. In such event Alemtek expects their suppliers to accept such reasonable changes.

Alemtek declares herewith:

| Legal compliance

- to comply with the laws of the applicable legal systems.

| Prohibition of corruption and bribery

- to tolerate no form of and not to engage directly or indirectly in any form of corruption or bribery and not to grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage.

| Fair competition, anti-trust laws and intellectual property rights

- to act in accordance with national and international competition laws and not to participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors;
- to respect the intellectual property rights of others.

| Conflicts of interest

- to avoid all conflicts of interest that may adversely influence business relationships.

| Respect for the basic human rights of employees

- to promote equal opportunities for and treatment of its employees irrespective of skin colour, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age;
- to respect the personal dignity, privacy and rights of each individual;
- to refuse to employ or make anyone work against his will;
- to refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination;
- to prohibit behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;
- to provide fair remuneration and to guarantee the applicable national statutory minimum wage;
- to comply with the maximum number of working hours laid down in the applicable laws;
- to recognize, as far as legally possible, the right of free association of employees and to neither favour nor discriminate against members of employee organizations or trade unions.

| Prohibition of child labour

- to employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14.

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| Health and safety of employees

- to take responsibility for the health and safety of its employees;
- to control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases;
- to provide training and ensure that employees are educated in health and safety issues;
- to set up or use a reasonable occupational health & safety management system.

| Environmental protection

- to act in accordance with the applicable statutory and international standards regarding environmental protection;
- to minimize environmental pollution and make continuous improvements in environmental protection;
- to set up or use a reasonable environmental management system.

| Supply chain

- to use reasonable efforts to promote among its suppliers compliance with this Code of Conduct;
- to comply with the principles of non-discrimination with regard to supplier selection and treatment.

| Conflict Minerals

- to take reasonable efforts to avoid in its products the use of raw materials which directly or indirectly finance armed groups who violate human rights.

| Confidentiality and data protection

- to respect the privacy and confidentiality of information relating or belonging to its clients, its partners/principals and staff and others with whom it does business.
- to protect personal and other confidential information in all forms.

| Sanctions and export controls

- to not conduct activities nor assist any other party in violating applicable economic sanctions or export control laws and regulations.

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