

Code of Conduct

This Code of Conduct defines the minimum requirements for Alemtek AB (“Alemtek”) and its business partners regarding ethical conduct, environmental responsibility, and respect for human rights, in alignment with applicable legislation. Alemtek commits to implementing, monitoring, and continuously improving these principles through structured governance, risk management, and due diligence processes.

This Code of Conduct applies to all Alemtek employees, as well as to business partners, including suppliers, contractors, consultants, and other parties providing goods or services to, or acting on behalf of, Alemtek. Business partners are expected to comply with the requirements of this Code or demonstrate equivalent standards. Alemtek may assess compliance and require corrective actions where necessary.

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 its business partners to accept such reasonable changes.

Failure to comply with this Code may result in corrective actions, including termination of business relationships where appropriate.

1. Legal Compliance

- Alemtek shall comply with all applicable laws and regulations in the countries of operation.
- A process shall be in place to identify, monitor, and update applicable legal requirements at least annually.
- Responsibility for legal compliance shall be assigned to a named role.

2. Anti-Corruption and Bribery

- Alemtek applies zero tolerance towards corruption and bribery.
- Alemtek shall take reasonable measures to prevent financial crime, including fraud and corruption.
- Employees in risk-exposed roles (e.g. sales, procurement, management) shall receive training at onboarding and periodically thereafter.
- Gifts, hospitality, and benefits shall follow approval procedures.
- Business transactions shall be recorded accurately and transparently in accordance with applicable accounting standards.
- All suspected violations shall be reported, investigated, and documented.

3. Fair Competition and Intellectual Property

- Alemtek shall comply with all applicable competition laws.
- Employees in commercial roles shall receive basic competition law training.
- Any contact with competitors shall follow documented internal guidelines.
- Intellectual property rights shall be respected and protected through contractual and operational controls.



4. Conflicts of Interest

- Employees shall disclose any actual or potential conflicts of interest.
- Disclosures shall be documented and reviewed by management.
- A register of declared conflicts shall be maintained and reviewed annually.

5. Human Rights and Working Conditions

Alemtek commits to respecting internationally recognized human rights and shall implement a risk-based due diligence process.

Requirements:

- No forced or involuntary labor
- No child labor in violation of ILO conventions
- Equal treatment and non-discrimination
- Respect for dignity and prohibition of harassment
- Fair wages in line with legal requirements
- Working hours compliant with applicable laws
- Freedom of association respected where legally permitted

Implementation:

- Employees shall have written employment agreements in a language they understand
- Human rights risks shall be identified and reviewed, including where the company may cause, contribute to, or be directly linked to adverse impacts
- Relevant actions shall be defined where significant risks are identified
- Incidents related to employees or working conditions shall be recorded and followed up

6. Health and Safety

- Alemtek shall maintain a structured occupational health & safety system.
- Workplace risks shall be assessed and documented regularly.
- Incidents and near-misses shall be recorded, investigated, and followed up.
- Employees shall receive safety training relevant to their roles at onboarding and periodically thereafter.

7. Environmental Protection

- Alemtek shall comply with all applicable environmental regulations.
- Environmental aspects and impacts shall be identified and assessed annually.
- The company shall:
 - Monitor energy use, emissions, and waste
 - Set measurable environmental targets
 - Track and document performance
- Environmental data shall be retained for reporting purposes.

8. Supply Chain

- Alemtek shall apply a risk-based approach to supplier management.



- Suppliers shall be evaluated based on risk (e.g. geography, category, spend).
- Suppliers may be requested to provide relevant information, participate in assessments, and implement corrective actions where needed.
- High-risk suppliers shall be subject to additional review (e.g. questionnaires or audits).
- Suppliers shall inform Alemtek of any significant risks or breaches related to this Code.
- Supplier compliance with this Code shall be contractually required.
- Non-compliance shall result in corrective actions or termination.
- Alemtek reserves the right to terminate business relationships in case of material non-compliance with this Code.

9. Conflict Minerals

- Alemtek will assess and monitor its supply chain to identify the origin of conflict minerals and reduce the risk of contributing to armed conflict or human rights abuses, taking appropriate action where risks are identified.
- Suppliers shall be required to provide relevant sourcing information upon request.
- Identified risks shall be documented and addressed.

10. Confidentiality and Data Protection

- Alemtek shall comply with GDPR and applicable data protection laws.
- Personal and confidential data shall be protected through defined technical and organizational measures.
- Information and systems shall be protected against unauthorized access and security threats.
- Employees shall receive basic data protection training.
- Data breaches shall be documented and managed according to internal procedures.

11. Sanctions and Export Controls

- Alemtek shall comply with all applicable sanctions and export control regulations.
- Screening procedures shall be applied where relevant (e.g. customers, suppliers, transactions).
- High-risk transactions shall require additional review and approval.

12. Reporting and Whistleblowing

- Alemtek shall maintain a confidential reporting channel available to employees and relevant stakeholders.
- Reports shall be investigated and documented.
- Retaliation against whistleblowers is prohibited.
- Summary of cases shall be reviewed by management annually.

13. Monitoring and Documentation

- Compliance with this Code shall be monitored through:
 - Internal reviews
 - Incident reporting
 - Supplier assessments



- Alemtek will retain relevant documentation and make it available for audit where required, while ensuring that confidential and commercially sensitive information is protected and only disclosed to the extent necessary.

14. Review and Continuous Improvement

- This Code of Conduct shall be reviewed at least annually.
- Updates shall be based on:
 - Risk assessments
 - Incidents and findings
 - Regulatory changes

ALEMTEK