

The Hexatronic Code of Conduct

INTRODUCTION

This Code of Conduct (Code) has been developed to ensure that Hexatronic Group AB's business operations and communications with the market are conducted in an open and trustworthy way, in accordance with the laws and good practice of a listed company.

The writings in this Code represent the minimum requirements for Hexatronic's operations. If local, national or international legislation imposes more stringent requirements than this code, these shall be followed. The owner of this Code is the Group CEO. The operational responsibility for implementing the Code has the Group CEO, together with each subsidiary's CEO.

OUR CORE VALUES

Long-term thinking, Innovation, Customer proximity and Entrepreneurial spirit – characterise our business activities. Managing business operations based on our core values and this Code is important to maintain confidence and trust among our customers, partners, employees, shareholders and other stakeholders. Confidence and trust mean that we choose to be open about how we run our business, but that we also take care of our commercial assets and the personal integrity of individuals.



SUSTAINABLE BUSINESS ACTIVITIES

The Code of Conduct reflects Hexatronic's commitment to carry on business activities in a responsible and ethical way in terms of the activities themselves and the world around us. This includes:

- being a responsible social citizen
- respecting human rights
- safeguarding health and safety
- working for sustainable development
- working based on the UN's Global Sustainable Development Goals – Agenda 2030

RULES

The Code of Conduct contains clear rules for all persons working at Hexatronic and includes:

- ensuring that applicable laws, regulations and ordinances are always complied with
- helping to ensure that information in financial reports and other public communications is complete, accurate, exact and comprehensible, and is published in time
- handling conflicts of interest in a suitable way

- protecting and using the company's property in the right way
- protecting confidential information

SHARED RESPONSIBILITY

The Code of Conduct and our core values include the Board, Group Management and each individual employee. Everyone working at Hexatronic shall read the Code, support and work in line with the company's commitments and our internal rules, which are summarised in the Code, and all applicable laws. Suppliers and their subcontractors shall comply with The Hexatronic Code of Conduct for Suppliers.

The immediate manager shall inform and encourage all relevant parties to follow the Code. It is vital for managers to set a good example and be available for employees who have questions relating to ethics or who want to report breaches of the Code. Managers are responsible for ensuring that the code is respected and used within the organisation, and for ensuring that unethical behaviour is not ignored. Together, we all take responsibility for ensuring the Code is followed.



THE CODE OF CONDUCT

THE COMPANY'S SUSTAINABILITY RESPONSIBILITIES

- Hexatronic is responsible for handling all sustainability issues in a professional manner and for conducting business activities in a responsible manner. It is important for us to act in a socially and ethically responsible way in accordance with our SUSTAINABILITY POLICY within HEXATRONIC GROUP AB.
- SUSTAINABILITY POLICY & SUSTAINABILITY REPORT – Hexatronic has produced a Sustainability Policy that is based on the approaches in the UN's Global Sustainable Development Goals, with a focus on Environmental, Economic and Social Responsibility. Agenda 2030, which covers areas of responsibility such as human rights, working conditions, health and safety, the environment and anticorruption, forms part of this. These approaches provide a foundation for our work when we are carrying out our business activities and in our encounters with customers, suppliers and employees to help bring about sustainable development for future generations. Every year we publish a sustainability report that describes our results, challenges and continued work on sustainability within the group.
- KNOWLEDGE – We shall improve knowledge and awareness of sustainability among our employees. We build long-term relationships with our suppliers through joint development and by sharing our thoughts on business ethics and sustainable development.



CARE OF PERSONNEL

In order to respect human rights and promote fair employment terms, safe working conditions, responsible environmental work and a high ethical standard, our Code of Conduct is based on the UN's Global Compact and shall be applied throughout the company's operations.

- Hexatronic does not accept child labour.
- No employee may be discriminated against, for instance, on the grounds of skin colour, gender, sexual orientation, marital status, pregnancy, parental status, religion, political beliefs, nationality, ethnicity, social background, social status, affiliation with an indigenous people, disability, age, union membership or any other basis for discrimination protected under local law.
- All employees shall be aware of the basic conditions and circumstances for their employment.
- All employees with the same experience, performance and qualifications shall receive equivalent pay for equivalent work in comparison with others carrying out the same work under similar working conditions.
- Employees' health and safety in the workplace shall always be a priority.
- We work with prevention and health promotion to create a good work environment that provides well-being and job satisfaction.
- All employees shall be given the freedom to peacefully and legally form or join, or not join, trade unions that they choose themselves, and be given the right to negotiate collectively.

LAWS AND GUIDELINES

We shall observe the laws and ordinances that apply to our activities. When you work within Hexatronic, you will need to take a position on, deal with and follow a number of different judicial laws and guidelines. Breaches of applicable laws or ordinances may have serious consequences, both for Hexatronic and for the persons affected. That is why it is the responsibility of everyone together to be aware of and to comply with the relevant laws and ordinances, including those listed below.

- **INTERNATIONAL BUSINESS** – Employees who are involved in international business transactions must be familiar with and follow all applicable domestic and foreign laws and ordinances, e.g. import and export regulations, anti-boycott regulations and applicable trading bans and sanctions.
- **FREEDOM OF COMPETITION** – Hexatronic supports freedom of competition. This is the basis for business development and innovation. Everyone working for Hexatronic shall compete on the open market in a healthy, constructive way and consistently follow the competition laws in all countries where Hexatronic operates.
- **ACCOUNTING AND FINANCIAL REPORTING** – Hexatronic has a responsibility to follow strict accounting principles and norms, to report full and correct financial information and to maintain suitable internal control functions and processes in order to ensure that accounting and financial reporting complies with laws, ordinances and stock exchange listing requirements. You, as an employee, are necessary for the company to be able to fulfil requirements in this area.



- **INSIDER TRADING** – Everyone working for Hexatronic shall act strictly in accordance with applicable laws and ordinances regarding insider trading and insider tips. You may not, directly or indirectly, purchase or sell shares or securities in any company whose shares are listed on the stock exchange, including Hexatronic, if you have insider information about such a company. Nor may you reveal insider information to any party within or outside Hexatronic, including family, friends, employees or others who do not need such information in order to be able to carry out their work at Hexatronic.

- **PRIVACY** – Hexatronic works to protect personal data, e.g. information on employees, partners, subcontractors, customers and end users. Hexatronic has an obligation to comply with laws on the protection of personal data. When, as part of your work, you come into contact with or process personal data, you must be familiar with and follow the applicable legal requirements and contractual requirements.
- **COMMUNICATION AND FINANCIAL INFORMATION** – It is important that Hexatronic’s employees have a good understanding of how the business functions and of the financial position of their own unit, in order to encourage commitment to developing the business. At the same time, account must be taken of Hexatronic’s procedure for external communication and legal requirements, such as insider rules, stock exchange and reporting regulations issued by stock exchanges and financial regulatory bodies. Hexatronic’s obligation to follow these requirements determines how Hexatronic’s employees are to handle information that could affect the share price. See also **RULES ABOUT CONFIDENTIAL INFORMATION** further down.



- **APPOINTED SPOKESPERSONS** – Comments regarding financial results and future prospects to external parties shall only be supplied by spokespersons appointed in accordance with the procedure for external communication. All employees are encouraged to spread information about Hexatronic by sharing public information about the company, but only appointed spokespersons may comment on financial results, strategically sensitive issues or confidential customer-related information.

CONFLICTS OF INTEREST

We make business decisions for the good of the group and not based on individual considerations or relationships. A conflict of interest arises when something prevents or influences our independent judgement to the detriment of Hexatronic. We must avoid situations where our personal interest may come into conflict with, or even appear to conflict with, the interests of the group.

- **BUSINESS OPPORTUNITIES/PERSONAL GAIN** – As an employee, you may not derive any personal gain from business opportunities identified through your work for Hexatronic if this comes into conflict with Hexatronic's interests. Nor may you use Hexatronic's property or information or your position at Hexatronic in any other way for personal gain.
- **OTHER EMPLOYMENT** – You may not accept a position outside Hexatronic, whether remunerated or otherwise, that negatively affects or that may affect your work performance for Hexatronic or that creates or may create a conflict of interest. You may not engage in business activities outside Hexatronic that take time and attention away from your obligations to Hexatronic or that require work during your working hours at Hexatronic. Avoid any conflicts of interest by not accepting employment at another company, or with a Hexatronic supplier, subcontractor, representative, customer or competitor. If duties for another employer do become relevant, a written agreement shall be drawn up between Hexatronic and the employee.
- **EXTERNAL ASSIGNMENTS** – Hexatronic's employees may not take on assignments on a board, or similar body, at a for-profit company or government agency if this creates a conflict of interest. All such assignments must be approved in advance by your manager. Assignments on boards of non-profit or social organisations do not require prior approval, provided that there is no potential conflict of interest with Hexatronic.
- **POLITICAL ACTIVITIES** – Hexatronic does not make contributions or provide other support, directly or indirectly, to political parties or political organisations, or to individual politicians. You may not offer any political contributions on behalf of Hexatronic or using funds or resources from the company.
- **OFFER/RECEIVE** – You may not offer or receive gifts, benefits, remuneration or hospitality to or from a third party that would constitute a breach of the law or that could influence, or be thought to influence, your professional judgement during the exercise of your work for or position with Hexatronic or any third party.
- **BRIBES** – No person, either directly or indirectly, may demand or receive, offer or give any form of bribe, illegal commission or other illegal or unethical benefit to employees or other representatives or contractual parties to Hexatronic or any third party. All such offers or proposed arrangements must be reported without delay to your immediate manager.
- **REPORTING** – Hexatronic requires that you report any situations or transactions that may reasonably be expected to cause a conflict of interest. If you suspect that you are involved in a transaction or other arrangement that causes a conflict of interest, or something that other people may reasonably perceive as a conflict of interest, you must report this to your manager. You and your manager will determine together if there is any conflict of interest and, if there is, how best to handle it. Although transactions or arrangements that cause conflicts of interest are not automatically forbidden, some transactions or arrangements may not be desirable, and for some people, for instance members of the group management team, such transactions or arrangements may require approval from the board's audit committee or the general meeting.

COMPANY PROPERTY

Hexatronic owns various sorts of property, including material property, information and intellectual property. You are responsible for protecting the Hexatronic property entrusted to you and in general for helping to protect all of Hexatronic's property.

- **INTELLECTUAL PROPERTY** – Intellectual property includes a number of different types of property, such as computer programs, technical documentation and inventions. Certain intellectual property is subject to or may come to be subject to special protection through copyright, patent rights, trademark registration, etc. Intellectual property rights have a significant value for Hexatronic and must be handled with care. You must follow instructions, and if you are in doubt, ask for guidance regarding how to protect such valuable property. Intellectual property created by Hexatronic's employees during their employment is transferred and assigned to Hexatronic in accordance with the law and/or employment contracts or other agreements, with the exceptions outlined in international conventions, laws and the agreement with Hexatronic.
- **IT RESOURCES** – Hexatronic's IT resources, including communication systems and internet connections, are to be used to carry out Hexatronic's business activities or for other purposes sanctioned by your manager. The management may approve your use of Hexatronic's IT resources with devices and storage media not provided by Hexatronic. Prohibited use of Hexatronic's IT resources includes processing, sending, downloading, displaying, printing or in any other way distributing information that is false, constitutes harassment, is intimidating, illegal, racist, of a sexual nature, obscene, threatening, offensive or in any other way inconsistent with professional behaviour.
- **WHEN YOU LEAVE YOUR EMPLOYMENT** – You shall return all property belonging to Hexatronic, including documentation and media containing Hexatronic information. Once you have left Hexatronic, you are still bound by the restrictions that apply to all use and distribution of Hexatronic information.
- **PROTECTING INFORMATION** – Persons working for Hexatronic have access to information owned by Hexatronic, as well as occasionally information owned by third parties. Such information may include financial information, business plans, technical information, information on employees, customers, suppliers, etc. Unauthorised access, use and distribution may damage Hexatronic or the third party. Therefore, you may not collect, use or distribute the information unless you are authorised to do so. Unauthorised access, use and distribution may also be a breach of the law and confidentiality regulations. If you are unsure about your authorisation, you must speak to your manager to clear up the matter.



See next page for some rules to help to protect confidential information belonging to Hexatronic or our customers, partners and suppliers:

RULES ABOUT CONFIDENTIAL INFORMATION

- Unpublished Hexatronic information shall not be revealed to anyone other than
 - persons working for Hexatronic who need access to the information in their work and possess a legitimate reason for having the information
 - other persons authorised by Hexatronic to receive such information
 - persons to whom you are required to give such information in the exercise of your duties
- You may not, directly or indirectly, obtain, copy, reproduce or use unpublished information other than in your position at, or assignments for, Hexatronic. When you leave Hexatronic, all authorisation to access or use unpublished information ends. You must return or destroy all such information in your possession
- If you become aware of incorrect use or processing of unpublished information, inform your manager immediately and cooperate fully with Hexatronic in order to protect such information
- Do not store unpublished information on private computers, storage media or other devices not approved by Hexatronic. Cloud services supplied by a third party or other storage services online may not be used to store confidential information unless they have been approved for this purpose by Hexatronic
- Access and authorisation given to persons working for Hexatronic may only be used for its intended purpose. Passwords, PIN codes and similar information may never be shared or be given to unauthorised persons

APPLICATION & FOLLOW-UP

Everyone covered by the code is responsible for applying and respecting the content.

- **KEEP THE DISCUSSION ALIVE** - In order for this Code to be a living document, the content needs to be regularly discussed in the management team, on staff days, workplace meetings and development talks. Discuss together the issues and ethical dilemmas you have.
- **WHISTLEBLOWING – REPORTING BREACHES**
 - **EMPLOYEES' RESPONSIBILITY** – Persons working at Hexatronic are encouraged to report to their manager any behaviour that they, in good faith, perceive to be a breach of laws or the Code of Conduct. If the manager is involved in the issue, or if the manager cannot handle or has not handled the issue in a satisfactory manner, the employee should report the matter to a more senior manager or a member of the company's management team instead. Alternatively, breaches may be reported anonymously to the board.
 - **PARTNERS' RESPONSIBILITY** – Suppliers, customers and other parties with a professional relationship to Hexatronic can report suspected breaches of laws or the Code of Conduct to the management of the local business operation. Alternatively, breaches may be reported anonymously to the board.
 - **MANAGERS' RESPONSIBILITY** – Managers are expected to handle reported breaches in a serious manner and to work towards a satisfactory solution in accordance with local legislation and regulatory requirements. Hexatronic will not accept any discrimination or retribution against individuals who have reported suspected breaches in good faith.
- **FOLLOW-UP** – Compliance with this Code will be regularly monitored as a natural part of the regular business. For example, internal and external audits.

ASK YOURSELF IN YOUR DAILY WORK

- ✓ Is the decision / action I am about to take or not take in accordance with our values and this Code?
- ✓ Do I lead by example?
- ✓ Have I considered whether we can be adversely affected?
- ✓ How would it feel if the action I take / decision I make today end up in the media?

CONFIRMATION

The Hexatronic Code of Conduct

I confirm that I have read the code and understand its meaning and purpose.	
Date	
Signature	
Name (in plain written text)	

Submit written confirmation to HR / CEO