

Infobric Group

# Code of Conduct

Living our purpose and values

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Responsible for document:  
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Approved by:  
Infobric Board of Directors

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# Introduction

**The purpose of our Code of Conduct is to guide and empower sustainable business conduct. It helps us put our values into practice and to earn and maintain the trust of our stakeholders.**

In short, our Code of Conduct describes the **values, ethical principles, and standards** of Infobric's way of conducting business.

It is based on the ten principles of the UN Global Compact and its underlying conventions and declarations. It describes what behaviour that is expected from us as employees and what an employee can expect from Infobric as a company and employer.

The Code applies to board members, managers, employees, workers, and other contractual partners associated with or representing us, our brand and/or our corporate values in any way. We require all employees in Infobric Group to read, understand and comply with the Code.

In addition to the principles outlined in the Code and other internal policies in Infobric Group, we will always comply with applicable laws and regulations in the countries where business is conducted.

**If local laws and regulations set out a more stringent position than the Code, such regulations shall prevail.**

This Code is a living document that should evolve based on continuous feedback and dialogue. It is therefore important that we feel comfortable bringing up any questions or input we have directly with our manager. That way, we can ensure that this Code is as meaningful and effective as it can be.

The Code should be updated at a minimum every third year.

## **If you have questions**

Key contact in case of questions or comments in relation to the Code is Håkan Unbeck, General Counsel at Infobric Group. Email: [hakan.unbeck@infobric.com](mailto:hakan.unbeck@infobric.com)

# The ten principles of the UN Global Compact

**Our Code of Conduct is based on the ten principles of the UN Global Compact and on our core values.**

The UN Global Compact consists of ten principles divided into four areas - human rights, labour rights, environment, and anti-corruption. By incorporating the Ten Principles of the UN Global Compact into strategies, policies and procedures, and establishing a culture of integrity, companies are not only upholding their basic responsibilities to people and planet, but also setting the stage for long-term success.

## Human Rights

### Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights; and

### Principle 2

make sure that they are not complicit in human rights abuses.

## Labour Rights

### Principle 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

### Principle 4

the elimination of all forms of forced and compulsory labour;

### Principle 5

the effective abolition of child labour; and

### Principle 6

the elimination of discrimination in respect of employment and occupation.

## Environment

### Principle 7

Businesses should support a precautionary approach to environmental challenges;

### Principle 8

undertake initiatives to promote greater environmental responsibility; and

### Principle 9

encourage the development and diffusion of environmentally friendly technologies.

## Antikorrupktion

### Principle 10

Businesses should work against corruption in all its forms, including extortion and bribery.

## More information

Read more about the ten principles of the [UN Global Compact](#)

# **We are all responsible for adhering to the Code.**

**Every Infobric employee will be provided with a copy of this Code of Conduct and should read, understand and comply with it, as well as with other existing corporate policies and procedures. It is your manager's responsibility to ensure that you have read and are enabled to be compliant with the Code.**

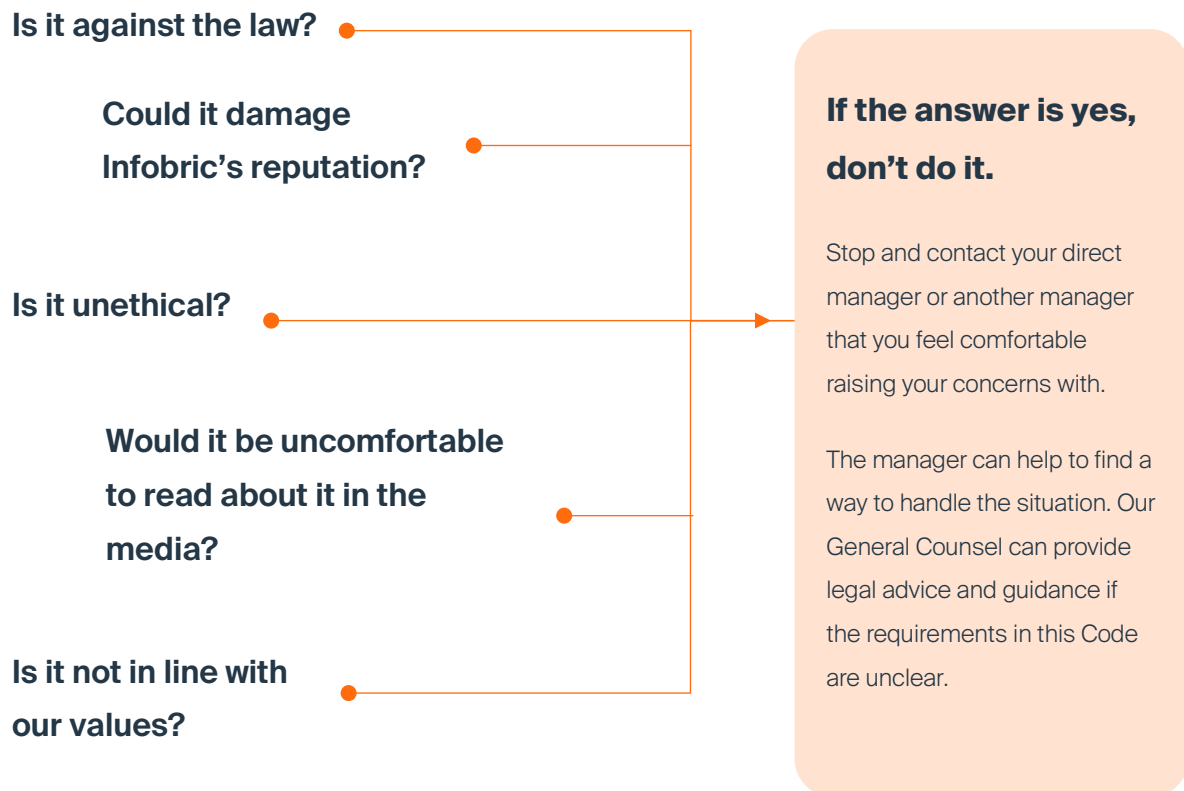
As a company, we support our employees to adhere to the Code by integrating relevant elements into trainings, providing any tools required, and by designing our business and decision-making processes in accordance with the Code.

If it is determined that the Code has been violated by either failure to report a violation, or by withholding information related to a violation, the relevant person will be disciplined for non-compliance. Failure by employees to follow the Code may include disciplinary action in the form of re-training, or other corrective action, including termination of employment, depending on the circumstances.

**” The Code of Conduct, together with our core values, is the basis of our culture which helps us achieve our vision – to be a cornerstone in building a sustainable society.”**

# We consider all possible consequences.

The Code of Conduct contains rules and policies. On the other hand, it cannot describe all actual situations that may arise and sometimes the correct answer is not obvious. If you are unsure of what to do, ask yourself the following questions:



# We act in line with our values.

**Our core values are four carefully selected values that create the foundations for the Infobric culture and the company we want to be.**

These values are a major force in guiding our day-to-day behavior and drive our decision-making at all levels of the organisation. They give us a framework for leadership and daily decisions, and help us enjoy our time at work. Our Code of Conduct serve as a guide for how these values translate into our attitudes and behaviors.



## **Embrace Challenge**

We are not afraid of big challenges; we raise the bar and embrace failing as a critical part of success.



## **Achieve Together**

We are one company in many locations. We inspire big thinking and help colleagues and customers succeed.



## **Be your Best self**

We strive for continuous improvement within a happy and healthy workplace, taking ownership of our contribution and embracing curiosity to learn and grow.



## **Do the Right thing**

We seek to do the right thing even when it's costly, we treat each other with respect and make sustainability a priority.





**How we support and  
respect the protection  
of human rights,  
diversity and inclusion.**



**Infobric's purpose is to help build a better world.**

**As a company that supplies a range of digital technologies, we believe that the products we develop together with our customers can contribute to advancing towards several of the UN's sustainability goals.**

One specific goal that Infobric can have a positive impact on is goal **#8: Decent working conditions and economic growth**. Enabling safer and more socially sustainable working conditions for all is not only a core part of our product offering and support to our customers, but also an important focus area for us as an employer and in our business relationships.

### **Human rights**

We take the right to decent working conditions for everyone involved in any aspect of our operations or value chain seriously. Fundamental human rights and working conditions shall be known, respected, and equally applied to all employees regardless of employment status.

We pay specific attention to ensuring that children under the minimum working age as established by local law, or below fifteen years of age, whichever is greater, are not used as labor force. Employees under the age of eighteen shall not carry out hazardous work, heavy work, or work night shifts.

All work shall be voluntary, and we accept no form of modern slavery, including forced or debt-bonded labour, trafficking, indentured and slave labour.

### **Diversity & Inclusion**

We strongly believe that diversity contributes to a better business and a stronger society. We actively promote diversity and provide an equal opportunity workplace. All recruitment is based solely upon individual merits and qualifications directly related to professional capacity.



We ask all employees to pay attention to the fact that discrimination can be based on a broad set of factors, such as; gender, gender identity, ethnicity, age, sexual orientation, pregnancy status, religion, disability as well as political opinion. We never accept discrimination in any form, neither verbal or non-verbal, physical or visual and expect all employees to raise and address any forms of discrimination identified or suspected.

We pay our employees equal pay for equal work, and provide adequate insurance and paid leave (sick, parental and annual).



**How we contribute to  
a healthy and safe  
working environment.**

**A safe and healthy working environment is essential for you as an employee to perform your best and reach your goals. All employees in Infobric are responsible for contributing to a good working environment. Respect for each other and team spirit are crucial in every aspect of our employment.**

### **Safe working conditions**

We take pride in providing a safe, clean, and healthy workplace and conduct a risk assessment at all workplaces. We keep and make available to our employees a record of occupational hazards as well as workplace accidents and injuries, together with our related preventive measures and corrective actions. At least once a year, we provide information and training on health and safety to all employees.

All employees shall be free to form, join or not to join a trade union or employee organisation of their choice. All employees have the right to bargain collectively. All employees shall have an employment contract in a language understandable to the employee, specifying the terms of employment including working hours, overtime compensation, wage, frequency of payment, and notice period.

### **Respectful behaviour**

Unwanted behaviour that creates an intimidating, offensive or hostile work environment does not belong within Infobric. Instead, we encourage and expect mutual respect, both among employees and between our group companies and our business partners.

#### **How should I act?**

- Treat all individuals with respect.
- Never bully, scare or threaten anyone.
- Avoid behavior that someone else might reasonably perceive as offensive or inappropriate.
- Stand up against harassment and other inappropriate behavior, whether it's directed personal or anyone else.

We define "harassment" as any behavior and comment that creates, encourages or allows an offensive or threatening work environment.

It includes:

- verbal and physical harassment,
- bullying,
- sexual harassment,
- abuse of power, racism, inappropriate humour or other acts that offend or cause discomfort.

## Anti-discrimination

Infobric values diversity among employees and expects hiring managers to comply with applicable anti-discrimination laws.

Work-related decisions such as employment, salary, position, promotion, disciplinary action, dismissal and working conditions shall be based on the ability or performance of persons, not on irrelevant personal factors.

All position requirements and employment-related decisions must be based on legitimate, commercial grounds.

### How should I act?

- Don't discriminate. Instead, assess the applicants based on their talent, skill and experience.
- Report to your manager if you encounter discrimination or think you have been subjected to unfair discrimination.

The Code defines "discrimination" as events where qualified persons are disadvantaged in their work due to irrelevant personal factors, such as:

- gender, gender identity or gender expression
- age
- nationality, ethnicity, colour or cultural background
- religion or belief
- disability, genetic or health related information, including pregnancy
- sexual orientation
- union association





**How we contribute  
to Infobric's  
environmental  
responsibility.**

**Contributing to a sustainable development of society is the foundation of our business idea. Together with our customers, we can contribute to decreasing the environmental impact from their industries through smart, technical solutions. But as a business, our environmental and social responsibility also comes down to making our own contribution.**

We believe that developing a sustainable business is not only the best way to help look after our environment, but also contributes to developing a successful and ethical company.

Climate change and environmental degradation are global and urgent challenges to the prosperity of our planet. We believe that everyone must play their part in contributing to solving these challenges, by minimising negative footprint as well as contributing positively where possible.

We always apply the precautionary principle in our assessment of substances and processes that may harm the environment. We promote the development and use of environmentally friendly technologies, for example procurement of energy-efficient products and circular economy services.

We continuously strive to minimise the amount of natural resources used and increase the rate of recycling.



### **How can I contribute?**

- When making business decisions on behalf of Infobric, always consider the impact this may have on the environment.
- Reduce nonessential business travel, when possible, by using technologies such as video conferencing.
- When travelling within work hours, use public transport to the extent possible.
- Produce less waste; only print on paper when necessary; use less plastic items that go to waste.
- Always ask for and buy recycled paper if you can - for your business stationery and to use in your printers.
- Recycle; familiarise yourself with how recycling works in your office and department.
- Customise your portions of food- avoid throwing away food.
- Switch off computer monitors, printers and other equipment at the end of each day. Though in standby mode they're still using power and adds to global warming.
- Always switch off your office light and computer monitor when you go out for lunch or to a meeting.

#### **More information**

Read more about what we do in our [Sustainability Policy](#)





**How we act  
responsibly with  
Infobric's assets.**

**Each of us have a duty to look after and respect all of Infobric's assets and protect our assets from misuse, theft and waste. We must also ensure other companies cannot gain an unfair advantage by accessing important information about our business.**

### **Communication and social media**

All our employees play an important role in building and maintaining Infobric's brand reputation, and communication is a crucial tool for managing our company internally and externally. All communication on behalf of or in the name of Infobric should be planned to the extent possible in the context of our strategic objectives designed to create the best possible business environment for our operations and employees. When we communicate both internally and externally, we should always engage in truthful, fact-based and well-balanced communication.

If you identify as an Infobric employee (including our Infobric Group subsidiaries) on social media, then information that you share about our company may be viewed as an official message from Infobric.

#### **How should I act?**

- Protect the confidentiality of our business information.
- Avoid disparaging, discriminatory or harassing comments towards other employees, customers, vendors or our business partners.
- Avoid the use of Infobric's trademarks or logos in a manner that would mislead or confuse the public.

### **Confidential information**

All employees has a duty to protect information that Infobric considers confidential. Theft, unauthorized use or disclosure may cause significant damage to our business. It includes any information that we have not disclosed about our processes, our services and products, our innovation and our economic or strategic plans or our position.

#### **How should I act?**

- Make sure there is a permission and a legitimate business purpose before disclosure of confidential information to anyone outside your company.
- Never post any confidential information on social media. Do not discuss confidential information in public places and never leave confidential material unattended, even in the office.
- Protect the confidential information that suppliers, business partners and other stakeholders share with us.

Keep in mind that the obligation to protect confidential information may apply even after leaving Infobric in accordance with applicable employment contract.

## Intangible assets

Infobric's intellectual property, such as technical inventions, patents, copyrights, know-how, trade secrets, design protection, trademarks and related licenses, are very valuable assets, but that value may be lost or compromised if that property is misused or disclosed improperly. Infobric will take steps to protect its intellectual property and has the attitude of respecting the intellectual property of others.

### How should I act?

- Be sure to protect Infobric's all trade secrets, inventions and design protection and do not publish or disclose them unless there is a specific permission to do so.
- Respect and do not use materials that constitute the intellectual property of others without the permission of Infobric and third parties.
- In case of access to confidential information or intellectual property, it should be handled properly and be protected from unauthorized disclosure and should only be used in a permitted manner. If the information belongs to a third party, compliance with all agreements with that party including the use and disclosure agreement shall be ensured.

## Tangible and financial assets

Infobric's assets, including financial assets, property and corporate equipment, systems and networks, are critical to our continuous productivity and company success. We must use these assets responsibly and protect from theft, negligence and waste, whether that means protecting access to company buildings, equipment and tools or showing good judgment when using company funds

### How should I act?

- Comply with our IT policies
- Do not use company assets, such as equipment and funds, to benefit personally or anyone else personally.
- Follow local procedures and instructions for reporting expenses and don't report personal expenses as business expenses.

### More information

Read our [Information Security Policy](#)

Read our [Information Policy](#)



**How we avoid  
corruption and  
conflict of interest.**



**A conflict of interest arises when our personal interests are inconsistent with the interests of our business and may create conflicting loyalties. All employees should avoid situations that create, or appear to create, a conflict between the personal interest of you as an employee and Infobric's interests.**

Infobric's business model is straight-forward, efficient and customer oriented. It should be easy for customers to do business with Infobric. Interaction with customers and other third parties is extensive and a normal course of our business. Each employee has far-reaching responsibility for both Infobric's business as well as the project through which he or she serves the customer. Infobric expects the highest standards of integrity and conduct from its employees in all matters affecting Infobric.

At Infobric, we make sure to prevent conflicts of interest on every management level and in all facets of our business. Infobric is committed to prevent Anti Money Laundering (AML) and Counter-Terrorist Financing (CTF) and we comply with all applicable laws and regulations wherever we conduct business.

Gifts and business entertainment can be a form of bribery. A general principle for all decisions made by Infobric employees on the provisions or acceptance of gifts and entertainment must be able to withstand both internal and external scrutiny without damaging Infobric's reputation. Whether a gift and/or business entertainment is acceptable or not may differ by country or specific situation. Therefore, all gifts, hospitality and reimbursed expenses should comply with our Gifts & Entertainment Guidelines.

### **Why is there a concern about offering or accepting gifts and entertainment?**

The giving and receiving of gifts or entertainment is an important part of many business relationships and can provide valuable opportunities for developing an understanding of a customer's, or prospective customer's, business and gaining the insight necessary for an effective and successful working relationship.

However, offering or accepting gifts or entertainment should be avoided where this casts doubt over the integrity, independence, objectivity or judgment of Infobric Group or the customer, prospective customer or third party (for example, a government or government agency). Gifts and entertainment can also constitute bribes or give the impression of a bribe and therefore be in contravention of Infobric Group Anti-Corruption Policy. In addition, there may be specific laws (for example, relating to Public Officials) which make it illegal for them to give or receive gifts or entertainment. Customers may also have specific policies of their own concerning the offering or accepting of gifts and entertainment.

### **Mer information**

Read our [Competition Law Policy](#)

Read our [Anti-Corruption Policy](#)

Read our [Gifts & Entertainment Guidelines](#)



**How we ensure  
privacy and  
personal data  
protection.**



**At Infobric, we consider privacy and personal data protection to be fundamental rights. We are committed to protect the personal data of our employees, customers, and other business partners.**

The subject of privacy is developing rapidly, and there is increasing awareness among our customers about the topic, as well as in society in general. Infobric views strong privacy routines as an important competitive advantage that builds trust in the market and will attract even more customers.

Data processing is subject to adequate organisational and technical protective measures. When handling customer data, you should always act according to the Infobric Group Data Protection Policy and customer contract.

Infobric also processes personal data about our employees as data controller during employment, to facilitate fulfilment of the employment contract. Infobric is equally committed to ensuring privacy in this regard. If you have questions regarding how you should handle customer data or how your data is handled, please contact the Data Protection Manager in the business area you work for or the Group Data Protection Officer. All Infobric employees are given mandatory data protection training

**Our Data Protection Principles:**

- We ensure a lawful processing of personal data.
- We ensure that personal data is protected by implementing appropriate technical and organisational measures.
- We ensure that our processing of personal data, measures and decisions regarding data protection is properly documented.
- We secure transparency by ensuring that clear and unambiguous, intelligible, and accessible information regarding the processing of personal data is provided to the categories of data subjects concerned.
- We use all necessary agreements which govern the processing of personal data, for example when service providers handle personal data on our or our customers' behalf.
- We take measures to fulfil individuals' rights under the GDPR.
- We manage our data protection work and new and changed processing activities in the business to ensure the level of compliance over time.
- We ensure awareness and knowledge of data protection rules by, among other things, carrying out internal trainings for our staff.

**More information**

Read our [Data Protection Policy](#)

Read our [Personal Data Retention Policy](#)

**How do I report  
suspected violations  
of the Code?**

**In Infobric, we nourish an open and honest culture where all employees are encouraged to speak their mind and communicate if they have any concern regarding potential risks to themselves, their colleagues, our business or reputation, or to any other stakeholder.**

We expect that you live by our ethical standards and report concerns if you experience anything within our organisation that does not comply with laws, rules, regulations, or internal policies.

We aim to solve any concerns or potential breaches to the Code within each team as far as possible. If you are uncomfortable with raising an issue with your immediate manager, we urge you to reach out to Infobric Group's General Counsel.

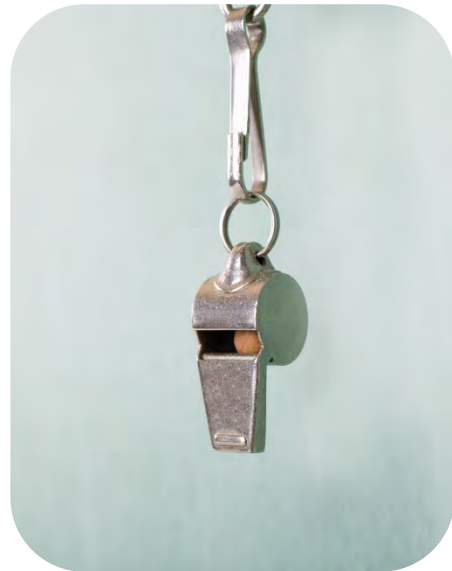
We also provide whistleblowing opportunities and anonymous disclosure channels for all employees and other external persons.



### **Whistleblowing**

Infobric has implemented a Whistleblowing Policy available on our intranet to ensure that employees and other external persons can express their concerns in an effective and responsible manner.

The Whistleblowing Policy sets forth the routines on how to make a report, procedures for Infobric's handling of whistleblowing reports and the processing of Personal Data. The Policy applies to Infobric Group and all employees.



### **More information**

Read our [Whistleblowing Policy](#)

Read more about [how to use the whistleblowing service](#)

## Two ways of reporting concerns

To encourage and ensure that an employee or an external person who becomes aware of serious misconduct in a work-related context within the organisation raises his/her voice and reports the issue, Infobric Group has set up two ways of reporting.

### Alternative 1

#### Speak with a manager



As a main rule, you should always contact your closest manager to report a suspected misconduct. If you do not feel comfortable talking to your immediate supervisor, you may contact that person's supervisor, anyone on the board, Legal or another person within the organisation you feel comfortable talking to. If you are an external person, you should contact your Infobric contact person, anyone on the board or Infobric Group's General Counsel. (see contact information on page 4).

*Matters relating to poor management, inefficient systems or other operational aspects, alcohol or drug problems, petty theft at work, less severe work environment problems etc., should always be reported in accordance with Alternative 1.*

### Alternative 2

#### Use the Whistleblowing service

If you suspect an ongoing, planned or previous misconduct in a work-related context within the business of Infobric and there is a public interest in revealing it (as defined in the Whistleblowing Policy) you may use Infobric Group's whistleblowing system.

You can choose to report anonymously through the whistleblowing system. However, it normally facilitates any subsequent investigation and handling of the matter if you identify yourself. Therefore, we encourage employees and other external persons to provide name and contact details when submitting a report.

*Before using the whistleblowing service, please read the Whistleblowing Policy*

# Appendix I: Infobric Group Policies

- [Anti-Corruption Policy](#)
- [Competition Law Compliance Policy](#)
- [Data Protection Policy](#)
- [Gifts and Entertainment Guidelines](#)
- [Information Security Policy](#)
- [Information Policy](#)
- [Personal Data Retention Policy](#)
- [Whistleblowing Policy](#)

[Find all policies on the Infobric Hub \(Group Intranet\)](#)



infobric

**We help build a better world.**

Infobric Group Code of Conduct

Version 1.1