

Knowit Group Code of Conduct

Approved by

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Per Wallentin, CEO Knowit Group

1 Introduction

Our corporate culture is based on the idea of a sustainable society and is created in collaboration between executives in charge and employees and based on respect for the value and dignity of each person, as well as openness and honesty. In this document, we describe what this means in practice in relation to various interested parties.

1.1 FUNDAMENTAL PRINCIPLE

Knowit observes the laws and regulations of the countries in which we operate.

1.2 KNOWIT'S CUSTOMER PROMISE

"We understand our clients' businesses and deliver value-adding solutions by combining our expertise in strategy, technology and creativity."

We are Knowit. We create digital opportunities for a sustainable and human society.

*Per Wallentin
CEO Knowit Group*

2 Code of Conduct

2.1 OUR CUSTOMERS

All Knowit employees and the subcontractors we hire shall jointly ensure that we make deliveries in accordance with our customer promise.

No employee may give bribes. Gifts and services may only be given within the limits of sound work ethics and on condition that they are within the limits of the laws applicable in the markets where we operate.

2.2 OUR EMPLOYEES

We strive to attract, develop and retain competent and motivated employees.

Knowit's policies reflect the ten principles in the UN Global Compact, which include principles on human rights (including labor rights), protection of the environment, and anti-corruption, targeted at companies. The principles are based on the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention Against Corruption.

- We accept each employee's right to be a member of a labor union and to be represented in collective negotiations. No employee that makes use of this right will be discriminated.
- We do not hire child laborers. Further, we do not accept slave labor, debt labor or forced labor.
- We actively strive for an equal and non-discriminatory recruiting process and workplace. For more information on this, see Knowit's Equality policy.
- We offer employment terms adapted to the markets on which we operate and we always pay more than the regulatory minimum wage in the countries where such exists. All employees shall have valid employment contracts.
- In order to remain an attractive workplace, we work actively with competence development and career planning. We have also established a *Job Rotation Policy* to facilitate for our employees to develop professionally within Knowit. For more information on this, see Knowit's *Job Rotation Policy*.
- We work to achieve a safe and secure work environment in accordance with our values and the legislation in force. To ensure our success, we continually follow up on work injuries and sick leave. For more information on this, see Knowit's *Work environment policy* and Knowit's *Sustainability report*.
- We are moderate with alcohol during both internal and external entertainment.
- We offer occupational health service and regular health checkups to all our staff.
- Knowit employees avoid all suspicions and emergence of conflicts of interests. Business or any other corporate related operation cannot be done in the employment, if the spouse, registered partner or family member or relative is in a position where he/she may benefit from this significantly in financial terms.
- A romantic relationship that is initiated between a manager and an employee implies a strain on both the people involved and the organization. Should such a situation arise, we will make an effort to separate these people within the organization, so that both can remain Knowit employees.

2.3 COMMUNICATION AND FINANCIAL INFORMATION

Knowit shall follow the ethical rules for communication, marketing and advertising applicable to the markets on which we operate.

Knowit observes the laws and rules that are in force within the countries in which we operate. Knowit is listed on NASDAQ OMX Stockholm and therefore observes the rules connected to the stock contract. We also follow International Financial Reporting Standards (IFRS) and the interpretations made by IFRIC and accepted by EU.

Financial information and other public information shall only be handled by the people designated to do so. No employees at Knowit use insider information either directly or indirectly in trading stock.

Formal statements in the press and media may only be made by the Chairman of Knowit's Board, the CEO of Knowit Group or VP of corporate communication. Exceptions can be made only if one of these persons has expressly approved or delegated this right. See also Knowit's *Communication policy* and Knowit's *Social media policy for employees*.

2.4 SUPPLIERS AND SUBCONTRACTORS

The suppliers and subcontractors that Knowit hires shall work in accordance with the same fundamental values as Knowit. This is ensured through Knowit's choice of a supplier/subcontractor based on fundamental values evaluated by Knowit and found to correspond to Knowit Group *Code of Conduct*. Knowit can also ensure this by having the supplier/subcontractor commit in a written contract to observe the Knowit Group *Code of Conduct*.

Some of our suppliers are also Knowit's clients. In cases where we choose not to use a supplier on the basis of our Code of Conduct, we should also choose not to have the same company as a client.

No Knowit employee may personally accept gifts, services or other remuneration from suppliers other than what falls within the limits of good working ethics and given that it is within the limits of the laws in force on the markets in which we operate.

2.5 SOCIETY AROUND US

The companies within the Knowit Group are committed to acting responsibly towards society and the world at large. Knowit's work with social responsibility, human rights, labor and environment are based on the company's values and the ten principles in the UN Global Compact.

- We dissociate from all illegal and unethical competition limitation.
- Money from Knowit may not be used for any form of political support to either political parties, political organizations or individual politicians.
- We do not comment on politics or make political statements when representing Knowit.

- We report crimes in the cases where there are substantive and clear signs that crimes have occurred.
- We observe the laws and regulations in the countries in which we operate.
- We support and respect international human rights.
- We make sure that we don't facilitate or participate in any way in crimes against humanity.

2.6 THE ENVIRONMENT

Knowit's environmental work is an integrated part of Knowit's sustainability efforts. Our vision is to create a sustainable and humane society through digitization and innovation. This means that we take responsibility for environmental aspects in regards to the development of our clients' operations, our employees' development and our own impact on society.

Knowit creates the conditions for employees to make conscious environmental decisions with the aim to decrease our ecological footprint. We work continuously to improve our environmental efforts, both through development and adaptation of internal processes and in client projects.

Knowit works actively to decrease our negative environmental impact through CO₂ emissions and encourages our employees to make environmentally friendly choices.

Knowit's significant environmental aspects are:

- Emissions to air (negative impact)
- Energy and resource usage (negative impact)
- Choice of suppliers and purchasing of goods and services (positive impact)
- Awareness and knowledge on potential environmental benefits in our client assignments (positive impact)

To ensure that we are successful in our environmental efforts, we measure how our environmental impact changes over time. For more information on Knowit's environmental efforts and the results of our measurements, see Knowit's *Sustainability Reporting*.

Knowit AB and some of our subsidiaries are certified under ISO 14001 since the spring of 2010.

2.7 ASSETS AND INFORMATION

All of Knowit's employees and subcontractors shall support Knowit's and our customer's tangible and intangible assets. Knowit's assets may only be used for the company's purposes unless other agreements have been made.

Information can be held by Knowit, be created by Knowit for a customer or be provided by a customer. Regardless of type, the information shall be protected in the same way. More information can be found in Knowit's *Information security policy*.

We respect the IPR (patents and other rights) that are relevant e.g., in connection with third party products used in solutions we develop for customers. In connection herewith, we also protect ourselves and our customers through the use of standard agreements created for our field.

Knowit's IT environment shall be used for work-related tasks. Other uses are allowed only if they occur to a limited extent and if they cannot be seen as unsuitable or illegal.

Recording of moving images or audio, or photography is only acceptable at Knowit if those participating in the meeting or activity are informed of this beforehand. This applies regardless of if the participants are Knowit employees or external parties. If any person after recording does not want to be seen or heard in the context in question, relevant parts of the material are to be erased. Hidden recording of moving images or audio, or photography, is never acceptable at Knowit.

All information that an employee gains through his/her employment or a customer project shall be seen as confidential and may not be disseminated. This is regulated both in the employment contract or the subcontractor agreement and in any separate NDAs.

Upon suspicion of a security incident, regardless of if it relates to physical assets or information assets, Knowit's Security manager or Knowit's Service desk shall immediately be informed.

3 Observance and reporting

All employees and subcontractors should be familiar with and observe Knowit Group *Code of Conduct*. The executives in the company carry particular responsibility to observe the *Code of Conduct* and lead by example. It is the responsibility of each executive to ensure that all employees and subcontractors have studied and understood Knowit Group *Code of Conduct*.

Each employee has personal responsibility for his/her ethical standpoints, but as an employee representing Knowit, our *Code of Conduct* should be taken into account.

All employees are obliged to report breaches of our *Code of Conduct* to his/her closest superior. The number of reported breaches of our *Code of Conduct* is measured annually.

In cases where the employee, for whatever reason, does not want to report to his/her closest superior, reports can be made to other executives, the local HR-function or through Knowit's Whistleblower function. For more information on the Whistleblower function, see Shareit. The number of Whistleblower errands received annually is measured.

Actions in breach of Knowit Group *Code of Conduct* will immediately be attended to and may also be the object of disciplinary measures.