

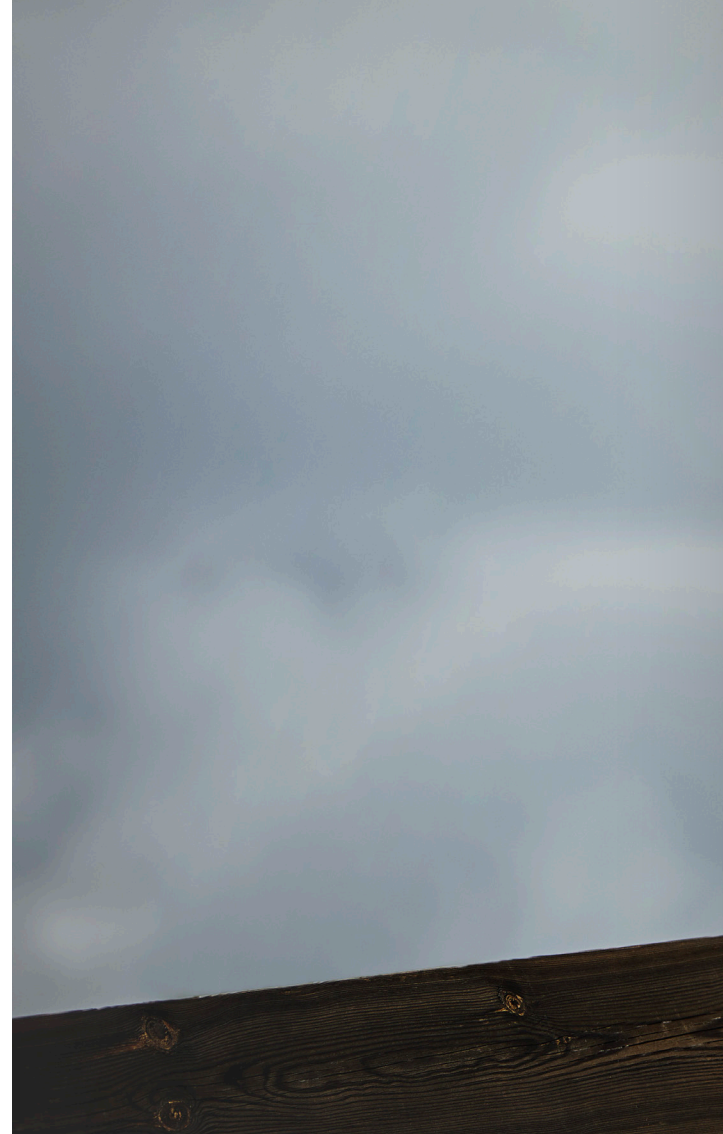


# CODE OF CONDUCT

NEXER

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# WHY A CODE OF CONDUCT?

This Code of Conduct describes how we act and what it's like working at Nexer regarding company policies, laws and ethical practices.

By establishing these guidelines and communicating them throughout the organisation, we embrace the spirit of our choices and actions. It defines who we are – both to ourselves, our customers, suppliers and partners.

This Code of Conduct applies to employees in all companies within Nexer Group.

This Code of Conduct is also for all suppliers where we expect them to adhere to our Code of Conduct principles. We assure compliance in the initial supplier evaluation process and the yearly supplier audit.

# A WORD FROM OUR CEO

At Nexer, we are proud of what we stand for and our way of working. We believe in a better future and have a strong belief in our vision – **Promising Future**. We want to make a difference for our employees, our customers and contribute to a better society. Our values are our compass. We are proud and passionate about what we do, and we make sure to get it done. It's about cutting-edge knowledge combined with the ability to dream without geographic boundaries and with diversity and equality as faithful companions. We want to work with people who create wow!

We always strive to find the best solution and being ahead of change providing the best values to our customers and employees. We build our relationships on values on our values, respect, trust, and individual responsibility. With a firm foundation in our vision and values, we can confidently make the right decisions. However, we need to define our way of doing things. We describe some guidelines in this Code of Conduct.

**Let's show the world the Nexer way of doing things!**

Lars Kry, CEO of Nexer Group →





# OUR VALUES

PUT YOUR HEART IN IT AND  
MAKE IT HAPPEN.

Nexer creates trust by applying our values and vision to build long-lasting relationships inside and outside the organisation.

Our **values** are the principles that we lead by with professionalism and earned trust every day. Our **vision** is our belief and ambition that guides us in our daily operations.



OUR VALUES  
Passion and Execution







## OUR VISION

Promising Future

**For our customers** – Driven by entrepreneurship offering competitive, innovative and efficient tech solutions that will improve business today and in the future.

**For our employees** – Nurture an engaging and developing culture where people can grow and make a difference every day.

**For the world at large** - Take social and environmental responsibility and contribute sustainable solutions for our society.



NEXER CONTRIBUTES  
TO TECHNICAL  
INNOVATION FOR A  
SUSTAINABLE SOCIETY.



# SUSTAINABLY FOR A BETTER FUTURE

We are proud to be environmentally responsible, providing technical innovations and contributing to a sustainable future.

## YOU ARE PART OF A RESPONSIBLE COMPANY

We believe in something bigger than ourselves. We believe that together we can create a better future in which we want to live. Finding the most innovative solution is not just about business. Therefore, we engage in a range of initiatives and take an interest in greater social responsibility, both at home and away.

## TAKE CARE OF THE ENVIRONMENT

We strive to conduct business in an environmentally responsible manner and are committed to complying with applicable environmental laws and regulations.

Our goal is to minimise our environmental footprint by reducing greenhouse gas emissions, decreasing waste and limiting energy use at our facilities. Our ISO 14001 certification governs this. We are continuously looking for ways to do things better. We set

goals for working more efficiently and reduce our environmental footprint by recycling, reducing waste, smart travelling and sustainable services — it's all about a better future by taking care of the environment and preserving precious resources.

## NEXER CARES

We have a genuine and ambitious program to contribute to a better future with our vision as guidance and a desire to make a difference. Also, the tech skill shortage is a concern for us. We want to contribute and share our knowledge and inspire more people to become a part of the tech community. Our strategy focuses on education, gender equality and diversity. Our selected activities to contribute to a better future all reflect these areas. We do this through collaborating with organisations and schools, networking, self-education, and arranging knowledge transfer events. We are very proud of our Corporate Social Responsibility (CSR) program, which we call Nexer Cares.

Nexer Cares takes its stand in the United Nations Sustainable development goals, contributing to several of the 17 development goals.

## EDUCATION:

In education, we support **Star for Life** where high school students in South Africa get training to strengthen their self-esteem and motivation to educate themselves and thus create a better future.

We also support **Motivationslyftet by Star for life**, where high school students in Sweden can learn more about motivation and self-esteem through mental health training as part of the school curriculum.

For young children, we support **Kodcentrum** where children learn more about programming and digital creation.

## GENDER EQUALITY:

Today, women are a minority in the tech community, and we want to change that. We want to support and inspire more women to join and stay in the industry.

We do not see gender as an identifier. We see talented people that we want to work with.

We support **Pink programming** to inspire more women into programming. We also have a network for women in the industry, **Nexer Network: Women**.

## DIVERSITY:

All employees at Nexer are offered to be a mentor for a Swedish citizen with an academic background from another country. We do this in cooperation with the organisation **Mitt Liv**.

We believe that when people with different backgrounds and experiences meet, both the commitment and the understanding of each other grows. Therefore, Nexer has supported Mitt Liv since 2016.







## SUSTAINABILITY AND REDUCE POVERTY:

We act as an environmentally responsible company in several ways. One of them is as a supporter of **VI Agroforestry**, where the Agroforestry Network (combining sustainable farming and forest replanting) gives a double effect: reduced poverty and reduced climate change.

Nexer also participates in the **UN's Global Compact Sustainability Initiative**. Today, this initiative has nearly 10,000 affiliated companies from 160 countries.

All affiliates undertake to uphold the UN's ten principles of human rights, labour law, environment, and anti-corruption, include them in their corporate strategy, and report on how to work on improvements in those areas each year.

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### **Also, see:**

Nexer Environmental policy on the intranet.  
Our Nexer Cares initiatives and the yearly Global Compact sustainability report on [www.nexergroup.com](http://www.nexergroup.com)





WE HAVE ZERO-TOLERANCE FOR  
INSULTING OR ABUSIVE BEHAVIOUR  
AS THIS IS A SERIOUS THREAT TO  
OUR EMPLOYEES.



## EQUALITY POLICY

# CONTRIBUTE TO DIVERSITY & EQUALITY

We are a global company and operate in many countries, and our vision with Promising Future reflects our commitment to human rights, diversity and equality. We work better together because of our differences, not despite them. We believe that we achieve the most and enrich our own culture through the diverse skills, experiences, and backgrounds that each brings to the company.

We treat each other with respect and support each other in our work. We want to create an environment where we all help and take care of each other.

Therefore, we have zero tolerance for any insulting or abusive behaviour as this is a severe threat to our employees, their well-being and career development.

We have been a member of the United Nations Global Compact since 2015, and we follow and respect the Ten Principles.

## OUR COMMITMENT

- We strive to offer good working conditions for all our employees, which allows them to perform to their full potential.
- We provide equal employment opportunities to all qualified candidates.
- We do not discriminate based on age, gender, ancestry, colour, parental leave, gender identity or expression, marital status, medical condition, national origin, physical or mental disability, political affiliation, protected veteran status, religion, sexual orientation, or any other characteristic protected by applicable laws, regulations, and ordinances.
- We pay attention to discovering our unconscious biases and take action to create an inclusive culture that enables each employee to feel welcomed and perform their best.
- We promote a balanced work-life and facilitate both women and men to combine parenthood and working life. We give everyone full opportunity to be on parental leave and Temporary Parental benefit. Employees on parental leave are welcome to participate in information actively, courses, attend meetings and social activities.

- We comply with applicable legislation and agreements with working hours, rest, time off and offer flexible or individual working hours and the freedom to choose the physical location to perform the work. Of course, in line with a shared understanding from the customer and line manager.
- We offer fair employment conditions and wages with a competitive compensation and benefits package. In addition, we are compliant with national legislation, and we offer all employees yearly salary audits.

## HOW WE WORK

- We honour and promote human right. All employees have the same rights and obligations. We see differences and diversity as something positive. We aim to have an equal and well-balanced working environment where different personalities complement each other.
- All employees with equivalent qualifications, experiences, achievements and duties have equal employment terms.
- All positions are open for everyone that meet the prerequisites,

and we base the recruitment on qualifications and competence. However, individuals from minority backgrounds can be prioritised when appointing a vacant position, provided that qualifications and suitability are equivalent.

- We are actively working to create awareness of unconscious biases.
- All employees have freedom of association and the right to form and join unions of their choice.
- We do not employ or use child labour or forced labour, and we do not knowingly engage with suppliers involved in child labour, forced labour or any other unfair or illegal practices.

## PERSONAL HARASSMENT

We do not accept harassment of employees, suppliers or customers. If an individual feels he or she has been subject to harassment, the individual should report this to a line manager or senior management. Every manager who receives a report of this kind is responsible for ensuring the case is dealt with confidentially and impartially.

## HOW TO REPORT

- For discussing or notifying, contact the nearest manager, HR or union representative. All contact persons, in this case, have a duty of confidentiality of how the complaint is treated.
- Nexer will protect anyone who makes a complaint. Furthermore, Nexer guarantees that anyone who complains harassment should not be adversely affected by this.
- Can agreement not be reached between parties involved – Nexer, the harasser and harassed – Nexer takes appropriate measures.





# TRANSPARENCY AND OPENNESS

We believe in transparency and openness. By making good decisions and ethical choices, we create the desired culture and trust among colleagues, customers and partners.

We have an open-minded atmosphere, with freedom of action and openness to speak out.

## RESPONSIBILITY

Every employee's responsibility is to work according to company standards of integrity and honesty described in this Code of Conduct and ensure that company

operations are pursued with sufficient skill, care, consideration, and openness.

We expect Nexer employees to know and act accordingly to this Code of Conduct. Managers at all levels are responsible for ensuring that these policies are understood and applied. The best way to do so is to set a good example. If there are any unclear points, questions or uncertainty, you must discuss this with your manager.

## SPEAK UP

At Nexer, we value transparency and openness, and our culture promotes speaking up if something's not right. As a result, we have an open-minded atmosphere, with freedom of action and openness to speak out. We do not seek scapegoats – instead, an early awareness,

if something's not right, is valued and can provide a solution and avoid problems and potential conflicts.

Nexer will always review incoming mistreatment reports and will not tolerate any retaliation against the reporter.

## HOW TO REPORT

If you know of, or have good reason to suspect, that something is not right, or even that there is an unlawful or unethical situation, or believe you are a victim of prohibited workplace conduct, immediately report the matter to:

- The nearest manager
- Human Resources
- Speak-Up Inbox

We will always handle your message confidentially.

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E-mail: [speakup@nexergroup.com](mailto:speakup@nexergroup.com)  
Letter: Nexer AB, Lindholmspiren 9,  
41756 Göteborg, Att: Human Resources  
(option for anonymous)



## COMMUNICATION POLICY

# COMMUNICATE WITH CARE

The tone of voice in our communication is bold, energetic and straightforward.

We have a positive and friendly tone that is clear and understanding, professional and helpful.

All employees represent Nexer when communicating both internally and externally. We consider all employees to be ambassadors when sharing in their networks and social media.

## INTERNAL COMMUNICATION:

- Open and inclusive: We will communicate openly and inclusively, both within and between teams/ business units. If you do not understand, please ask, and we encourage an open

discussion where different ideas and opinions are taken advantage of. We show each other trust and respect.

- Availability: It's everyone's responsibility to gather the information needed to perform the work in the best possible way. We have an open attitude and share information and exchange experiences to develop our business. Present the information intelligently with a language that is clear and easy to understand.
- Fast and factual: We inform each other quickly and objectively so that everyone has accurate information to avoid misunderstandings and concerns. We strive to ensure that externally communicated information is available first to employees.

## EXTERNAL COMMUNICATION

- Clearly state that any opinions expressed about our company are entirely the employees own and do not reflect our company's.
- Never disclose confidential business information about our company or our customers, business partners or suppliers.
- Do not post anything that's confidential business information, discriminatory or would constitute a threat, intimidation or harassment.
- Irony and sarcasm should be avoided.



## CONFIDENTIAL INFORMATION

Employees are not permitted to exploit confidential information obtained through assignments with customers or within Nexer. Employees with access to confidential information cannot pass on the information or disclose the information to a third party. This also applies to situations in which Nexer's customers or suppliers are involved.

## WHAT IS NON-PUBLIC INFORMATION?

Non-public information is any information that Nexer has not disclosed or made generally available to the public. Examples include information relating to:

- Contracts
- Strategic and business plans
- Major management changes
- Mergers and acquisitions
- Technical specifications
- Pricing
- Proposals
- Financial data
- Internal costs

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*If you are uncertain if a piece of information is public, contact a manager and Nexer's communication department before publishing.*

## FINANCIAL COMMUNICATION

We make sure that the financial reporting and accounts are correct and that we communicate with transparency.

We meet the applicable legislation and trade standards in all our activities. This includes financial and non-financial tasks such as offers, agreements, statements of account, salary lists, expenses, personal data etc.

We base all financial data on facts, and we use supporting tools and controls to ensure correct financial reporting.

# MANAGERS AS ROLE MODELS

## A SAFE AND SOUND CULTURE OF ETHICS

It's everyone's responsibility to contribute to the wanted culture and Nexer way of doing things. Still, our managers have a special responsibility to lead by example and setting the correct values. Our managers set the way we make decisions share information, and manage different situations and opinions.

This defines the foundation for trust in the company. Our success depends on the culture and trust we build together, starting with the managers as role models.

Our managers should, at all times, model appropriate conduct and:

- Lead by example by modelling ethical decision-making.
- Support the company values and the business strategies to achieve our goals.
- Ensure that the employees supervised understand their responsibilities related to company goals and policies.
- Talk to the team about ethics and integrity and point out the importance of the Nexer way of doing things and the values it's based upon.
- Make time to discuss the code of conduct with employees to create an understanding atmosphere where different situations and scenarios are raised and discussed.
- Create an environment where employees feel comfortable raising concerns without fear of any consequences.
- Consider behaviour concerning this Code of Conduct and other company policies when evaluating an employee.
- Ensure that the teams know that they must achieve them the right way for results to matter.
- Never encourage or direct an employee to achieve business results at the expense of ethical conduct or compliance with the Code of Conduct or the law.
- Always act to stop violations of the Code of Conduct or the law.

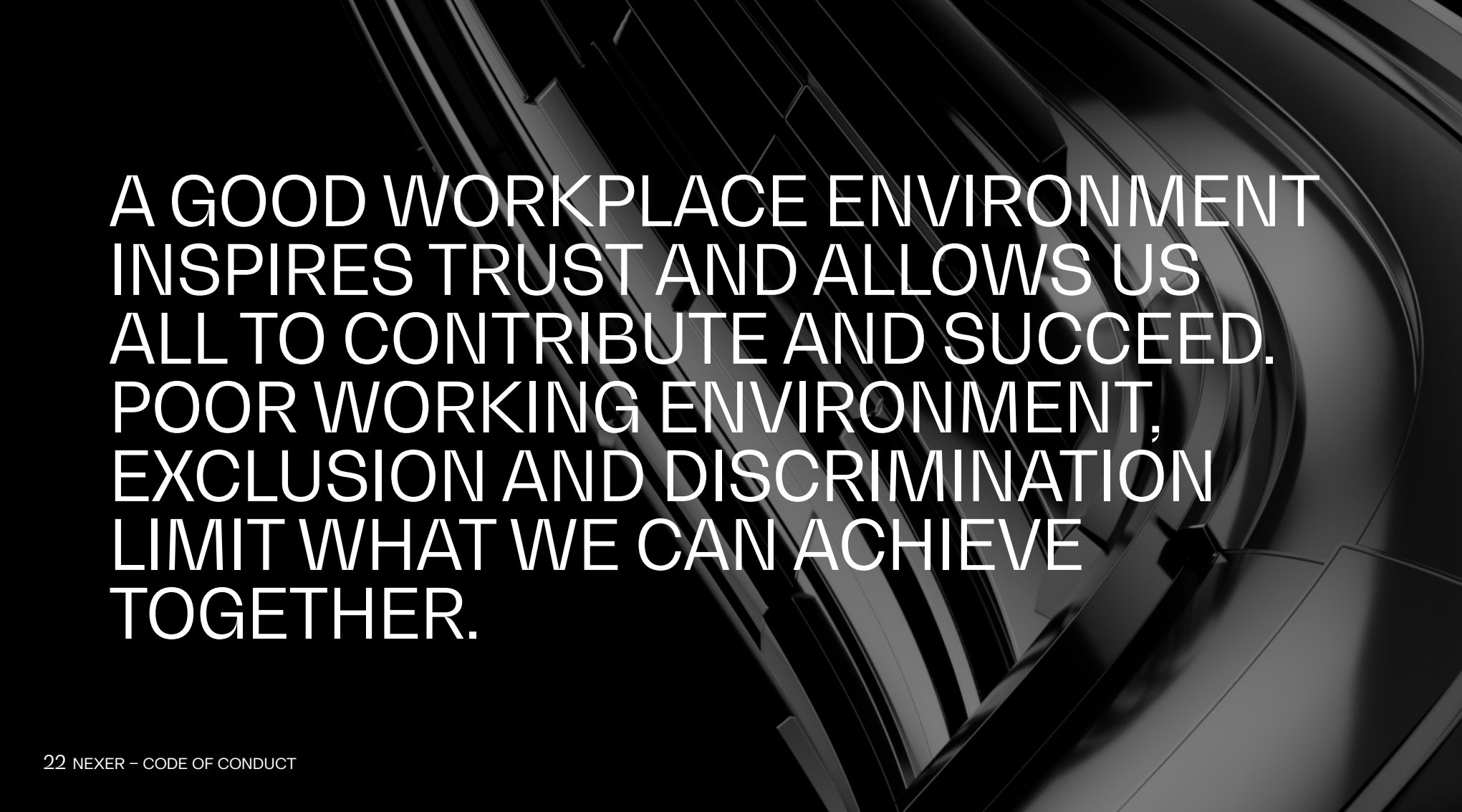
Our success depends on the culture and trust we all build together.

## RESPONSE TO QUESTIONS AND CONCERNS

Managers approached with a question or concern related to this Code of Conduct should always listen and give the employee their full attention, asking for clarification and additional information if necessary. All questions should be answered without delay, if possible. If a question or concern requires investigation by the manager, Human Resources is the information source to contact.







A GOOD WORKPLACE ENVIRONMENT  
INSPIRES TRUST AND ALLOWS US  
ALL TO CONTRIBUTE AND SUCCEED.  
POOR WORKING ENVIRONMENT,  
EXCLUSION AND DISCRIMINATION  
LIMIT WHAT WE CAN ACHIEVE  
TOGETHER.

## WORK ENVIRONMENT POLICY

# OUR WORKPLACE

We believe that our values, **Passion** and **Execution**, are the heart of Nexer. They are the cornerstones when creating a safe and fruitful work environment.

All employees must be safe and secure, feel job satisfaction and fellowship. With this in mind, a conscious effort for a healthy working environment should be integrated into daily work within all activities at Nexer, both in the office, working remotely, and working at client premises.

The working conditions must be adapted and developed according to people's different situations in both physical and mental aspects.

Continuous improvements regarding the work environment shall be part of Nexer's systematic quality work. We shall conduct them following applicable laws and regulations and within the framework stated in our guidelines.

We support a work environment that empowers everyone to do their best every day.

## OUR BASICS:

- We treat others with respect and do not tolerate harassment or discrimination.
- We integrate safety and health practices into our operations and comply with workplace safety regulations.
- We resolve problems respectfully and never resort to acts or threats of violence.
- We do not work under the influence of drugs or alcohol.

A good workplace environment inspires trust and allows us all to contribute and succeed. On the other hand, discrimination, exclusion and an inadequate working environment limit what we can achieve together.





# ENSURE INFORMATION SECURITY

As an employee, you will have access to and develop company intellectual property. By assigning to Nexer, the intellectual property rights of your work fall on Nexer. This intellectual property includes ideas, inventions, software, templates, publications and other materials relating to Nexer's current or anticipated offerings, business or development.

- We follow local privacy and data protection laws, such as GDPR.
- We provide clear and accurate privacy notices when collecting or processing personal data.

- We protect our customers' data by using safe tools and well-defined and secure processes.

You are required to follow the defined information security policy and take measures to ensure information integrity.

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**Also, see:**

Nexer Information security policy on the intranet.

## QUALITY POLICY

# QUALITY IN EVERYTHING WE DO

Our basis is always that the work we do, either for customers, partners or ourselves, shall be based on the defined requirements and needs and be conducted according to our ways of working to deliver the best quality services and products.

As part of Nexer, you should contribute to our vision by delivering quality and thereby creating a better future:

### FOR OUR CUSTOMERS

By offering them competitive, innovative and efficient IT/tech solutions that will improve their business today and tomorrow.

### FOR OUR EMPLOYEES

By nurturing an engaging culture where people can grow and make a difference every day.

### FOR THE WORLD AROUND US

Through taking social and environmental responsibility and contributing with sustainable solutions for our shared society.



## ETHICS POLICY

# ACT ETHICAL

Our business is very dependent on the Nexer brand based on trust, transparency and integrity. We are a trustworthy and reliable service provider with a culture and values based on strong ethics of doing the right thing.

## AVOID CONFLICTS OF INTEREST

As an employee, you must ensure that nothing interferes with the ability to make all business decisions in the best interest of our company, meaning that nothing we do should interfere, or appear to interfere, with the responsibility for objective and unbiased decision-making on behalf of the company.

No activity at work or home should harm our reputation or Nexer's name. All employees must disclose if personal or

financial activities interfere (or have the potential of interfering) with the loyalty toward the company.

We shall always safeguard the interests of Nexer, regardless of any personal gain or self-interest when working in the business operation. Avoid situations where personal, family or financial interests may come into conflict with those of Nexer.

Examples of conflict of interest that you must report to your manager include:

- The employment of a relative.
- Personal interest in a business deal with a company within Nexer or with a customer or supplier to our company.
- Ownership or other interest in a competitor, customer, supplier, or party seeking to do business with Nexer.

A conflict of interest is not necessarily a violation of Nexer's policy. However, failing to disclose a conflict promptly is always a violation.

## COMPETE FAIRLY

Every Nexer employee is responsible for ensuring that we compete fairly and comply with all applicable competition laws, regulations, decrees, and orders. Nexer must never collude with other companies on price or terms to be offered to customers; agree with competitors to allocate markets or customers or manipulate the bidding process.

### Our guidelines

- We must apply sound business practice together with the standards established by the company. We understand

and follow the guidelines about contacting competitors, obtaining and handling competitive information, and participating in trade and professional associations.

- Employees are obligated to familiarise themselves with and observe the regulations/laws applicable to the operation and engage advisors, if necessary.
- Company assets are not permitted to be used directly or indirectly, with an unlawful or improper purpose in mind or for personal or private benefits.
- We do not provide, receive or exchange any of the following types of information with a competitor or its representative, whether in person, electronically or at an industry meeting:
  - Bids and prices

- Customers, suppliers, or sales territories
- Terms or conditions of sale
- Costs, profits or margins
- Sales or marketing strategies
- We do not propose or enter into any agreement or understanding with any competitor about any aspect of competition between Nexer and a competitor, which may include agreements on pricing, bidding, deal terms, wages, or markets or customers' allocation.
- Actively disassociate from any situations in which improper agreements or information sharing between competitors are raised.



## ANTI-CORRUPTION POLICY

# WORK AGAINST CORRUPTION

Our commitment is to operate with transparency, trust and integrity continuously. Whether it is on a corporate or personal level, corruption, extortion or bribery is not acceptable in our organisation.

This approach applies to all markets where we operate and our business relations and shall guide us in our daily work with all our stakeholders.

## TRANSPARENT AND NEUTRAL

- Nexer shall, in a transparent manner, communicate the result and ambition of the work against corruption.
- Employees, independent of role and seniority, who participate in political activity or campaigning and do so as individuals and in their capacity, must never use Nexer's resources, networks, or brand to contribute, financially or non-financially political parties, politicians or political campaigns.
- Contributions to community projects or charities shall be made in good faith, with a business and stakeholder perspective and in compliance with Nexer's policy framework.
- As a Nexer employee, I do not offer, promise, give, request, accept or agree to receive significant gifts or entertainment (including

events, trips and other travelling arrangements) to or from third parties.

- Events, gifts and activities arranged to strengthen and build client and supplier relationships shall be made in good faith and presented transparently, never impact behaviours and always be moderate.

## SELECT BASED ON PROFESSIONALISM

- A Nexer employee responsible for or involved in recruitment, promotion or professional development must assure competence based on human resources procedures and processes for recruitment, promotion, and professional development.
- Supplier selection shall be conducted in a structured process, with documentation demonstrating how the selection has been made.
- Supplier selection shall never be based on receipt of a gift or hospitality.
- We follow the trade sanctions and export control laws and regulations that apply to our business. To ensure that we do not engage in any transaction with unauthorised countries, organisations and individuals, we perform due diligence with those we consider engaging with a business relationship.



## IMPROPER PAYMENTS

- Employees are not permitted to accept gifts or entertainment that might reasonably influence their purchasing decisions or business deals.
- Gifts, entertainment, and personal favours should only be accepted if they follow prevailing sound business practices and are not in contravention with the laws in force. In situations where there is any doubt, you should contact the manager for a decision.
- Never offer, promise, make or authorise a payment or give anything of value to anyone to obtain an improper business advantage.
- Remember that providing gifts, entertainment or anything of value to government employees is highly regulated and often prohibited. Therefore, do not provide such gifts and entertainment unless you have received prior approval.
- Treat with extreme caution a demand from a third party to receive its commission payment before winning a deal/contract.
- Watch out for commissions that seem too large concerning the services provided.

All employees can anonymously report suspicions of, or attempts at, bribery and corruption, or suspected or actual breaches of this code by sending a letter to the postal address.

## HOW TO REPORT

If you know of, or have good reason to suspect, that something is not correct or even that there is an unlawful or unethical situation or believe you are a victim of prohibited workplace conduct, immediately report the matter to either:

- The nearest manager
- Human Resources
- Speak-Up Inbox
- Letter (option for anonymous)

Your message will always be handled confidentially.

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E-mail: **[speakup@nexergroup.com](mailto:speakup@nexergroup.com)**

Letter: Nexer AB, Lindholmospiren 9, 41756 Göteborg,

Att: Human Resources (option for anonymity)

# REVISION AND DOCUMENT CONTROL

## REVISION AND DOCUMENT CONTROL

This document is an integral part of Nexer's management system and is under the control of Nexer's Quality Manager and management team.

Revisions usually are done once per year or when needed.

Original documents are stored electronically in Nexer's document management system with version and access control.

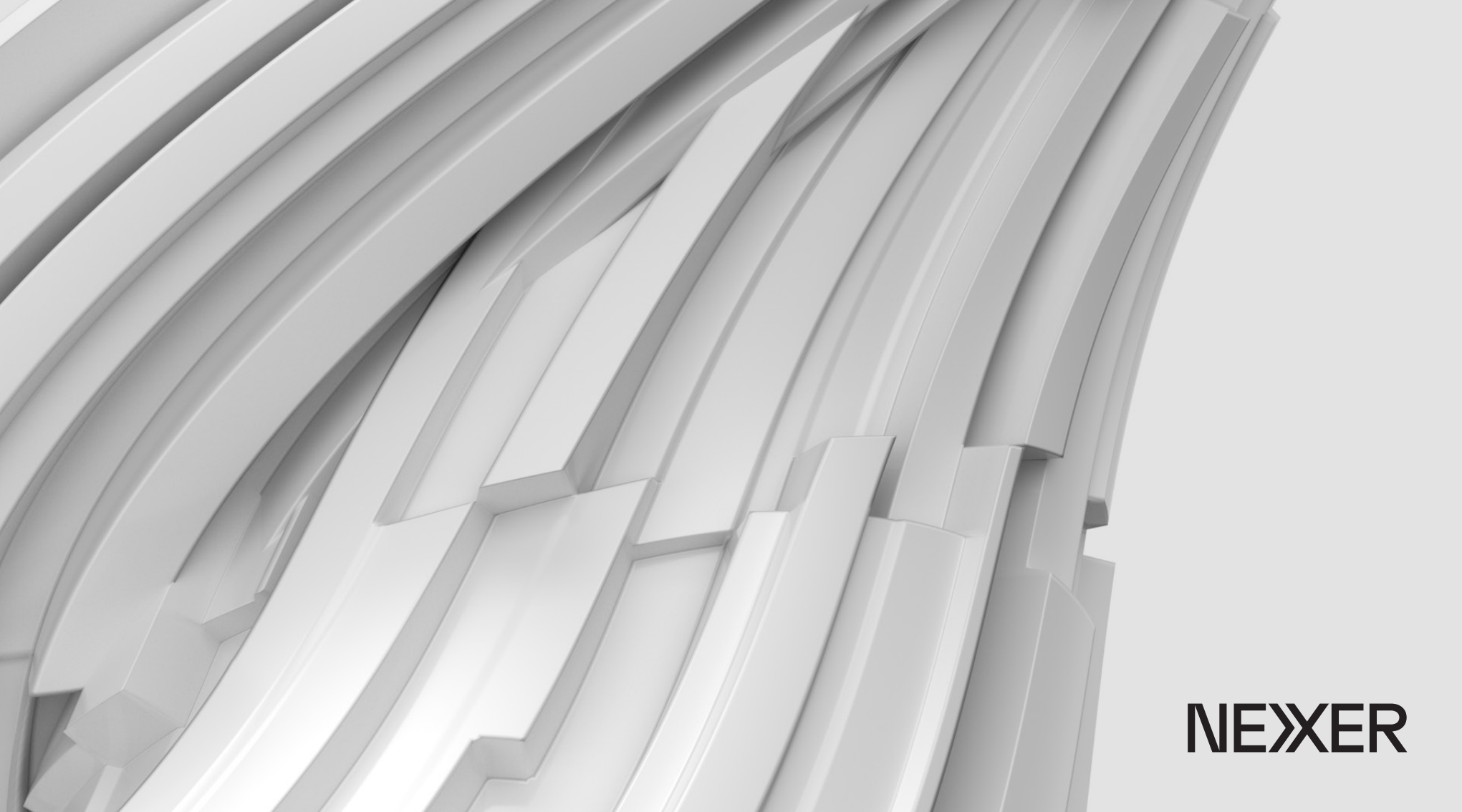
## ADDITIONAL RESOURCES FOR GUIDANCE

If you have further questions about topics covered by or related to this document, please get in touch with **[codeofconduct@nexergroup.com](mailto:codeofconduct@nexergroup.com)**

Document ID	SITC-14811060-262
Author	Fredrik Haase
Document type	Steering Document
Process	Company generic
Revised date / by	2021-08-25 / Beatrice Silow
Approved date / by	2021-08-25 / Lars Kry







**NEXER**