



advania

**Code of Conduct for
Employees in Advania Group
2021**

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1. Introduction

1.1 Purpose

This Code of Conduct is based on the values of Advania and is intended to clarify its position and work regarding fundamental social, ethical and environmental standards. The Code of Conduct is based on the ten principles of the international UN Global Compact*:

- ❖ Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.
- ❖ Principle 2: Make sure that they are not complicit in human rights abuses.
- ❖ 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.
- ❖ Principle 6: The elimination of discrimination in respect of employment and occupation.
- ❖ Principle 7: Businesses should support a precautionary approach to environmental challenges.
- ❖ Principle 8: Undertake initiatives to promote greater environmental responsibility.
- ❖ Principle 9: Encourage the development and diffusion of environmentally friendly technologies.
- ❖ Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

The UN Global Compact is the world's largest corporate sustainability initiative, which motivates businesses to align strategies and operations with universal principles on human rights, labour, environment and anti-corruption. The Code of Conduct exists in two versions: this internal Code of Conduct, which describes our employees' rights and obligations, and an external Code of Conduct (Advania's Supplier Code of Conduct) which outlines our expectations of suppliers.

*Read more about the ten principles of the UN Global Compact here:

<https://www.unglobalcompact.org/what-is-gc/mission/principles>

1.2 Advania

Advania is one of the leading and most comprehensive system integrators in the Nordic region. With a stated goal of being the most flexible and value-adding supplier, we help our customers in both the private and public sectors.

2. Rights

For Advania to fulfil the commitments of the UN Global Compact principles underlying this Code of Conduct, all Advania employees have rights and obligations which they are expected to understand and fulfil. Here, employee rights are described.

2.1 Human rights

The first two principles of the UN Global Compact relate to human rights*. They determine that businesses

should support and respect the protection of internationally proclaimed human rights and make sure they are not complicit in human right abuses. For companies in developed countries with functioning democracies such as the Nordic countries, human rights may seem like a given as many of the areas the principles discuss, such as citizens' rights to freedom of speech and religion, education, protection, etc., are already covered by national legislation. Yet in today's globalised world, human right violations can still occur in the Nordic labour market. Rights that may sometimes be violated in our part of the world include the right to equal pay for equal work, the right to satisfactory working conditions, the right of satisfactory rest from work according to minimum statutory standards and the right of paid leave.

Advania systematically attempts to prevent these kinds of violations with standard operating procedures and policies that determine the company culture and working conditions. The Code of Conduct plays a crucial role in showing that Advania supports and respects the Universal Declaration of Human Rights and systematically works to ensure that employees' rights are upheld. This also applies to Advania's supply chain, as outlined in "Advania's Supplier Code of Conduct".

*Read more about all UN conventions on human rights here:

<http://www.regeringen.se/49baf9/contentassets/d6d5653029e14e338a4b86f5f4b34c6b/fns-konventioner-om-manskliga-rattigheter>
<http://www.regeringen.se/>

2.2 Working conditions at Advania

The third, fourth, fifth, and sixth principle of the UN Global Compact relate to labour. In terms of businesses and their obligation to uphold the freedom of association and the effective recognition of the right to collective bargaining, to eliminate forced and compulsory labour, to abolish child labour and to eliminate discrimination. All employees have the right to establish, join and organise trade unions or similar employee organisations and to negotiate with the company on a collective basis. Advania's employees are members of several trade unions with respect to their different occupations. Advania complies with local collective bargaining agreements negotiated with the trade unions and local industry associations. The ambition of Advania to offer its employees competitive salaries and good working conditions is a prerequisite for enabling Advania to attract and retain competent staff.

Statutory acts, regulations and company policies also regulate Advania's procedures that cover a range of diverse areas regarding labour. Advania complies with pension schemes and insurance protection of employees in accordance with, or exceeding, local legislation.

Advania values the wellbeing of its employees and demonstrates that by providing all employees rebates for health costs. All employees are offered a wellness allowance and discounts on various gym memberships. Advania also takes targeted preventive measures such as providing training and individual help from professional healthcare partners.

2.3 Equality and diversity

In the broader sense, both equality and diversity pose challenges in the IT-industry. There is a gender imbalance in the industry, in terms of how few women choose to work in IT. Within the industry, there is also a lack of inclusion for people of different cultures and backgrounds. This results in a homogeneous workforce and long-

term efforts are required to resolve the issue which the whole IT industry should aim to resolve in collaboration.

All Advania companies strive for a more diverse workplace and manage a number of local internal and external initiatives; such as recruiting and retaining more women and other under-represented groups, measuring and monitoring that there is no wage discrimination and funding external organisations to help drive long term improvements in the whole industry.

2.4 Discrimination and harassment

All employees have equal value and an equal right to grow and develop according to their own abilities.

All forms of discrimination or harassment on the basis of gender, gender identity or gender expression, sexual orientation, ethnicity, religion or other beliefs, nationality, social origin, political views, trade union membership, disability, civil status, pregnancy or age are forbidden and must be actively opposed. Our efforts are at the minimum compliant with local laws.

We have a zero-tolerance policy against discrimination and encourage all employees to report any incidents of experienced discrimination. There is also zero tolerance for retaliation, i.e. punishment, against employees who choose to report detected misconduct or participate in an investigation into misconduct.

2.5 Staff development

The IT industry is a sector which develops rapidly and where the requirements in terms of expertise change dramatically. In order to react quickly and be able to maintain a competitive edge in this rapidly changing industry, Advania must continuously provide our employees with learning opportunities.

In addition to external training, we offer internal training courses via the Advania Academy. The internal courses are largely based on best practices within a selected area which we subsequently adapt to our industry and business model. The Advania Academy focuses both on training in compliance related areas like this Code of Conduct and Anti-corruption, but also on leadership which plays a key role in our internal recruitment and employee leadership development.

Advania's skills development model comprises seven areas: technical skills, business skills, delivery quality, administrative ability, knowledge transfer, motivation and attitude.

Advania holds annual employee appraisals with the aim of ensuring employee satisfaction, competence and development. These appraisals are based on Advania's core values and cover employee performance, manager performance and determination of appropriate goals to maintain positive development. Based on the employee appraisal, a personal training plan is drawn up with goals and activities. The employee appraisals are also complemented with anonymous annual employee surveys. The employee satisfaction goals are followed up on and communicated internally and externally.

2.6 Parental leave and sick leave

All Advania companies comply with local legislation, and where relevant local collective agreements regarding parental leave and benefits. Being able to offer adequate parental benefits gives us a competitive advantage in the recruitment process and enables many parents with small children to divide parental leave more equally.

Sickness benefit is regulated by national law or, where relevant, by local collective agreements. A systematic approach to prevent work-related ill health and sick leave is a high priority in all Advania companies.

2.7 Health and work environment

Advania provides a safe and healthy work environment. Advania has a proactive and systematic work environment management system in all our workplaces, which covers the physical, organisational and social work environment. It is based on the regulations and provisions of local authorities. Our work environment policy describes our level of ambition, goals and how the work is managed.

Work environment management must be an integral and natural part of the company's business. This means that work environment issues must be dealt with in direct connection with everyday issues. An essential aspect of our business is preventing illness and accidents at work.

Advania's local CEO's are ultimately responsible for the work environment, and this responsibility is delegated to the HR manager. Work environment tasks are shared between managers and appointed security committees or similar groups. Each manager must ensure that the tasks and workplaces in his or her area are designed and developed to protect employees against illness and the risk of accidents at work. All managers at Advania AB must have the skills, resources and authority to carry out work duties correctly from a work environment perspective.

3. Obligations

For Advania to fulfil the commitments of the UN Global Compact principles underlying this Code of Conduct, all Advania employees have rights and obligations which they are expected to understand and fulfil. Here, employee obligations are described.

3.1 Behaviour in the workplace - inclusive culture and integrity

In the same way employees are entitled not to be discriminated against in the workplace, they have a corresponding obligation to act themselves in a non-discriminatory fashion towards their colleagues, customers, partners or other people they encounter in their work.

The starting point for Advania is to promote an inclusive company culture, and actively strive for greater diversity. It is up to every employee to contribute to this culture by taking responsibility for communicating and acting in a way which cannot be perceived as being offensive, e.g. against any individual's gender, age, sexual orientation, religion or background.

Breaching the law in any way on the company's premises or using the company's equipment is obviously not permitted. This includes, for instance, harassment, theft, fraud or unlawful threats on the Internet. There are also activities which are not unlawful, but which are contrary to the company's business and values, which are therefore not permitted. Examples of this include spreading anti-democratic propaganda or storing pornographic material.

Every employee has a duty to familiarise themselves with and follow the company's policies and instructions which govern for example protection of personal integrity. Advania's information security policy with underlying policies and instructions controls, among others, the company's compliance with the GDPR and protection of the company's information.

3.2 Business travel and meetings

The seventh, eighth, and ninth principle of the UN Global Compact relate to the environment. They state that businesses should support a precautionary approach to environmental challenges, undertake initiatives to promote greater environmental responsibility and encourage development of environmentally friendly technologies. Business travel is one of Advania's main environmental issues, and the travel policy states that financial and environmental factors must always be considered when deciding if a trip is necessary and when choosing the mode of transport. If an established relationship exists with a customer or partner, the same results can often be achieved through web- or teleconferencing.

3.3 Internal and external environmental efforts

Advania complies with all applicable environmental legislation and on a local level proactively uses management systems which include environmental protection. Advania has identified environmental objectives for the business and supports the application of the precautionary principle to minimise risks and negative environmental impact from the operations.

Advania carries out internal activities to reduce its own environmental impact. The scope of the environmental impact of Advania is published in a separate Sustainability Report. The purpose of this report is to inform on the current impact of the operations and the intended future development and improvement at Advania.

Advania also plays a proactive role in encouraging customers towards sustainable digitisation of their business. One example of this is that Advania advises customers to use resources more efficiently in the field of IT products and services.

By far the largest environmental impact in Advania's value chain is the manufacturing of IT-hardware. To be able to create greater impact in the supply chain, Advania is a member of the Responsible Business Alliance* (hereinafter "RBA"). RBA supports the rights and wellbeing of workers as well as taking responsibility for reducing the environmental impact in the global supply chain in a joint force of approximately 150 members.

Responsibility for environmental management has been delegated to the company's Chief Sustainability Officers or HR Directors, who reports directly to the executive management team. Every local CEO is ultimately responsible for ensuring that the company complies with current environmental legislation. All employees are expected to know about the company's environmental impact as well as attend to their own individual responsibility for following the policies and procedures that enable us to achieve our environmental goals.

* Read more about the RBA at: <https://www.responsiblebusiness.org/>

3.4 Business ethics and transparency

The tenth principle of the UN Global Compact states that businesses should work against corruption in all its forms. All forms of corruption are strictly forbidden at Advania, including blackmail, bribery, money laundering and other ways of exploiting Advania's position to gain inappropriate advantages for Advania, specific individuals or any other parties. Entertainment, gifts and other benefits from business relationships must comply with current legislation and follow the principles of good business ethics.

Advania complies with all applicable trade controls, including economic sanctions, and all our employees are expected to be familiar with the company's sanctions compliance policy. Advania has a systematic and proactive approach to ensure trade controls compliance, including by screening all customers and business partners for

risks of being under any form of sanctions according to the official sanctions lists in the US, EU and UK. Complying with local anti-trust laws are also important from a business ethics perspective and Advania give guidance and training to all relevant employees to detect and minimize risks of breaching local competition laws.

Advania's implemented policies to give guidance in these areas are the Anti-Bribery and Corruption and Anti-Money laundering policy, the Sanctions Policy and the Antitrust and Competition compliance policy. They all offer guidance on applying current laws in the daily operations and employees are regularly given training in the understanding of these policies.

4. Compliance and follow-up

All Advania's employees are responsible for complying with Advania's Code of Conduct and policies in a consistent and suitable manner and for helping others to do so as well. If the Code of Conduct is not followed or if it is suspected that this is the case, measures will be taken to investigate the situation and, if necessary, stop the offence of the code or execute preventive measures to minimize the risk of the offence being repeated.

Anyone who violates the Code of Conduct or Advania's policies and procedures may face disciplinary action and, at worst, dismissal. Disciplinary measures will also be taken against anyone who commits, authorises or knows about offences and does not immediately rectify the situation.

As a supplement to the Code of Conduct, we have drawn up a checklist for ethical decision-making (see Appendix 1). It is intended to help employees understand the Code of Conduct and use it as a basis for making the right decisions in their daily work.

4.1 Training and communication

All employees at Advania receive online training on the Code of Conduct to ensure that all employees and subcontractors are familiar with and support the Code and understand how to act towards the company's suppliers and customers and how to deal with any violations. The Code of Conduct is also available to all external stakeholders such as customers and suppliers per demand.

4.2 Reporting violations

Employees who discover any violation of Advania's approved policies and procedures should report this to their line manager or directly to HR. Suggestions for improvements of the business can also be reported and is an effective way of capturing the commitment and potential for continuous improvement that exists in the organization.

4.3 Whistleblowing

Advania has implemented a whistleblowing channel with the purpose of ensuring that employees and outside parties can expose misconduct. Advania attaches great importance to ensuring that employees can express their opinions freely and give feedback to the company. To guarantee anonymity, Advania has set up a whistleblowing function that allows information to be sent securely through a third party. The whistleblowing function is primarily intended to supplement our standard violation reporting methods. It is meant for

reporting serious misconduct and can be used by internal as well as external individuals. Advania guarantees that anyone who reports or participates in an investigation into a reported misconduct will not be subject to any form of retaliation.

The information can be provided anonymously using our reporting channel, which is handled by a third party; WhistleB. The reporting channel can be accessed on all devices, including smartphones. We recommend all employees to use the channel from a device that is not connected to the local intranet.

The whistleblower service can be accessed via the following link: <https://report.whistleb.com/advania> where there is more information on how WhistleB ensures anonymity. On the same page the Whistleblower policy and information about the processing of personal data can be found.

Stockholm 05/09/2021

Mikael Noaksson

CEO Advania Group

Annex 1 Checklist for ethical decision-making

As a guideline for decisions on taking action, follow these instructions and ask yourself the following questions:

1. Identify an action, a decision or a problem
 - a. Are you being encouraged to do something you think could be wrong?
 - b. Are you aware of potentially illegal or unethical action by other Advania employees or by a customer?
 - c. Are you trying to make a decision while feeling uncertain about the ethical consequences of your action?
2. Think before you act
 - a. Summarise and clarify your problem
 - b. Ask yourself why there is a dilemma
 - c. Consider the different options and their consequences
 - d. Think about the people who could be affected
 - e. Consult with others
3. Decide on a course of action
 - a. Identify your responsibility
 - b. Review all the relevant facts and information
 - c. Check your proposed action against Advania's current policies and standards
 - d. Assess the risks and how they can be reduced
 - e. Consider the best approach
 - f. Consult with others
4. Check your decision
 - a. Work through the "List of ethical questions to consider"
 - b. Check your decision against Advania's values
 - c. Make sure that you have taken Advania's policies and standards into consideration
 - d. Consult with others and listen to their opinions about what you plan to do
5. Continue with confidence
 - a. Explain your decision and your motives to everyone who is interested
 - b. Reflect on what you have learned
 - c. Share your successes with others

LIST OF ETHICAL QUESTIONS TO CONSIDER:

1. Is it against Advania's practice or general practice?
2. Does it feel right?
3. Is it legal?
4. Will it reflect badly on you or Advania?
5. Who else could be affected by it (other Advania employees, customers, you yourself, etc.)?
6. Would you be embarrassed if other people knew that you had chosen this approach?
7. Is there an alternative approach which does not involve an ethical conflict?
8. How would it look in the newspapers?
9. What would a sensible person think?
10. Will you be able to sleep at night?