

# Knowit Group Code of Conduct

**Approved by**  
Board of directors, Knowit AB

**Date**  
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# 1. Introduction

Our corporate culture is built on local decision-making instead of central control, but with strong shared support functions that are based on our management system, which is certified in accordance with ISO 9001, ISO 14001 and ISO 27001.

## 1.1 Founding principle

Knowit complies with the laws and regulations in force in the countries where we operate.

## 1.2 Knowit's values

Knowit's vision is "*A sustainable and humane society*", and we aim to achieve this by fulfilling our mission of "*Fixing the future together with our clients using strategic, creative and tech skills*". Knowit is a value-driven organization and our core values reflect what we expect from each other as leaders, as consultants and teams. Our core values are the essence of who we are and how we act together. In fact, value-driven companies often perform better, with higher growth and customer satisfaction paired with a co-operative edge and a taste for change.

- Choose courage
- Trust in transparency
- What's in it for we?

Inspired by our core values, we make one another better. We believe in the strength of networks, and that we can always deliver more innovative and tailored offers when we tap into the knowledge of all our business areas.

## 2. Code of Conduct

### 2.1 Our clients

All Knowit employees and the subcontractors we hire shall work together to ensure that we make deliveries in accordance with our vision to create a sustainable and humane society through digitalization and innovation. For more information about our quality work, see Knowit's *Quality Policy*.

### 2.2 Our employees

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

Knowit's policy reflects the ten principles in the UN Global Compact, which contains principles for corporations, related to human rights, labor, environment, and anti-corruption. 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, the United Nations Convention Against Corruption, OECD's guidelines for multinational enterprises and the UN's Guiding Principles on Business and Human Rights.

- 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 or does not make use of it 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 recruitment process and workplace. For more information on this, see Knowit's *Diversity, Equity and Inclusion 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 this exists. This means that all Knowit employees are paid above living wage. 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 *Workplace environment policy* and Knowit's *Sustainability report*.
- We are moderate with alcohol during both internal and external entertainment.
- We offer corporate healthcare and regular health checkups to all our staff.
- Knowit's employees avoid doing business or initiating collaborations where there is a risk of conflicts of interest because a close relative or family member might reap the financial benefits of the business deal or collaboration.

- A couple or poly relationship between manager(s) and employee(s) within the same Knowit company creates a strain for both those involved and the organization. If such a relationship were to arise, we make an effort to separate those involved organizationally, so that they can continue as Knowit employees.
- No employee may give or receive bribes from customers, suppliers or any other party. Gifts, services or other compensation 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.
- Knowit provides an anti-corruption training available for all employees and employees are encouraged to conduct the training. All functions that are considered as “at risk” are mandated to conduct Knowit’s anti-corruption training, and the completion of the course is continuously monitored. Knowit defines its “at risk” functions as CEOs of our subsidiaries, and designated sales representatives.
- In order for video recording, photography, or audio recording to be accepted at Knowit, everyone participating in the meeting or activity must be informed thereof in advance. This applies regardless of if the participants are Knowit employees or external parties. If any person later expresses a wish not to be visible or audible in the context, that portion of the material shall be deleted. Concealed video recording, photography, or audio recording is never acceptable at Knowit.

## 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 complies with applicable legislation and regulations such as the Swedish Companies Act (SFS 2005:551), the Securities Market Act (SFS 2007:528), the Swedish Code of Corporate Governance, Nasdaq Stockholm's Rulebook for Issuers, Nasdaq Stockholm's Rulebook, the European Parliament and Council Regulation (596/2014/EU) on Market Abuse (MAR).

Formal statements in the press and media may only be made by the Chairman of Knowit’s Board, Knowit’s President, or the Head of Communication. Exceptions can be made only if one of these persons has expressly approved or delegated this. See also Knowit’s *Communication Policy* and Knowit’s *Social Media Guideline*.

Knowit’s financial reporting and communication is further governed by our *Finance Policy*, our *Financial Manual*, our *Sustainability Reporting Manual* and our *Communication Policy*. Additional guiding policies that cover the entire Knowit Group’s operations are the *Transfer Pricing Policy* and the *Insider Policy*.

## 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 the choice of a supplier/subcontractor based on their fundamental values, as evaluated by Knowit, having been found to correspond to

Knowit Group's *Supplier Code of Conduct*. Knowit can also ensure this by having the supplier/subcontractor contractually commit to observing Knowit Group's *Supplier Code of Conduct*.

Some of Knowit's suppliers are also clients of Knowit. In cases when Knowit chooses not to use a supplier with reference to our *Supplier Code of Conduct*, we should usually also elect not to have that company as a client.

## 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 UN Global Compact which Knowit is a member of.

- We deliver, utilize, and implement existing and new technology in an ethical and professional manner.
- We dissociate from all illegal and unethical competition restriction.
- 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 do not engage in lobbying activities.
- We report crimes in the cases where there are substantive and clear signs that crimes have occurred.
- We comply with the laws and regulations in the countries where we operate, which include anti-corruption, anti-money laundering, and counter-terrorism financing legislation.
- We support and respect the protection of international human rights.
- We ensure that we do not contribute to crimes against human rights.

For more information about our sustainability work, see Knowit's *Sustainability Policy* and *Sustainability Report*.

## 2.6 The environment

Our vision is to create a sustainable and humane society through digitalization and innovation. For us, this means that sustainability and an environmental perspective are fundamental and a natural part of the dialogue with our employees, customers, partners, and owners.

*As makers of a sustainable future*, we believe our greatest potential to make a difference to the environment lies in our ability to support our customers to create secure and innovative solutions enabling a sustainable future. We strive to integrate sustainability in our customer proposition.

Responsibility for our own environmental impact should be a natural part in all decisions and design of internal processes, and we strive to create conditions for our employees to contribute to sustainability within their roles and responsibilities.

Knowit applies and adheres to applicable legislation and mandatory requirements in the countries where we operate.

We set our goals to challenging levels and frequently evaluate our performance to seek opportunities to improve our ways of working and to further reduce the negative environmental impact.

All employees have the responsibility to consider the environmental perspectives in all decisions and activities.

All employees are expected to complete our digital Sustainability training.

In Knowit's *Sustainability Policy* and *Sustainability Report*, you can read more about our environmental work.

## 3. Security and information security

Knowit shall continuously ensure the protection of our customers and our assets against both intentional and unintentional threats, in compliance with applicable laws, regulations, contractual requirements, as well as other business needs and expectations.

Knowit's work with information security is governed by our *Information Security and Data Protection Policy*. Every employee is personally responsible for following our internal policies and guidelines, as well as external regulations. Our governing documents are available on our Intranet.

Every employee is expected to:

- **Be attentive and aware:** Remain vigilant and informed about potential threats to protect the company's data and assets.
- **Participate in training:** Actively participate in security training to learn best practices and increase awareness.
- **Ask and report:** Communicate any concerns or suspicions regarding compliance, security, cybersecurity, report suspicious activities, as well as any knowledge or suspicion of unauthorized use or leakage of personal information promptly.

### 3.1 Personal data and privacy

As a company, it is our responsibility to protect the personal data we handle, such as information about our customers, suppliers, and employees. The collection and processing of personal data should only occur for clearly specified and legitimate business purposes. The extent of the processing should be proportionate to the purpose, and we should meet the requirements of transparency in our handling of personal data. Please also refer to Knowit's *External Privacy Policy*.

### 3.2 IPR (Intellectual property rights)

We respect the intellectual property rights (patents, copyrights and other rights) that are relevant, for example, when third-party products are used in solutions we develop on behalf of clients. In doing so, we protect ourselves and our customers by using standard agreements designed for our industry.

## 4. Compliance and reporting

All employees and subcontractors should be familiar with and adhere to the Knowit Group *Code of Conduct*. The executives in the company carry particular responsibility to lead by example and themselves comply with our *Code of Conduct*. It is the responsibility of each manager to ensure that all employees and subcontractors have read and understood the Knowit Group *Code of Conduct*.

Each individual employee ultimately has personal responsibility for their ethical standpoints, but as an employee representing Knowit, it must be done in accordance with our *Code of Conduct*.

All employees are obliged to report breaches of our *Code of Conduct* to their closest manager. The number of reported breaches of our *Code of Conduct* is measured annually. Further, all CEOs of subsidiaries are obliged to report all incidents of corruption or bribes, including incidents involving business partners, to the Knowit Group Head of Legal/General Counsel. All cases involving a breach of our *Code of Conduct* are to be reported to the Knowit Group Head of Legal/General Counsel.

In cases where the employee, for any reason, does not wish to speak with or report to their immediate manager, they can do so to another manager or the local HR function, or through Knowit's external Whistleblower function. For more information about the Whistleblower function, please refer to the homepage of Knowit's Intranet or the homepage of Knowit's external website. The number of incoming Whistleblower cases is measured annually.

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