

- Adopted by the management team 2023-04-21

Code of Conduct



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Business with common sense

At Avoki, we have a long-term perspective on our business. We should be a competitive and attractive partner for both customers, suppliers and employees. For us, it's about doing good business with common sense, based on honesty, respect, fairness and integrity.

Our values together with the company's team spirit and camaraderie, guides us in the right direction for development and growth. However, it is not always obvious how to act in all situations. As a complement to our values, this code of conduct helps our employees to work with respect and integrity in practice.

Read this Code of Conduct, and consider how its content relates to your work, and let's continue to build Avoki into the company where we are all proud to work

- Peter Uddfors CEO Avoki



1. Business with common sense

1.1. Scope and responsibility

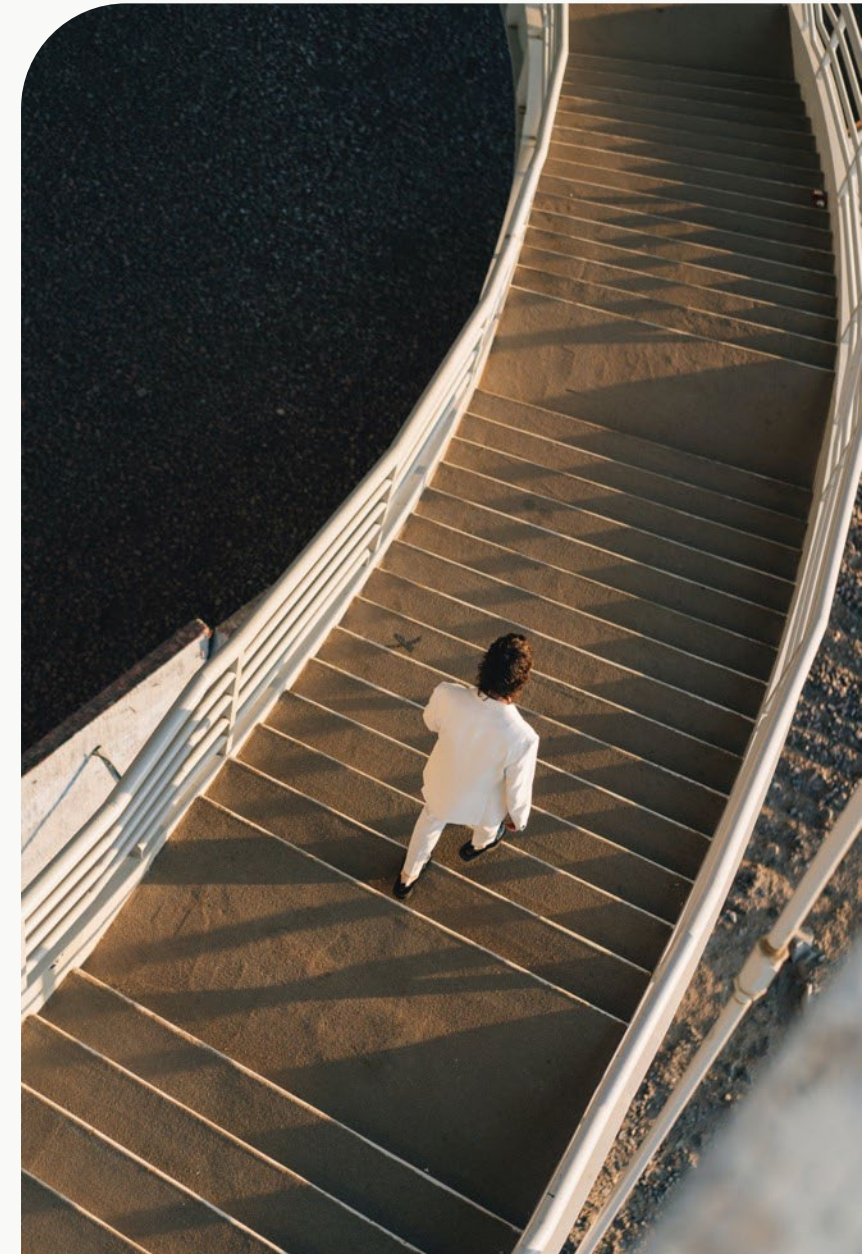
The Code of Conduct (hereinafter referred to as "the code") is based, among other things, on the 10 principles of the UN's Global Compact. The code applies to all employees and companies within the Avoki group.

- It is the manager's responsibility to make the code known within his/her organisation, and to set a good example
- It is the individual employee's responsibility to understand and follow the code.

This code was adopted by the management team on 21 April 2023.

1.2. Our Values

Avoki's values together with the team spirit and camaraderie that pervade our group are our success factor. The values guide us to conduct business with common sense in accordance with this code.



For more guidance read:
Our Values and Employer Value Proposition

2. Business ethics

2.1. Fair and honest relationships

Our business should be conducted with common sense, based on honesty, respect, fairness and integrity. Our stakeholders must be aware of our values and the code.

We comply with applicable laws and regulations in the markets where we operate. We respect and follow competition rules, labor market laws, agreements, safety requirements and other regulations that set the framework for our operations.

2.2. Anti-corruption

We oppose all forms of corruption. Corruption involves the abuse of a position of trust for personal gain. This can happen by giving or receiving inappropriate benefits. No employee may accept any form of compensation that can be perceived as corruption or bribery or influence on decisions

The following applies:

- Representation and gifts must be characterized by moderation and good judgment, regardless of the payer.
- Representation must have a natural connection with the business.
- Personal gifts should be avoided.
- Personal giving or receiving of gifts and benefits must take place according to the Representation Policy - internally & externally
- Gifts or representation may only be given within business operations conducted in corporate form.
- The situation must be able to be openly communicated without damaging the company's good name and reputation



For more guidance read:
Anti-corruption policy
Representation policy - internally & externally

2. Business ethics

2.3. Conflict of interest

Our business decisions must be based on objective grounds and criteria to ensure the best business decisions for the Avoki group. Decisions should never be based on subjective or personal relationships. If in doubt, always consult with your manager.

A conflict of interest occurs when something interferes with or affects an employee's judgment concerning Avoki's interests

Situations we should be observant about:

- **Business opportunities:**

An employee must not independently or privately take advantage of business opportunities that belong to Avoki. Employees must also not use information, property, or work position for personal gain.

- **Personal relationships:**

Be aware of potential conflicts of interest if a family member, relative or close friend is involved in a business activity. Always inform and consult with your immediate manager if aligns with Avoki's best interests.

- **Other assignments or ownership in external operations**

Involvement in various leisure-related side activities is viewed positively. However, they must not negatively affect work or conflict with Avoki's business interests or employees' rest and recovery. As an employee within Avoki, you may not hold any other employment or engage in commercial work for others without written approval from Comp & Ben, which must be recorded in the personnel records. The same applies to board positions and advisory roles for or ownership in clients, suppliers, partners, or competing businesses.



For more guidance read:
Anti-corruption policy
Representation policy - internally & externally

3. Sustainable work environment

3.1. Work environment

Avoki prioritizes employee health and safety. We act in accordance with the Work Environment Act and have established routines for systematic work environment.

- No employee shall risk physical or psychological harm in their workplace.
- We promote a training and learning organisation
- We promote a healthy work-life balance

Keep in mind: If you notice something abnormal that endangers the physical or psychological work environment, contact your local work environment representative or HR.

3.2. Equal conditions and opportunities

We do not accept any form of discrimination regarding gender, appearance, religion, age, disability, sexual orientation, nationality, political opinion, trade union affiliation or social or ethnic origin. All employees must have the same opportunities to perform their work, develop within the company and be recruited for new positions

Remember to: Pay attention to unconscious biases to reduce the risk of discrimination

Avoki respects basic human rights, most of which may seem more obvious to us but not as obvious in our supply chain. By highlighting these rights, we work for a more sustainable workplace at Avoki and with our partners



For more guidance read:
Our Values and Employer Value Proposition

3. Sustainable work environment

3.3. Zero tolerance towards harassment

Mutual respect, dignity and inclusion help us bring out the best in each other. No form of harassment is tolerated within Avoki or in our business relationships. Whether it's in or out of the office, or online. This includes, but is not limited to:

- physical, verbal, or written harassment
- physical or mental abuse against co-workers or third parties at work

Keep in mind: Harassment includes offensive, embarrassing, or derogatory jokes, remarks, pictures, and name-calling, as well as unwanted attention or physical contact or other invasion of privacy.

3.4. Freedom of association

We respect all employees' right to organisation, freedom of association and the right to collective bargaining.

3.5. Child labour and forced labour

No form of forced, compulsory or child labour is tolerated.

3.6. Alcohol and drugs

Consuming alcohol and drugs at work, or before work, is incompatible with our business. Our ambition is to ensure a high level of safety and to prevent illness, incidents, and accidents at our workplaces. Sobriety at work is a matter of course and all employees of course completely refrain from all non-medical use of drugs classified as narcotics.

Did you know: The greatest risk of child labour and freedom of association that affects our business is in our supply chain, more specifically in the production of the hardware we sell to our customers. We follow up on how our suppliers work to counter child labour and freedom of association through our Supplier Code of Conduct and supplier dialogues.



For more guidance read:



Policy and action plan against harassment,
Purchasing routine, Supplier Code of Conduct,
Policy and management of alcohol and drugs

4. Environmental & climate impact

4.1. Reduce our own climate footprint

In their daily work, all employees can act and make decisions that are better for the environment and climate. It may include the following but is not limited to:

- Reduce unnecessary consumption and amount of disposable products.
- Sort waste according to local procedures.
- Always think about the environmental impact before you travel. When travelling, we must prioritize journeys with a low climate footprint, such as trains.

Keep in mind: A train journey from Stockholm to Gothenburg for one person generates carbon dioxide emissions equivalent to just one pinch of petrol. And a 2 km car journey generates a carbon dioxide emission equivalent to 1 lap around the world with SJ's train.

4.2. Procurement and supplier requirements

The largest impact on the environment and climate comes from the products and services we purchase for our own operations and for our customers. When making purchases, you can reduce the negative impact by:

- Buy products that best contribute to OM's profitable development, is of high quality that can be reused, repaired and recycled.
- Prioritize eco-labelled products and services.
- Avoid products that contain dangerous or toxic substances/materials
- Communicate our Supplier Code of Conduct to new suppliers

At Avoki, we are involved in mitigating the climate crisis and supporting circular initiatives, while securing the future of our business. The group is environmentally certified according to ISO14001, which means that we have systematic environmental work with a focus on continuous improvement. We all have a responsibility to contribute through our daily work, and to live and lead by example.



For more guidance read:
Environmental policy, Purchasing rutin,
Travel policy, Company car policy,
Supplier Code of Conduct

4. Environmental & climate impact

4.3. Innovate for the future

To remain competitive, we should continuously enhance our customer offering and encourage our customers to make more sustainable choices. From an environmental perspective, this can include but is not limited to:

- Recommend eco-labelled products and services
- Recommend products and services with lower energy consumption, or operation of services with renewable energy.
- Recommend refurbished products, with approx. 80% lower climate footprint compared to new ones.
- Recommend product as a service, which includes product take-back to ensure reuse and recycling.



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For more guidance read:

Policy and action plan against harassment,
Purchasing routine, Supplier Code of Conduct,
Policy and management of alcohol and drugs

5. Assets & information

5.1. Physical and digital assets

All employees have access to physical and digital assets such as computers with e-mail, internet, and various applications. All employees have a personal responsibility for their computer equipment and that it is used appropriately.

- We never lend out our identity or password to anyone else.
- We protect our IT environments and systems against intrusions and negative impacts
- We do not use Avoki's IT system to harm Avoki or third-party networks and data.

5.2. Intellectual assets

Intellectual assets can be knowledge, methods, concepts, and ideas, which we develop and use in our professional practice. We protect and manage these assets in the interest of Avoki. Intellectual assets can quickly spread and gain traction on the internet through thoughtless wording, such as on social media.



5. Assets & information

5.3. Information

All information that governs our operations and our decisions is based on operational information, which we handle carefully. Avoki must ensure confidentiality, integrity, availability, and traceability of our information assets, and that the right authorization governs how confidential information is protected. In case of suspicion of intrusion, illegal handling, or other incidents regarding information, we report it to our immediate manager.

5.4. Confidentiality

Employees within the Avoki group have been made aware of the significance of confidentiality through their employment contracts. We do not disclose information of a confidential nature that could provide outsiders access to sensitive information. Confidentiality continues to apply even after the employment or contract with Avoki has ended. We do not make company secrets or other critical information available to unauthorized individuals. If applicable, a signed confidentiality agreement from the other party is required.



For more guidance read:
Information security policy

6. We adhere to our Code and regulatory requirements

6.1. Use common sense

Always use your best judgment and common sense. You may encounter difficult and ambiguous situations. In such cases, ask yourself the following questions:

- Is it compatible with our code?
- Is it ethical?
- Is it legal?
- Is it beneficial for Avoki?
- Are we willing to stand up for our behavior publicly?

If the answer to any of these questions is '**no**,' then you should not proceed with your action. If you are unsure, always consult with your manager

At Avoki, we aim to foster an open and inclusive culture where everyone should feel comfortable sharing ideas, suggestions for improvement, and any concerns. We achieve this by communicating with our managers or higher-level managers to ensure that all matters are managed in a straightforward manner.

6.2. Act on concerns

In case of any incidents, it is always best to address the situation directly with the person involved. We are aware that there may be situations where it can be uncomfortable. In such cases, you should speak with your immediate supervisors, or if necessary, a higher-level manager or HR. In rare cases, it may be uncomfortable to address an issue personally. For this reason, we offer Avoki's Whistleblower function, where you as an employee can report matters anonymously.

We are expected to abide by applicable laws and the principles in this code. In unlikely instances where the code conflicts with the law, the law shall always prevail. In cases where the code sets higher standards than the law, the code shall apply. Each one of us bears the responsibility to adhere to the code and the applicable laws



For more guidance read:
Whistleblower policy

For questions or comments:

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