

Knowit Group Code of Conduct

Approved by



Per Wallentin, CEO Knowit Group

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1 Introduction

Our corporate culture is based on fundamental values related to a sustainable society and is created in collaboration between conscientious executives 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 our various stakeholders.

1.1 Founding principle

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

1.2 Knowit's client promise

“We understand our clients’ businesses and deliver value-creating solutions by combining our expertise in strategy, technology, and creativity.”

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

*Per Wallentin
CEO Knowit Group*

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 client 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 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 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 against.
- 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 *Equality and diversity 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. 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 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.

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 regulations in force in the countries where we operate. Knowit is listed on NASDAQ OMX Stockholm and therefore adheres to the rules connected to the stock contract and the Group also complies with the International Financial Reporting Standards (IFRS) and interpretations from IFRIC as adopted by the 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 shares.

Formal statements in the press and media may only be made by the Chairman of Knowit's Board, Knowit's President, or the CCO. 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 *Policy for employees in social media*.

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.

No Knowit employee may personally accept gifts, services, or other compensation from suppliers, beyond what can be considered to fall 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.

2.5 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 supports.

- 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 report crimes in the cases where there are substantive and clear signs that crimes have occurred.
- We adhere to the laws and regulations in the countries in which we operate.
- We support and respect the protection of international human rights.
- We ensure that we do not contribute to crimes against human rights.

2.6 The environment

Knowit's environmental work is an integrated part of Knowit's sustainability work. Our vision is to create a sustainable and humane society through digitalization and innovation. This means taking responsibility for environmental aspects in the development of our clients' businesses, the development of our employees, and our impact on society.

Knowit creates the conditions for employees to make conscious environmental choices with the aim of decreasing our carbon footprint. We work continuously to improve our environmental work through both development and adaption of internal processes and in client projects.

Knowit works actively to decrease its negative environmental impact from CO₂ emissions and encourages employees to make climate-smart choices. Knowit is a climate-neutral company as of January 1, 2019.

Knowit's significant environmental aspects are:

- Emissions into the air (negative impact)
- Energy and resource usage (negative impact)
- Choice of suppliers and purchasing of goods and services (positive impact)
- Awareness and knowledge about the possible environmental benefits of our client assignments (positive impact)

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

Knowit AB and a number of our subsidiaries are, since the spring of 2010, certified in accordance with ISO 14001.

2.7 Assets and information

All of Knowit's employees and subcontractors shall protect Knowit's and our clients' tangible assets and information 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 client, or be provided by a client. 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 sector.

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 inappropriate or illegal.

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 afterward 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.

All information that an employee gains through his/her employment or a client 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 tangible assets or information assets, Knowit's CSO or Knowit's Service desk shall immediately be informed.

3 Compliance and reporting

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

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

All employees are obliged to report breaches of our Code of Conduct to their 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 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's *Code of Conduct* will be attended to immediately and may also be the object of disciplinary measures.