

# Code of Conduct

A Code of Conduct serves as an ethical compass that is based on our values, and clarifies how we are to behave as business partners, employers, employees and community citizens. All of our relationships are characterized by trust and transparency, simplicity and a product focus.

We are a decentralized organisation with employees in many offices throughout the Nordic region. Furthermore, as a company, Vitec is growing through corporate acquisitions, with new employees from various corporate cultures joining the Group every year.

Consequently, we need a clear framework in order to live up to our shared brand promise:  
**To rely on – Today and Tomorrow.**

## The Code of Conduct applies to all of us

The Code of Conduct applies to all employees and Vitec's Board of Directors. Everyone bears a responsibility to set a good example. Leaders at Vitec are expected to promote a culture whereby it comes naturally to act in accordance with our Code of Conduct.

Those who sign agreements with customers and suppliers must ensure that they abide by the relevant sections of the Code of Conduct. The Code of Conduct is complementary to applicable laws and regulations, and provides the basis of our policy documents.

Since the Code of Conduct does not cover every conceivable situation, it is not a substitute for good judgment.

## Work environment

Vitec's workplaces are to offer a work environment that promotes good health and growth, and which is not harmful to physical or mental wellbeing. Our employees' work environment is to be prioritized when we, for example, design workplaces, choose equipment, create job positions and plan competence development.

Vitec is a drug-free workplace. No one, neither an employee, contractor nor other individual, may undertake any work while under the influence of alcohol or drugs.

## Respect

- ✓ We treat each other with equality and respect. In our shared work environment, how we choose to behave has an impact on the way our colleagues feel at work.
- ✓ Since we are creating a work environment based on mutual respect, we do not tolerate any form of harassment, bullying or sexual advances.
- ✓ Decisions are to be based on facts and business reasons, without the influence of relationships.

- ✓ Managers and employees are obliged to actively counteract all forms of discrimination.
- ✓ Naturally, we respect the UN conventions on human rights.



## Business ethics

We do not accept corruption, bribery or other unfair advantages. The giving or receiving of gifts or other benefits must be moderate in nature and for legitimate business purposes, and advance approval must be obtained from your manager. Never give or receive gifts comprising, leisure travel or money. Avoid alcohol as gifts.

Hospitality may constitute a method of creating and nurturing customer relationships. However, all company representation must be moderate and pursuant to our values.

Vitec conducts business solely with bona fide players. Our customers and business partners pursue legitimate activities. Consequently, you may not make payments to, or accept payments from, players who are not legitimate business partners. Neither may you accept or make cash payments.

## Bias and conflict of interest

It is of utmost importance that our customers and the general public fully trust Vitec. One of the prerequisites for gaining such trust is that our actions must never be questionable in terms of disloyalty or partiality due to bias or conflicts of interest.

Consequently, you have an obligation to act professionally, with integrity, and without allowing bias or conflicts of interest to influence your professional decisions. You are also to avoid situations that may be perceived as stemming from bias or conflicts of interest. Your actions at or outside of work must not be detrimental to Vitec.

You may not exploit Vitec's resources, time or influence for personal gain.

You are to seek the approval of your manager before engaging in any external activities that could compete with Vitec or entail an impact on your capacity to work at Vitec.

Vitec has a neutral stance concerning political and religious organizations, and the shaping of public opinion. Therefore, you may not use Vitec's logo, name or products in any capacity to shape public opinion.



## Transparency

We keep our word, both internally and externally. We are to be clear and correct in our accounting and reporting. All communication from Vitec is to be based on our values and our Code of Conduct.

Discretion must be used for sensitive information about our employees, products, customers, suppliers and internal affairs. Always consider whether the information you have access to is of a sensitive nature before you spread it.

Vitec respects personal integrity and handles personal data in a responsible manner. When publishing on social media, it is crucial that you explicitly distinguish whether you are expressing yourself as a private individual or as an employee of Vitec – think before you post. The CEO of Vitec Software Group is the media spokesperson.

### If you feel uncertain, ask yourself:

- Is my behavior legal and pursuant to the Code of Conduct?
- Are my actions based on our values?
- Am I treating others as I expect them to treat me?
- Could my actions be harmful to Vitec?
- Would I be willing to stand for such behavior?

## Sustainability

Our sustainability efforts are based on our brand promise, "To rely on – Today and Tomorrow," as well as on social, economic and ecological sustainability. We are to act as a facilitator of the needs of today, without compromising the opportunities of future generations.

Our products provide the foundation and are the most important contributors to our sustainability efforts. They help to increase sustainability by supporting necessary society functions and enabling the streamlining of our customers' processes, which in many cases, results in a reduction of resource usage.

You are responsible for ensuring that your work-related activities are as resource efficient as possible.

## Compliance with the Code of Conduct

Although it can be difficult to speak up when you notice that someone is acting incorrectly, doing so will help to strengthen our company and protect your colleagues. If a deviation from our Code of Conduct or legislation should come to your attention, approach your manager or someone you trust. If you are uncertain about applicability, ask your manager. If for any reason, it is inexpedient to approach your superiors, you can reach out confidentially (and anonymously if you wish) to [thecode@vitecsoftware.com](mailto:thecode@vitecsoftware.com) or Vitec Software Group AB, Att: Head of HR, Tvistevägen 47, SE-907 29 UMEÅ, Sweden. Serious deviations will be handled by the Board of Directors.

Vitec does not tolerate any form of reprisals against an individual who has reported a deviation in good faith and will take measures against those who contribute to such reprisals. Confirmed violations of the Code of Conduct will be processed in accordance with the Group's internal procedures and applicable national legislation.

The need for any revisions of the Code of Conduct is determined at the annual review.



**Act if you see an issue.**

**Ask if you're not sure.**