

# CODE OF CONDUCT

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## 1. OUR COMMITMENT TO INTEGRITY

Our success today is a reflection of our good business practices, leadership, and our employees. In order to sustain good, ethical business practices, we want to introduce this Code of Conduct to everyone at Fibox. Doing the right thing is always a choice, which is why it is important to understand our ethical commitments to the company, our customers and other stakeholders, and people and the environment around us.

This Code of Conduct document describes those ethical guidelines that we follow in our everyday work to sustain ethical behaviour and responsible business conduct in all our operations. In case of different language versions, this English version is the original and binding version.

### 1.1. Purpose and applicability

Our Code of Conduct (the Code) defines those ethical guidelines that we want to comply in order to work with integrity and in an ethical manner. The purpose of this Code is to support everyone at Fibox in ethical business conduct and decision making.

Everyone at Fibox is expected to commit to this Code of Conduct, and to comply with the ethical guidelines stated in this document. We expect everyone at Fibox to speak up in case they come across any misconduct or actions or behaviour that contradict the Code. Failing to do so is a breach of this Code in itself. You can read more about how to report in section 4 of this document.

## 2. PEOPLE AND THE ENVIRONMENT

### 2.1. Healthy culture and workplace

Building a healthy corporate culture is up to all of us. All of us at Fibox are committed to treating our employees, customers, partners, and other stakeholders with respect and dignity. We do not tolerate harassment, bullying, discrimination, or other inappropriate behaviour in any shape or form.

We promote diversity and equality and strive to build an inclusive workplace for all. We support our employees' and are committed to providing equal opportunities to all our employees. We do not accept any discriminatory behaviour relating to one's gender, ethnicity, abilities, sexual orientation, religion, or any other personal quality.

Always treat your colleagues and the company's other stakeholders with kindness and respect. Do not hesitate to intervene if you come across bullying, harassment, discrimination, or any other form of inappropriate behaviour.

## **2.2. Safety**

We take safety and well-being at work seriously and invest in prevention of situations that could jeopardize our safety in any way. Safety is a priority for us in all of our operations.

We comply with all safety regulations and company guidelines regarding safety at work. Everyone at Fibox is expected to familiarize themselves with relevant safety regulations and guidelines. We do not hesitate to intervene and take corrective action in case we notice any behaviour or situations that could be a safety risk.

Make sure that you are familiar with the relevant safety guidelines of your department. Reach out to your supervisor, in situations where you are not sure how to act.

## **2.3. Human Rights**

We seek to identify, assess, and manage human rights impacts within our value chain concerning our employees, suppliers and contractors, local communities, and the society as a whole.

We support the principles contained within the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the ILO Core Conventions on Labor Standards, the EU Human Rights Convention, other core human rights conventions, the UK Modern Slavery Act 2015, the UK Human Rights Act 2000 and associated legislation.

## **2.4. The Environment**

Circular economy and decarbonizing our product and service portfolio are at the core of our sustainability focus areas. Our aim is to provide products and services that are safe for the environment, and that we operate in an energy-efficient manner throughout our operations.

We are committed to using re-used and recycled materials wherever possible. When the use of hazardous substances is unavoidable, the personnel is trained accordingly, and records are kept of their use and management. Effort is also put into ensuring that our operations, products or purchase decisions do not have negative impacts on ecosystems. Proper waste management and recycling is part of our daily actions.

Our commitment to making environmentally sound decisions also extends to our travel practices.

### **3. RESPONSIBLE BUSINESS CONDUCT**

#### **3.1. Anti-bribery and corruption**

We do not accept corruption or bribery in any form and comply with all anti-corruption laws. Corruption can be any action or attempt to gain personal or business-related benefits, acquired in an inappropriate or illegal manner.

We do not give or receive gifts, favours, or benefits that are not in alignment with our business objectives. Gifts that are given or received are clearly documented, and they are reasonable in value and appropriate in relation to the nature of the business relationship.

Always decline and report all offers and requests of inappropriate gifts, payments, hospitality, or benefits. Never offer or accept gifts or hospitality that are intended to affect decision making.

Corruption in all of its forms is strictly forbidden and cannot be found in any of our operations.

#### **3.2. Conflict of interest**

All our employees are expected to act according to the company's interests. A conflict of interest occurs when your personal interests are or may conflict with the interests of the company. Our personal relationships should never intervene with our decision making.

Even the possibility of conflict of interest may be damaging for the company. In situations where you might have a conflict of interest, always make this known and recuse yourself from decision making.

#### **3.3. Privacy and confidentiality**

We respect everyone's right to privacy. We are committed to protect and process business related confidential information and personal information of our employees and other stakeholders with care and consideration. We comply with all relevant privacy legislation. We process confidential information cautiously and only when necessary. Only those who have the right to process the information and need it in their work, can do so. We do not store information that we do not use or no longer need.

Exposing the company's confidential information during or after the employment or other professional relationship is forbidden. Confidential information includes but is not limited to prices, sales, profits, customers' and other stakeholders' non-public information. All of us have the responsibility to make sure that third parties do not have unnecessary access to confidential information. All information can be used only for necessary and legal business purposes, in compliance with the law.

#### **3.4. Company assets and information**

Always be careful when dealing with company assets or processing the company's or our stakeholders' information. These assets can be physical, such as our premises, materials, products and machinery, or immaterial assets, such as confidential information, information systems and immaterial property rights.

Always treat the company's assets and information as carefully as you would like your own assets and information to be treated. We take care of our customers' and suppliers' assets and information in the same cautious way as our own.

### **3.5. Fair competition**

We compete fairly and responsibly and in accordance with applicable competition laws. Everyone at Fibox must comply with competition laws, regulations, and company guidelines. We do not participate in any activities that are intended to restrict or distort fair competition.

### **3.6. Trade sanctions and money laundering**

We comply with trade sanctions and relevant export control laws and regulations. We do not conduct business in violation of applicable anti-money laundering, anti-terrorism and financial crime laws.

### **3.7. Business partners**

We expect our business partners to be committed to our Supplier Code of Conduct that includes similar ethical guidelines to this Code of Conduct. Our Supplier Code of Conduct is available on our website.

## **4. SPEAKING UP**

### **4.1. Shared responsibility to take action**

We all have the responsibility to make sure we act in accordance with the ethical guidelines stated in this document. We also have the responsibility to speak up whenever we come across activities that conflict with these guidelines.

The management has the responsibility to communicate these ethical principles and take them to their teams' everyday work. We encourage you to contact your supervisor in situations where you are unsure about the best way to act.

### **4.2. How to speak up**

Any Fibox employee, who suspects violations of this Policy is expected to take action and speak up. We provide multiple alternative channels for our

employees to express their concerns related to compliance with Fibox Code of Conduct.

The first point of contact is the direct line manager. When receiving reports of potential violations of this Code, managers and executives have the responsibility to evaluate the situation and the possible actions needed. Managers also have an important role in supporting their teams in embedding the requirements of this Code into everyday action.

You may also contact HR or legal department for raising questions or reporting concerns relating to potential Code of Conduct violations.

In addition, Fibox has an ethical reporting channel, which is also open for external stakeholders for reporting concerns. We process all reported concerns with care and consideration and respect your confidentiality; if you choose, you can remain anonymous. However, we encourage you to identify yourself to create the best possible conditions for an effective investigation.

All received reports of potential violations of this code will be evaluated and investigated, using external expertise as needed.

At Fibox, we do not accept any form of retaliation against someone who speaks up, expresses concerns or opinions, reports potential or actual violations of policies and laws in good faith.

Violations of our Code, failure to promptly report a known violation, or making a false report may result in disciplinary action up to, and including, termination of employment.

If you have anything to ask concerning these ethical guidelines, please contact your supervisor or HR department.