

Code of Conduct – Lagercrantz Group

This Code of Conduct sets out the fundamental principles and requirements that apply to ACTE A/S as part of the Lagercrantz Group. The document is based on the common values of the Lagercrantz Group and is adapted for use by the Danish company ACTE A/S.

About Lagercrantz Group

The Lagercrantz Group is a technology group that – within well-defined niches and in partnership with customers and suppliers – provides value-creating technical solutions. The Group has approximately 1,000 employees across around 30 independent subsidiaries operating under their own names. Each subsidiary conducts its business with a high degree of autonomy and under its own responsibility.

Accordingly, the most important business decisions are made where knowledge and expertise are greatest – close to customers and the market.

The Group's operations are built on close and long-term relationships with customers, suppliers and other business partners. We strive to be a credible, long-term and reliable partner. In addition to financial objectives and guidelines, our business activities must be conducted with high standards of integrity and ethics. We therefore place great emphasis on acting professionally, honestly and ethically at all times.

We support the principles of the United Nations Global Compact, the core conventions of the International Labour Organization (ILO), and the OECD Guidelines for Multinational Enterprises. This Code of Conduct is inspired by these principles.

Our long-term objective is that all customers and suppliers of the Group's companies comply with this Code of Conduct. We recognise that certain adjustments may require time, but we expect a continuous commitment to improvement. As a minimum, we always comply with applicable laws and regulations and will, where necessary, introduce internal standards aligned with this Code of Conduct in cases where existing legislation does not fully reflect its objectives.

Responsibility for ensuring that daily operations are conducted in accordance with this Code of Conduct rests with the CEO of each individual company within the Group.

Society

Relations with society

Each company within the Group works to have a positive impact on the communities in which it operates. Business decisions that may reasonably be expected to have a significant impact on society should, where possible, be preceded by – or as soon as possible followed by – dialogue with relevant societal representatives in order to identify any need for joint actions.

Political neutrality

We maintain neutrality towards political parties and candidates. Neither the name Lagercrantz Group, the names of Group companies, nor any resources under the control of the Group may be used to promote the interests of political parties or candidates.

Anti-corruption

We do not tolerate corruption, bribery or disloyal, anti-competitive practices. The Lagercrantz Group follows the Swedish business code issued by the Institute Against Bribery (IMM), which provides guidance on the use of gifts, hospitality and other benefits in business contexts.

All marketing and sales of our products and services must be conducted in compliance with applicable laws and regulations in the relevant country.

We must not offer, give, request or accept improper payments or other undue advantages, directly or indirectly, for the purpose of obtaining or retaining business relationships.

Working conditions

We aim to be a respected and attractive employer. The companies within the Group shall ensure a safe and healthy working environment and support employees' personal and professional development. Relationships between the company and its employees – as well as among employees – shall be based on mutual respect and provide reasonable influence over matters affecting the individual's working situation.

We expect customers and suppliers to adhere to the same fundamental principles that apply to the Lagercrantz Group.

Working environment

We provide a safe and healthy workplace and safeguard the well-being, health and development of our employees. This means that workplaces, equipment, work tasks and conduct are designed to prevent physical and mental ill-health and to promote well-being and development.

Employee health and safety are given high priority. Appropriate protective equipment must be used, equipment and buildings must be safe, and hazardous substances and waste must be handled responsibly.

Equality

We strive to ensure that employees have equal opportunities for career development, training, remuneration, job content and employment conditions, regardless of gender. Any pay gaps between women and men shall be actively addressed, and we seek a more balanced gender representation in recruitment.

Non-discrimination

We provide equal employment opportunities regardless of race, religion, gender, age, disability, family circumstances or sexual orientation. We do not accept any form of discrimination and actively work to prevent and address discriminatory behaviour.

Other employment conditions

All employees shall be treated with respect and dignity. No employee may, under any circumstances, be subjected to corporal punishment or any form of physical, sexual or psychological abuse, harassment or coercion.

We do not accept forced labour, involuntary labour or unpaid work in any form. The United Nations Convention on the Rights of the Child, the ILO Convention on Minimum Age for Admission to Employment, and the Convention on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour provide guidance for all activities carried out in our name.

Employees have the right to freely exercise their lawful right to join, organise or work for organisations that represent their interests as employees.

Environment

Environmental responsibility and the prudent use of natural resources are key elements of our business. Environmental considerations shall be incorporated into significant decisions in order to create long-term value for customers, employees, owners and society as a whole.

Environmental work shall be integrated into daily operations and take into account the entire life cycle of the products and services we provide. Environmentally beneficial measures shall be implemented where technically feasible, economically reasonable and environmentally justified.

Customers and suppliers are expected, as a minimum, to be aware of and comply with applicable national legislation, regulations and industry standards, and to ensure safe handling of hazardous substances and waste.

Information and communication

Confidentiality

All information relating to our business, customers, suppliers, employees and internal matters is confidential. This includes information regarding existing or previous business relationships, unless otherwise agreed.

External engagements

Employees' involvement in activities outside the Lagercrantz Group – including board memberships, other employment or independent business activities – must be approved by the immediate manager.

Financial reporting

All financial reporting and accounting shall be maintained and reported in accordance with applicable local regulations and International Financial Reporting Standards (IFRS). Reporting shall provide a true and fair view of the company's assets, liabilities, income, expenses and operations.

Social media

When employees communicate in social media in a professional capacity, they represent ACTE A/S and the Lagercrantz Group. All such communication must therefore be consistent with our values and aligned with how we communicate in other channels. A clear distinction must always be maintained between private and professional presence.

Implementation and follow-up

Communication

We strive for openness and dialogue with all stakeholders and respond to enquiries in a correct, professional and effective manner.

Responsibility and compliance

Managers within the Group's companies are responsible for being familiar with and ensuring compliance with this Code of Conduct as well as relevant national laws and regulations. The CEO of each company is also responsible for ensuring that key customers and suppliers are aware of the Code of Conduct.

All employees are responsible for acting in accordance with the values and business principles set out in this Code of Conduct. Group management is responsible for ensuring that work related to the Code of Conduct is a continuous process.

Reporting and protection

Employees are encouraged to report suspected violations of laws, fraud or other breaches of this Code of Conduct. Reports may be made confidentially and without risk of retaliation, provided they are submitted in good faith.

Reports of violations of this Code of Conduct can be submitted anonymously and confidentially to info@lagercrantz.com or to Lagercrantz Group AB, Att. Info, Box 3508, 103 69 Stockholm.

This Code of Conduct applies to ACTE A/S and to all employees and business relationships acting on behalf of the company.