

edita
group

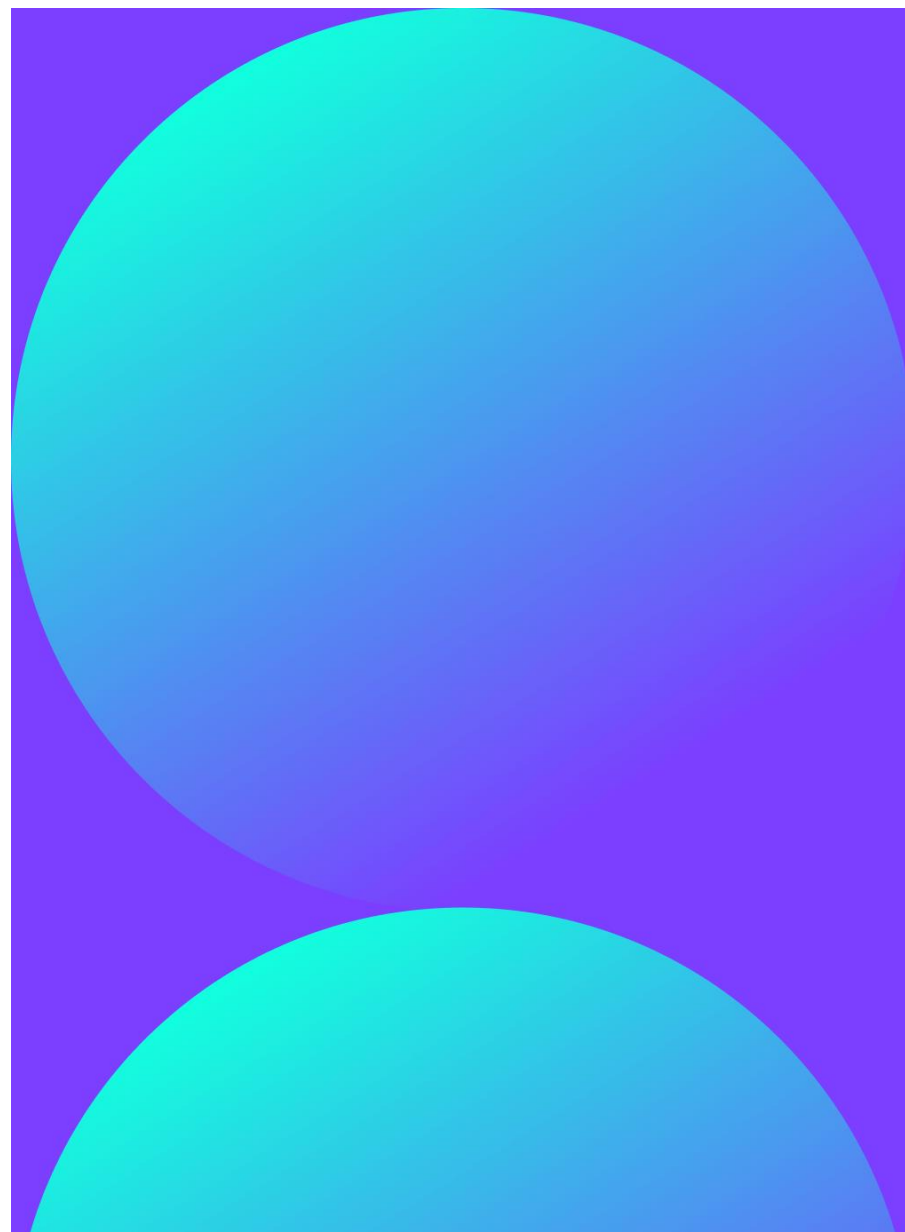
Edita Group Plc

Code of Business Ethics

October | 2022

Ethically every day

- This Code of Business Ethics, approved by the Board of Directors in December 2021 , applies to all employees of Edita Group and its subsidiaries regardless of their position in the organisation and the nature of their employment.
- The Code of Business Ethics describes how we maintain the trust of our stakeholders by operating ethically, responsibly and in line with our **Guiding Principles**.
- The Code of Business Ethics is supplemented by additional guidelines and principles issued by the Group.
- We expect that also our partners shall follow the Code of Business Ethics.



Code of Business Ethics **applies to us all**

The Group's Code of Business Ethics is followed throughout the whole Group.

It applies to each and every one of us and covers the following:

- Our business areas
- HR processes
- Group functions
- Our collaboration with partners, subcontractors and customers

Code of Business Ethics and responsibilities

- The Board of Directors is responsible for ensuring that these ethical guidelines are applied throughout Edita Group.
- The CEO together with the Group Management Team is responsible for implementing these ethical guidelines through strategy work and leadership.
- Day-to-day responsibility for implementing the Code of Business Ethics lies with each employee.

Read more
about our
Corporate
Governance



Be you. Be curious.



We trust and respect.



Fail fast, laugh, learn.



Communicate, collaborate and co-create.



Make wow-experiences and value every day.



Be an accountable daredevil!

**edita
group**

Guiding principles are part of our ethical guidelines

Our Guiding Principles guide our daily behaviour and simultaneously develop our culture towards a desired ethical direction.

We all have an important role in our business culture. Our guiding principles and everyone's own values can be seen in the way we collaborate with our colleagues, partners, customers and other stakeholders.

Code of Business Ethics supports cooperation with our stakeholders (1/2)

EDITA GROUP

- Makes it possible to identify and prevent internal and external conflicts of interest
- Supports conducting business operations efficiently, protects and strengthens our brands
- Improves confidential operations with our stakeholders
- Guides to accurate and truthful communication of our businesses
- Does not allow bribes
- Keeps us politically neutral

PEOPLE

- Builds a safe and healthy workplace with respect for equal opportunities
- Guarantees continuous learning of all employees and takes the development of individual's own strengths into consideration
- Supports caring leadership and values individual needs for recovery and work-life balance
- Guides towards fair rewarding

Code of Business Ethics supports cooperation with our stakeholders (2/2)

CUSTOMERS

- Supports customer relationships and cooperation based on trust and confidentiality
- Guides us to honest and accurate communication about our customers' business as well as the services and products we create for them
- Guides our professionals towards quick and professional handling of customer complaints and other possible problems

PARTNERS

- Supports cooperation based on trust and confidentiality
- Guides to equal treatment of our suppliers and sub-contractors and towards objective assessment of price, quality and reliability in competition
- Ensures our own and our partners' intellectual property rights
- Guides our partners to comply with our code of conduct and to oppose illegal and unethical labor practices as do we

Ethical guidelines in practice

- **Everyone should feel welcome to work with us**, regardless of gender, age, race, cultural background, religious beliefs or sexual orientation.
- If personal interests form a conflict of interest with our company, it must be reported and corrected. **We always act with the company's interests in mind.**
- **Neither we nor our families should unduly benefit from any business deal with Edita Group's partners.** Nor should we compete directly or indirectly with any aspect of our employer's business.
- **We do not accept bribery or corruption in any form.** We can exchange gifts of small value if neither Edita Group nor its brands are compromised by doing so.
- **We stay politically neutral**, but we may have political parties as our clients.
- **We will always seek a customer's approval** before openly discussing or publicizing a service we have created for them.



We respect all internationally recognized human rights in all our activities and expect the same from our suppliers and partners.

We follow these Group policies

1(4)

"We are committed to running our businesses in a sustainable way and to respect environmental and social responsibility and ensure good governance in all our operations."

- Edita Group

Read more about
our Sustainability

SUSTAINABILITY

Environmental responsibility

We reduce our environmental impact by investing in environmentally responsible operations, products and services and by promoting environmental awareness amongst our employees

Social responsibility

We are committed to building a culture of engagement, providing employees with equal learning opportunities, talent nurturing, caring leadership and rewarding for major achievements.

Good governance

We follow principles of good corporate governance. Our goal is to show integrity, transparency, and accountability in all our operations. We comply with legal requirements and are honest and transparent when communicating about our business.

Financial responsibility

We aim for profitable business and want to produce added value for our employees, customers and the owner. Our partners, investors and the countries and municipalities in which we operate are also important stakeholders.

We follow these Group policies

2(4)

HEALTH AND SAFETY POLICY

We are committed to providing a safe workplace that supports well-being at work. To ensure safety at work risk assessments are made regularly. Alcohol and drugs are forbidden during working hours. We care for the mental and physical well-being of our employees. Everyone is treated equally and with respect. Harassment and bullying are forbidden.

RISK MANAGEMENT

Regular monitoring of financial risks helps us to identify risks related to our business operations and react to them in advance. A risk can be anything that might have an impact on the company's ability to meet its business objectives.

WHISTLEBLOWING

Edita Group's Whistleblowing channel implemented according to an EU directive gives an employee the possibility to report suspected wrongdoings within the Group anonymously. Reporting can be done safely here: <https://editagroup.eqs-integrity.org/>

We follow these Group policies

(3/4)

IT

Edita Group offers its personnel all the needed Information Technology equipment and services with IT ensuring their data security.

IT also ensures that all the Group's IT resources are used confidentially, responsibly, legally and efficiently and in consideration of others.

Users are responsible for their equipment and services which must not be used to undermine Edita Group companies or the integrity or privacy of the staff.

PRIVACY PROTECTION

We in Edita Group respect the privacy of our stakeholders and will protect person-related data in every way we can.

Our [privacy statement](#) describes how we collect, keep, maintain and upkeep personal data and why we collect that data.

We follow these Group policies

(4/4)

COMMUNICATION

We provide our stakeholders with accurate and up-to-date information about Edita Group's objectives and businesses. We communicate in a timely, open and trustworthy manner in our chosen communication and social media channels.

Our communication is in line with our Code of Business Ethics and guiding principles. We do not distribute undermining or confidential information about Edita Group, its brands, customers, our colleagues, partners or other stakeholders.

SPONSORSHIP

All sponsorship activities should be linked to our business and approved by the Group Management Team (GMT).

If you notice a wrongdoing

- If an employee detects a possible wrongdoing, it can be reported to the Group's anonymous Whistleblowing channel. The reporting is safe and confidential.
- All reports will be taken seriously and will be handled and examined in confidence. It will be ensured that required actions will be taken to stop the possible wrongdoing.

What and how to report?

- Any activity that does not comply with our Group's policies or European Union or national legislation shall be reported on the Whistleblowing channel.
- Employees are encouraged to report possible wrongdoings or disagreements related to work primarily to their nearest manager or other responsible person in the organization.
- The reporting employee is protected from countermeasures for notification if it has been done in good faith.
- Misuse of the reporting channel, i.e., intentional reporting of harmful, misleading, or inappropriate information, is a crime that may lead to further actions.

Edita Group's
Whistleblowig
channel:
[https://editagroup.
eqs-integrity.org/](https://editagroup.eqs-integrity.org/)



We in Edita Group work in close collaboration with our clients to deliver superior experience to their customers, driving growth and customer satisfaction. Our Code of Business Ethics guides us in this work.

More about us:

<https://editagroup.com/en/>