

CODE OF CONDUCT

Determined by	Board of Directors
Application area	Odevo Group
Document owner	Odevo Group Chief People & Performance Officer
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Introduction

Odevo Group is committed to maintaining the highest standards of ethical conduct, integrity, and professionalism in all aspects of its business operations. This Code of Conduct outlines the principles and expectations that guide the behavior of all employees and representatives of the Odevo Group, including subsidiaries operating in Sweden, Finland, the United Kingdom, and the United States and other from time to time relevant jurisdictions. Adherence to this code is essential to uphold Odevo Group as a safe and inclusive workplace, to build trust with clients, partners, and the communities we serve, as well as managing reputational risks.

1. Compliance with Laws and Regulations

All employees and representatives of the Odevo Group must comply with the laws and regulations of the countries in which we operate. Any illegal or unethical activity will not be tolerated, and individuals engaging in such behavior will be subject to disciplinary action, up to and including termination.

It is of utmost importance that all employees and representatives take part in the Odevo Group's work to counter financial crime. In case an employee or a representative have suspicion of conducted financial crime by a customer please consult with the appointed person in your respective entity. In case of suspected internal fraud, reach out to the Chief Risk and Compliance Officer or use the ability to submit a whistleblowing report.

2. Integrity, Honesty and Transparency

Integrity is at the core of our business. Employees and representatives must act honestly and ethically in all interactions with clients, colleagues, suppliers, and other stakeholders. Transparency and truthfulness are essential in our communications and dealings.

Within the Odevo Group there is a zero tolerance for bribery and corruption. Adherence to this applies to all employees, representatives and suppliers within the Odevo Group.

The Odevo Group has an overarching group policy for anti-bribery and corruption. In case of questions or support please consult the group entity's Head of Legal or the Group Chief Risk & Compliance Officer.

3. Protection of Confidential Information and Personal Data

Respecting the confidentiality of information and Protecting Personal Data is crucial to maintaining trust. Employees and representatives must safeguard sensitive information, including client data, employee, supplier and client personal data, financial information, and trade secrets. Unauthorized disclosure of confidential information and incorrect handling of personal data is strictly prohibited.

4. Conflict of Interest

All employees and representatives must avoid situations where personal interests conflict with the interests of the Odevo Group. A conflict of interest occurs when an entity or individual becomes unreliable because of a clash between personal (or self-serving) interests and professional duties or responsibilities. Such a conflict occurs when a company or person has a vested interest, such as money, status, knowledge, relationships, or reputation, which puts into question whether their actions, judgment, or decision-making can be unbiased.

If a conflict arises, it must be disclosed promptly to management, and appropriate steps will be taken to address the conflict in a fair and transparent manner. When in doubt, consult the General Counsel

or the Chief Risk and Compliance Officer for assistance with the assessment and how to manage the conflict.

5. Fair Competition

Odevo Group is committed to fair and open competition. Employees and representatives must not engage in anticompetitive practices, collusion, price-fixing, or any other activities that violate fair competition laws.

6. Diversity and Inclusion

Odevo Group values diversity and is committed to creating an inclusive and respectful workplace. We respect and uphold human rights. Discrimination or harassment based on race, gender, ethnicity, religion, sexual orientation, or any other characteristic is strictly prohibited.

7. Health and Safety

A safe and healthy work environment is a priority for Odevo Group. Employees are expected to follow safety protocols, report hazards, and contribute to maintaining a secure workplace.

8. Environmental Responsibility

We recognize the importance of environmental sustainability. Odevo Group is committed to minimizing its environmental impact and promoting sustainable practices in all aspects of its operations.

9. Social Responsibility

Odevo Group is dedicated to contributing positively to the communities in which we operate. Employees and representatives are encouraged to engage in volunteer activities and support charitable initiatives.

10. Reporting Violations

If employees or representatives become aware of any violations of this Code of Conduct, they are obligated to report it promptly to their supervisor or through the designated reporting channels. Where required by law, whistleblower protection measures are in place to ensure the confidentiality and protection of those reporting in good faith. Whistleblowing reports can always be submitted to the Chief Risk and Compliance Officer or the Chief People Officer via ordinary communication channels as well as through whistleblowing channels where available, and the matter will be treated with the utmost discretion.

11. Disciplinary Action

Violations of this Code of Conduct may result in disciplinary action, ranging from counseling and training to suspension or termination of employment or business relationship, depending on the severity and nature of the violation.

12. Acknowledgment

By adhering to this Code of Conduct, we ensure the continued success and integrity of Odevo Group. Each employee and representative plays a critical role in upholding these principles, fostering a culture of accountability, transparency, and ethical behavior.

This Code of Conduct may be updated periodically to reflect changes in laws, regulations, and business practices.