

Code of Conduct

LOGENT GROUP



Document information

Administered by: HR-department

Approved by: CEO Logent Group

Valid from: 2025-01-15

Valid to: Until revoked

Revision history

Revised by	Revision date	Version	Change
Christoffer Asp	2025-01-10	1.0	Creation of English version of Code of Conduct
Camilla Källvik	2025-05-16	2.0	Updated Part: Human Rights
Camilla Källvik	2026-04-17	3.0	Updated Part: Business Ethics



Dear colleagues,

I am very proud of our company and the excellent reputation we have among our customers, employees, investors, partners, and other stakeholders. All of us who work at the company share a significant responsibility to ensure that the company continues to act responsibly by always complying with laws and regulations and acting ethically, honestly, and with integrity. We shall always be trustworthy and adhere to these principles, clearly demonstrating zero tolerance for corruption and fraud.

To guide us in how to behave and act in various situations, we have compiled this document describing our “Code of Conduct”. We should view our Code of Conduct as encompassing fundamental ethical principles and our core values that apply to each of us, always. A violation of our Code of Conduct jeopardises our business operations and reputation and may also constitute criminal behaviour. Therefore, it is naturally expected that all of us always comply with applicable laws, regulations, and this Code of Conduct.

We should see the Code of Conduct as guidance that provides us with a foundation, but it does not, of course, answer all questions or offer solutions to every situation. If you are unsure about what to do in a particular situation, or if you believe a breach of the Code of Conduct or our other policies and rules may have occurred or could occur, you should report it – contact your manager, the legal department, or our established whistleblowing function.

A breach of our Code of Conduct may also constitute a violation of the employment agreement.

I am confident that we all act in accordance with this Code of Conduct, thereby enabling us to continue achieving our goals and maintaining pride in our company. I ask each of you to read through this brochure and discuss with your colleagues what our Code of Conduct means to you. Thank you!

Best regards
Joel Engström
CEO Logent Group



Our Core Values

CARING

Caring

We care about people, our planet and our partners. We are committed, considerate, and strive for long-term sustainability in everything we do.

TRUSTWORTHY

Trustworthy

We keep our promises and take responsibility. Based on our vast expertise, we deliver the most effective solutions for our customers.

INNOVATIVE

Innovative

Our expertise and innovative working methods enable us to find optimal solutions for our customers while continually striving for positive development.

RESOLUTE

Resolute

With our flexibility and strong determination, we quickly adapt to changing conditions. We make things happen.

The foundation of Logent's Code of Conduct is rooted in our core values, which are reflected in five key areas.

CARING

TRUSTWORTHY

INNOVATIVE

RESOLUTE

The five key areas

1. **Respect and kindness**
2. **Business ethics**
3. **Assets and resources**
4. **Conflict of interest**
5. **Communication**



Respect and kindness

This means that:

- We do not discriminate against anyone based on ethnicity, national origin, language, sex, gender identity, sexual orientation, age, disability, religion, political opinion, or marital status.
- We respect our employees' right to privacy concerning confidential personal information. Logent handles all personal data confidentially and in accordance with applicable laws and regulations on privacy.
- Logent does not tolerate any form of harassment, bullying, or other misconduct towards any employee or other stakeholder. This includes sexual harassment, passive harassment, or any other degrading behaviour towards anyone.
- Logent has a whistleblowing function where employees and other stakeholders can anonymously report misconduct.
- Logent respects freedom of expression, but as an employee, I understand that my personal opinions should not be associated with Logent. It is every employee's responsibility to ensure that personal views are not linked to the company.
- We should choose attire appropriate for our work. For roles that require workwear, it must be worn. It is important to remember that we always represent Logent. For external meetings, we select attire suitable for the occasion.

Business Ethics

This means in our interactions with partners, customers, and society:

- Logent applies good business ethics in all our operations.
- Conflicts of interest must always be avoided and disclosed in accordance with the 'Conflict of Interest' section.
- Logent maintains strong relationships with suppliers and customers, built on professionalism. These relationships are founded on honesty and trust. We expect our suppliers to follow the same guidelines as Logent. We evaluate our suppliers regularly.
- Logent takes a firm stand against all forms of extortion, corruption, bribery, or other inappropriate behaviours involving Logent, its employees, board members, customers, suppliers, or other stakeholders. It is not uncommon for suppliers to offer Logent employee's various types of activities or items at the expense of the counterpart. In such cases, approval must always be obtained from the immediate manager, and there should never be a risk that the activity or gift could influence business decisions. The same rules apply to us; we never offer our customers anything that could unethically influence decisions.
- Logent shall be committed to uphold human rights, which include labour and other rights, and to treat people with dignity and respect. We shall respect all internationally recognised human rights and avoid infringing on the human rights of others. Logent is following the United Nations Guiding Principles on Business and Human Rights (UNGP) and International Labour Organizations (ILO) conventions. Any form of modern slavery (e.g. human trafficking, forced labour, debt bondage, slavery of children etc.) is unacceptable.
- Logent strongly opposes all forms of child labour.
- Logent adheres to internationally recognised human rights and fundamental freedoms within the scope of our business operations. Furthermore, we actively contribute to protecting and promoting these rights and freedoms through our actions.
- Logent has taken and will continue to take all necessary measures to prevent money laundering within the scope of our business operations.
- Financial Responsibility
- Logent is committed to maintaining accurate, complete, and transparent financial records in compliance with all applicable laws, regulations, and accounting standards. All transactions shall be properly authorized and documented. Any form of fraud, misrepresentation, or improper financial reporting is strictly prohibited.



- Disclosure of Information - Logent shall ensure that all material information is disclosed accurately, consistently, and in a timely manner in accordance with applicable legal and regulatory requirements. Confidential and sensitive information must be safeguarded and disclosed only to authorized parties on a need-to-know basis.
- Fair Competition and Anti-Trust - Logent is committed to conducting its business in full compliance with applicable competition and anti-trust laws and regulations. Employees shall not engage in any form of anti-competitive conduct, including but not limited to price-fixing, market allocation, bid-rigging, or the improper exchange of competitively sensitive information.

Assets and Resources

Which means:

- Logent's assets and resources are allocated for Logent's business operations. Every employee at Logent is responsible for ensuring that resources are used appropriately to secure Logent's success. This means that we never use Logent's assets, such as intellectual property, facilities, materials, or office equipment, for purposes other than business-related activities.
- Logent's assets must also not be used for illegal purposes or in political or unethical contexts.
- The same applies where Logent, under contract, has the right to use a business partner's assets, such as property, premises, etc., and we always respect others' assets and intellectual property rights.
- We treat the information of our customers, suppliers, and other stakeholders confidentially and never subject other stakeholders to behaviours that harm them. We understand that actions which may harm our stakeholders constitute breaches of employment agreements and can harm both Logent and the individual involved.

Conflict of interest

Which means:

- Conflicts of interest may arise in situations where private or personal, direct or indirect, interests conflict with the company's interests. As an employee of Logent, all work we perform is for Logent's benefit, and any other assignments or work must not create a conflict of interest.
- Personal relationships between employees or between employees and business partners can also create conflicts of interest. Therefore, it is important to inform the relevant manager if a conflict of interest arises.

Communication

Which means:

- All external communication with the media, authorities, or other stakeholders, where you may be perceived as a spokesperson for the company, must be approved by the CEO of Logent Group.