

# CTT Systems Code of Conduct.

## Responsibility and Sustainability

CTT Systems recognises that responsibility and sustainability are key to its long-term success. As a signatory to the United Nations Global Compact, CTT Systems AB is committed to promoting its core values in respect of human rights, labour, environmental and anti-corruption practices. CTT Systems is determined to ensure the highest standards of responsibility and sustainability throughout its operations including its supply chain. CTT Systems therefore expects its employees and suppliers to meet the standards and requirements set out in this document.

### 1 Compliance with Laws

Compliance with all applicable laws and regulations of the countries in which operations are managed or services provided.

### 2 Human Rights

Treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture, in accordance with the relevant International Labour Organisation (ILO) conventions.

#### 2.1 No Child Labour

Ensure that illegal child labour is not used in the performance of work. The term “child” refers to any person under the minimum legal age for employment where the work is performed provided the legal age is consistent with the minimum working ages defined by the International Labour Organisation (ILO).

#### 2.2 Human Trafficking

Suppliers must adhere to regulations prohibiting human trafficking, and comply with all applicable local laws in the country or countries in which they operate. Suppliers must refrain from violating the rights of others and address any adverse human rights impacts of their operations.

CTT prohibits employees and suppliers from engaging in any suspected human trafficking-related activities. This includes, but is not limited to, engaging in sex trafficking, procuring commercial sex acts, using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labor from a person by threats of serious harm to that person or another person, among others.

### 3 Employment Practices

#### 3.1 No use of forced labour

CTT employees and suppliers shall not engage in or support the use of forced labour. There shall be no use of corporal punishment, mental or physical abuse.

#### 3.2 Harassment

Ensure that employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct.

#### 3.3 Non-discrimination

Provide equal employment opportunity to employees and applicants for employment without discrimination. Decisions on hiring, promotion, development and compensation shall be based on the employees' abilities and skills related to the job and must never be based on irrelevant factors

such as gender, age, ethnic or national origins religion, disability, sexual orientation, union membership or political affiliation.

### **3.4 Wage and Benefits**

Suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers must be paid for overtime at such premium rate as is legally required or, in those countries where such laws do not exist, at least equal to their regular hourly payment rate. Deduction from wages as a disciplinary measure should not be permitted.

### **3.5 Social Dialogue**

Respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal. It is also expected to recognise and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing.

## **4 Anti-Corruption**

### **4.1 Comply with Anti-Corruption Laws**

Comply with the anti-corruption laws, directives and regulations that govern operations in the countries in which they do business. Employees and suppliers are required to refrain from offering or making any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, even in locations where such activity may not violate local law. Personal safety payments are permitted where there is an imminent threat to health or safety. Suppliers are expected to exert reasonable due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of intermediaries such as agents or consultants.

### **4.2 No use of illegal Payments**

CTT work force and suppliers must not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives or others. The receipt, payment, and/or promise of sums of money or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited. This prohibition applies even in locations where such activity may not violate local law.

### **4.3 Fraud and Deception**

Employees or suppliers must not seek to gain any advantage of any kind by acting fraudulently, deceiving people or making false claims, or allow anyone else to do so. This includes defrauding or stealing from the company, a customer or any third party, and any kind of misappropriation of property.

### **4.4 Competition and Antitrust**

CTT and its suppliers must not fix prices or rig bids with their competitors. They must not exchange current, recent, or future pricing information with competitors. Suppliers must refrain from participating in a cartel.

### **4.5 Gifts/Business Courtesies**

All CTT work force and suppliers are expected to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, it must be ensured that the offering or receipt of any gift or business courtesy is permitted by law and regulation, and that these exchanges do not violate the

rules and standards of the recipient's organisation, and are consistent with reasonable marketplace customs and practices.

#### **4.6 Insider Trading**

CTT employees and suppliers and their personnel must not use any material or non-publicly disclosed information obtained in the course of their business relationship with CTT Systems AB as the basis for trading or for enabling others to trade in the stock or securities of any company.

### **5 Conflict of interest**

CTT employees and suppliers are expected to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. Suppliers are expected to provide notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests of CTT Systems AB and personal interests or those of close relatives, friends or associates.

### **6 Maintain Accurate Records**

It is a must to create accurate records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records should be retained based on the applicable retention requirements.

### **7 Information Protection**

#### **7.1 Confidential / Proprietary Information**

Handle sensitive information properly, including confidential, proprietary and personal information. Information must not be used for any purpose (e.g. advertisement, publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorisation from the owner of the information.

#### **7.2 Intellectual Property**

Comply with all the applicable laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

#### **7.3 Information Security**

Protect the confidential and proprietary information of others, including personal information, from unauthorised access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures. Suppliers must comply with applicable data privacy laws.

### **8 Environment, Health, and Safety**

Establish an appropriate management system for Environment, Health and Safety. Operate in a manner that actively manages risk, conserves natural resources and protects the environment in the communities within which they operate. Protect the health, safety, and the welfare of their employees, contractors, visitors and others affected by their activities. Finally, as stated in Section 1. "Compliance with Laws" of this document, comply with all applicable environmental, health and workplace safety laws and regulations.

### **9 Global Trade Compliance**

#### **9.1 Import**

Suppliers must ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the import of parts, components, and technical data.

#### **9.2 Export**

Ensure that business practices are in accordance with all applicable laws, directives and regulations governing the export of parts, components, and technical data. Provide truthful and accurate information and obtain export licences and/or consents where necessary.

### **9.3 Responsible Sourcing of Minerals**

Compliance is expected with applicable laws and regulations regarding conflict minerals which include tin, tungsten, tantalum and gold. Additionally, suppliers should establish a policy to reasonably assure that the tin, tungsten, tantalum and gold which may be contained in the products they manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses. Exercise, as may be directed by law, due diligence on the source and chain of custody of these minerals and therefore at a minimum require the same from their next tier suppliers.

### **9.4 Counterfeit Parts**

Suppliers are expected to develop, implement, and maintain effective methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. In addition, suppliers shall provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.

## **10 Ethics Programme Expectations**

### **10.1 Whistleblower Protection**

CTT keeps a system and expects suppliers to provide a method to the employees with avenues for raising legal or ethical issues or concerns without fear of retaliation and take action to prevent, detect, and correct any retaliatory actions.

### **10.2 Consequences for violating this policy document**

This policy shall be followed by CTT employees as well as suppliers. In the event that the expectations of this policy are not met, the business/employee relationship may be reviewed and corrective action pursued subject to the terms of the contracts and according to laws and labour agreements.