

# Code of Conduct of Secto Topco Group companies

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## We always follow the law

At Secto, we follow the law and our internal policies in all our activities. We also expect all our partners to follow the law.

We do not condone breaking the law, and we will never encourage or instruct anyone to break the law. For us, the most important laws are those on employment, equality, privacy, anti-bribery and corruption, competition and consumer protection, safety at work, taxation and environmental protection.

We also do not direct our partners or other parties to do anything that we cannot do ourselves under our laws, commitments or policies.

We actively monitor and anticipate changes in legislation and society. We cooperate and discuss openly with our stakeholders, public officials and other decision-makers.

## Confidentiality and Information Handling

As employees, from time to time we have to handle confidential information about Secto, our customers and our business partners. Most information is in digital format, and therefore easily accessible, manipulated, shared and replicated. Information is of great value to Secto, which is why all information must be identified and protected. There may be external requirements as to how long different types of information can be stored or retained.

Confidentiality is paramount in the protection of Secto's reputation and interests in competitive and regulatory processes, and to safeguard the integrity of assets that are important to us.

### How we work at Secto

- We treat information as a valuable asset and act accordingly.
- Each employee deals only with the information required for each of his or her different tasks.
- In presenting information, we aim to minimise the extent of the information displayed.
- We use artificial intelligence to control the retrieval and processing of data. Any unusual events are alerted to the control.
- We only share confidential information when we are authorised to do so and have a valid reason for it.
- We protect confidential information from unauthorised viewing.
- We categorise documents according to their sensitivity.
- For email traffic, we try to use encryption wherever possible.
- We treat the information we receive from third parties with the same care as we treat our own.
- We do not discuss confidential matters in public places in front of others.
- We ensure that all information shared by Secto is reliable, accurate and meets both professional and ethical standards.
- We only use information systems approved by Secto, and we process data in accordance with the requirements.
- To reduce the risk of human error, we are increasing the use of automated data processing.
- Secto has a strict and comprehensive monitoring system to protect against email phishing. We are constantly developing and monitoring our control system.
- We verify over the phone the accuracy of the content of a suspicious email with the person who sent it.

### We are particularly vigilant

- If we hear sector employees talking about confidential matters in public.

- If one of our business partners asks us to sign a non-disclosure agreement – and especially if he or she does not when there is reason to do so.
- If we handle data or company documents that contain confidential information and should be protected.
- If someone tries to engage us in discussions that lead into the details of Secto's business activities.
- If we share any confidential information externally.

## Financial Integrity and Fraud

We follow laws, regulations and rules that apply to us. We operate in accordance with good accounting practice. Honesty in financial matters is key to maintaining the trust of shareholders, customers, financiers, business partners and employees.

### How we work at Secto

- We follow Secto's accounting principles and internal control procedures.
- We record all transactions correctly in accordance with the law and good accounting practice.
- We report accurately, reliably, transparently, consistently and on time.
- We keep our costs within reasonable limits and report them clearly.
- We make decisions according to Secto's international guidelines and segregate cost items according to requirements.
- We are aware of the risks associated with money laundering, for example, so we look for inconsistencies in financial transactions and deal with discrepancies on a case-by-case basis.
- We only return money to a bank account confirmed in writing by the person authorised to sign on behalf of the party we originally invoiced.

### We are particularly vigilant

- If we see discrepancies in financial figures or accounting.
- If we have reason to suspect that one of our stakeholders has falsified documents.
- If we find that our costs are not reasonable.
- If we are unsure whether a transaction has been recorded correctly, we will ask the relevant manager or auditor for help.
- If we suspect that any employee is misreporting financial information.
- If we suspect that Secto's assets have not been used or recorded in accordance with our policies.

## Anti-corruption

Secto has zero tolerance for all forms of corruption. Our business is always open and transparent. Bribery is illegal and can result in legal penalties and reputational risk for both Secto and those involved in the bribery. Bribery can take many forms, for example the use of shell companies or hidden owners. Gifts, hospitality and even sponsorship can be considered bribery. The public sector has particularly strict rules on bribery and should be treated with extra caution.

### How we work at Secto

- We never accept bribery or other attempts to influence our business.
- We never offer, give, ask for or accept dubious or vague payments or benefits.
- We always report any attempted bribery by third parties.
- We never ask others to do something that we are not allowed to do ourselves.
- Our accounting, data and communications are always honest and transparent.
- We are particularly careful in our dealings with public sector actors.
- We always report directly to our managers or through our Whistleblowing Channel if there is reason to suspect that one of our personnel, customers or partners has engaged in bribery or corruption.

### We are particularly vigilant

- If we notice an unusual payment not clearly related to our business.

- If we suspect that a business partner is not acting in accordance with Secto's business principles.
- If we are offered or asked to give or receive gifts, trips, donations, unusual leisure activities, or to make or receive cash payments.

## Gifts, Hospitality and Travel

Hospitality takes many forms, including meals and drinks, seminars, business functions, dinners and similar events. Travel includes all travel costs including taxis, buses, trains, flights, accommodation, and other incidental travel expenses. Hospitality, travel and gifts can create conflicts of interest or may be considered as bribery in certain cases. A gift is always given without expectation of anything in return, including goodwill. Business partners, especially public officials, may have their own strict rules about what kind of gifts they can accept or give.

### How we work at Secto

- We never accept gifts, travel or hospitality that could be construed as an attempt to improperly influence our business decisions.
- We never offer gifts, travel or hospitality that could be construed as an attempt to improperly influence a business partner's business decisions.
- We accept and offer only reasonable hospitality.
- We pay our own travel costs.
- We never offer or accept cash, cash equivalents or expensive and extravagant gifts.
- If an employee receives a gift that does not comply with the rules, it must be returned or given to Secto immediately.
- We may offer or accept hospitality when the underlying purpose is clear and legitimate, and the context open and transparent.
- We do not accept the extension of corporate gifts to family or close friends.
- Before offering or receiving gifts, we always discuss them with our immediate supervisor.

### We are particularly vigilant

- If business gifts are offered in particularly sensitive situations such as during negotiations or purchasing processes.
- If the gifts are offered in a way that is not open and transparent.
- If we believe that giving or receiving a gift may compromise our independence, objectivity or integrity.

## Money Laundering

Money laundering is the concealment or conversion of funds obtained through criminal activity. The proceeds of criminal activity can be any type of property, including money, goods, other assets and real estate. Money laundering takes many forms and can involve all types of contracts and transactions, including banking, investments, billing and real estate. Trusts and shell companies can hide the true owners of money and increase the risk of money laundering. Money laundering also includes using legitimate funds to support criminal activity or terrorism.

### How we work at Secto

- Secto is registered in the Money Laundering Control Register.
- We do not accept cash.
- Secto's seeks to engage only with business partners and transactions that are legally financed.
- We avoid money laundering by checking the background of our partners and customers in accordance with our Code of Conduct.
- We question unusual payments or financing arrangements and report strange requests.
- We always contact Secto's Legal Partner if we have reason to doubt the origin of money or other assets.

- We promptly report suspicious transactions or money laundering attempts.
- We are alert to possible under-valuations or over-valuations of assets.
- Alternatively, personnel and stakeholders may use Secto's Whistleblowing Channel to report suspected money laundering.

#### We are particularly vigilant

- If payment is requested or presented in a different form to that specified in the contract.
- If the payment is received in cash and is not the normal method of payment.
- If the payment comes from an offshore bank account.
- If the payment comes from an account that the customer does not normally use.

## Safeguarding our Assets

Business assets are everything that a business owns or uses to carry out its business, including equipment, premises, systems and, above all, information. It is the responsibility of all of us to safeguard the assets of the company. Intangible assets such as Secto's brand, trademarks, copyrights, inventions, trade secrets and know-how are often valuable assets and important for Secto's success. Security threats can affect our assets, and can have significant financial, operational and reputational impacts.

#### How we work at Secto

- Safety is in everything we do.
- We immediately report any actions that compromise our safety, in accordance with local laws and regulations.
- We protect all company property from loss, damage, theft, waste and misuse.
- We limit the access of employees and third parties to company assets to what is necessary to accomplish assigned work.
- We always carefully follow the instructions for accessing property, and do not share access credentials, including PIN codes, tokens and passwords.
- We only use Secto-approved systems for data sharing and storage.
- We prevent unauthorised access to our premises.
- We protect Secto's intangible assets properly and we respect the intangible rights of others.

#### We are particularly vigilant

- If we see people on our premises, or trying to enter them, without the required authorisation.
- If our mobile phone or personal computer is stolen or suddenly operates strangely.
- If we receive suspicious emails, messages or phone calls.
- If we identify vulnerabilities in our systems, processes or services.

## Conflict of Interest

There is always a conflict of interest when personal interest may conflict with that of Secto. Personal benefits can be financial benefits, business opportunities, outside job offers or benefits from people close to us, such as family members, personal friends or business partners.

Even the suspicion that we are not acting in Secto's best interests can lead to our integrity being called into question and may seriously damage our reputation. Openness and transparency are essential to avoid real, potential or perceived conflicts of interest. There may be a conflict of interest, even if Secto benefits from it.

#### How we work at Secto

- We always act in Secto's best interests.
- All decisions we make on behalf of Secto must be based on objectivity and an honest assessment of the company's interests, without any personal motives.
- We avoid conflicts of interest and other situations that could influence our decisions.
- We remove ourselves from situations where we have a potential or perceived conflict of interest.

- We always disclose actual, potential and perceived conflict of interest to our manager.
- We work with our manager to eliminate conflicts of interest and to document decisions and actions.
- We always involve the management team or board of directors if a conflict of interest cannot be avoided.
- We do not accept employment or positions that can, or may, adversely affect our ability to act in Secto's best interests.
- We asked for the consent of our managers before taking on any outside decision-making or similar tasks.

#### We are particularly vigilant

- If we have financial or other interests with existing or potential business partners of Secto.
- If we have an outside employment commitment or position that may affect our ability to perform our duties for Secto.
- If we recruit, hire or directly supervise a family member, friend or close associate.
- If current or potential business partners offer us any valuable personal benefits including gifts, discounts and other benefits.
- If a business partner of Secto offers or intends to offer us services that are of personal benefit to us.

## Business Partners

We expect our business partners to act in accordance with our policies and ethical values in all business relationships. The actions of our business partners may damage our reputation or have legal consequences. Our business partners include individuals and organisations with which Secto works or plans to work. These include service and goods suppliers, contractors, joint ventures, sponsorship and donation recipients, sustainability partners and other relevant parties.

#### How we work at Secto

- We only work with business partners whose business practices and ethical values are acceptable.
- We expect our business partners to respect all laws and regulations that apply to our business.
- We select our business partners carefully.
- We treat all our business partners with respect, fairness and transparency.
- We require our suppliers to commit to our Supplier Code of Ethics.

#### We are particularly vigilant

- If we encounter a business partner that is not fully committed to our policies.
- If we become aware that our business partner is conducting business in a way that is harmful to us.
- If we become aware of conduct or practices that cause us to question the business ethics of our partner.

## Competition

Fair competition is socially important and creates the basis for long-term business opportunities. Profiting from unfair competition damages our relationships with customers, business partners and society. Anti-competitive agreements and practices are illegal.

#### How we work at Secto

- We compete fairly, create our own business strategy and compete on our expertise and the reputation of our service.
- We restrict contact with current and potential competitors. We do not share commercially sensitive information.
- We do not participate in agreements where our current or potential competitors share markets, agree on prices or restrict the availability of products.

- It is our duty to inform the company's management immediately if we become aware of a breach of competition law.

#### We are particularly vigilant

- If we are approached by a current or potential competitor offering information relating to their pricing, strategies, tactical transactions or similar matters.
- If we suspect that there are formal or informal agreements in place to restrict market entry by existing or potential competitors.
- If we plan to attend informal meetings or events with current or potential competitors.
- If we plan to participate with our current or potential competitors in events where the purpose is obviously to exchange sensitive information about the competitive situation.

## Climate and the Environment

We are committed to protecting the environment and helping to mitigate climate change. We operate in accordance with local laws and internationally recognised environmental standards.

#### How we work at Secto

- We are looking for ways to substantially reduce the greenhouse gas impact of our own operations, and to help our customers reduce their carbon emissions.
- We consider climate and environmental impact when buying products and services, and we assess our suppliers' own corporate responsibility.
- We support responsible waste management and aim to minimise the amount of waste we produce at work.
- We operate transparently and are developing our own ability to report on the environmental impact of our operations.
- We report activities that are harmful to the climate and the environment if we see them.

#### We are particularly vigilant

- If we find that our own or our partners' activities do not meet the climate or environmental targets we have set.
- If we find that the environmental regulations or guidelines we have set been breached.

## Health and Safety and People Security

We all have a responsibility to provide a safe and healthy working environment for our employees, suppliers and visitors. We are committed to and understand our responsibilities to ensure health, safety and well-being in all our operations throughout the value chain. In line with our core values, we encourage a proactive work culture committed to improving the health, safety and well-being of our employees and everyone who works for us.

#### How we work at Secto

- We provide a safe working environment for all our employees and partners.
- We know our working environment, act responsibly and take responsibility for our actions.
- We actively promote a safe working culture, and we work with our partners to identify health and safety risks.
- We are aware of potential health and safety risks, and we work to minimise them.

#### We are particularly vigilant

- If we notice any unsafe activity or circumstances that could expose us or our partners to risks.
- If we have any reason to be concerned about the health, safety or welfare of any of our employees.
- If we observe any signs of hazardous situations, an increased level of haste, inappropriate behaviour or work fatigue among our own personnel and/or our business partners.

- We immediately report any of the above cases to our manager, HR or health and safety representative.

## Human Rights and Labour Rights

Human rights and labour rights apply to all of us equally. We have a duty to respect human rights. Labour rights are part of human rights. Sustainability is of paramount importance to Secto's business. We are committed to promoting human rights and their positive impact on our society.

### How we work at Secto

- We respect and support human rights and labour rights.
- We put in place the necessary practices to ensure that we do not violate human rights or get violated ourselves. The procedure applies to everyone whether they are our colleagues, business partners, customers or anyone affected by our activities.
- We report any human rights violations that have occurred or may occur directly to our manager or through the Whistleblowing Channel.
- We are committed to promoting better human rights.

### We are particularly vigilant

- If we experience or become aware of any human rights abuses by our colleagues, employees of our business partners or anyone associated with our operations.
- If we or our colleagues are prevented from joining legitimate employee engagement forums such as trade unions.
- If anyone, including public officials, asks for personal information about our employees without proper authorisation and without following due process.
- If we negotiate a contract at such a low price that it is likely to lead to low wages and excess working hours for business partner employees.
- If an existing or potential business partner refuses to authorise audits, inspections or other transparency measures.

## Workplace Environment

All employees deserve a working environment free from bullying, intimidation, discrimination or threats of violence, including acts related to gender, sexual orientation or identity, race, ethnicity, disability, national origin, religion, cultural practices or nationality. Secto does its best to promote equality in all jobs.

We foster a working atmosphere where people are treated with integrity and professionalism, and their uniqueness and ideas are valued.

### How we work at Secto

- We treat each other with respect and appreciation.
- We show respect for other employees and treat them as we would like them to treat us.
- We do not target undue suspicion at any employee, business partner or customer.
- We do not participate in discussions or share messages that in any way contain offensive name-calling, jokes, slurs, stereotyping, defamation or threats, nor do we display or share offensive material.
- We listen carefully to different points of view, and assess them purely on their merits.
- We actively address any form of bullying or inappropriate behaviour, and we protect our working environment from bullying.
- We do not drink alcohol or use drugs during working hours or abuse prescription medicines, and we never buy sexual services on business trips or during other work-related occasions.

### We are particularly vigilant

- If we experience, see or hear any form of bullying, name-calling or harassment.



- If we experience or become aware of any form of harassment, sexual harassment or discrimination.
- If our managers are repeatedly criticising one colleague or a specific group for reasons unrelated to their work.
- If we suspect that certain colleagues are not being fairly evaluated for promotion or assignments.
- If we suspect that some individuals or groups are being excluded from activities or discussions.

## News and Social Media

Secto staff are encouraged to share Secto publications and press releases on their social media accounts, as well as social media posts and any non-confidential information about events and achievements important to Secto. However, only specifically designated individuals may comment publicly on matters on behalf of Secto in the media, including social media and other digital channels.

### How we work at Secto

- We are always responsible in our external communication.
- We follow Secto's social media etiquette.
- We do not participate in external discussions on social media or other channels on behalf of Secto unless we have been previously authorised to do so.
- We do not discuss sensitive or confidential work matters in public or on social media.
- We only share our personal views on social media.
- If we communicate as individuals on industry-related matters, please remember that in these situations our opinions will always be associated with Secto.
- However, we remember that social media posts spread quickly and are difficult to remove. We therefore think carefully about the content of our posts.
- We refer media questions about Secto to the people responsible for marketing and communications.

### We are particularly vigilant

- If we see a public discussion on social media or other platforms that risks damaging Secto's reputation.
- When preparing to speak as a representative of Secto at external events or other occasions.
- If we suspect that our conversation with an outside party may negatively affect our business.
- If we promote our company and receive negative feedback on social media or other media platforms.

## Privacy

We hold personal data about our customers and employees. We have a duty to protect such data and only to use it for legitimate business purposes. Personal data includes employee, customer or business partner messages, phone numbers, emails, addresses, location information, phone records, payment history, salary information, marital status and health information. All personal data is confidential. Responsible use of personal data is essential to maintaining the trust of our customers and personnel.

### How we work at Secto

- We earn trust by protecting all personal data.
- We do not share personal data with anyone who does not have a clear business reason to use it unless sharing is permitted or required by law.
- We only use personal data for business-related purposes.
- We are open and honest with our customers and personnel about the purposes for which their personal data is used.
- We ensure that personal data is not accessed without proper authorisation, security and data protection measures in place.

- We are up to date with data protection requirements when our work involves the use of personal data.
- We follow generally accepted data security practices.

#### We are particularly vigilant

- If we become aware that personal data has been viewed or used without proper authorisation, including the sharing of data with third parties.
- If our company collects data about our customers or personnel that they would not expect us to collect or use.
- If we become aware that the private data of our customers or personnel has been used in a way that could be considered intrusive.
- If a public official requests information from us about a customer or employee, including business-related information, in a way that deviates from normal procedures.
- If there are any indications that personal data has been or may be compromised.

## Public Officials

Public officials include all persons employed or working for the state or municipality, including legal and administrative authorities, executive authorities and the armed forces. Public officials carry out administrative tasks that are vital for societies and also for our licence to operate there. Secto cooperates with public officials at many levels and for different purposes. Information shared with public officials may become public as a result of laws governing public access to government-held information. Persons employed by state-owned companies may in certain cases be considered public officials.

#### How we work at Secto

- We follow a strict code of ethics in our relations with public officials.
- Our conduct must never be perceived as improperly influencing a public official.
- We take due account of public officials when we participate in commercial transactions or approval procedures.
- We always comply with local laws and rules in our dealings with public officials.
- We do not offer gifts to public officials, except for gifts of minimal value, and then only when it is customary to do so.
- We do not pay travel, accommodation or similar expenses for public officials.
- We offer only modest hospitality to public officials and only in cases where the activity is clearly and legitimately related to our business, the costs are reasonable and the activity is transparent.
- We always consult our manager and, if necessary, seek guidance from the Legal Partner before offering hospitality to public officials.
- We do not discuss Secto matters with public officials unless we have been authorised to do so in advance.

#### We are particularly vigilant

- If our business partner directly or indirectly interacts with public officials on our behalf.
- If a public official requests personal data about Secto employees, customers or other individuals.
- If a public official asks Secto to send information or messages to third parties.