

CODE of CONDUCT



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Why do we have a Code of Conduct?	3
Who does the Code of Conduct apply to?	4
The Axelent Spirit	5-9
Ethics and integrity	10-15
Fair employment, diversity, and inclusion	16-23
Health and Work Environment	22-27
Human rights	28-29
Social engagement	30-31
For our customers	32-33
Working with our suppliers and other partners	34-35
Environment and sustainability	36-37
Our communication	38-43
Violation of Code of Conduct	44-45
Our employees' responsibility	46-47

Why do we have a Code of Conduct?

Axelent operates in 15 countries, and we come from many different cultural backgrounds. Despite our differences, all of our employees share a sense of belonging—a sense of “us” and a strong commitment to transforming our industry through innovative solutions. When we represent Axelent, we are guided by our vision, our culture, and our values. Our strategy, One Axelent, provides a clear path for how we achieve our vision, and our culture and values define who we are, what we stand for, and how we act.

Our Code of Conduct provides practical guidance to our staff, suppliers, and business partners on how we conduct business worldwide. We live in a fast-paced and ever-changing world where many external factors continue to shape our work. Our Code of Conduct should serve as a clear reminder of our ongoing commitment to always act responsibly.

Who does the Code of Conduct apply to?

Axelent's Code of Conduct applies globally to all our employees within the Axelent Group, including subsidiaries and sister companies. We will do our best to encourage our suppliers and other business partners to adhere to our Code of Conduct.

The Axelent spirit

» THE AXELENT SPIRIT

A lot is changing in the world and also here at Axelent, but there is one thing that always remains the same. Axelent's culture, or "The Axelent Spirit" as we call it, is one of our most important competitive advantages. It defines who we are as a company and how we manage our relationships. Our culture underlies all our actions, how we take care of each other as a team, and how we give back to society.

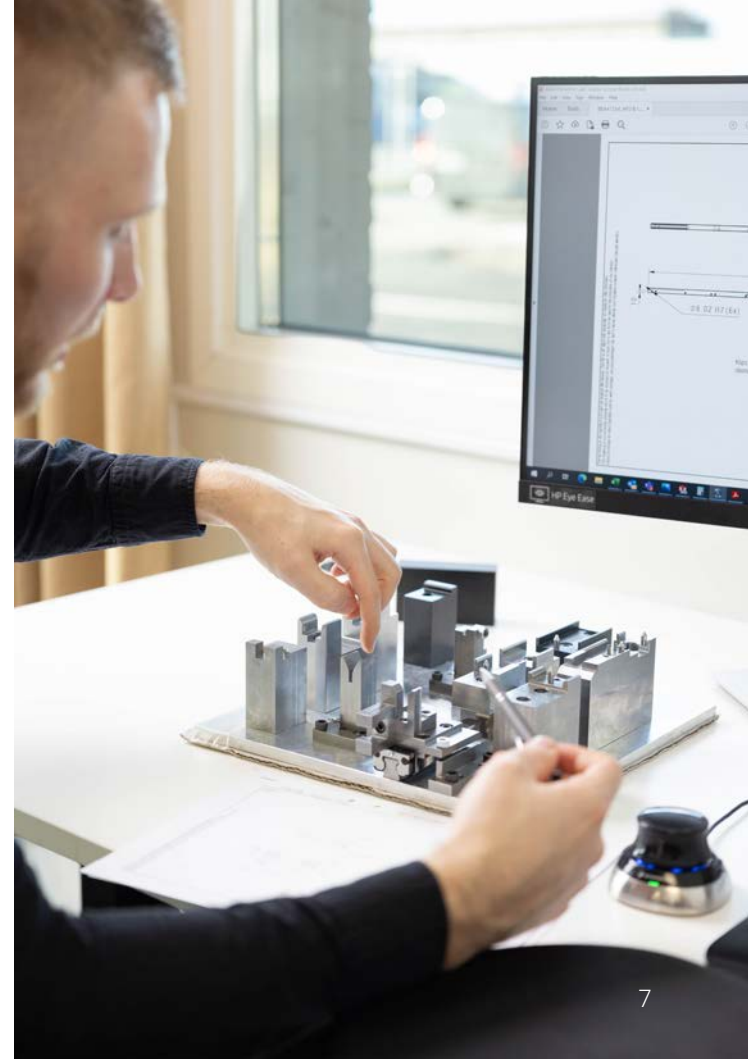
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We create involvement - we are all part of Axelent.

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We are inclusive

We create involvement - we are all part of Axelent. We believe in teamwork and working as a team, in every sister company and globally. Even though we are a large corporation, we still feel like a family. We share our knowledge - we want to explain and simplify complex information. We strive for openness and mutual respect. We know that to be successful as individuals, we must work together and believe in each other. At Axelent, we stand up for equality and embrace diversity.



» THE AXELENT SPIRIT

We are brave & passionate

We show commitment in our work. We are flexible and approach tasks with energy. We don't focus on how things should be done in theory, but are passionate about improving our business and our customers in the real world.

We have a strong drive to grow and make a difference, seeking innovative solutions, always keeping our customers' best interests in mind. We are brave, and we strive to be the challenger in the market. We achieve this by being passionate and true to ourselves, our environment, and our heritage.





We take responsibility

We take personal responsibility for our actions and results. If something doesn't work, we learn from it and try again. Our ambition is to be leaders; to create the world's safest workplaces for our customers, the best business opportunities for our suppliers, and the best development for our team. Always with maintained quality, customer focus, and sustainability.

When we encounter a problem, we think of a solution with a proactive and service-oriented attitude. We seek long-term partnerships with everyone we work with.

Ethics and integrity

» ETHICS AND INTEGRITY

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Trust, respect, integrity, and honesty are crucial to us.

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Our approach to dealing with our business partners should be characterized by honesty, respect, fairness, and integrity. All companies within the Axellent Group must comply with laws and regulations in all jurisdictions where we conduct our operations. We should not offer or accept any rewards or benefits from customers and other business partners that violate applicable laws or this Code of Conduct.

Trust, respect, integrity, and honesty are crucial to us. Any form of corruption goes against the goals of conducting good business.

Within our group, we should always make business decisions based on what is in the best interest of the group. Decisions should never be based on personal considerations or relationships.

Cartel and competition legislation

Axelent is committed to fully and in good faith comply with the cartel and competition laws and regulations applicable in the countries where we operate. We select suppliers and contractors based on their ability to meet the requirements of Axelent's Code of Conduct.

Taxes

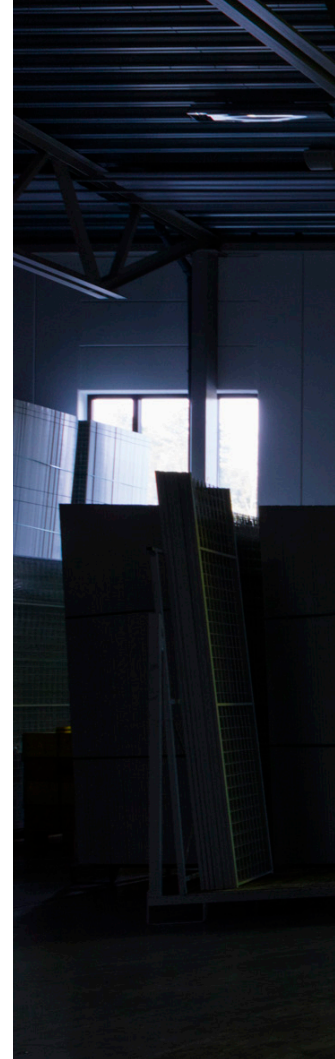
In all countries where Axellent operates, we shall adhere to the respective tax laws and regulations of each country. We shall actively engage in the applicable rules through our representatives/resellers/agents in the country, and if the tax legislation does not provide clear guidance, accuracy and transparency shall be guiding principles.



Gifts and bribes

We understand that gifts and entertainment can often be part of building warm business relationships, but we must always be mindful to ensure that they do not impact our objectivity in business. We may offer or accept meals and presents, but this should always be done with good judgment and without creating dependency or preconceived notions that could influence business decisions. Appropriate gifts may include simple meals, reasonable entertainment events, and symbolic items. However, cash gifts or similar forms of compensation are strictly prohibited, regardless of the amount.

By following these guidelines, we can ensure that our business relationships are built on fairness, honesty, and transparency, and that we continue to uphold high ethical standards within the company.





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Fair employment, diversity, and inclusion



» FAIR EMPLOYMENT, DIVERSITY, AND INCLUSION

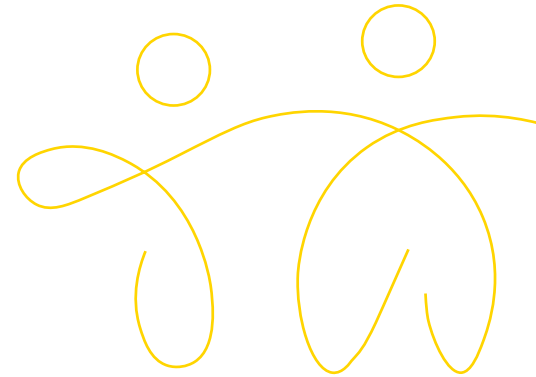
We are a global company with employees from many different countries, backgrounds, and cultures. We believe that our diversity and the dedication of our employees are a strength and competitive advantage. Mutual respect and tolerance are fundamental to how we work and communicate with each other. We believe that competence, commitment, performance, and potential should guide our employment-related decisions, such as recruitment, talent management, training opportunities, and promotion. We adhere to applicable labor and employment laws in the countries where we operate, including regulations on wages and working hours, collective agreements, non-discrimination, and similar labor rules.

Our ambition to be an inclusive and equal workplace aims to provide equal opportunities for all, regardless of background or location of our employees in the world. We want all our employees to feel valued and safe, and to be able to contribute in the best way possible without ever being subjected to harassment or discrimination.

We strive to treat our employees with respect and fairness, without discriminating based on gender, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social or ethnic origin.

Harassment and bullying

All employees should treat each other with dignity and respect. Our managers and supervisors at all levels should be attentive to any workplace harassment and take necessary actions to prevent all forms of such behavior.



Compensation

Axellent shall pay wages that at minimum correspond to the levels regulated by law or collective agreements and cover the basic needs of employees.

Temporary labor and apprentice systems shall not be exploited to evade the group's obligations towards personnel according to applicable legislation or laws and regulations regarding social security.



Freedom of association

At Axelent, we respect every employee's right to freedom of association and their preference for institutional and recognized employee associations. We respect employees' right to join, form, or not join an employee association of their choice without fear of reprisal, interference, threats, or harassment.



Gender equality

All employees have the right to equal opportunities, and advancement within Axelent is strictly based on merit, performance, and professional qualifications. We are committed to prohibiting any form of discrimination based on various demographic characteristics or identity factors such as gender, ethnicity, sexual orientation, cognitive style, age, nationality, disability, mental health, religion, or family situation.

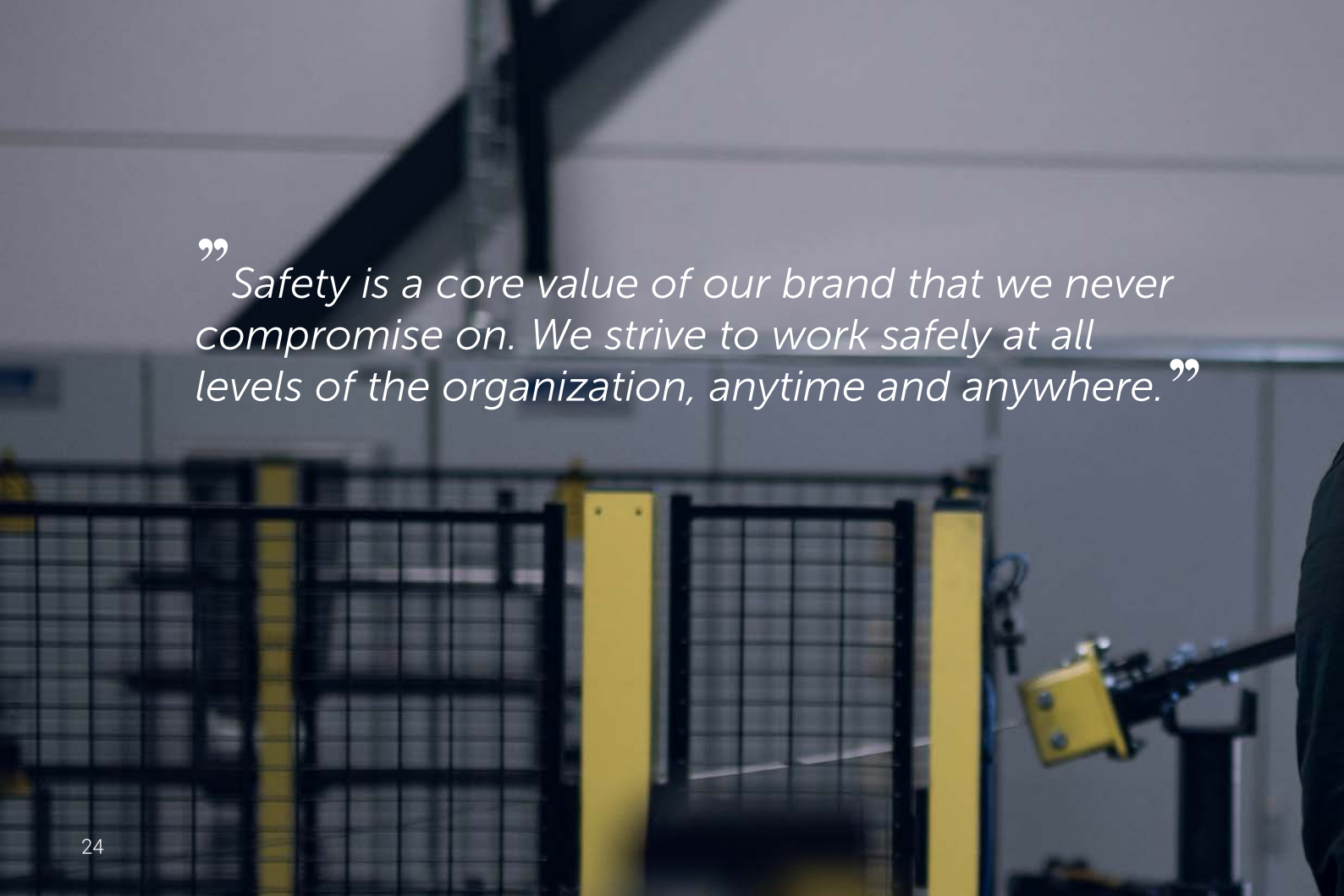
We have a strong culture of diversity and inclusion that welcomes people from all backgrounds and lifestyles. It is our belief that the inclusion of differences contributes to a dynamic and successful workplace where each individual is valued for their unique contributions and perspectives.

Health & Work Environment

Work Environment

At Axelent, all employees should feel safe. Our Safety Committee actively works to create a safe work environment for everyone. Axelent strives to be a safe and good workplace for all, both internally within the company premises and externally with customers. No one should have to risk their safety or health by working with or for us.

Axelent aims to be an example when it comes to safety and creates conditions for a safe work environment through preventive measures and training. Axelent ensures a healthy work environment and takes necessary actions to prevent accidents and injuries.

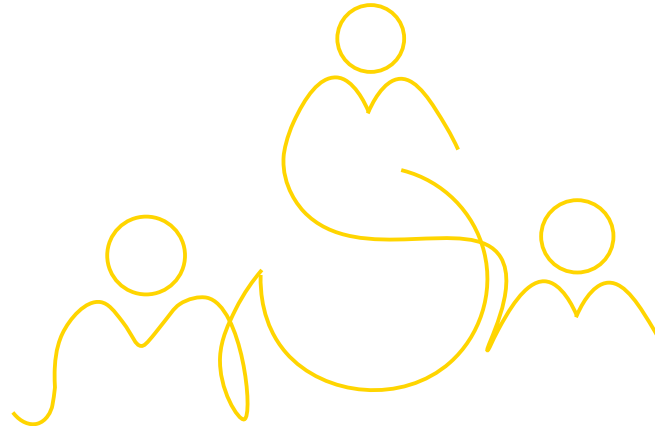


” Safety is a core value of our brand that we never compromise on. We strive to work safely at all levels of the organization, anytime and anywhere. ”



Work environment at our customers

A safe working environment should be considered a human right. While inadequate work safety and health incur costs, a well-managed one can become a growth opportunity. Companies with higher safety and health standards are therefore both more competitive and sustainable. Axelent's products aim to create safe and secure workplaces for our customers and their employees.



Alcohol and drug abuse are never acceptable

We do not tolerate or allow alcohol abuse or the use/distribution of illegal drugs on Axelent Group premises. No one is allowed to work under the influence of alcohol or any other substance that may impede employees from performing their job duties safely and effectively.

Human rights

» HUMAN RIGHTS

We promote an organizational culture that supports human rights and strives to avoid involvement in human rights violations. We support the principles outlined in the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.

Child labor

Axelent will neither accept child labor in its operations nor tolerate products from suppliers that directly or indirectly engage in child labor through collaboration with subcontractors or other business contacts involved in the production of its products.

Social engagement

Axelent strives to be a positive force in the communities where we operate. We are always politically independent and gladly engage in charitable projects. We believe that good relationships are crucial for long-term success, regardless of where Axelent conducts its business. Since each community is unique, our policy is for each Axelent company to strive to understand the society around them.

We do not provide financial contributions to political parties, individual politicians, or candidates for public office. We also do not provide direct or indirect support to political organizations. Employees cannot receive paid leave for political commitments, but they may be able to take unpaid leave according to local policies and legislation.

Axelent supports activities, engagement in charitable projects, and nonprofit organizations where there is some form of connection to Axelent as a company. We aim to contribute to society and make a positive difference in the communities where we operate.



For our customers

» FOR OUR CUSTOMERS

We strive to provide our customers an experience that exceeds their expectations. We consider quality to be every customer's right and every employee's responsibility to achieve this goal.

The overall experience is the most significant driver for our customers and forms the basis for the business relationships we maintain with our suppliers and partners.

We prioritize the safety and reliability of our products to ensure the security of our customers and the safety of their employees.

Working with our suppliers and other partners

We view our relationships with suppliers as more than just the procurement and delivery of products and services. We work together with them in a mutually supportive, open, fair, and objective manner to create a strong and sustainable business relationship.

To achieve our vision of sustainable procurement, we require the full support and cooperation of our suppliers. We expect our suppliers to adhere to business practices that respect the environment, human rights, health and safety, decent working conditions, and fair business standards.

Confidential information, intellectual property rights

Confidential information and intellectual property rights are two important aspects of Axellent's operations that we take very seriously. Confidential information refers to information that we receive from customers, suppliers, or third parties, and which we are expected to keep confidential and use only for a specific purpose. This includes information shared through presentations or emails and must always be clearly marked as "confidential". We consider confidential information as a valuable asset belonging to ourselves, our customers, suppliers, and other collaborating parties, and we are obligated to protect it. Improper disclosure of confidential information includes leaks through websites, social media, and other digital channels.

Intellectual property rights are also a crucial part of Axellent's success in the market. This encompasses specialized knowledge, methods, concepts, and ideas. We manage these assets on behalf of the company and in accordance with existing guidelines. We are also obligated to respect the intellectual property rights of others and avoid any infringement of such rights. We believe in a strong respect for intellectual property rights and actively work to ensure that we handle them in an ethical and responsible manner.

Environment & sustainability

» ENVIRONMENT AND SUSTAINABILITY

We take the responsibility to minimize our environmental impact and utilize fewer resources and more environmentally friendly materials in our products to protect our planet, its nature, and biodiversity. We are committed to maintaining high environmental sustainability and utilizing our resources in the best possible way, and every employee has a crucial role to play in fulfilling this commitment in our daily work.

Efficient utilization

We prioritize selecting equipment, materials, tools, and services that are most beneficial for the environment in the long term when using or purchasing them. We strive to make conscious choices that reduce our environmental footprint and contribute to a sustainable future. By making environmentally friendly choices in our manufacturing, procurement, and resource utilization, we take responsibility for reducing our negative impact on the environment.



Our communication

» OUR COMMUNICATION

We strive to communicate in a manner that exudes respect, honesty, transparency, and professionalism. Our communication is an important reflection of our reputation and brand as a leading provider in workplace safety.

Whether we are communicating internally or externally, through any media or channel, we always provide accurate and comprehensive information. We encourage open discussions and dialogues and support a culture of openness and transparency.

Marketing

Our ambition with our marketing is to always showcase the knowledge we possess and explain and simplify complex facts. We want to be clear and understandable with facts and tell stories to inspire. We also want to present our security solutions from a human perspective.



Information and technology

We use information technology to promote Axelent's and our customers' business interests. We recognize that the use of information technology and associated systems such as email, software, networks, applications, the internet, and social media may be subject to cyberattacks and other similar internal and external threats. We use our information technology responsibly, only for legitimate business purposes, in line with Axelent's interests and rights, and in accordance with Axelent's rules and guidance regarding our information technology systems.

Privacy and personal data

Axellent ensures that all personal data used for registration, compilation, storage, and deletion is handled with privacy and confidentiality in accordance with applicable laws, regulations, and the GDPR (General Data Protection Regulation). We respect our employees' right to protect their personal data and ensure that only authorized personnel have access to this information. Employees have access to personal data solely for specific business purposes and must not search for information for other purposes. Employees must not disclose personal information to anyone unless approved or required by law. Authorized personnel may only use personal data when necessary for their work, and the data should be treated with integrity and confidentiality.



»» OUR COMMUNICATION

The requirements for the processing of personal data must not be disregarded with reference to the demands for availability. We take data protection very seriously and take all measures to ensure that personal data is processed in a secure and lawful manner. We strive to be transparent in our handling of personal data and are always available to address any questions or concerns from our employees or customers.

Violation of Code of Conduct

Axelent's Code of Conduct applies to all individuals working with or within Axelent's companies. We are encouraged to use our judgment to determine the best course of action, but sometimes we may find ourselves in ethical dilemmas or feel unsure and in need of guidance on how to proceed.

If we suspect a violation of the Code of Conduct, we should report it to our immediate supervisor or contact person at Axelent. The purpose of Axelent's guidelines is to create a healthy, sustainable, and pleasant work environment both internally and externally in the short and long term. Axelent should always be regarded as a fair company that holds high ethical and moral standards in all areas.

Whistleblowing

We are committed to doing what is right and maintaining the trust of our employees, partners, and the public in our business and operations. Therefore, we strive to detect and prevent any misconduct in our operations as early as possible. Through our whistleblowing service, an employee or other partners can report suspicions of serious misconduct. Axelent has engaged an independent recipient function that manages our reporting system to maintain independent and impartial handling of the reports. All received reports and messages are handled in a manner that ensures confidential treatment of the submitted materials.

Examples of misconduct typically covered include violations of laws and regulations, corruption, bribery, financial crimes, misuse of financial resources, and severe harassment. Violations of various laws and regulations with an EU legal basis, such as public procurement, product safety, environmental protection, etc., are also covered.

Our employees' responsibility



» OUR EMPLOYEES' RESPONSIBILITY

Axelent's products and services contribute significantly to businesses worldwide. However, it is not only about what we do but also how we do it that sets us apart from our competitors, strengthens our credibility and trust among our customers and stakeholders, and ensures our continued growth and success as a company. Every employee at Axelent is expected to read and understand our Code of Conduct. The code sets high ethical standards for employees. However, leaders within Axelent have specific responsibilities and obligations under the Code of Conduct, and these cannot be delegated to others.





AXELENT

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