



2020 Code of Conduct - VATI

VATI of Sweden & VATIs Common Ground

This code of conduct outlines our expectations regarding employees' behavior towards their colleagues, supervisors and overall organization. The code is applicable to all employees, regardless of their terms of employment.

We promote freedom of expression and open communication. We expect all employees and consultants to follow our code of conduct. We also expect them to foster a well-organized, respectful and collaborative environment.

The code is applicable to all employees, regardless of their terms of employment. In addition we would like all our business partners – including suppliers, agents, contractors and other external parties to acknowledge this code of conduct and confer with the content and the values. The code may be supplemented as needed by policies, instructions and guidelines that constitute more detailed internal regulations.

We outline the components of our Code of Conduct below:



Roles and responsibilities

The code is adopted by the Board of Directors.

The CEO has ultimate responsibility for implementation of the code and compliance by all employees of VATI's organisations, as well as for incorporation of relevant parts into agreements with VATI's business partners.

The CEO is responsible for ensuring that the code is regularly reviewed and revised as needed. All managers must serve as positive role models. Managers are expected to introduce new employees to the code during their onboarding, as well as have a regular dialogue about its relevance in day-to-day duties. Compliance with the code and following mandatory training must also be addressed during performance reviews.

It is the responsibility of all employees to be familiar and comply with the code. All employees are to follow the mandatory Code of Conduct training. Employees can always bring up questions about the code with their immediate manager. Non-compliance can lead to disciplinary actions, up to and including termination of employment.

Compliance with law

All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws. We expect employees and consultants to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

Reporting violations of Code of Conduct and Whistleblowing

Employees and business partners that are aware of or suspect violations of the code have the responsibility to raise these issues. The earlier a problem is discovered, the better chance we have to repair the situation. Wherever possible, reporting should be done to the immediate manager, or the CEO.

Business ethics

VATI is strongly committed to upholding the highest ethical standards in every aspect of our business. Our owner requires VATI to be a role model for sustainable business, for which strong business ethics among employees are fundamental.

We have linked SDG4.7, SDG5, SDG8.3, SDG10.2, SDG12, SDG16.10, and SDG17 to our business strategy.



Anti-corruption

VATI has a zero-tolerance policy when it comes to bribery and other types of corruption.

VATI does not accept any attempt at improper influence on the part of current or prospective business partners, customers or other stakeholders. No employee or business partner may accept, approve a promise of or demand any type of benefit that may be perceived as corruption.

Similarly, employees and business partners who represent VATI may not act in a way that attempts to improperly influence the decisions of others or can be perceived as doing so.

A benefit is improper, or may be perceived as being, if it encourages the recipient to perform their duties in a manner that is disloyal to their employer. A benefit does not need to have financial value in order to be improper. Particular caution must be taken when interacting with government or public officials; providing gifts to public persons is illegal in many countries and should therefore be avoided.

As guidance, benefits should never exceed the (equivalent of) 500 SEK. If an employee has doubts whether a gift or other type of benefit is improper, it should always be discussed with the manager. In case of doubt, the most appropriate decision is always to abstain.

Conflicts of interest

Business decisions must always be based on objective reasons and may not be influenced by personal interests that are not relevant to VATI's business.

A conflict of interest can for example arise because of a private or family relationship, or a financial interest in a company that has business relationships with VATI.

If a risk of conflict of interest arises, an employee must always notify their immediate manager in advance so that appropriate action can be taken. Employees should disclose financial interests they, a family member or close friend have in a company that has business interactions with VATI, and where they can personally impact the business with that company.

When employees want to hire a family member or close friend, this should be discussed in advance with their immediate manager and CEO. In order to further prevent conflict of



interests, employees are obliged to inform VATI for employment in addition to their employment at VATI (e.g. consultancy, board membership, second employment).

Respect in the workplace

All employees and consultants should respect their colleagues. We won't allow any kind of discriminatory behavior, harassment or victimization. Employees and consultants should conform with our Gender Equality Policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

Diversity and inclusion

VATI believes differences contribute to a more dynamic and attractive workplace and that every employee has the right to be treated with respect. No employee may be discriminated against, bullied or harassed in any way, for any reason or under any circumstances.

VATI actively pursues diversity and gender equality at all levels of the organization, which is influencing both salary levels and other employment conditions, but also career and personal development. In every recruitment process, of a staff member or an independent consultant, VATI shall aim for gender equality.

Every individual within the companies shall feel confident and secure in his/her ability to influence and get his/her voice heard, regardless of position, seniority or role in the organization.

Managers must serve as role models and take a proactive approach to diversity and gender equality. This includes preventing and correcting bullying, harassment and other improper treatment on the work floor.

Alcohol and drug abuse

No employee or business partner may perform their duties or be at a VATI workplace under the influence of alcohol or drugs. VATI is committed to support employees who have substance abuse problems. Employees with alcohol or drug issues have a responsibility of their own to seek help through health services, or by reaching out to their immediate manager.



Environment

Sustainability and environmental awareness is something that shall be embraced throughout our entire business process. VATI shall, on strategic as well as operational level, make business decisions where any eventual impact on the environment is taken into consideration. We shall encourage environmental responsibility throughout the entire life cycle, not only internally but also externally, e.g. by expecting equally environmentally aware processes from suppliers in terms of purchasing, production, delivery, etc.

Protection of Company Property

All employees and consultants should treat our company's property, whether material or intangible, with respect and care. This includes trademarks, copyright and other property (information, reports etc.) Employees and consultants should protect company facilities and other material property from damage and vandalism, whenever possible.

All employees and business partners of VATI that have access to confidential information must always act prudently and not share confidential or proprietary information with uninformed colleagues or unauthorized third-parties, unless specifically authorized to do so.

Social media

Employees and business partners are not allowed to use social media in such a way that it can damage the reputation of VATI.

If an employee is uncertain about what they have the right to do on social media and what is permitted in the context of the employment relationship, the employee should ask their immediate manager.

Privacy and data protection

VATI respects every individual fundamental right to protection of personal data and complies with data privacy laws such as GDPR concerning collecting, processing, and retaining of personal data. Employees that work with personal data must always handle information in line with the instructions given by VATI.



All processing of personal data must be justified and used for specified and legitimate business purposes only. Discovered or suspected breaches of data privacy must immediately be reported to the immediate manager or the CEO.

Employees and Working conditions

VATI respects and supports internationally recognized human rights as set forth by the UN Declaration of Human Rights and the International Labour Organisation's Core Conventions. VATI is a signatory of the UN Global Compact and follows the OECD guidelines for Multinational Enterprises. VATI will always promptly address any problem that arises in connection with a violation of human rights.

Professionalism

All employees and consultants must show integrity and professionalism in the workplace.

Corruption - We discourage employees and consultants from accepting gifts from clients or partners. We prohibit bribes for the benefit of any external or internal party.

Job duties and authority - All employees and consultants should fulfill their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers must not abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner. We encourage mentoring throughout our company.

Conflict of interest - We expect employees and consultants to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties.

Collaboration - Employees and consultants should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

Communication - All employees and consultants must be open for communication with their colleagues, supervisors or team members.

Benefits - We expect employees and consultants to not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits our company offers.



Policies - All employees and consultants should read and follow our company policies. If they have any questions, they should ask the CEO.

Child labor or forced labor

VATI does not tolerate or employ any form of child labor or forced labor.

Freedom of association

All employees are entitled to join associations, as well as to establish an organization, and bargain collectively in accordance with laws.

Business partners

VATI aims to build sustainable business with our business partners, that creates value for all, by limiting the negative impact from the supply chain on society and the environment, combat bribery and corruption and contribute to social, environmental and economic development.

We take responsibility for the business partners with whom we cooperate and expect the same level of integrity, honesty and ethical behavior from them as they can expect from us. We achieve this by ensuring that the Code of Conduct for Suppliers is always part of the contractual agreement with suppliers, and that the suppliers we use are approved from a sustainability perspective.

Societal commitment

VATI is a for-benefit company with a primary purpose to deliver social, environmental, and economic benefits.

VATI participates in various partnerships and associations that provide us with an opportunity to improve our industry, serve as a good and responsible member of the community and cultivate confidence in our company.

VATI confines its social commitments and sponsoring programs to a limited number of major projects that are determined by the CEO, the Board of Directors and the owner of the company. All of our sponsoring programs must benefit both the organization with which we are collaborating and VATI itself.



Disciplinary actions

Our company may have to take disciplinary action against employees and consultants who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation.

We will take legal action in cases of corruption.

This Code of Conduct is written and based on:

- UN Guiding Principles on Business and Human Rights (UNGPs)
- Ten Principles of the UN Global Compact
- UN Sustainable Development Goals (SDGs)
- ILO Centenary Declaration for the Future of Work
- ILO conventions and recommendations
- OECD guidelines for Multinational Enterprises