

## Code of Conduct

### Why a Code of Conduct?

This Code of Conduct describes how we act and what it is like to work at Digimake in terms of company policies, laws and ethical practices.

It defines who we are - to ourselves, our customers, suppliers and partners.

It applies to all employees and freelancers.

### Our vision

We help companies work on their digitalisation. By digitisation, we mean a digital transformation, a thorough business transformation with the help of information technology.

An agile approach allows digitalisation to continue in an increasingly complex environment. We support companies to improve and maintain an agile way of working by participating as agile leaders, coaching and training their employees.

Combining agile working methods with technical development using advanced tools, where coding is minimised, can provide rapid solutions. We are prepared to take full responsibility for this type of delivery.

We offer services and technical solutions on a pay-as-you-go basis and in some cases at a fixed price. At a fixed price only when the risk is low.

We have a culture based on the equal value of people. Our behaviour is based on honesty, transparency, openness and respect.

We comply with the laws and regulations of the markets we operate in. We only work with customers, suppliers and partners who are reputable.

### Our values

#### The equal value of all people

We adhere to the principle of the equal value of all people. By following this principle and not dividing people into groups, equality is achieved.

#### Our guidelines

- We treat each other with respect and support each other in our work. We want to create an environment where we all help and look after each other.

- We have zero tolerance for insulting or offensive behaviour as this is a serious threat to our staff, their well-being and career development.
- We are mindful of recognising our unconscious biases and taking steps to create an inclusive culture that makes every employee feel welcome and perform their best.
- All employees have the freedom of association and the right to form and join trade unions of their choice.

## **Transparency and openness**

We believe in transparency and openness. By making good decisions and ethical choices, we create the desired culture and trust among colleagues, customers and partners.

We have an open atmosphere, with freedom of action and openness to speak up.

## **Responsibility**

It is the responsibility of every employee to work according to the Company's standards of integrity and honesty as described in this Code of Conduct. We expect all employees to know and act in accordance with this Code of Conduct.

## **Speak up**

Our culture favours speaking up when something is not right. As a result, we have an open atmosphere, with freedom of action and openness to speak out. We don't look for scapegoats - instead, early awareness. If something is not right, all employees are valued and can provide a solution and avoid problems and potential conflicts.

## **Safe and secure workplace**

All employees should be safe and secure, feel a sense of job satisfaction and community. A conscious effort should be made to create a healthy working environment.

We support a working environment that empowers everyone to do their best every day.

## **Our guidelines**

- We treat others with respect and do not tolerate harassment or discrimination.
- We integrate health and safety practices into our operations and comply with health and safety regulations.
- We solve problems respectfully and never resort to acts or threats of violence.
- We do not work under the influence of drugs or alcohol.

## Ensure information security

We ensure information security by using common sense and secure IT solutions according to recognised industry standards.

- We comply with local privacy and data protection laws, such as the GDPR.
- We provide clear and accurate privacy notices when collecting or processing personal data.

## Respect for intellectual property rights

Respecting intellectual property rights means respecting the rights of other people and companies to their property and to keep the fruits of their labour.

As an employee, you will have access to and develop the company's intellectual property. Under your employment contract, the intellectual property rights for your work belong to Digimake or our customers. This intellectual property includes ideas, inventions, software, templates, publications and other materials relating to Digimake's current or anticipated offerings, business or development.

### Our guidelines

- We must always have a supply agreement that describes how rights are allocated between us and the customer.
- We only use software that we are entitled to through licence agreements, either commercial agreements or clear Open Source licences.
- If we make software available as Open Source, the type of licence should be carefully considered.

## Quality in everything we do

Our foundation is always that the work we do, whether for clients, partners or ourselves, should be conducted according to our ways of working to deliver the best quality services and products. As part of Digimake, you should contribute to our vision by delivering quality and thus creating a better future.

## How we deliver

We deliver services and technical solutions on a pay-as-you-go basis. We can also deliver some services and technical solutions on a fixed-price basis.

When we offer services and technical solutions at a fixed price, this price must be based on a thorough analysis of the possible time required. A good basis is to have developed and used a similar service/technical solution.

## **Our guidelines**

- We do not speculate by submitting fixed-price tenders for technical solutions where we have insufficient knowledge of the customer's needs and/or the technology to be used.
- In the case of high uncertainty, we deliver services on a pay-as-you-go basis. The risk then lies with the customer.

## **Taking care of the environment**

By caring for the environment, we respect the right of all people, as well as other living beings on our planet, to a good environment.

We endeavour to operate in an environmentally responsible manner and are committed to complying with applicable environmental laws and regulations.

We aim to minimise our environmental footprint by reducing greenhouse gas emissions, cutting waste and limiting energy use in our workplaces.

## **Our guidelines**

- We avoid unnecessary commuting by working digitally, remotely.
- When we travel to meet, the meeting should have a clear purpose and meaning.
- Manufacturing physical resources takes a lot of energy and consumes raw materials. We buy high-quality computers, printers and monitors that are durable. We reuse these as far as technically possible.

## **Internal and external communication**

The tone of our communication is bold, energetic and to the point.

We have a positive and friendly tone that is clear and understanding, professional and helpful.

All employees represent Digimake when communicating both internally and externally. We see all employees as ambassadors when they share in their networks and social media and refer to Digimake or our customers.

## **Internal communication**

- **Open and inclusive:** We will communicate openly and inclusively. If you don't understand, feel free to ask, and we encourage an open discussion where different ideas and opinions are recognised. We show each other trust and respect.
- **Accessibility:** It is everyone's responsibility to gather the information needed to do their job in the best possible way. We have an open attitude, sharing

information and exchanging experiences to develop our activities. Present information intelligently, using language that is clear and easy to understand.

- Fast and factual: We inform each other quickly and objectively so that everyone has accurate information to avoid misunderstandings and concerns. We endeavour to ensure that externally communicated information is first available to employees.

## External communication

- All official external communications, such as websites, newsletters or printed material, must be authorised by the CEO before publication.
- Clearly state that any opinions expressed about our company, for example on social media, are entirely those of the employees and do not reflect the position of our company.
- Never disclose confidential business information about our company or our customers, business partners or suppliers.
- Do not post anything that is confidential information, discriminatory or would constitute a threat, intimidation or harassment. Irony and sarcasm should be avoided.

## Confidential business information

Employees must not exploit confidential information of our customers or within Digimake. Employees with access to confidential information should not pass on the information or disclose the information to a third party.

## What is confidential information?

There is a lot of information that is confidential.

Examples of confidential information within Digimake are:

- Contract
- Contact details of customers or employees of our customers
- Strategic documents and business plans
- Organisational changes
- Mergers and acquisitions
- Pricing
- Proposal
- Financial data
- Internal costs
- Employment conditions and remuneration

What information is confidential with our customers can be different. Review the customer's descriptions of what is confidential information, for example on

intranets or internal training programmes. Check with your client's supervisor. If necessary, also inform other employees at Digimake that confidential information about the customer may not be communicated externally.

If you are unsure whether a piece of information is public, contact the CEO.

## **Financial communication**

We ensure that our financial reporting and accounts are accurate and that we communicate with transparency.

We comply with applicable laws and trading standards in all our activities. This includes financial and non-financial data such as offers, contracts, bank statements, payrolls, expenses, personal data, etc.

## **Ethical policy**

Our business relies heavily on the Digimake brand based on trust, transparency and integrity. We are a trusted and reliable service provider with a culture and values based on a strong ethic of doing the right thing.

## **Avoid conflicts of interest**

We always look after Digimake's interests, regardless of personal gain or self-interest, when we work. Avoid situations where personal, family or financial interests may conflict with Digimake's interests.

### **Our guidelines**

Examples of conflicts of interest that you must report to the CEO include:

- Ownership or other interest in a competitor, customer, supplier or party seeking to do business with Digimake.
- Employment of a relative.

A conflict of interest is not necessarily a violation of Digimake's policy. However, failing to disclose a conflict promptly is always a violation.

## **We follow the law and are honest**

We comply with all trade restrictions, export controls and regulations that apply to our business.

We only co-operate with customers, suppliers and partners who are reputable. The companies must essentially comply with our Code of Conduct. The owner, principal, management and employees of these companies must have an ethical approach and must not have a criminal background.

## **Our guidelines**

- To ensure that we do not engage in any transaction with unauthorised countries, organisations and individuals, we carry out due diligence with those we are considering engaging in a business relationship.
- We comply with current legislation and agreements on working time, rest and holidays.
- We do not knowingly cooperate with suppliers involved in child labour, forced labour or other unfair or illegal practices.

## **Compete fairly**

Each employee is responsible for ensuring that we compete fairly and comply with all applicable competition laws, regulations, and rules. We must not agree with competitors to allocate markets or customers or manipulate bidding processes.

## **Our guidelines**

- We must apply sound business practices along with the standards set by the company. We understand and follow the guidelines for contacting competitors, obtaining and managing competitive information and participating in industry and professional organisations.
- Employees are required to familiarise themselves with and comply with the rules/laws applicable to their activities and to seek advice, if necessary.
- Company assets must not be used, directly or indirectly, for any illegal or improper purpose or for personal or private gain.
- We do not provide, receive, exchange or agree on any of the following types of information with a competitor or its representative, whether in person, electronically or at an industry meeting
  - Bids and prices
  - Customers, suppliers or sales areas
  - Terms and conditions of sale
  - Costs, profits or margins
  - Sales or marketing strategies
  - Wages and salaries
- We actively distance ourselves from any situation where unfair agreements or information exchanges between competitors are raised.

## **Corruption and extortion**

Our commitment is to work with transparency, trust and integrity at all times. Whether on a corporate or personal level, corruption, extortion or bribery is not acceptable in our organisation.

This approach applies to all the markets in which we operate and our business relationships and should guide us in our daily work with all our stakeholders.

## **Our guidelines**

- As an employee, I do not offer, promise, give, request, accept or agree to accept significant gifts or entertainment (including events, trips and other travel arrangements) to or from third parties.
- Events, gifts and activities organised to strengthen and build customer and supplier relationships should be done in good faith and presented openly, never interfere with conduct and always be moderate.
- The choice of supplier should never be based on the receipt of a gift or hospitality.
- Treat with great caution a claim from a third party to receive their commission payment before winning a deal/contract.

## **Report suspected or actual offences**

All employees can anonymously report suspicions of, or attempts at, bribery and corruption, actual violations of this Code of Conduct or believe you are a victim of prohibited behaviour in the workplace

You can raise this directly to or via:

- CEO
- Your boss
- Letter (option for anonymous)

by sending a letter to the postal address.

Digital Makers Stockholm AB, Grev Magnigatan 10, 5 tr, 114 55 Stockholm  
(option for anonymous)