



# Lexit Group **Code of conduct**

ver 2025:2

# Scope --- and background

**Lexit Group believes in being a responsible group. This corporate philosophy is established in the group corporate culture and values. Altogether, these represent a commitment for all employees regarding their behavior within the company and in all relations outside the company.**

Promoting proper business ethics, decent working conditions, and environmental principles is part of our strategy, which means that we act in a socially and environmentally responsible way. To achieve this, we want to work closely with our customers and partners who share and apply the same principles detailed in this Code of Conduct.

Lexit Group's board has adopted the Code of Conduct to clarify expectations and requirements for ourselves and our partners. The companies within the group expect its board, employees (including hired consultants), and partners to make systematic, targeted efforts to ensure compliance.

Everyone shall apply and work in full compliance with applicable laws, rules, and regulations as well as international conventions, the UN Global Compact principles, the rules for the valid version of the Code of Conduct, and Lexit Group's policies, directives, and guidelines. Employees and partners can find further guidance in the documents as mentioned above.

Interested parties can always contact the management of the different companies for more information. See contact information on the last page.





We are  
committed.  
**Always.**



Honesty, trust,  
openness and  
respect in all  
relations.  
**Always.**

# Overall — Principles

Compliance with national and international laws, international conventions, and regulations. A fundamental requirement is to always act within the framework of laws, rules, and international conventions. Employees and partners must comply with all applicable national and international laws, regulations, conventions, and the UN Global Compact. It is completely unacceptable not to respect and comply with applicable laws and regulations, such as anti-corruption and anti-competitive practices, customs / export / import / transport regulations, tax, environment and working environment or agreements, and safety requirements and other regulations setting basic standards for our business. Furthermore, it is not acceptable to provide fraudulently counterfeit products, systems, or information or the equivalent.

If a conflict arises between the this Code of Conduct and valid law, the law applies. Only Lexit Group´s board may approve deviations from the Code of Conduct. Note that our Code of Conduct may be more far-reaching than applicable laws, rules, and conventions.



The companies within Lexit Group demonstrate honesty, trust and openness in all their relationships. We live up to our customers' commitments. Partners must feel that they are an essential element for joint business operations to be as successful as possible.

# Ensure ——— Compliance

Lexit Group Code of Conduct shall develop through continuous improvements. Routines and policies are integrated in the different companies possible ISO-management systems.

## **Partner requirements**

All partners must follow the standards set out in the valid version of the Code of Conduct or their own guidelines that are in line with or exceed Lexit Group's. Additional requirements and customers' codes of conduct also apply to Lexit Group's partners.

## **Violation reports and grievance**

Employees, partners and other stakeholders are encouraged to report and call for actual, potential, or suspected violations of the Code of Conduct.

For employees, reporting can take place either in line with group's regular reporting channels or according to the Whistleblower policy. Other stakeholders are welcome to contact CEO or CXO. Contact information is to be found on the last page.







# Business Ethics

## Responsible business

Employees and partners are expected to conduct their business openly and ethically and always act with integrity. The ethical elements include, e.g., business integrity, anti-corruption, and fair competition. Fair business practices must be used, including accurate and truthful advertising/information. Laws and regulations must be adhered to where they apply. Lexit Group takes responsibility for following the highest ethical standards in all its activities and all relationships. Everyone must take personal responsibility for their own actions and feel responsible for Lexit's brand, products, and services.

## Anti-corruption

All types of corruption, extortion, and fraud are prohibited. Employees and partners shall not offer, pay, or receive bribes or payments, gifts, and other benefits in violation of applicable laws and regulations. Nor should anyone create a risk of inappropriate business decisions and conflicts of interest, nor participate in other illegal incentives in business or government relations.

It is forbidden to request or make any promises in connection with gifts and donations. Employees and partners may never resort to bribes or unauthorized compensation in any form of relationship with customers, partners, authorities, or other decision-makers to obtain or retain business, influence decisions, or other gains. Lexit does not take party political positions.

### Anti-competitive activities

Lexit Group acts fairly and stands for transparent competition. Employees and partners are expected to comply with the legislation on the collection and exchange of information with external parties. Lexit does not allow any form of price collusion, cartel, or abuse of market dominance. All parts of the business must have correct and unlimited competition in tenders, procurement, and purchasing.

### Anti-conflict of interest

Employees may not conduct personal financial or other external activities in violation of Lexit's interests or rules for ancillary activities. Lexit Group's assets and resources shall be used for Lexit Group's goals and not for personal gain or other inappropriate activities. Employees should avoid participating in activities that could lead to conflicts of interest. This includes, but is not limited to, giving, or receiving personal gifts or services to a value that exceeds the specified level, or participating in work beyond everyday activities.

Employees may not engage in competing activities or have other business to such an extent that it violates the regular obligations during implementation. It is forbidden to use Lexit Group's relations with business partners such as customers and partners for personal benefit.

### Prevention of money laundering and the financing of terrorism

Employees and partners must not accept, facilitate, or support money laundering, terrorist financing or be at risk of or involved in transactions/activities for tax evasion.

### Transparency

Employees and partners must act transparently and in accordance with internal rules, keep up-to-date registers with information on the relevant parts to show that these codes of conduct are followed. All financial transactions must be reported in accordance with a valid accounting standard, and the accounts must be registered correctly and fairly.

### Intellectual property, privacy and information security

We are committed to a high level of legal and ethical standards in the conduct of our business. It is the policy to compete fairly in the marketplace. This commitment to fairness includes respecting and protecting the privacy, information, data and the intellectual property rights of our customers, business partners, competitors and other.

Employees and partners must protect Lexit Group's confidential information, data and

trademark. Confidential information and data refers to Lexit Group's ownership, technology and technical knowledge, expertise, experience, know-how, inventions, specifications, formulas, tests and financial, business and personnel information, and other information or data disclosed at any time and in any form considered confidential information and data. By the same way, we must protect and respect the intellectual property, information and data of others.

Stronger  
together.  
Always.

# Social

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# Sustainability

## Human rights and social aspects

For Lexit Group, the observance of internationally recognized human rights is the basis of all business relationships. We expect employees and partners to follow the principles of the Code of Conduct and neither commit nor participate in human rights violations.

## Fair and equal treatment

Employees and partners may not discriminate based on race, religion, gender, age, nationality, disability, personal relationship, union membership, sexual orientation, political opinion at or during employment. Discrimination on any other basis is also not permitted.

Lexit Group supports, respects and follows international human rights conventions.

We promote diversity and equality. Equal treatment and equal opportunities apply to all. We do not accept any form of mental or physical punishment, threats of punishment, discrimination in employment or work, bullying in the workplace, sexual or other forms of harassment.

## Remuneration and working hours

The Lexit Group companies and partners must ensure that employees work following all applicable laws and mandatory industry standards for regular working hours and overtime. We expect that remuneration and benefits at least comply with the statutory minimum wage and the statutory working hours / any license agreements in the countries concerned and per binding collective agreements.

## The right to belong to a trade union

The Lexit Group companies and its partners recognize the fundamental right of employees to socialize freely, to belong to a trade union, and to bargain collectively in accordance with all applicable laws and regulations.

## Anti-child labor and forced labor

The Lexit Group companies and partners ensure that the minimum age defined by the International Labor Organization (ILO) is respected and that existing rules on the respective national terms of employment are followed. Furthermore, Lexit Group companies or partners shall not use or in any way benefit from forced labor, prisoners, child labor, or involuntary work.

## Health and safety

The Lexit Group companies and partners are responsible for each employee's well-being and must provide a safe and healthy work environment. Lexit and partners must ensure that all employees are aware of health, safety, and environmental risks, and are appropriately trained to minimize the risks and possible effects of emergencies. Compliance with the safety regulations must be monitored continuously, and any deficiencies rectified immediately. Preventive health and safety programs must be in place. We expect that our partners and suppliers have HMS procedures based on the principles according to ISO 45001 or a similar health and safety management system.

# Environmental— Sustainability

Based on ISO 14001 Environmental Management procedures, we shall assume the precautionary principle, and projects in which Lexit Group companies participates shall be characterized by a safe, healthy, and sustainable environment.

Current and future operations and processes must comply with Lexit Group's policies, environmental standards, and legislation. We strive to create and provide services and products that limit the harmful environmental impact and that are safe to use, can be recycled, reused, or dismantled safely. This includes products and services from our partners. Employees must have an open dialogue with partners about our environmental and sustainability work, developed through continuous improvement.

We expect that our partners and suppliers share our environmental commitment, and that they carry out systematic environmental work based on the principles according to ISO 14001 or a similar environmental management system.

# Sustainability in all aspects. Always.





**Policy owner:**

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**For questions about this Code of Conduct,**  
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