



**ITIVITI**

# Code of Ethics

Itiviti Group AB



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This Code of Ethics explains Itiviti Group's position on key issues in three important areas: Anti-corruption and Ethics, Labor Standards and Human Rights, and The Environment.

The Code of Ethics applies to everyone at Itiviti – all employees, managers, executive officers, and members of the board of directors. Everyone is expected to follow the Code. Managers have a special responsibility to establish a work environment where ethical behavior is encouraged and rewarded. Employees should understand that every instruction that is given or goal that is set by their supervisor is done in the context of this Code.

To support the Code of Ethics, in particular our commitments to comply with the law and be true to our other core principles, on an operational level Itiviti has put in place a Corporate Compliance Program. The Program includes policies and manuals in compliance areas, including four specific areas that are of particular importance to the Itiviti's operations: anti-bribery, competition, data protection, and trade sanctions.

Everyone at Itiviti is expected to be familiar with the requirements of the Corporate Compliance Program as those requirements relate to their position.

As part of the Corporate Compliance Program and in line with the principles articulated in the Code of Ethics, Itiviti has also published a Whistleblowing Policy for reporting serious misconduct at Itiviti. As described in more detail in the Whistleblowing Policy, Itiviti has zero tolerance for discrimination against employees who, in good faith, report serious misconduct through the whistleblowing system.

It is Itiviti's firm belief that following the Code of Ethics is essential to the continued success of the company, and Itiviti sincerely thanks all employees for their efforts in this regard.

*Stockholm*  
*December 2017*  
**THE BOARD OF DIRECTORS**



## Introduction

Itiviti states in this Code of Ethics its position on key issues in three general areas: Anti-corruption and Ethics, Labor Standards and Human Rights, and The Environment.

The Code of Ethics embodies standards of business conduct and ethics that all employees, managers, executive officers, and members of the board of directors must follow. These standards are based on sound business practice, responsibility, and common sense, and are intended to encourage a high degree of personal and professional integrity.

## Anti-Corruption and Ethics

### Anti-Bribery

Itiviti refuses to accept or retain business through bribery. Employees do not directly or indirectly offer, promise, grant, or authorize the giving of money or anything of value to someone in order to unduly influence the recipient in the performance of professional duties or in order to obtain or retain an improper business advantage. Employees do not ask for or accept improper benefits from others for performance of their duties to Itiviti. Applicable anti-bribery laws are strictly followed.

### Competition

Itiviti and its employees follow applicable competition law. Employees do not engage in discussions with competitors regarding market allocation, information exchange, production and sales quotas, or bid rigging.

### Trade Sanctions

Itiviti complies with United Nations sanctions and applicable sanctions under the laws of the European Union and the United States. Employees never attempt to circumvent applicable trade sanctions.

### Conflicts of Interest

Employees avoid situations in which their own personal interest, or the interest of their family members, affect the employee's ability to make decisions that are in the best interest of Itiviti. Every business decision is based on the best interests of Itiviti, not personal interests.

## Labor Standards and Human Rights

### General

Itiviti does not compromise on requirements set out in national law or international standards with regard to worker safety and human rights. Itiviti takes responsibility for all people participating in the conduct of its business. Itiviti employees are not deprived of their human rights, or subject to mental or bodily harm in their labor. Itiviti understands that its business may have an impact on human rights issues, in particular in relation to people's working and living conditions.

Itiviti complies with all relevant international covenants and conventions as well as all laws which are applicable to worker safety and working conditions for laborers.



### **Privacy**

Confidential personal information is safeguarded and employees follow applicable laws on the handling of personal data. Data is disclosed to third parties only when legitimate grounds to do so have been established and appropriate measures have been taken to protect the personal data to be transferred.

### **Equal Opportunity and Anti-Discrimination**

All employees are treated with dignity and respect. Itiviti provides equal opportunities to everyone. Discrimination or harassment based on race, ethnicity, gender, physical disability, sexual orientation, or religion is not tolerated. All employees with the same qualifications, training, and skill set receive equal pay for equal work.

### **Working Conditions**

Itiviti provides a healthy and safe work environment for its employees and constantly strives to make working conditions even better. Abuse (whether physical or verbal) and unlawful harassment are strictly prohibited.

### **Forced Labor**

Itiviti does not, directly or indirectly, use forced labor or other forms of involuntary labor, including prisoners, bonded workers, illegal workers, or other non-paid workers.

### **Child Labor**

Itiviti recognizes and honors the rights of every child to be protected from economic exploitation and from performing any work that is likely to be hazardous, to interfere with the child's education, or to be harmful to the child's health or physical, spiritual, moral, or social development. Itiviti complies with applicable law and international standards regarding child labor.

### **Political Involvement and Labor Unions**

Employees are free to express their political views and engage in political activities outside of working hours without retribution or discrimination in the workplace. Employees may not, however, use the Itiviti's name or property to further their personal political interests. Employees are free to join labor associations of their own choosing and to be part of, or included in, collective bargaining.

## **The Environment**

Itiviti complies with all applicable environmental laws and regulations. Environmental resources are used responsibly and carefully and Itiviti constantly strives to conduct its business in an environmentally sustainable way, by way of, for example, improved efficiencies or investment in sustainable products, services, and technologies. Ideas from employees that reduce the environmental impact of Itiviti's activities are supported and encouraged.

## **Monitoring of Compliance and Enforcement**

### **Understanding and Complying with the Code of Ethics**

It is the personal responsibility of every employee, manager, executive officer, and member of the Board of Directors to understand and comply with the Code of Ethics. Managers should ensure that their subordinates fully understand and comply with the standards and requirements stipulated in the Code of Ethics. Problems encountered in enforcement as well as comments or suggestions for improvement should be escalated in line with standard reporting procedures, and if appropriate, to the CEO.



### **Violations of the Code of Ethics**

Itiviti does not tolerate any illegal or unethical acts. Anyone violating the Code of Ethics may be subject to disciplinary action, up to and including termination of employment.