



ITIVITI

Code of Conduct

Itiviti Group AB



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Introduction

The Code of Conduct applies to everyone at Itiviti Group – all employees, managers, executive officers, and members of the Board of Directors. Everyone is expected to follow the Code of Conduct. 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 Conduct, in particular Itiviti's 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. 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 Conduct, 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 Conduct is essential to the continued success of the company, and Itiviti sincerely thanks all employees for their efforts in this regard.

This Code of Conduct refers to Itiviti's other policies and/or related manuals.



General Principles

It is Itiviti's key responsibility to develop and maintain an economically sound and prosperous business. Itiviti, as a business, has responsibilities toward our employees and business partners and toward society in general such as the countries, communities and environments in which we operate.

Therefore, Itiviti has defined some key principles for its performance:

- Itiviti complies with legal requirements that apply in the countries where Itiviti does business
- Itiviti is committed to conduct our business with a high standard of integrity and ethics
- Itiviti is open-minded in dialogue with those who are affected by Itiviti's operations. Itiviti responds to inquiries from external parties and communicate with affected parties in a timely and effective manner
- Within the sphere of Itiviti's influence, Itiviti will endeavor to ensure that its business partners abide by the principles in the Code of Conduct

Employee Relations

A strong and consistent relationship to all employees, built on mutual respect, trust and dignity is of vital concern to Itiviti.

Employment conditions offered to the employees will meet the minimum requirements of national legislation and relevant conventions.

- Itiviti provides equal opportunities to people without regard to race, color, gender, nationality, religion, ethnic affiliation or other distinguishing characteristics. Itiviti does not allow discrimination or harassment. Please view the Work Environment Policy, as well as our Gender Equality Policy for further information.
- Itiviti provides a safe and healthy working environment and is committed to continual improvement. Please view the Work Environment Policy for further information.
- Itiviti recognizes employees' rights to form or join trade unions in accordance with each country's laws and principles. All employees have the right to join, not join, or leave any kind of group or association of a person's choosing. Please view the Work Environment Policy for further information.
- Itiviti respects the United Nations Universal Declaration of Human Rights and recognizes its responsibility to observe those rights that apply to Itiviti's performance toward Itiviti's employees and the communities Itiviti works and lives in. Please view the Corporate Social Responsibility Policy and Manual for further information.



Business Ethics

Corruption, bribery and unfair anti-competitive actions distort markets and hamper economic, social and democratic development. Itiviti is committed to avoiding such practices.

- Itiviti shall not act contrary to applicable competition laws.
- Itiviti shall not offer customers, potential customers, governments, or any representatives of such entities, any rewards or benefits in violation of either applicable laws or other reasonable and generally accepted business practices. Please view the Anti-Corruption and Anti-Bribery Policy for further information.
- Itiviti must not accept payments, gifts, or other kinds of reimbursement from a third party that could affect or appear to affect their objectivity in their business decisions. Please view the Anti-Corruption and Anti-Bribery Policy for further information.
- Itiviti reports all financial transactions by Itiviti with generally accepted accounting practices, and accounting records must show the nature of all transactions in a correct and non-misleading manner. Please view the Annual Report for further information.
- Employees at Itiviti conduct their private and other external activities and financial interests in a manner that does not conflict or appear to conflict with the interests of Itiviti. Should such a conflict of interest arise, it must be reported immediately by the person subject to the conflict to his/her immediate manager.

Ethics for the Employee

Itiviti requires employees to conduct business with a high standard and ethics. The work atmosphere shall be collegial and collaborative.

Itiviti employees shall adhere to all applicable laws and policies. Each employee must annually certify that they have received, read, complied with and will continue to comply with key policies. Those who supervise others have the additional responsibility of ensuring that those they supervise understand Itiviti's principles, and support those who report a suspected violation.

Employees must 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 the company. Every business decision is based on the best interests of Itiviti, not personal interests.

All Itiviti employees shall act in good faith, seek advice, raise a concern, or report misconduct when necessary. Itiviti does not tolerate any direct or indirect retaliation of any sort against such individuals. Those who engage in retaliatory conduct will be subject to disciplinary actions, which may include termination.



Secondary Employment / Other Engagements

Itiviti employees should dedicate all their work time to Itiviti and may not engage in other activities, regardless of whether the engagement is adverse or is competing with Itiviti's practices. Exceptions to this policy may occur on a case by case basis.

After termination or resignation, an employee might begin working for a competitor or starting a business, adverse to Itiviti's interest. However, employees or former employees are prohibited from exploiting confidential information, trade secrets or sensitive information of Itiviti.

All employees are advised to read their employment agreement for further information or contact Human Resources at HR@itiviti.com.

Information Security

As a leading provider of technology and services for the global financial industry, information and systems are crucial assets that must be protected at all times. Furthermore, all data must be processed in a manner that protects privacy. Information security policies and standards have been established to support confidentiality, integrity and availability of these assets. Please view our Information Security Policy and our Data Protection Policy for further information.

Drug and Alcohol

Itiviti shall have a drug free working environment. One of the most important components to obtain a sound personnel policy and a secure and healthy working environment is to prevent and immediately take action when it comes to alcohol and drug abuses. Drug and alcohol in working life cause a loss of valuable personnel resources and costs for diminished production capacity and can therefore not be accepted. Please view our Drug and Alcohol Policy for further information.

Information

One of Itiviti's most important assets is the market's confidence in the company. Itiviti acknowledges how important it is to ensure correct and consistent information. Itiviti's established Information Policy helps develop and strengthen the communication and dialogue with Itiviti's employees, customers, clients, shareholders and debt investors, partners and other stakeholders. Other objectives with Itiviti's Information Policy is to protect sensitive business information, and give correct information and spread the knowledge and understanding about Itiviti and its offering, as well as its financial performance. Please view the Information Policy for further information.



Environment

Itiviti's aim is to protect the environment and to take active measures to conserve resources and energy in all its operations. Please view our Environmental Policy for further information.

Whistleblowing

An important aspect of Itiviti's practice is a mechanism to enable all employees to voice concerns internally in a reasonable and effective manner when they become aware of the information which they believe shows serious malpractice, wrongdoing, misconduct, alleged dishonest or illegal activity occurring within Itiviti's organization. The whistleblowing policy is essential to the firm's professional integrity. It should be emphasized that this policy is intended to assist employees who have bona fide concerns about impropriety practice, not concerns about general business decisions. Please view our Whistleblowing Policy for further information.

Our Responsibilities

It is the responsibility of Itiviti managers to communicate and live the content as well as the spirit of this document within their organizations, and to encourage employees to reveal behavior that may be non-compliant with these principles. Explicit or implicit approval of questionable actions will not be tolerated.

Reports of violations of this code may be done confidentially to the HR department. Persons reporting violations in good faith will not be subject to retaliation.

This Code of Conduct will be promptly and consistently enforced. Failure to comply with its provisions can result in disciplinary action.

Applicability

This policy applies to all employees of Itiviti Group AB and its subsidiaries. In cases where national regulations cause difficulties regarding the implementation of or differs from the content of this policy, national regulations shall rule in those areas. Other parts of this policy shall still be valid.

Owner

Head of Human Resources