

# Code of Conduct

**EDGE Associates AB**

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[www.edgeassociates.se](http://www.edgeassociates.se)

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## From the Board

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At EDGE Associates, we are passionate about creating digital advantage for businesses and society. We operate in a highly dynamic data rich market, where our innovation capabilities and solution portfolio provide us a strong position at the forefront of digitalization and in improving our customers' competitiveness.

We believe that our long-term success will be built on our values and where sustainability is integrated as a natural part in our daily operations and our commitment to responsible and ethical business is an essential part of our corporate culture.

At EDGE Associates, we have zero tolerance for any unethical behavior.

Our Code of Conduct sets clear expectations for our business conduct and provides the ethical standards that will help us make the right choices every day. This Code of Conduct applies to every one of us throughout the organization, subsidiaries, hired consultants and others acting on behalf of the company.

All employees and representatives are expected to be familiar with and comply with the Code of Conduct.

Together, we are responsible for ensuring that the content and spirit of this Code of Conduct is understood and fulfilled.

Thank you for your support and commitment.

Pushparaj Silva

CEO

## Our values

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### Purpose

This Code of Conduct Policy (Code) clarifies and outlines what is expected from us as individuals and as a company. It outlines and demonstrates our commitment to ethical conduct and international standards.

We can think of it as a compass that helps keep us on course with our values. Use this document as a tool to guide our decision making.

If you are uncertain of how to act in each situation or have questions on how to interpret the Code, please contact the managers or leaders.

### Scope and applicability

Our Code outlines ethical behavior standards for all EDGE Associates employees and representatives in all countries where we operate. EDGE Associates' subsidiaries and joint ventures are all included in the Code's scope.

The Code does not describe every possible situation that we might encounter in our work at EDGE Associates.

Everyone is responsible for compliance with the Code as part of the firm ethical foundation that helps EDGE Associates do the right thing.

EDGE Associates leaders must ensure that both the content and the spirit of this document are communicated, understood and applied in daily work within our organizations. Managers are expected to encourage team members to report behavior that may be non-compliant with this Code. Suppliers and business partners are expected to comply with our Supplier Code of Conduct Rule.

EDGE Associates abides by the local laws and regulations of each country and jurisdiction in which we operate.

In situations where the law does not give guidance, EDGE Associates applies these ethical standards. In cases of conflict between relevant laws and the principles described in this Code, the highest standard shall prevail to ensure sustainable operations.

## Violations

At EDGE Associates we have zero tolerance for violations of the Code, and we take failures to comply with the Code and its related rules seriously. Disciplinary actions, including dismissal and legal action, may be taken if the Code is violated.

## Reporting

All of us have the responsibility to bring up matters that may be in violation of the Code, our rules or the law. Failure to do so is itself a breach of the Code. We do not need to have evidence, or be certain that it is a violation, in order to report a concern.

EDGE Associates is committed to a culture in which everyone feels safe reporting concerns. Reporting ensures that irregularities are addressed and enables us to always act legally and ethically. EDGE Associates prohibits retaliations against anyone who reports concerns and violations in good faith. Reporting can be done to your leader, board or to [compliance@edgeassociates.se](mailto:compliance@edgeassociates.se).

## Ethical Business

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In the global business context, the importance of business ethics is growing continuously. EDGE Associates is committed to acting with absolute integrity and to preventing corruption in any form, with zero tolerance for any unethical behavior. We expect all our employees and representatives to act in the best interest of EDGE Associates and not based on personal considerations or relationships.

### Anti-Corruption and improper payments

EDGE Associates opposes all forms of improper payments – that is, giving or receiving something of value to influence a decision or a transaction. Employees and representatives are strictly prohibited from offering or receiving valuable gifts, travels, kickbacks, illegal payments and any offer of items of value that may inappropriately influence or reward a customer, supplier or business partner to order, purchase or use our products and services. This applies irrespective of whether such gifts are provided directly, indirectly through a third party, such as an agent, supplier, business partner or consultant, or in the form of a sponsorship or a charitable contribution. Facilitation payments – small payments or gifts made to government officials for the performance of a routing government action – are regarded as bribes and strictly prohibited.

### Extortion

Extortion is the wrongful use of actual or threatened force, violence or intimidation to gain money or property from an individual or an organization. It usually involves a threat being made to the victim's person or property. Digital extortion is the act of coercing an individual or organization to pay in exchange for gaining back stolen cyber assets, such as document files, database files, or access to servers. Extortion in all forms is strictly forbidden at EDGE Associates.

### Gifts, hospitality and similar benefits

EDGE Associates has a firm attitude towards gifts, remunerations and activities that may be perceived to include elements of a gift. We do not offer or accept gifts or other business courtesies like hospitality, expenses or other benefits where they might influence or appear to influence business decisions, our independence, integrity or our ability to make objective decisions in the best interest of the company.

Gifts, hospitality and business courtesies can only be accepted or offered if they are minimal in value and frequency and if the time and place are appropriate and proportionate in the context of our business activities. Under no circumstances should we accept gifts or other remuneration if it can be reasonably perceived that these are for the purpose of influencing business decisions.

It is each individual's responsibility to be aware of other parties' rules and policies regarding the receipt of gifts, as they may differ from EDGE Associates'.

When EDGE Associates or our employees are hosting or attending an event, gifts and similar benefits of personal nature and hospitality may be offered or accepted only if minimal in value and if consistent with reasonable hospitality given in the ordinary course of business. When EDGE Associates has a business interest to participate in an event, EDGE Associates carries the cost.

EDGE Associates does not make any charitable donations to, or on behalf of, its customers.

### **Conflicts of interest**

As employees and representatives should avoid any situation where a personal interest conflicts or appears to conflict with the interest of EDGE Associates.

An example of a situation in which a conflict of interest might occur is when an employee or representative of EDGE Associates participates in an activity or influences a company decision that may result in personal gain, gain for a family member or someone the employee has a close relationship with. Employees and representatives cannot take part in, or attempt to influence a process, a decision or settlement if there is a conflict of interest or other circumstances exist, which could give grounds to question the individual's or EDGE Associates' impartiality.

Should a risk for a conflict of interest arise, or if we are unsure whether such situation exists, we should notify our manager immediately.

### **Fraud**

EDGE Associates is committed to prevent and detect all forms for fraud. Fraud is a type of theft by intentional deception that could result in unlawful gain, profit, advantage, harm or loss to EDGE Associates or another party.



Any act that intentionally conceals or misstates facts to mislead others, including customers, suppliers, third parties or colleagues, is considered fraudulent.

### **Money laundering**

EDGE Associates is opposed to all forms of money laundering and shall take steps to prevent that financial transactions with the company or subsidiaries can be used to launder money.

### **Confidentiality**

As an employee or person associated with EDGE Associates, we have a duty of confidentiality by law and/or written agreement in accordance with this Code of Conduct. We must keep confidential any information that comes to our knowledge related to EDGE Associates or any affiliated entity, their customers or business partners, and which is related to their economy, operations, products or product development, or other information relating which is not commonly known. Further, we must exercise caution when discussing internal matters to avoid being overheard by persons not concerned. The duty of confidentiality does not only apply externally, but also towards other employees in EDGE Associates who do not need the information in the performance of their duties. The duty of confidentiality applies even after the termination of employment or contractual relationship with EDGE Associates for as long as the information is considered to be confidential.

### **Safeguarding corporate assets**

Employees are expected to use EDGE Associates' tangible and intangible assets only for legitimate business purposes and protect them from loss, damage or unauthorized use.

At all times we must observe security requirements concerning access to and use of EDGE Associates' facilities,

IT resources and access to electronic resources and documents. All employees are expected to comply with applicable security policies.

Intellectual property, including but not limited to documentation, source code, scripts, integrations, knowhow, methodology, concepts and ideas shall be protected and managed in the interest of EDGE Associates and in accordance with relevant regulations and guidelines. Unless otherwise stated by law or orders from public authorities, we must not disclose any trade secrets or business confidential information available to unauthorized persons without

prior manager approval. We should also respect the intellectual property rights and trade secrets of others and avoid infringement of such rights.

### Security

As a trusted service provider of business-critical services to our customers and society as a whole, security and safety measures must be an integral part of all our services, products and processes. Each and every employee, partner and subcontractor have a shared responsibility of behaving in a secure manner by knowing and adhering to our security policies and rules.

### Privacy

EDGE Associates is committed to respecting and safeguarding the privacy of everyone we interact with, including employees, customers, suppliers, business partners and others. Any processing of personal data shall be limited in scope and duration to what is deemed necessary and in accordance with applicable data protection legislation. EDGE Associates has strict policies and processes in place to protect any personal data from unauthorized access or unintended disclosure.

### Trade compliance

EDGE Associates does business in many countries. As employees involved in cross-border transactions, on behalf of EDGE Associates or a customer, we must comply with applicable trade regulations, including export controls, trade restrictions, trade embargoes, economic sanctions and boycotts.

### Expertise and authority

All decisions related to the Code must be made at the appropriate level in accordance with the applicable regulations and EDGE Associates' decision making principles. We may only make internal decisions and/or commit EDGE Associates towards external third parties if an authorization for this is delegated to us, and at all times within the limits of our mandate.

### Internal Control

Internal controls shall ensure that EDGE Associates business processes are efficient and within an acceptable level of risk, that physical and intangible assets are safeguarded and utilized, ensure financial information is correct and timely, and comply with applicable laws,

regulations and guidelines. The management is responsible for internal controls, but every individual has shared responsibility for upholding this.

## Human Rights and labour conditions

We always treat our colleagues and business partners with dignity and respect. We honour the diversity of people and recognize its inherent value. We are committed to providing fair, safe and healthy working conditions where everyone's rights are protected.

EDGE Associates supports and respects all internationally recognized human rights including the International Bill of Human Rights and the principles concerning the fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Fundamental human rights shall be known, understood, respected and applied equally to all employees whether temporarily or permanently hired or contracted.

If we become aware of any violations with the standards set out below, we should notify our leaders or by sending an email to [compliance@edgeassociates.se](mailto:compliance@edgeassociates.se) or any other appropriate executive immediately so the appropriate actions can be swiftly taken.

### Non-discrimination and equal opportunities

In regard to the ILO convention No. 100 and 111, EDGE Associates hires and treats its employees on equal terms and does not allow any discrimination with regard to sex, gender identity, nationality, religion, belief system, race, age, disability, sexual orientation, political opinion, union membership or social or ethnic origin. We are proud to promote a culture of equal opportunities and diversity in which appointments to jobs, wages, benefits, leadership and personal development as well as access to training depend on each individual's ability and performance. Furthermore, we promote an inclusive workplace where differences are welcome and respected, where different ideas and perspectives are expressed and listened to, where each employee finds a sense of belonging and has an equal opportunity to grow. All managers in EDGE Associates work actively to ensure diverse teams, which includes a balanced gender composition that reflects the markets EDGE Associates operates in.

### Forced labour

In regard to the ILO convention No. 29 and 105, any employment relationship with EDGE Associates shall be freely chosen and free from threats. EDGE Associates opposes all forms of compulsory, bonded or forced labour, including trafficking. No employee shall ever be required to deposit identity papers during their employment. Employees are always free to leave their employment after the due notice period.

### **Child labour**

In regard to the ILO convention No. 138 and 182, EDGE Associates upholds international and local child labour standards across all our businesses. No one under 15 years of age or below the country's legal minimum age are employed by EDGE Associates. Persons under the age of 18 shall not perform any hazardous work, including but not limited to exposure to physical or psychological stress.

### **Freedom of association and the right to collective bargaining**

In regard to the ILO convention 87 and 98, EDGE Associates supports the freedom of association. All employees have the right to be a member of a trade union and to bargain collectively. Accordingly, no disciplinary action will be taken against employees that choose to organize or join an association. As employees of EDGE Associates, we must not interfere or in any way or obstruct other employees' freedom of association, or the right to be unorganized. EDGE Associates employee representatives must be allowed to carry out their functions unhindered in the workplace.

### **Fair employment conditions**

In regard to the ILO convention 100 and 111, employment contracts and conditions at EDGE Associates should be understandable for all employees, with equal pay for equal work regardless of gender or any other non-objective criteria. Payments and terms shall comply with applicable laws and/or industry standards, whichever is higher. Working hours must comply with applicable laws. EDGE Associates respects employees' right to leisure time, including their right to family life and children's rights to their parents.

### **Health and safety**

Our employees' well-being is essential to EDGE Associates. We promote good health and safe working environment in compliance with internationally recognized standards. We all share the responsibility for achieving this goal. We should do our utmost to control hazards and take necessary precautions to prevent accidents and occupational diseases. We must keep the working environment free from bullying, harassment or similar. We do not tolerate any behaviour that can be perceived as degrading or threatening.

Employees, when possible, are offered flexible working conditions – with respect to time and place – in order to support a healthy work-life balance.

## Act responsibly

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EDGE Associates seeks to earn and maintain the respect and trust of our stakeholders. As EDGE Associates employees and representatives, we should treat everyone they encounter in the marketplace with the same ethical standards as when engaging with colleagues.

### Political activity

EDGE Associates does not provide financial or any other kind of support or assistance to individual politicians, candidates, political parties or institutions. Neither the EDGE Associates name nor any resources controlled by EDGE Associates can be used to promote the interests of political parties or candidates. Employees participating in political activities will be granted leave from their work in accordance with the law and agreements.

### Fair competition

Antitrust and competition laws are in place to promote fair competition and protect customers from inequitable business practices. EDGE Associates embraces and supports fair competition. This means that under no circumstances should we cause or contribute to any breach of competition regulations, including but not limited to illegal agreements between competitors that aim to restrict or prevent free competition, fix prices or otherwise promote illegal trade practices. EDGE Associates never disparages the products or services of our competitors.

### Relations with customers, suppliers and public authorities

We must meet customers with insight, respect and understanding. We must always try to fulfil the needs of the customer in the best possible manner, within the business ethical guidelines that apply to the business. Equally, we must treat suppliers impartially and justly. Suppliers in competition for contracts with EDGE Associates should be able to trust EDGE Associates' selection processes. Public authorities shall be met in an appropriate and open manner. Any public information about the company should be given by EDGE Associates' management or by the person responsible for public communications, unless otherwise agreed.

### Accounting and reporting

All accounting and reporting by EDGE Associates is conducted in accordance with generally accepted financial accounting practices. Our accounting practices ensures that business

transactions are fully, correctly and timely reported and documented. All financial disclosures are transparent, relevant, timely and understandable.

### **Responsible procurement**

EDGE Associates expects its suppliers and service providers to comply with all applicable laws and regulations.

Suppliers that have a direct contractual relationship with EDGE Associates must adhere to the principles outlined in the Supplier Code of Conduct, which are minimum standards in key areas such as business ethics, anticorruption, human rights and labour conditions.

## Acceptance

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I confirm that I have read, understood and agree to comply with EDGE Associates's Code of Conduct.

I am aware that the Code of Conduct is revised at irregular intervals and I undertake to keep myself updated on possible changes.

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_