

ALEIDO

Code of Conduct

ALEIDO GROUP AB



CODE OF CONDUCT

Aleido's Code of Conduct is based on the UN Global Compact, the Universal Declaration of Human Rights (UDHR) and the ILO Core Conventions. It has been adopted by Aleido Group AB's board of directors, covering all companies within Aleido Group (hereinafter referred to as "Aleido"), to emphasise the principles that govern the company group in relation to its employees, business partners, shareholders and the world around us. The Code of Conduct is a compilation of the policies and guidelines that form the basis for Aleido's business activities. All Aleido employees must comply with this Code of Conduct, including full and part-time employees, temporary workers, interns as well as the Board of Directors. Furthermore, it applies to all subcontractors of all Aleido companies (all references to "employee" herein also encompasses sub-contractors).

INTRODUCTION

Aleido's reputation and continued reward for bridging the gap between technology and its users through aftermarket information and digital learning will not only depend on the quality of services but also on how the services are provided.

When doing business, Aleido shall build relationships based on respect, responsibility and trust with employees, business partners and shareholders, and do it in a socially, sustainable and responsible manner. Achieving this requires long-term profitability, sustainable consideration and social commitment. Aleido is guided by principles of Environmental, Social, and Governance (ESG) in our efforts to reduce environmental impact, promote social equity, and maintain transparent and ethical leadership.

Considering the above, Aleido shall act in a socially responsible way. This implies that Aleido, in addition to being fully compliant with laws and regulations, also needs to deal with ethical and moral issues. Even if the Code of Conduct cannot address all possible dilemmas that might arise, it gives guidance on our business ethics and clarifies how we shall act towards each other, customers, shareholders and the world around us. In situations where the requirements of this Code

of Conduct are stricter than applicable laws or contractual obligations—or vice versa—the stricter standard shall apply. If a direct conflict arises between the Code of Conduct and legal requirements, compliance with the law must take precedence, while we continue to strive to uphold the principles and values of this Code of Conduct to the greatest extent possible.

THE PRINCIPLES

Principles of human rights and labour issues

Our employees are our most important and most valuable resource. Their expertise, motivation, respect and commitment are extremely important, both in business contacts and in creating good relationships.

Human Rights

Aleido shall support and respect the protection of internationally proclaimed human rights, in line with the UDHR, and make sure the company is not complicit in human rights abuses. Aleido shall take voluntary actions to contribute towards the protection and fulfilment of human rights in our society.

Non-discrimination

All of Aleido's employees shall be treated equally, fairly and with respect, irrespective of gender, age, religion, ethnicity, cultural and social background, birthplace, disability, sexual orientation, gender identity, gender expression, union representation or political views. Recruitment, performance and development discussions, promotions and other actions shall always be carried out on an equal basis.

Forced labour

Aleido shall not use, or support forced, bonded or compulsory labour. No employee shall be required to make a deposit or hand over identity documents as a condition of employment.

Child labour

Aleido shall not undertake or tolerate child labour. Children are defined as individuals under 16 years of age, or higher if local legislation sets a higher minimum age for work or mandatory schooling. Furthermore, no person under the age of 18 shall be employed in work that is hazardous or likely to jeopardise their health, safety, or moral development.

Freedom of association

Aleido respects all employees' rights to form and be a member of associations and organisations and trade union membership and to sign collective agreements, in line with national law and practices. Aleido will ensure that the official representatives nor any members of such trade union associations are not subject to any form of discrimination.

Working hours and compensation

Aleido undertakes to pay salaries and provide benefits that meet or exceed minimum standards and industry norms in all areas where it operates. Aleido shall observe applicable laws and ILO standards on working hours and rest periods in all countries where it has business activities.

Workplace practice

Aleido actively strives to constantly improve health and safety in the workplace and works towards providing employees with a safe working environment. All Aleido units shall at least adhere to national laws and/or collective agreements. Aleido shall ensure that registration, storage and use of employee information are treated confidentially and in accordance with local legislation.

Principles of environmental sustainability

Aleido is committed to contributing to sustainable development. This responsibility is shared by all employees throughout Aleido.

Environment

All our actions have an impact on the environment around us. Caring about the environment is a natural part of our daily business, and we shall always aim to reduce environmental risks and our footprint.

Aleido supports a precautionary approach to environmental challenges, undertakes initiatives to promote greater environmental responsibility and encourages the development and diffusion of environmentally friendly technologies.

To ensure accountability and progress, Aleido sets measurable environmental goals, including:

- Reducing carbon emissions across operations and supply chains
- Improving energy efficiency in facilities and digital infrastructure
- Implementing waste management practices that prioritise reduction, reuse, and recycling
- Encouraging the development and adoption of environmentally friendly technologies

All employees are expected to contribute to these goals and integrate sustainability into their daily work.

Principles of anti-corruption and fair competition

We are against all forms of corruption and believe in free and fair competition. Our attitude to our stakeholders should always be characterised by impartiality, quality, respect, integrity, transparency, and dialogue and in full compliance with applicable laws and accepted business practices.

Anti-Corruption

Aleido maintains a zero-tolerance policy toward all forms of corruption, bribery, and unethical influence, and thus shall not participate in or endorse any corrupt practices or activities. Aleido shall never provide customers, potential customers, governments, authorities or representatives of such organisations with any rewards or benefits that breach existing laws or reasonable and accepted business practices.

Employees are not permitted to accept payments, gifts or other remuneration from third parties that can affect, or that can be perceived to affect, the objectivity of business decisions.

Money laundering

Aleido shall not accept, facilitate, or support money laundering. Aleido will comply with all applicable laws, maintain controls to prevent illicit financial activities, and treat any violation as a serious breach subject to disciplinary and legal action.

Fair competition practices

Aleido shall compete in a fair manner and with integrity. Aleido shall use legitimate methods to gather information about its competitors and shall not exchange information or enter into agreements or understandings with competitors in violation of applicable competition laws and regulations.

GENERAL

Principles of business conduct

We believe that integrity, respect and fairness will build trust in our business and services. It is

therefore of importance that our business always is conducted on these principles.

Communication

Aleido supports transparency and openness and encourages continuous dialogue with stakeholders. Confidential business details that could damage Aleido's competitive strength or contacts with customers or partners must, however, remain protected.

Marketing and sales

Aleido shall present its services accurately and shall comply with applicable regulatory and legal requirements. Aleido shall not make false statements or provide misleading information regarding its services or their performance.

Political involvement

Aleido takes a neutral stance in terms of political affiliation and candidates. Neither Aleido's corporate identity, nor its assets will be used to promote political interests, parties or candidates.

Export controls and economic sanctions

Aleido is committed to comply with all applicable export control and economic sanctions laws in the regions where we operate. We conduct due diligence to avoid unauthorised transactions and ensure that our international business activities meet legal requirements.

Employees involved in cross-border operations must remain informed and vigilant and report any concerns to the Legal or Compliance teams.

Company property and resources

Aleido's property and resources shall be used for business objectives. The property and resources shall not be used for personal gain, fraudulent purposes, or in any other inappropriate manner.

Accounting and reporting

Aleido's financial transactions shall always be reported in accordance with generally accepted accounting principles and accurately reflect the

nature of transactions. Aleido's reporting shall be open, truthful, relevant, understandable and timely.

Taxation

Aleido shall comply with the tax laws and regulations of each country in which it operates.

Where tax laws do not give clear guidance, prudence and transparency shall be the guiding principles.

Ethical Council

Aleido shall act in an ethical manner in all contacts with its stakeholders. On occasions when there is uncertainty from an ethical point of view about cooperation, the matter shall be referred to Aleido's Ethics Council. The Ethical Council includes the group management and designated responsible persons/functions relevant for the specific matter

REQUIREMENTS ON BUSINESS PARTNERS

Aleido requires all its business partners to apply the principles outlined in this Code of Conduct. These principles will further be applied when evaluating current and prospective business partners.

CONSEQUENCES OF NON-COMPLIANCE

Adherence to this Code of Conduct is essential to maintaining Aleido's integrity, reputation, and legal standing. Failure to comply with the principles outlined in this Code of Conduct or any related policies may result in serious consequences, including:

- Damage to Aleido's brand and stakeholder trust
- Disciplinary actions, which may include dismissal or termination of employment
- Legal proceedings against the company or individuals involved
- Where applicable, criminal charges

REPORTING ROUTINE

All employees are encouraged to report suspected violations of this Code of Conduct, laws or regulations, to their superior, the superior's manager, or in accordance with Aleido's Whistleblowing Policy ([link to Policy](#)). Reports shall be treated confidentially and without retaliation.

PERIODIC REVIEW

Aleido's Code of Conduct has been adopted by Aleido AB's board of directors. The Code of Conduct can only be altered or revoked by the board of directors.

Aleido Group AB's board of directors, November 2025