

Code of conduct

CODE OF CONDUCT

The Code of Conduct describes Antiphon's requirements and guiding principles for our company and our business partners, around compliance with applicable laws and regulations, regarding basic working conditions, human rights, care for the environment and business integrity.

This Code of Conduct is based on internationally proclaimed human rights, including the International Bill of Human Rights, the eight core conventions of the International Labor Organization, and Article 32 of the UN Convention on the Rights of the Child. In addition to this, Antiphon also supports the UN Global Compact initiative, which is a strategic policy initiative for companies committed to aligning with ten universally accepted principles on human rights, labor, the environment and anti-corruption.

BUSINESS ETHICS AND PRINCIPLES

We comply with laws and regulations

Antiphon complies with the laws, rules and regulations that apply in the markets in which we operate.

We do not accept corruption and bribes

Antiphon always acts responsibly and ethically in its business relationships. We do not tolerate any form of corruption, bribery, "facilitation payments" or extortion. This means that:

We act and take decisions without consideration of personal gain for ourselves or those close to us.

We do not use relationships with business partners for personal gain.

We avoid situations that may create or give the impression of creating conflicts of interest. If a conflict of interest cannot be avoided, it should be reported openly to the immediate manager. If an employee pursues business operations outside of Antiphon (a sideline), approval must be sought from Antiphon.

We never breach applicable laws on the giving or accepting of bribes. We neither give nor accept gifts or services of a value that exceeds the levels established by Antiphon. Nor do we participate in corporate entertainment outside normal business operations. We adapt to our business partners' rules on gifts, corporate entertainment and the like, if they are stricter than Antiphon's rules.

We comply with competition laws

Antiphon has a lot of contact with customers, suppliers, subcontractors and sometimes with competitors. Antiphon pursues business in compliance with the applicable competition law in the markets in which we operate.

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This means:

We work to promote fair competition in tendering, quotation, procurement and purchasing processes.

We do not accept any form of unlawful anti-competitive practices, such as price fixing, cartel formation or the abuse of market dominance.

We act correctly and do not engage in undue influence or manipulation intended to distort competition.

Under no circumstances do we exchange sensitive business information with competitors.

When meeting with competitors, or, for example, a trade association, we know our obligations.

We cooperate with investigating competition authorities by responding as quickly and fully as possible to requests for information.

We always ask for help when we feel uncertain. If we do not find supporting information in our policies, guidelines and rules, we will contact a stand-alone lawyer to assist with the matter.

HUMAN RIGHTS AND WORKING CONDITIONS

We prioritize occupational health and safety

Antiphon's worksite must be secure, inclusive and safe, without sickness and accidents. We focus on the employees' job satisfaction and health and are constantly working to develop the work environment.

We work systematically, preventively and long-term with the physical, organizational and social work environment.

At Antiphon's worksite everyone must participate in working environment management and follow Antiphon's guidelines and worksite rules. Employees take responsibility for their own and others' working environments. We think twice about our day-to-day work and safeguard both ourselves and others.

Antiphon's worksites must have adequate equipment and competence for the protection of people and property.

We work to ensure that the entire value chain, in compliance with each country's work environment legislation, contributes to a safe and sound working environment.

All risk observations, safety deficiencies, including suspicions of safety deficiencies, incidents and accidents must be reported immediately to the manager or person responsible at the worksite.

Antiphon's business partners and subcontractors working on Antiphon's worksite must adhere to the same rules and guidelines as a minimum.

We promote equal opportunities and diversity

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To us, all people are equal. We work actively to increase diversity and inclusivity in all parts of the business. Discrimination, regardless of the basis, is not acceptable and must not occur in any part of the business. We have zero tolerance for bullying, discriminatory jargon, derogatory jokes and offensive statements at work. Zero tolerance applies to all forms of victimization, harassment, sexual harassment, bullying and discrimination. Zero tolerance also applies to reprisals, i.e. imposing negative consequences on someone who complains that they feel that zero tolerance has been broken. This applies not only to employees, but also to students, trainees, seconded or agency staff and job seekers. All employees must actively uphold zero tolerance.

We will actively prevent and stop zero tolerance from being breached in business and show moral courage and act if we become aware that this has happened.

We do not accept child labor

All forms of violence, force or abuse of children are unacceptable. A person under the age of 18 is regarded as a child, in accordance with the first article of the UN Convention on the Rights of the Child. Work that is dangerous or harmful to the health, safety or social and mental development of children must not occur. Nor should work exist that prevents the child from going to school. Employees under the age of 18 must be particularly protected from dangerous work tasks that pose a risk to health and safety, such as night work. Specific regulations and requirements such as applicable national legislation, other regulations or applicable collective bargaining agreements impose on employees under the age of 18 regarding, for example, working hours, work tasks and other parts of the employment relationship must be unconditionally complied with in all parts of the business.

We do not accept forced or bonded labor

We do not accept human trafficking, forced labor or labor linked to any form of threat or punishment. Work must be conducted on a voluntary basis. Employees must be free to leave the worksite at the end of a work shift. Employee salary, or part of such salary, other benefits accruing to the employee, or documents such as ID cards and passports, must not be seized for the purpose of enforcing work. Employees must not be forced to deposit valuables, identity papers or similar with their employer.

We uphold the right to freedom of association

We recognize and respect the right of employees to enroll themselves in trade unions and to bargain collectively, where this is compatible with current legislation and do not accept restrictions on freedom of association or the right to collective bargaining. Employees must be able to exercise these rights without hindrance and without fear of punishment, threats or other reprisals.

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Discrimination against union elected officials and employees who are unionized is not accepted.

We uphold the right to reasonable employment conditions

We uphold reasonable terms of employment and respect and comply in all respects with obligations to employees arising from national laws (including EU legislation), other regulations, applicable collective bargaining agreements and ILO core conventions. Working hours and salary as well as other remuneration must comply with national laws, applicable agreements (including collective bargaining agreements) and what can otherwise be considered generally applicable to the industry in the country where the product is manufactured or the service is performed. Illegal labor may not be used.

We show respect for each other in social media

We want good communication, a good atmosphere and respect for others to prevail in Antiphon, in all contexts where our employees are located. That includes our actions on social media. We are aware that each employee's participation in social media not only affects the image of the employee but can also affect the image of Antiphon. Therefore, we act respectfully and in line with our core values and show consideration for colleagues, employers, suppliers, customers and competitors.

We do not make any political contributions, and our worksites are politically neutral

As a rule, Antiphon does not sponsor political projects, and we do not make any contributions to lobbyist organizations.

Antiphon's worksites must be politically neutral, which means that there must be no political meetings at the worksites. That includes posting election information or other types of political messages. It is of course important to get involved in current social issues, but all forms of political activity must take place in the employee's spare time and outside Antiphon's operations.

We provide the media with transparent and accurate information

Antiphon's contact with the media should be characterized by openness, clarity and accuracy. Our media management is about being available and answering the media's questions credibly and correctly. The prerequisite for credibility is to be transparent, take responsibility for our business and respond to questions about any shortcomings that receive media attention. Antiphon's worksites must also be characterized by openness to the mass media but should be done in consultation with the press responsible.

ENVIRONMENT

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We care about the environment and climate

Antiphon contributes to sustainable social development and works continually to prevent environmental and climate risks and minimizes our impact on climate change and the environment. Our environmental and climate management must be systematic and integrated with operations. We follow and respect laws and other relevant requirements established by society concerning the environment.

We strive to reduce the environmental impact of our operations

Antiphon actively focuses on the areas in which our operations have the greatest environmental impact from a life cycle perspective and works to phase out environmentally and health-hazardous products, increase resource efficiency and strive to achieve climate neutrality.

Antiphon works progressively with continual improvements to enhance environmental and climate performance.

Employees and business partners at Antiphon's worksites are responsible for reporting deviations and environmental incidents. We encourage knowledge about, and the development and adoption of clean technology.

WE PROTECT OUR INFORMATION

Secure information management is a prerequisite for our business operations

At Antiphon, information is an asset and secure handling of information is a prerequisite for our business operations. Our information security work also creates conditions for employees, customers, suppliers and other stakeholders to be confident that we have a secure and efficient information management and information supply. We protect information and information resources from unauthorized disclosure and access. We ensure that our information is accurate and protected against modification and deletion. We protect our information so that it is available to those who have the right and need to use it. We protect our information by being aware of the risks and threats that can lead to the misuse of the information.

We process personal data in accordance with the principles of the General Data Protection Regulation

The General Data Protection Regulation (better known as the "GDPR") protects the rights of every employee. Antiphon works according to the following principles:

We decide in advance what the personal data will be used for and we do not use the data for any

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other purpose.

We inform the person whose personal data we are going to process.

We only collect the necessary personal data, the purpose and means of which was determined in advance.

We do not save the data longer than necessary.

We protect the data from unauthorized use and access.

We make demands of our value chain

At Antiphon, we are committed to responsible business, wherever we operate, and we rely on the same level of commitment from our business partners. We insist that our business partners not only communicate the principles of this Code of Conduct to their employees and subcontractors but also ensure that their employees and subcontractors respect them. By doing so, we aim to ensure that everyone associated with Antiphon shows integrity, responsibility, and trust.

As our business partner, you and your employees and subcontractors must always – comply with this Code of Conduct or similar principles, with all applicable laws and regulations and, of course, with your contractual obligations to Antiphon.

The stricter rules shall always apply if a substance is covered by this Code of Conduct as well as by applicable laws and/or your agreement with Antiphon.

We expect all our business partners to meet all the following basic requirements, and we expect them to be handled professionally and systematically. Basic working conditions and human rights.

We are convinced that employees are a company's most important resource and that is why we insist that our business partners respect and work in line with internationally proclaimed human rights principles.

Conflict of Interest

We expect our business partners to disclose to us whenever a situation arises where there appears to be a conflict of interest involving or affecting Antiphon. Similarly, we expect all employees or other representatives of Antiphon to disclose to us any involvement or financial ties with any of our business partners.

Antiphon is committed to full compliance with applicable export control laws and regulations, and we expect our business partners to do the same.

COMPLIANCE

Complaints and Whistleblowing

Antiphon works actively to prevent crime, misconduct and unethical behavior within the company

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and promotes a good reporting culture.

Antiphon has a whistleblower function to report serious irregularities.

Notification is made to whistler@antiphon.se

or

Antiphon,

To: Whistler,

Pappersvägen 1,

673 34 Åmotfors,

Sweden

This report does not entail any reprisals or negative consequences.

A whistleblower function exists to report serious irregularities or irregularities in our organization such as:

- Bribery or corruption
- Financial fraud (incorrect accounting, violation of internal control)
- Environmental crime
- Security flaws
- All forms of discrimination, bullying and harassment

The whistleblower function is not for reporting minor offenses or general dissatisfaction and complaints. It is only possible to report to people in senior positions within Antiphon. It includes business management. If there is suspicion of crime, very serious irregularities or misconduct, everyone should information regardless of person is assessed and handled as notification matter. The recipient of the notification is a working group at Antiphon consisting of; external board member of Antiphon, member of the management team of Antiphon and union representative. You can expect all incoming matters to be dealt with promptly. The case is de-identified. This is to ensure that the person reporting can remain anonymous.

An initial assessment of the case is made by the above working group to decide whether it should be handled by our whistleblower function or not. The de-identified case is then reported to company management who decide whether the report should be investigated further or not.

We comply with legal regulations

Antiphon is locally based in the Nordic region, where strong labor laws apply and where human rights are considered given. Human rights are also largely protected in the constitutions of the Nordic countries.

The Code is based on the UN Global Compact and its ten principles in the areas of human rights, labor law, the environment and the fight against corruption and its underlying conventions and declarations. The principles of the Code are also based on the UN Declaration of Human Rights, the UN Global Goals for Sustainable Development and the ILO Declaration on Fundamental principles

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and Rights at Work. Antiphon also complies through the code with the rights presented in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGP), the general principles of the International Human Rights Regulations and the OECD Convention against Bribery and its recommendations.

Antiphon follows the above core principles and guidelines wherever we conduct our business and at the same time we consider the specific circumstances of each country. Antiphon complies with the legal regulations that apply in the markets where we operate.

The code must be complied with

Antiphon's management team is ultimately responsible for ensuring that Antiphon's Code of Conduct is followed in our operations. The principles of the Code are continuously monitored as a natural part of the work, and here management and managers at all levels have a special responsibility to lead by example. An employee who is uncertain about the application of these principles in day-to-day operations can turn to their manager for guidance. Managers at each level are responsible for ensuring that the requirements of the Code and the associated guidelines and rules are applied and complied with within their departments or functions.