

Code of Conduct

Hexatronic Group's Code of Business Ethics

Message From Our CEO and President

Dear Colleagues,

This is our Code of Conduct. It guides us and establishes clear expectations and requirements for how we conduct our business. I expect all to read and understand our Code of Conduct. Don't be afraid to ask your manager, Legal, or HR if there is something you don't understand or need help clarifying.

At Hexatronic, we believe the future belongs to everyone. The more people can access what the future has to offer, the better all our tomorrows will be. Whatever our roles within the company are, we are part of bringing connectivity to everyone around the world, through our outstanding fiber optic solutions.

Our vision is tightly linked to our core values, and they guide us in everything we do to create long-term value for our customers, shareholders, and other stakeholders. We are all empowered and encouraged to take initiatives, make decisions, and drive our business forward. Our long-term success depends on each of us exercising good judgment and always thinking about what we do and why and how we do it.

Thank you for your dedication and support in achieving Hexatronic's goals.

Rikard Fröberg
President and CEO

"Our Code of Conduct guides us and establishes clear expectations and requirements for how we conduct our business".

Our Vision and Values

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Our vision

A long lasting link to the future

Responsible

An Honest Day’s Work

Being reliable and delivering on your promises, always conducting our business ethically, is to create true value.

At Hexatronic, we are close to our customers, share their working day, and are committed to their success.

At our workplaces, we take care of each other and build a strong and vibrant community. How we go about our work, rests on being responsible. And so does our business.

Open

Business is Personal

At Hexatronic, we are attentive, receptive, and proactive. That’s how we gain long-term customer trust. And, what’s more, how we create strong ties with our colleagues.

Our organization is made better by each and every one of us. We value and embrace the diversity of opinions and approaches within the team. After all, ideas are only ever good when shared, especially with an open mind and a culture that fosters generosity.

Inventive

How to Stay Curious

Fresh thinking is at the core of who we are. At Hexatronic, we break new ground and explore new opportunities. It’s taken us to the forefront of what we do. We can thank our passion and entrepreneurial spirit for that. And our partners, who genuinely believe in us. A thorough understanding of their needs lies at the heart of our solutions.

Did we mention that we never give up, even when faced with seemingly insoluble challenges? Necessity, after all, is the mother of invention.

Our Areas in Focus

Our People and Workspace



We are committed to creating a great workplace with zero harm and a culture of safety, diversity, inclusion, and well-being.

Our Business



We have a zero-tolerance policy towards bribery and corruption. We are good ambassadors for the Hexatronic Group. We make business decisions solely for the good of Hexatronic Group.

Information, Assets, and Data



While we encourage collaboration and information sharing, we emphasize the importance of handling confidential information appropriately.

Our Environmental and Social Engagement



We are committed to respecting human rights, reducing environmental impact, and supporting the communities in which we work.

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 Whistleblowing Policy

Our Code of Conduct guides us and establishes clear expectations and requirements for how we conduct our business.

The Code of Conduct establishes expected behaviours, clarifies what is considered good business practice, and helps us translate our values into actions in our day-to-day work and make good decisions.

Who Does It Apply To?

The Code of Conduct applies to all Hexatronic companies and employees, and to everyone who works on Hexatronic Group’s behalf, including full- and part-time employees, consultants, temporary staff, senior management, and the boards of directors of the Hexatronic Group companies.

As an employee, you are responsible for reading and understanding the Code of Conduct, as well as other policies and procedures, and how they apply to your job or position. Managers have a special responsibility within their area of responsibility to ensure that employees and business partners are informed of the contents of Hexatronic’s Code of Conduct and the need to comply with it.

How Should the Code of Conduct be Applied

The Code does not cover every situation or replace good judgment. It serves as a guide that helps us make the right decisions. If you are uncertain whether a decision or activity is ethically acceptable or legal, seek guidance from Hexatronic Group Legal.

Compliance with the Code

Compliance with the Code of Conduct is essential. Annual training is provided and all employees confirm their commitment by signing the Code of Conduct. Any employee who does not act ethically or violates this Code or our Policies may be subject to disciplinary action. Depending on the facts and circumstances, this action could include dismissal.

If you are a manager, member of the Executive Team, or member of the Board, you have a vital role, you must:

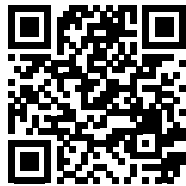
- Encourage team members to ask questions about challenging ethical situations
- Avoid putting pressure on teams at the risk of implicitly encouraging unethical conduct

- Report potential misconduct and support team members when they raise concerns

Raise Ethics and Compliance Concerns

We encourage our employees to ask questions and speak up if they have concerns about business practices or suspect violations of the Code, our policies and/or applicable laws and regulations.

If something doesn’t seem right: talk to your manager, local HR or the superior of your manager or Hexatronic Group Legal or Group HR. If you cannot talk to your manager, HR, or Group Legal, report the matter in the Hexatronic whistleblowing channel. Reports of violations of this Code may be made anonymously and confidentially via the Hexatronic whistleblowing channel. All reports received will be handled confidentially by the whistleblowing investigation team according to the procedure described in the Whistleblowing Policy. All messages are encrypted to ensure the anonymity. Hexatronic does not tolerate any retaliation against any individual for raising a genuine concern.



To report a violation, please enter the website: <https://report.whistleb.com/en/hexatronic>

If you are struggling with a decision, ask yourself:

Why am I making this decision?
Does it comply with our values and Code?
How would I feel reading about it in tomorrow’s news?

Our People and Workplace

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- Sustainability Policy
- Diversity and Gender Equality Directive
- Action Plan against Harassment and Victimization

We are committed to creating a great workplace with zero harm and a culture of safety, diversity, inclusion, and well-being.

Ensure Health and Safety

A healthy work environment is essential to the well-being of our employees. We work proactively to prevent workplace illness and injuries by actively engaging workers in tailored solutions to their context.

Treat Everyone Respectfully

Treating our colleagues with respect, dignity, and inclusion brings out the best in everyone. We do not tolerate any forms of harassment, discrimination, retaliation, threats, bullying, or acts of violence.

Diversity and Inclusion

We believe diversity is a strength and one of the things that makes us innovative. We strive to develop a talented workforce ready to think outside the box while taking on challenges. Together, we aim to create an environment where all employees feel valued, have

a sense of belonging, and are given opportunities to succeed and grow.

Provide Just Working Conditions and Respect Trade Union Rights

We provide just working conditions with fair and reasonable pay, and just terms and conditions, which at a minimum include a living wage. Adequate rest and leisure to support a healthy work-life balance, including working hours in accordance with international standards. We respect all colleagues' freedom of association and right to collective bargaining, and we do not unlawfully limit these rights.

Hexatronic is an equal-opportunities, inclusive workplace with a high degree of diversity. The organization has zero tolerance of discrimination, sexual harassment, and victimization.



We are required to:

- Make sure the workplace is safe for us and for others.
- Provide and use safety equipment as required.
- Report and learn from accidents and near misses.
- Promote a healthy work-life balance.
- Treat others with respect, dignity, and consideration.
- Act on any form of discrimination, sexual harassment, or victimization.
- Make decisions about recruitment, hiring, pay, rewards, development, and promotion based on ability, experience, work performance, and demonstrated potential in relation to the job.
- Encourage and participate in initiatives and activities that promote health and well-being.
- Never be under the influence of alcohol or illegal drugs while working.
- Provide just working conditions with fair and reasonable pay.
- Respect every employee's right to form and join, or not to join, any trade unions they wish and to negotiate collectively.
- Provide training and development opportunities and career and performance reviews.

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Anti-Corruption Directive

Trade Compliance Directive

Supplier Code of Conduct

Environmental Requirements for Suppliers

Zero Tolerance for Bribery and Corruption

The way we do business is just as important as the results we achieve. Hexatronic Group has a zero-tolerance policy towards bribery and corruption. We do not tolerate bribery or any other form of corruption, even if it means losing business. Corruption hampers economic development, distorts competition, increases costs, and erodes trust, reputations, and brands. Strong business ethics are a priority at Hexatronic Group. It is important that our customers, investors, suppliers, employees, and other stakeholders trust Hexatronic and know that we uphold a high level of business ethics.

Respect International Trade Laws

We respect all applicable trade laws. No Hexatronic entity shall do any direct or indirect business with any person listed on a US, EU, UN, or UK sanctions list, and all Hexatronic entities are required to follow the procedure described in the Trade Compliance Directive and perform a sanction screening. Any questions regarding sanctions and export controls should be directed to your manager or Group Legal.

Relationships with Customers, Partners, and Suppliers

We only engage with suppliers and other partners who share our high standards about business ethics, integrity, human rights, health and safety, and the environment. We conduct business with integrity, responsibility, and in compliance with the legal requirements and governmental regulations of the countries in which we operate and we expect our third parties to comply with all applicable laws and regulations.

Conflicts of Interest

We are committed to avoiding situations involving conflicts of interest. If such a situation occurs, we are expected to disclose and address the situation. Potential conflicts of interest can include business with any company where you or a close family member could in any way profit or exploit your position within Hexatronic Group for personal gain. Avoid making personal investments in companies that are competitors or business partners when the investment might cause, or appear to cause, us to act in a way that could harm Hexatronic Group.

Fair Competition

We do not seek competitive advantages through illegal or unethical business practices. You must always act within applicable competition, anti-trust, and fair-trading laws and regulations in all your dealings with customers, competitors, and suppliers. This means you must not enter into any agreements or otherwise participate in discussions that could give rise to competition concerns, such as price fixing or fixing other terms of purchase or sale, the sharing of competitively sensitive information, or other cartel-like behavior.

We have a zero-tolerance policy towards bribery and corruption

We are required to:

- Never tolerate any bribery or corruption and never offer any cash, loans, valuable gifts or other benefits to third parties, or accept the same from a third party.
- Never make an improper payment to expedite or secure a routine governmental action (facilitation payments), such as the issuance of a visa, permit, or for expedited customs.
- Never do any direct or indirect business with any person listed on a US, EU, UN, or UK sanctions list.
- Follow the Hexatronic Group procedures when doing business with a party in a risk country or if any risk factor has been identified.
- Only do business with third parties who share our values, who adhere to laws and regulations, and use fair business practices.
- Avoid conflicts of interest and don't do business with any company where you or a close family member could in any way profit from your actions. If such a situation occurs, disclose it.
- Not enter into any agreements or participate in discussions regarding price fixing, sharing of competitively sensitive information or other cartel-like behaviour.

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- Information Policy
- Insider Policy
- Information Security Policy
- Privacy Notice
- GDPR Policy

Transparent Communication

We are open, professional, and transparent in all our communication. As a listed company, we communicate price-sensitive information with all our stakeholders simultaneously. Information made public shall be correct, relevant, clear, and compliant with applicable legislation, rules, the NASDAQ Stockholm’s Rule Book for Issuers, and internal policies. We speak on behalf of the company only when authorized to do so and act responsibly when posting on social media. Only the Group CEO, Deputy CEO, and the Group CFO may reply to questions concerning price-sensitive information.

Inside Information

Inside information is information that is not public and, if made public, could have a significant impact on the price of financial instruments. Using this information or providing it to others to trade in financial instruments and securities is illegal. It is called insider trading. We treat inside information with due care and in accordance with laws, as well as internal regulations, and we do not engage in any form of insider trading.

Financial- and Sustainability Reporting

We have established high reporting standards in accordance with relevant regulations, where each employee involved in the recording, processing, and reporting of financial and sustainability information is expected to safeguard its validity, correctness, and relevance.

Confidential Information and Intellectual Property

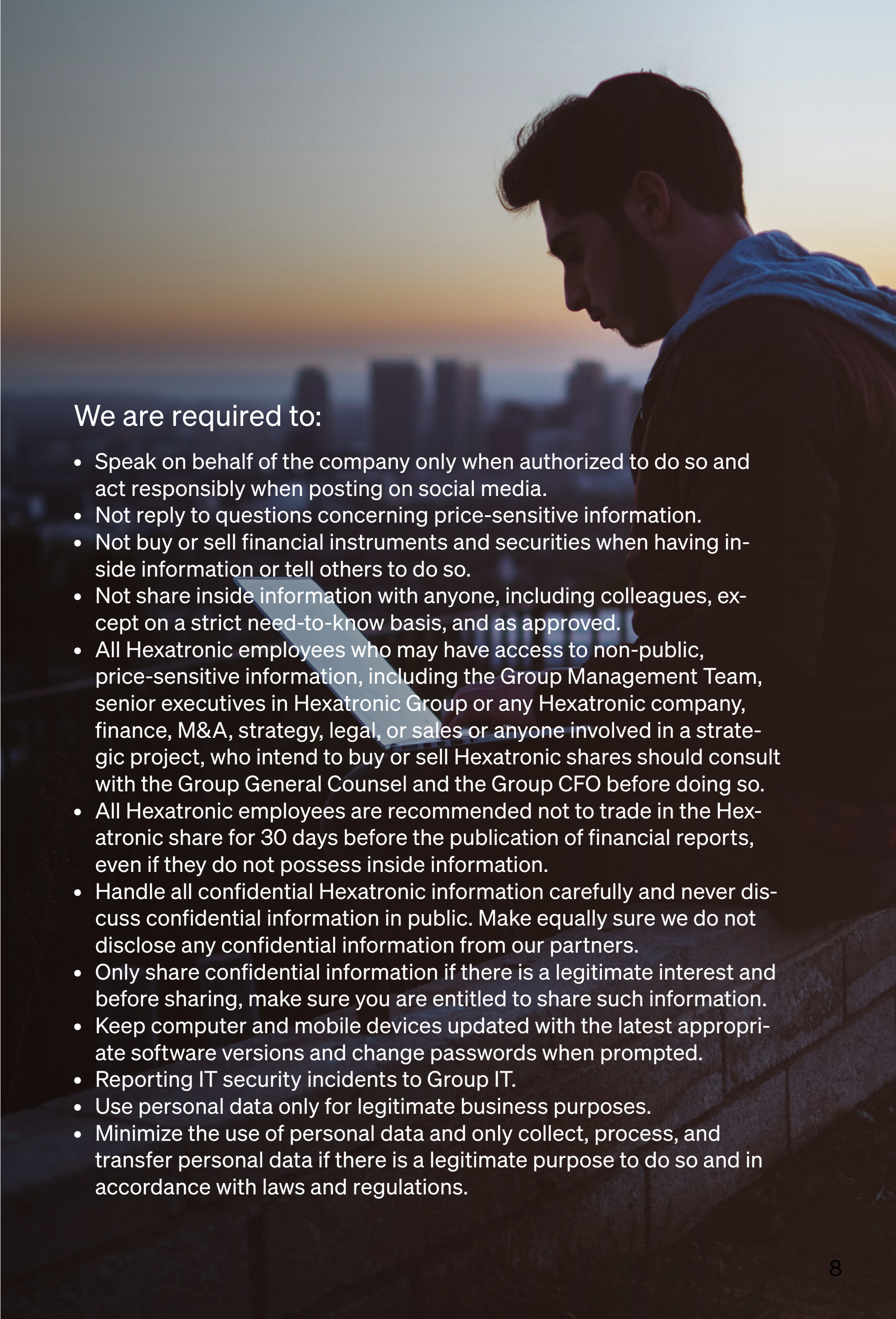
While we encourage collaboration and information sharing, we protect confidential information, handle it carefully, and do not share it with unauthorized parties. Everyone is responsible for knowing and following Hexatronic’s Information Security Policy, complying with the IT Acceptable Use Directive, adhering to the AI Instructions, participating in cybersecurity awareness training, and reporting IT security incidents.

Protect Personal Data

We acknowledge the importance of data ethics and respect every individual’s right to protect personal data. We take appropriate action to protect personal data and comply with applicable data privacy rules for storing, collecting, and processing personal data.

We are required to:

- Speak on behalf of the company only when authorized to do so and act responsibly when posting on social media.
- Not reply to questions concerning price-sensitive information.
- Not buy or sell financial instruments and securities when having inside information or tell others to do so.
- Not share inside information with anyone, including colleagues, except on a strict need-to-know basis, and as approved.
- All Hexatronic employees who may have access to non-public, price-sensitive information, including the Group Management Team, senior executives in Hexatronic Group or any Hexatronic company, finance, M&A, strategy, legal, or sales or anyone involved in a strategic project, who intend to buy or sell Hexatronic shares should consult with the Group General Counsel and the Group CFO before doing so.
- All Hexatronic employees are recommended not to trade in the Hexatronic share for 30 days before the publication of financial reports, even if they do not possess inside information.
- Handle all confidential Hexatronic information carefully and never discuss confidential information in public. Make equally sure we do not disclose any confidential information from our partners.
- Only share confidential information if there is a legitimate interest and before sharing, make sure you are entitled to share such information.
- Keep computer and mobile devices updated with the latest appropriate software versions and change passwords when prompted.
- Reporting IT security incidents to Group IT.
- Use personal data only for legitimate business purposes.
- Minimize the use of personal data and only collect, process, and transfer personal data if there is a legitimate purpose to do so and in accordance with laws and regulations.



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-  Sustainability Policy
-  Climate Directive
-  Modern Slavery Act Statement

Environmental Impact

Hexatronic Group is leading the way in creating sustainable solutions for the markets we serve. Sustainability is embedded in our business strategy and day-to-day operations, reflecting our dedication to minimizing environmental impacts and supporting our customers to do the same.

We take a life-cycle perspective to embed emission reduction and circular activities across all of our operations. Every managing director is responsible for promoting and implementing the Climate Directive and its contents.

Social Responsibility

We aim for our products and solutions to create development opportunities and contribute to equitable access to digital infrastructure.

We encourage employees to help identify and personally engage with and support relevant opportunities and voluntary programs in the local and international communities in which we operate. We know that real solutions are co-created together with the people who are impacted.

Human Rights

We are committed to respecting human and labor rights across our operations, our value chain, and the people and communities we impact. We carry out human rights due diligence in order to identify, prevent, and address potential impacts on people.

Hexatronic Group is committed to preventing all forms of modern slavery, servitude, and human trafficking, as well as forced or compulsory labor. Hexatronic is a signatory to the UN Global Compact and adheres to its ten principles.



We are required to:

- Follow all applicable environmental laws, regulations, and standards in the markets we compete in.
- Evaluate the environmental consequences of decisions and, when reasonable, choose alternatives with the lowest possible viable environmental and climate impact.
- Look for resource and energy savings and endeavour to minimize waste and consider recycling and reuse of products and materials.
- Only business travel when necessary and endeavor to find alternatives to air travel.
- Endeavor to select suppliers with a clear focus on low climate impact and have human rights due diligence processes in place.
- Engage with suppliers in capacity building, resource-sharing, and collaborative efforts to meet our ethical and environmental standards.
- Provide all documentation, information, and data needed to ensure accurate sustainability reporting.
- Contribute to Hexatronic’s targets related to the sustainability impact of our operations, activities, and products.
- Do not employ children or minors.
- Do not accept any form of forced, bonded, or compulsory labor.
- Do not accept human trafficking, and we distance ourselves from it.
- Never buy or accept sexual services or visit porn sites or strip clubs.



A lasting link to the future.