

CODE OF CONDUCT

I. ENSURING SUSTAINABLE BUSINESS CONDUCT

Tekompaniet is committed to conducting its business in a manner that contributes to sustainable development, minimising its negative impact on its surroundings and maximising its positive impact on its surroundings. Tekompaniet shall always work to uphold universal human rights and fair labour practices, in the organisation itself and in collaboration with business partners and suppliers. Tekompaniet shall work to limit its contribution to climate change, biodiversity loss and negative environmental impact. Furthermore, Tekompaniet shall work to combat corruption and maintain high ethical business standards. The purpose of this Code of Conduct (also referred to as “the Code”) is to ensure Tekompaniet’s sustainable business conduct. The term “shall” imply a mandatory requirement.

I.1 Scope and Responsibility of the Code

The Code applies to all Tekompaniet’s employees and workers, including consultants, regardless of employment type, contract and position. Tekompaniet expects the Code to be applied to and upheld by managers, board members, employees, workers, contracted workers, affiliates and other contractual partners associated with or representing Tekompaniet.

The Code has been approved by the Board. It is the responsibility of Tekompaniet’s CEO to secure the content, accuracy and relevance of the Code. Tekompaniet requires all employees to read and understand the Code, comply with it at all times and to inform Tekompaniet’s managers if any breaches to the Code has taken place or are at risk of taking place. Where applicable, department managers are responsible for the continuous implementation and compliance of the Code in their teams. If there is no manager, the CEO holds the responsibility for the implementation of the Code.

I.2 Foundation of the Code

The Code of Conduct is based on the 10 principles of the UN Global Compact and the main underlying conventions: The Declaration of Human Rights, the International Labour Organisation’s Declaration of Fundamental Principles and the Rights at Work, the Rio Declaration on Environment and Development and the UN Convention against corruption.

I.3 Legal Compliance and the Code

Tekompaniet always complies with local laws and regulations, in Sweden and in each country where we do business. The Code sets up a minimum requirement for sustainable business conduct. If provisions in national and/or regional laws, regulations or rules in the country or countries of operation provide a more stringent position to the standards set forth in the Code, such legislation shall prevail. In cases of conflict between this Code and a mandatory local regulation, the local regulation shall be given precedence. If the Code is more stringent than national legislation, the Code shall prevail.

2. HUMAN RIGHTS AND LABOUR RIGHTS

Internationally recognised human and labour rights shall be protected and respected at all times. All employees shall be treated with respect and dignity and shall be entitled to fundamental human and labour rights. All employees have the right to equal pay for equal work. Annual leave, sick leave and parental leave shall be permitted and paid for in accordance with the national legislation. Tekompaniet is responsible for ensuring that they do not directly or indirectly violate human or labour rights. If a violation of human rights or labour rights occurs, we must always remedy the issue and ensure that it does not happen again.

2.1 Non-discrimination

Tekompaniet regards diversity as a basis for a sound workplace. We shall ensure equal treatment in our practices and recruitment. All current and potential employees are treated fairly and without prejudice and discrimination, whether active or by means of passive support, regardless of gender, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation, age or other grounds recognised under ILO conventions or national law in the country or countries of operations.

Tekompaniet does not discriminate when recruiting, salary setting, skills development, promotion, dismissal or in our daily interaction with each other. Recruitment, development efforts and promotion take place on the basis of competence. Customers and other stakeholders are also treated fair and unprejudiced.

2.2 Harassment and Abuse

All human beings are equal and shall be treated with respect and dignity. No one shall be subject to degrading treatment, corporal and collective punishment, physical, sexual, psychological or verbal harassment or abuse.

2.3 Right to Form Unions and Collective Bargaining

The rights of employees to freely associate and to bargain collectively, in accordance with national legislation, shall be recognised and respected. Employees shall discuss and bargain with their workers'/worker representatives about all their workplace concerns, in good faith.

2.4 Occupational Health and Safety

Tekompaniet shall ensure a safe and healthy work environment, both physically and mentally. We shall work systematically to safeguard the best psychological work environment. This includes the physical work environment in our national operations and during business related travels outside of national operations, i.e., when visiting and auditing suppliers.

To foster a good psychosocial work environment, Tekompaniet shall ensure that our employees have a good work-life balance, help avoid the build-up of stress, and encourage preventative healthcare. Tekompaniet believes in the importance of creating a work environment where employees are well-balanced and able to create and maintain good relationships with each other.

2.5 Privacy and Confidentiality

Privacy and personal data protection are fundamental rights. Tekompaniet is committed to protecting the personal data of our employees and our business partners. Personal data shall only be managed within the boundaries of applicable law and in accordance with the General Data Protection Policy (GDPR). Tekompaniet recognises our legal and ethical responsibility to safeguard the confidentiality of individuals at all times.

3. CONSIDERATION OF THE ENVIRONMENT

As a company in the coffee- and tea sector, Tekompaniet is aware of the business-specific environmental impacts and risk. These include emission of greenhouse gases, consumption of resources such as energy, water and land, as well as the management of chemicals and waste. Tekompaniet shall strive to minimise its negative impacts on the environment and limit its contribution to climate change, aiming for net zero greenhouse gas emissions.

3.1 The precautionary principle, environmental risk assessments and environmentally friendly technology

- The precautionary principle shall always be applied in situations where risk or uncertainty of the safety of a product, substance or compound prevails, and action shall be taken accordingly.
- Tekompaniet shall always undertake environmental risk assessments in preparation of new projects, partnerships or business activities. If a project is considered not in need of an environmental risk assessment, this should be clearly motivated and documented. The environmental risk assessments shall always include an assessment of impact on biodiversity and ecosystem services. Biodiversity and ecosystem resilience shall not be decreased or negatively impacted due to Tekompaniet's business activities.
- Tekompaniet shall always promote the development and use of environmentally friendly technologies.

3.2 Sustainable use of resources

Tekompaniet shall use resources responsibly, within the limits of the planetary boundaries.

- Tekompaniet shall foster responsible water stewardship, since the issue of water stress and its connection to climate change resilience is a fundamental question even in Sweden. We shall minimise our water consumption, and ensure that all outgoing water is treated according to the highest environmental standards. This is especially relevant in any situation where chemicals are used, such as in printing and packaging.
- Chemicals and hazardous substances shall be eliminated when possible or kept to an absolute minimum. If chemicals or hazardous substances are used, Tekompaniet shall ensure safe handling, storage and disposal of the substances.
- Tekompaniet shall contribute to a circular economy. Waste generation should be kept to a minimum, and any waste generated shall be seen as a resource that shall be directed to recycling and reuse. Each employee is responsible for minimising the generation of waste and the recycling of any waste generated. Tekompaniet maintains accurate recycling facilities at all company offices and locations. Any hazardous waste shall be managed according to the highest environmental and safety standards.

3.3 Emissions and energy

Tekompaniet shall reduce greenhouse gas emissions caused by their business activities. This includes managing energy consumption and transportation:

- Tekompaniet shall use energy responsibly, monitor and measure the energy consumption, set reduction targets and follow-up on those. Renewable energy sources shall be prioritized.
- Tekompaniet shall always chose transportation methods with the least negative environmental impact. When travelling for business, Tekompaniet's employees shall choose the means of transportation that most suitable for the journey, giving due regard to environmental considerations alongside cost, time- and safety aspects.

4. ANTI-CORRUPTION AND BUSINESS INTEGRITY

All forms of corruption are unacceptable to Tekompaniet. Corruption includes, but is not limited to: bribery, extortion, facilitation payments, nepotism and cronyism, fraud, money laundering, transfer mispricing, tax evasion or tax avoidance, market distortion, conflict of interest and unfair competition.

4.1 Contracts, agreements and fraud

Our contractual relationships with suppliers and vendors, dealers and customers are important for business operations. Contractual agreements shall be in written form, signed by Authorised Representatives of all parties to the agreement, and contain clear Terms & Conditions.

Parties to any agreements involving Tekompaniet or its subsidiaries must be shown the Code of Conduct prior to signing any agreements.

To avoid doubt, no employee of Tekompaniet is authorised to present themselves as having authority unless the employee offers a written confirmation of authority signed by a member of the management or a member of the Board of Directors of Tekompaniet.

It should be clearly understood by Tekompaniet's employees and party we engage with, that any attempt to bypass rules stated in Tekompaniet's policies will be reviewed at the highest level of management at Tekompaniet and actions may result in termination of the contract or agreement.

4.2 Bribes, gifts and facilitation payments

Tekompaniet's employees or any member of our Board of Directors shall not offer, ask, give or accept, directly or indirectly, any undue advantage for personal or professional gain from any third party, unless it can be constituted as being within the boundaries of accepted business practices such as representation and reasonable hospitality given in the ordinary course of business. Tekompaniet internal guidelines state that:

- No employee is allowed to accept gifts in the form of cash or gift vouchers.
- No single undue gift should exceed the value of 500 SEK. (Legally granted presents or gifts on birthdays, anniversary or similar occasions are not included in this.)
- Gifts from external parties such as suppliers or customers are only allowed to be received on behalf of the company. Any employee that accepts a gift shall inform a senior manager.
- Tekompaniet employees shall not offer money, gifts or benefits to a government official or an employee of a government entity.
- When in doubt, employees are expected to seek advice from their managers.

Tekompaniet shall never perform direct or indirect unofficial payments made to secure or expedite a performance of a routine or necessary action to which the payer of the facilitation payment has legal or other entitlement.

4.3 Nepotism, cronyism and conflict of interest

Business decisions must never be motivated or influenced by personal relationship and/or interests. A financial or other business relationship with a partner who contributes to, or risks contributing to, conflict of interest should never be initiated.

For both internal and external recruitment, a specification of the desired competencies must be established to ensure that candidates receive the employment based on knowledge and not on relationships.

Employees may not conduct activities that are competing with Tekompaniet. To avoid risk of conflict of interest the following applies:

- Employees may not, without the company's consent, work outside Tekompaniet in any capacity (e.g. employment, consultancy, Board membership). This also applies to jobs that do not generate any compensation.
- If there is any risk, however small, for conflict of interest, employees are expected to immediately inform their manager who will then consult with Tekompaniet HR for guidance.

4.4 Financial malpractices

Tekompaniet is firmly committed to free and fair competition in open markets. Tekompaniet respects and complies with all applicable competition laws, and shall not engage in any form of cartels, abuse of power, beneficiary services or market distortion. Tekompaniet shall further not engage in activities that may hinder the development of fair competition.

Tekompaniet shall always submit truthful and accurate tax declarations to tax authorities in all countries where Tekompaniet have operations. Tekompaniet will further not conduct transfer mispricing.

5. SOURCING AND PURCHASING

Tekompaniet considers its impact on the environment, human rights and labour rights as well as the risk for corruption when sourcing and purchasing goods and services. Tekompaniet strives to source and purchase items with low environmental impact and where human rights and labour rights have been respected and the risk of corruption is minimised.

Tekompaniet's *Supplier Code of Conduct* stipulates expectations on suppliers concerning environment, human rights, labour rights and anti-corruption.

6. NON-COMPLIANCE

It is the responsibility of Tekompaniet managers to make sure that both the content and the spirit of this Code are communicated, understood and acted upon within their organisations and to encourage employees to reveal behaviour that may be non-compliant with the Code. It is the responsibility of all Tekompaniet employees to report any suspicion of deviances with risk of violation of the Code or explicit in-compliance immediately so that issues can be addressed.

6.1 Grievance mechanism

Concerns can be filed in the following ways:

E-mail to info@tekompaniet.se

Call to +46 8 68 40 50 00

For anonymous grievances, Tekompaniet has set up a reporting function with a commitment to fair treatment of information. The anonymous function is available at **xxxx**

6.2 Integrity

When handling information, Tekompaniet shall take into respect our patient and customers' rights to maintain integrity and privacy. Correspondingly, all employees' right to privacy and personal integrity shall be respected at all times. No one shall be subjected to arbitrary interference with his/her privacy, family, home or correspondence, nor to attacks upon his/her honour and reputation.

We handle all types of personal data that may occur in a report in accordance with the General Data Protection Policy (GDPR).