### EcoDataCenter

# Code of Conduct

EcoDataCenter's vision is a sustainable and secure digital society. Our mission is to deliver the conditions for a sustainable and secure infrastructure in the digital society. Our core values provide guidance on how to act and make decisions in everyday life. They describe what we stand for, how we work, what we can achieve and how we want to be perceived. Our core values are the compass in all encounters with customers, business partners, suppliers and colleagues.

EcoDataCenter's Code of Conduct clarifies for all employees how we should behave as a business partner, employer, employee and social actor.

The purpose of the Code of Conduct is to:

- ensure that applicable laws, rules and regulations are always followed
- ensure that information in financial reports and other public communications is complete, fair, accurate, understandable and disclosed in a timely manner
- manage conflicts of interest appropriately
- protect and make proper use of company property
- protect non-public information

## About the Code of Conduct

# Why a Code of Conduct?

The Code of Conduct is designed to ensure that EcoDataCenter's business activities and communications with the market are conducted in an open and trustworthy manner in accordance with the law. The Code of Conduct constitutes minimum requirements. If local, national or international legislation imposes stricter requirements than this Code, these must be complied with.

Conducting business based on our core values and this Code of Conduct is important to maintain the trust and credibility of our business partners, employees, owners and other stakeholders. We choose to be transparent about how we conduct our business while respecting our business assets and the privacy of individuals.

# To Whom does the Code of Conduct apply?

The Code of Conduct applies to all employees within the EcoDataCenter Group from the Board of Directors to individual employees. The contents of the Code must be respected and followed. It is everyone's responsibility to set a good example.

EcoDataCenter expects the Code of Conduct to be respected and followed by our business partners (customers, partners, suppliers).

The Code of Conduct is an overall framework and is supplemented by detailed rules and guidelines for individual areas.

### EcoDataCenter

#### Sustainable business

EcoDataCenter shall conduct profitable business with good ethics. EcoDataCenter shall be a role model in sustainable business, which includes environment, business ethics, anti-corruption, gender equality, diversity, working conditions and human rights.

In order to respect human rights and promote fair employment conditions, safe working conditions, responsible environmental practices and high ethical standards, we adhere to the United Nations Global Compact.

EcoDataCenter shall be a good place to work for everyone, regardless of gender, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age. Everyone should have the same rights, opportunities and obligations.

EcoDataCenter works for sustainable development and our sustainability work is based on the UN's Global Sustainable Development Goals - Agenda 2030.

The Code of Conduct reflects EcoDataCenter's commitment to conducting business in a responsible and ethical manner towards both its own operations and the outside world. In summary, it means that

- being responsible citizens
- respecting human rights
- ensuring health and safety
- working for sustainable development

## **Business ethics**

EcoDataCenter shall comply with the laws and regulations that apply to our business. We only engage in business activities that comply with laws and agreements and that are in accordance with our Code of Conduct. We do not engage in activities for which we cannot openly vouch or account, and we do not make business decisions based on personal interests or relationships. Bribes, kickbacks, or other illegal or unethical benefits are not permitted. EcoDataCenter employees shall not engage in any form of collaboration or otherwise act in a manner that may be perceived as anti-competitive.

EcoDataCenter supports the international fight against money laundering and takes its legal obligations very seriously.

EcoDataCenter wants to build trusting relationships with customers, suppliers and contractors and therefore follows the rules for procurement and sales that exist within the company. We will not engage suppliers or contractors if we are aware that they have breached their obligations to business partners or employees, violated laws, regulations or contracts, or have unclear ownership structures.

Violations of applicable laws or regulations can have serious consequences, both for EcoDataCenter and for the individuals involved. Therefore, it is everyone's responsibility to be aware of and collectively comply with relevant laws and regulations.

# EcoDataCenter

# Confirmation

## Code of Conduct EcoDataCenter

I confirm that I have read and understand the meaning and purpose of the Code of Conduct
Date
Signature
Name (please text)

The endorsed confirmation is given to the manager who ensures that it is archived in the employee's personal file with the support of HR.