

Bolag: Christian Berner Tech Trade
Document type: Policy
Document name: Code of Conduct
Owner: CEO
Approved by: Board of Directors
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Code of Conduct - Christian Berner Tech Trade AB

Christian Berner Tech Trade (CBTT) aims to be one of the Nordic region's leading technology trading companies, a technology and knowledge supplier with cutting-edge expertise. The Group must contribute to a sustainable society by cooperating with others and conducting business responsibly. Our promise that our customers and suppliers can expect more from us also places demands on our business partners.

The Code of Conduct will ensure that CBTT and its partners work together for sustainable development in an ethical, social and environmental manner. We will systematically assess, prevent and manage risks relating to human rights and labour law, health and safety, corporate responsibility and environmental impact.

The Code of Conduct is a general framework for the responsibility that is expected of the company's representatives and partners and is supplemented with policies, rules and guides for specific areas. The Code of Conduct is based on the UN's Universal Declaration of Human Rights, the UN Global Compact, the ILO core conventions and the OECD guidelines for multinational enterprises.

CBTT wants to encourage the company's representatives and partners to engage in a dialogue that promotes sustainable development and is open to questions about related progress and dilemmas.
Expect more

Bo Söderqvist
CEO, Christian Berner Tech Trade

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Scope and responsibilities

The Code of Conduct applies to CBTT's representatives (Board members and employees) and to the company's business partners (suppliers, customers and other partners).

The Code of Conduct does not replace legislation and the applicable legislation is a minimum requirement. CBTT shall comply with legal requirements and regulations in the countries in which we operate. Where the Code of Conduct makes more stringent demands than existing legislation, it is the Code of Conduct that shall apply.

CBTT's CEO has overall responsibility for the implementation of and compliance with the Code of Conduct. The CEO of each subsidiary is responsible for implementation and compliance at each company. The Group management is responsible for documenting and reporting to the Board of Directors how the company's representatives and business partners are meeting the requirements. Such reports are included in CBTT's annual risk assessment.

Familiarisation with the Code of Conduct forms part of the induction of new employees and new Board members and also takes place when cooperation is entered into with external parties. It is the responsibility of the company representative and business partner respectively to ensure that they understand and comply with the content of the Code of Conduct.

When evaluating and selecting business partners, their ability to meet the requirements of the Code of Conduct is assessed. Business partners who do not meet the requirements and standards specified by the Code of Conduct risk being excluded from the value chain. Breach of the Code of Conduct may constitute grounds for the termination of existing contracts.

- **Reporting misconduct**

CBTT has established a complaint mechanism for reporting misconduct.

The company's representatives exemplify CBTT's Code of Conduct and must comply with it in their day-to-day work. It is extremely important, therefore, that serious and repeated deviations from the Code of Conduct, or misconduct in general, are reported.

Irregularities must be reported in the first instance to your immediate manager. If a complaint cannot be submitted to the immediate manager or other member of the management of the company or the Group, the matter can be pursued through CBTT's whistleblowing function. Contact details for the whistleblowing function can be found at www.christianberner.com and on each subsidiary's website.

Business partners who believe that CBTT is not acting in accordance with its Code of Conduct or that other of CBTT's business partners are failing to comply with the terms of the Code of Conduct are encouraged to contact the person responsible for internal control, or to use the whistleblowing function; contact details can be found at www.christianberner.com

Breaches of the rules and guidelines in the Code of Conduct may lead to repercussions. Employees or others who draw attention to serious irregularities in good faith do not risk any repercussions.

- **Suppliers' responsibilities and monitoring**

CBTT's relationships with its suppliers must be characterised by openness and trust. By entering into a contract or cooperation with CBTT, a supplier undertakes to implement and monitor compliance with the relevant parts

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of the Code of Conduct. Suppliers are in turn responsible for subcontractors being informed of and complying with the same standards.

CBTT may, through established cooperation, request a report and inspection by CBTT, or by a third party engaged by CBTT, in order to verify compliance with the Code of Conduct. The Code of Conduct is also used when evaluating potential and existing suppliers.

If there is any conflict between the applicable laws and the Code of Conduct, the supplier shall comply with the more stringent standards. Where CBTT identifies that a supplier is failing to comply with the requirements of the Code of Conduct, guidance may be given in the first instance regarding the appropriate action to be taken. Subsequently, and in cases where the supplier fails to take remedial action, CBTT reserves the right to cease cooperation with the supplier and to terminate the business relationship.

Business ethics and integrity

CBTT's activities shall be conducted in accordance with good business ethics and characterised by respect and responsibility towards business partners, the company's representatives and the society in which we operate. This means that conflicts of interest, corruption, bribery and money laundering must be prevented and avoided. The reporting of financial accounting, the corporate structure, business activities and taxation must be characterised by transparency. Applicable tax legislation and rules must be adhered to in the countries in which we operate.

- **Conflicts of interest and anti-corruption**

Conflicts of interest between CBTT and its business partners must be avoided. CBTT will not share sensitive market information or enter into price-fixing agreements with competitors.

The company's representatives are expected to be loyal and take joint responsibility for protecting the assets of CBTT. Assets must not be used for personal purposes or to support operations or activities outside Christian Berner. Sponsorship requires the approval of the CEO. Payments that do not form part of CBTT's business operations ultimately require the approval of the Board of Directors.

Bribery and all other forms of corrupt conduct are strictly prohibited. CBTT's representatives must not offer or receive personal gifts, services, travel, entertainment or similar benefits that may be considered unreasonable or inappropriate in connection with potential business decisions or public authority decisions. Entertainment gifts must be characterised by openness and moderation, and they must always have a natural connection with the business relationship.

- **Handling of confidential information**

Confidential information relating to the business of CBTT or of our business partners may only be used for the purposes for which it is intended.

- **Consumer interest**

By supporting innovations and promoting sustainable solutions, CBTT works to improve environments that affect many people. CBTT shall act in compliance with all rules and regulations regarding safety and quality requirements applicable to its products and services.

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Environment

By placing demands on its own activities and those of its business partners, CBTT promotes the development and innovation of environmentally friendly products and technologies and is able to provide its customers with sustainable products and solutions.

CBTT shall apply the precautionary principle in order to protect people and the environment (where it is uncertain what impact a new product, technology or measure may have on people and the environment and there is no scientific consensus on whether it is hazardous, caution must be adopted and the product, technology or measure treated as hazardous).

CBTT will take active measures to limit and reduce the environmental burden and climate impact of its activities.

Human rights and working conditions

CBTT shall respect internationally accepted human rights and undertakes to treat the company's representatives and business partners in a respectful manner.

CBTT shall avoid causing, contributing to or being linked with a negative impact on human rights through its activities or its business relationships. Any negative impact arising as a result of its activities shall be dealt with and rectified.

Forced labour, modern slavery and child labour are prohibited. If child labour is identified, action must be taken on the basis of the child's best interests.

The right to organise, freedom of association and right to collective bargaining shall be recognised and applied. If the right to organise and the right to collective bargaining are restricted by applicable laws and regulations, alternative forms of employee representation shall be permitted.

In addition to being a living wage (a fair and adequate remuneration that gives human dignity to the employee and their family), the remuneration paid to employees must reflect the employee's competence, work results, responsibilities and development in their field.

CBTT will actively promote gender equality and diversity. CBTT shall not engage in any form of discrimination in its activities or recruitment processes. Prohibited bases of discrimination include, but are not limited to: age, disability, sexual orientation, gender, transgender identity or expression, religion or other belief or ethnicity. Employees must enjoy a good and safe working environment and be informed about any risks to health and safety that the work may involve. Adequate training and protective equipment must be provided.

Date

Signature

Name clarification