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Code of conduct

This Code of conduct serves as a guide for all Systam employees to uphold our strong commitment to integrity. Everyone must understand our Code and how it applies to everyday work. Alongside our values—trust, dare, and care—it steers us toward a sustainable future. Aligning our actions with these principles makes Systam a reliable employer, partner, supplier, and customer.

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1 We comply with laws and regulations

We are committed to complying with the applicable laws and regulations in the countries and regions where we operate. If local laws, regulations, or cultural practices differ from this Code of Conduct, the stricter of the two will be followed.

2 We are committed to honest and ethical business practices

In addition to complying with applicable laws and regulations, we operate following the principles of good business conduct. We conduct our business fairly and ethically, adhering to the highest standards of honesty and integrity. By fostering a culture of ethical behavior, we build trust with stakeholders, protect our reputation, and contribute positively to society and the environment.

3 We respect people and human rights

We promote and respect human rights in line with the <u>Universal Declaration of Human Rights</u> and the <u>United Nations Guiding Principles on Business and Human Rights</u>, and treat our employees and those of our partners with respect and dignity.

We are committed to:

- Opposing any form of modern slavery, forced labor, child labor, and human trafficking.
- Providing our employees with a safe and healthy working environment.
- Ensuring that our employees understand the terms of their employment.
- Ensuring freedom of association and collective bargaining for our employees.
- Promoting equal career opportunities based on qualifications and business needs.
- Standing against all kinds of discrimination based on bias or prejudice, including but not limited to race, skin color, gender, sexual orientation, marital status, pregnancy, family relationships, religion, or similar factors.
- Condemning all threats of violence, physical punishment, physical or verbal abuse, or any other form of unlawful harassment.

Resources: Human rights policy

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4 We have zero tolerance for corruption and bribery

We do not engage in illegal, regulatory-violating, or unethical business practices. Bribes or other unlawful financial benefits must not be offered, paid, or accepted under any circumstances, whether to authorities, customers, or other parties.

In particular, offering or accepting bribes, gifts, or services that exceed the norms of reasonable and customary hospitality is strictly prohibited.

We avoid conflicts of interest. We keep our personal interests separate from business decisions and do not let our personal relationships affect our work.

Resources: Anti-corruption policy

5 We know our customers and partners

We build strong, transparent, and lasting relationships with our customers and partners by understanding their needs and expectations. We are committed to conducting business with honesty, fairness, and respect, ensuring that our interactions reflect our values.

We also expect our partners to uphold the same high standards of conduct that we follow. This includes compliance with all applicable laws, ethical business practices, respect for human rights, and a commitment to environmental sustainability. Working together with shared principles ensures the integrity and reliability of our collaboration.

Resources: Supplier code of conduct

6 We support sustainability and environmental responsibility

We are committed to reducing the environmental impact of our operations and complying with applicable environmental laws and regulations in every country where we operate.

In practice, environmental responsibility means understanding and minimizing the ecological effects of our activities. We take proactive steps to promote environmental responsibility.



We expect all our employees to be aware of environmental issues in their day-to-day work. This is why we are all expected to act responsibly and share best practices.

Resources: Environmental policy

7 We value data privacy and security

We respect the privacy of our colleagues, customers, and other stakeholders and their representatives by handling personal data in compliance with relevant laws, such as GDPR (General Data Protection Regulation).

We protect confidential information and intellectual property from unauthorized disclosure, and all of our employees are required to undergo training on secure passwords, phishing awareness, and device security.

8 We work substance-free

We are dedicated to fostering a safe, productive, and healthy workplace for everyone. To ensure this, we maintain a substance-free environment where the use, possession, or influence of illegal drugs, alcohol, or other impairing substances during work hours is not permitted. Systam has operational guidelines in healthcare for the prevention of substance abuse.

We allow moderate alcohol consumption at company-sponsored after-work events, but we expect everyone to drink responsibly and avoid behavior that could harm our workplace culture or reputation.

9 We voice our concerns

Every employee must report any suspected or observed breach of the law, this Code of Conduct, or other Systam policies. Primarily, we encourage contacting one's immediate supervisor, another person in management, the occupational safety organization, a representative of the employee group, or the human resources department.

If an employee feels that it is not possible to report the matter with their name, they can also report it through <u>Systam's anonymous reporting channel</u>, remaining anonymous throughout the entire investigation. All reports and discussions are always treated with absolute confidentiality and thoroughness.