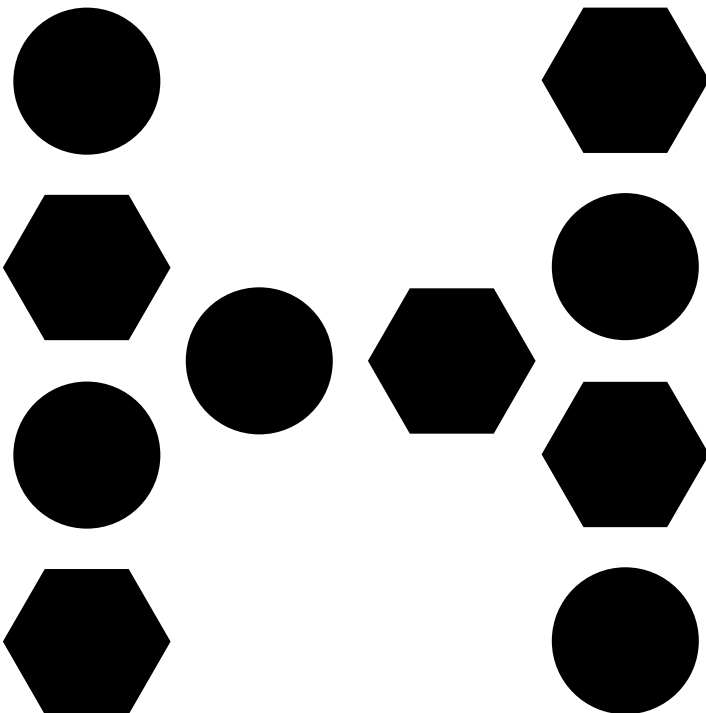


Code of Conduct



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Introduction

Dear Colleagues,

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

Our purpose is tightly linked to our core values and they guide us in everything we do in order to create long-term value for our customers, shareholders as well as other stakeholders.

We are all empowered and encouraged to take initiatives, make decisions and drive our business forward. The Code of Conduct will guide us to achieve our goals in a way that also meets legal and ethical requirements. Therefore, we all need to understand its content and live by its principles in our everyday business. Don't be afraid to ask if there is something you don't understand or need help clarifying.

I count on your commitment to integrate the Code into our daily work and speak up if you come across doubtful situations. If we all do that, while working alongside our vision and core values, we can maintain the reputation that makes us all proud to work at Hexatronic.

2022-08-30

Henrik Larsson Lyon
CEO Hexatronic Group

To whom does the code of conduct apply

The Code of Conduct applies everywhere we do business, 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 Hexatronic Group companies, hereafter referred to as *employee*. You are responsible for reviewing and seeking to fully understand the Code of Conduct, as well as our other Policies and Procedures, and how it applies to your job or position. All employees confirm their commitment by signing the Code of Conduct. Any employee who do not act ethically or violate this Code or our Policies may be subject to disciplinary action. Depending on the facts and circumstances, this action could include dismissal.

Please note that every manager has an obligation, within his or her area of responsibility, to ensure that employees and business partners are informed of the contents of Hexatronic's Code of Conduct and the need for compliance with it.

Compliance with laws and regulations

We want to conduct all our business in compliance with the Code of Conduct. Nothing in this Code of Conduct, however, should be understood as an instruction to break the law. All employees comply with applicable laws, rules, and regulations, including those relating to insider trading.

Inside information shall remain confidential until disclosed and no unauthorized party shall be given access to such information. Information made public shall be correct, relevant, clear and compliant with applicable legislation, requirements and internal policies. This includes compliance with NASDAQ Stockholm's Rule Book for Issuers.

Please consult the **Information policy** for additional information.

Because Hexatronic is a listed company, we follow the EU's market abuse regulation, and only the CEO, Deputy CEO and CFO may reply to questions concerning price-sensitive information.

How should the code of conduct be applied

The Code of Conduct helps us translate our values into actions in our day-to-day work.

The Code does not cover every situation or replace good judgement. It is a guide that helps us make the right decisions. If you are struggling with a decision, ask yourself:

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

Our Vision and Core values

Vision

A lasting link to the future.

Core values

Responsible

An honest day's work.

Being reliable and delivering on your promises, always working for a sustainable tomorrow, 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 any good when shared. Especially with an open mind and a generous culture.

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 Workplace

We are committed to creating a great workplace with zero harm to any of us. We believe results matter, but how we achieve those results also matters. We believe in the power of ownership and collaboration, and we learn from both our successes and mistakes. We also believe diversity is a strength and one of the things that makes us different. We strive to develop a talented workforce ready to think outside of the box while taking on challenges. Together we create an environment where all employees feel valued, have a sense of belonging, and are given opportunities to succeed and grow.

How we do it:

- We are all accountable for the quality, efficiency and effectiveness of our work and take ownership for our individual development.
- We respect every employee's right to form and join, or not to join, any trade unions they wish and to negotiate collectively.
- We make sure the workplace is safe for us and for others.
- We provide and use safety equipment as required.
- We report and learn from accidents and near misses.
- We treat others with respect, dignity, and consideration.
- We listen to and value different perspectives, experiences, thoughts, and ideas.
- We act on any form of discrimination, sexual harassment, or victimization.
- We make decisions about recruitment, hiring, pay, rewards, development and promotion based on ability, experience, work performance and demonstrated potential in relation to the job.
- We promote a healthy work-life balance.
- We encourage and participate in initiatives and activities that promote health and well-being.
- We are never under the influence of alcohol or illegal drugs while working.

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

Please consult the **Diversity and Gender Equality Policy** for additional information.

Our Business

To build and earn trust of others, whether it is employees, customers or partners, we run every part of our business with honesty, integrity, and transparency. We are committed to acting professionally and fairly and being seen to do so at all times. We believe that working with business partners with similar values makes good sense. The way we do business is just as important as the results we achieve.

Relationships with Customers, Partners & Suppliers

We are committed to maintaining the highest ethical and legal standards in our relationships around the world.

How we do it:

- We are good ambassadors for the Hexatronic Group. We always act as a single entity; we are all Hexatronic.
- We seek to do business with partners who share our values and sense of global responsibility, who adhere to laws and regulations and use fair business practices.
- We uphold our standards of integrity in every situation, not allowing, asking, or enabling others to engage in prohibited conduct on our behalf.
- We make sure our suppliers (new and existing) adhere to and comply with our Code of Conduct for Suppliers and our Environmental Requirements for Suppliers.
- We do not enter discussions with competitors regarding market allocation, information exchange, production, and sales quotas, or bid rigging.
- We comply with United Nations sanctions and applicable sanctions under the laws of the European Union and the United States, and never attempt to circumvent applicable trade sanctions.

Bribery & Corruption

The way we do business is just as important as the results we achieve. We do not tolerate bribery or any other form of corruption, even if it means losing business.

“Corruption is the abuse of your position to achieve an improper advantage for your own, or someone else’s, gain” (Transparency International). Corruption hampers economic development, distorts competition, leads to increased costs and erodes trust, reputations and brands. Bribery and corruption can cause immense damage, both to our company and the individual, such as in the form of fines and imprisonment.

How we do it:

- We never offer gifts, benefits, remunerations, or hospitality to third parties or accept the same from them where such inducements would constitute a violation of the law or might influence, or be thought to influence, our professional judgement.
- We only exchange hospitality and entertainment where there is a clear business reason to do so and when the costs involved are reasonable and appropriate in the circumstances.
- We are politically independent and do not make any contributions.
- We make sure only our own expenditures for business travel, board and lodge are paid for by Hexatronic Group when visiting or travelling with partners and suppliers.
- We do not offer any facilitation payments when acting on behalf of Hexatronic Group.

“We have a zero-tolerance policy towards bribery and corruption”

Please consult the **Anti-Corruption Policy** for additional information.

Conflicts of Interest

We make business decisions solely for the good of Hexatronic Group. Business decisions are never based on individual considerations or relationships.

How we do it:

- We make sure our personal interests and relationships do not influence our professional judgement, or conflict with our work-related responsibilities.
- We do not do business with any company where we or a close family member could in any way profit from our actions.
- We do not exploit our position within Hexatronic Group for personal gain or that of a family member, friend, or associate.
- We 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.
- We do not hold board assignments or other positions that could conflict with the interests of Hexatronic Group.

Conflicts of interest may not always be clear-cut and it is not possible to describe every situation in which a conflict of interest may arise – any question with respect to whether a conflict of interest exists, together with any actual or potential conflict of interest, should be directed to managers.

Information & Assets

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

How we do it:

- We always provide information that is accurate, correct, complete, traceable and accessible to those who need it (external and internal).
- We make sure we do not disclose confidential Hexatronic Group information, and make equally sure we do not disclose any confidential information from our partners.
- We do not accept confidential information from other companies unless all parties first sign an appropriate non-disclosure agreement.
- We minimize the use of personal data and only manage and transfer personal data if there is a legitimate purpose to do so.
- We do not tell our significant other or family members anything confidential.

We manage our assets responsibly and take all necessary steps to protect them against harm, theft, or unauthorized use. We are also committed to care for assets owned by others and to avoid their misuse or abuse.

“Each employee [...] is personally responsible for following IT Policy guidelines and rules, as well as for handling tools, such as computers, peripheral devices, mobile devices, applications, and licenses carefully, lawfully, and appropriately.”

Please consult the **IT Policy** for additional information.

Social and Environmental Engagement

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

Human Rights

We believe in, respect and support internationally proclaimed human rights and freedom of expression.

How we do it:

- We do not employ children or minors.
- We do not accept any form of forced, bonded or compulsory labor.
- We do not accept human trafficking and we distance ourselves from it.
- We never buy or accept sexual services or visit porn sites or strip clubs.

“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.”

Please consult the **Modern Slavery Act Statement** for additional information.

Environmental Impact

We are committed to reducing the negative environmental impact of all our operations and activities to protect the environment for present and future generations.

How we do it:

- We encourage each other to make good, green choices in our day-to-day work.
- We evaluate the environmental consequences of decisions and choose alternatives with lowest possible viable environmental and climate impact.
- We minimize waste and sort it.
- We are always looking for resource and energy savings.
- We always consider recycling and the reuse of products and material.
- We always consider travel-free meetings and endeavor to find alternatives to air travel.
- We endeavor to select suppliers with a clear focus on low climate impact and green products and services.

Social Responsibility

We endeavor to make a positive difference by actively contributing to the development of society, the industry, and Hexatronic Group through partnerships with other companies, foundations, organizations, and operations.

How we do it:

- We encourage our employees to personally engage with and support voluntary programs in the local and international communities in which we operate. Together we work to earn and maintain positive relationships with these communities by building trust and respect.
- We make charitable donations and other contributions for human rights, educational or other purposes that support a sustainable society.

Compliance & Whistle-Blower Reporting

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.

By taking ownership when we see or come across a colleague who is not living up to the Code of Conduct, we help them understand it and apply it. If this makes you uncomfortable, take up the alleged misconduct with any manager or HR representative.

Should you for any reason feel unable to report misgivings or alleged misconduct to your line manager or HR Representative, use the Hexatronic Group whistle-blower reporting service.

Reports of violations of this Code may be done anonymously and confidentially via an external partner. All messages are encrypted to ensure the anonymity of the person sending a message.

To report a violation, please enter the website:

<https://report.whistleb.com/en/hexatronic>

Please consult the [Whistle-blowing policy](#) for additional information.

Any questions or concerns regarding the Code of Conduct may be taken up directly with your line manager or Human Resources HR@hexatronic.com