



Global policy

HMS Group Code of Conduct

Adopted by the HMS Board of Directors, October 27, 2023



Doing business the HMS way

Honesty and fairness have always characterized the HMS way of doing business. This has resulted in a strong brand reputation built on a long and successful history of growth and loyal customers.

Our Code of Conduct aims to capture the way we do business, sustaining good long-term relations with all stakeholders.

By using the Code of Conduct in our daily work, we ensure that our business is conducted in a responsible and sustainable way.

Our commitment is to maintain the highest standards of business ethics and integrity in everything we do.

Thank you for contributing!
Staffan Dahlström, President and CEO



GLOBAL POLICY

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Introduction to the Code

The HMS Group Code of Conduct forms the basis for the way we work and conduct business. The Code aims to guide HMS employees in everyday business decisions, together with other group policies and HMS core values.

The principles in this Code of Conduct are based on internationally recognized standards and principles. These principles reflect our commitment to the Ten Principles of the UN Global Compact and the UN Guiding Principles on Business and Human Rights (UNGPs).

When developing the Code of Conduct, we have also been guided by the International Bill of Human Rights, the International Labour Organisation's (ILO) Core Conventions and the UN Sustainable Development Goals (SDGs), among others.

This Code of Conduct applies to all HMS employees and other representatives acting on behalf of the Group. Our employees and representatives are expected to always act according to, and in the spirit of the Code. Managers and leaders are expected to lead by example and to be available to questions or reports of violations of the Code.

The HMS Group places equivalent expectations on suppliers, sub-contractors, distributors and business partners. The Supplier Code of Conduct therefore contains guidelines, responsibilities and duties




of the Group's suppliers and business partners in relation to business principles, human rights, working conditions and the environment.

The HMS Group's integrity and reputation are highly valuable assets. Just as any other asset, they need to be developed and protected. Our Code of Conduct is aimed to guide us and to be a tool to maintain our integrity and reputation as a reliable partner for industrial ICT. It helps us to conduct our business in a reliable way and reminds us that every action counts. Failure to comply with the Code can severely damage the HMS Group's reputation and business and may result in disciplinary action.

If you have any doubts about the purpose and principles of your actions in any situation, please do not hesitate to contact your manager or HMS Human Resources for support and guidance.

Our Business Principles



The HMS Group is dedicated to being a responsible employer and a good corporate citizen. We are committed to ensure that all our business is conducted in a responsible, transparent and trustworthy manner.

The HMS Group shall follow the laws and regulations in each country where we operate. The Code sets forth the minimum level of approved behavior, even if it stipulates higher standards than required by local law. If there are any differences between the Code of Conduct and the above named regulatory frameworks, the regulation with the highest standard is to apply.

FAIRNESS IN ALL BUSINESS RELATIONS

The HMS Group must, always, stay committed to exercise fairness in all dealings with business partners and stakeholders. We have zero tolerance for all forms of corruption or bribery.

The HMS Group supports fair and equal competition. We compete in a manner that is

both ethical and fair, without engaging in any inappropriate activities or unfair trade practices.

Business decisions are based on the best interests of the HMS Group, without regard to personal relationships or considerations. Employees must not generally accept gifts, benefits, reimbursements or entertainment, whether directly or through intermediaries, that could affect, or even appear to affect, the objectivity and professional judgment of the employee.

Any gifts, benefits, reimbursements or entertainment shall be business related, of moderate value, free from obligation and expectation and also avoided during ongoing negotiations.

Any gift, benefit, reimbursement or entertainment exceeding a value of 100 EUR is generally not accepted without the approval from your manager.

Likewise, the HMS Group shall not offer rewards or benefits, whether directly or through intermediaries, to any business partner or stakeholder, which is, or appears to be, in violation of the law.

CONFLICT OF INTEREST

Employees may not engage themselves, with or without compensation, in activities that might conflict or appear to be in conflict with the Group's interests, without approval from the employee's manager and in accordance with the HMS "Grand Parent principle" (i.e. the manager of the manager is consulted before approval).

Employees must never use association with the HMS Group for personal gain and shall avoid engaging in external financial interests that might conflict with the HMS Group's interests — for example personal or family interests in companies that has business relationships with the HMS Group.

POLITICAL INVOLVEMENT

The HMS Group observes strict neutrality with regard to political parties and candidates. Neither the HMS brand nor resources of the HMS Group shall be used to promote the interests of political parties or candidates.

ACCURACY IN ACCOUNTING AND REPORTING

The HMS Group is committed to being fair, accurate and timely in all communication.

All financial transactions made by the HMS Group must be conducted and recorded in accordance with generally accepted accounting practices in each jurisdiction. Accounting records must show the nature of all transactions in a correct and non-misleading manner.



DEALING WITH CONFIDENTIAL INFORMATION

Employees often have access to information about the HMS Group, and sometimes also to information regarding customers or other third parties, that is not generally available to the public. Such confidential information must not be passed on to any unauthorized parties, family members included. This obligation continues even after termination of employment.

Employees are not allowed to trade in HMS shares or any other kind of property based on insider information, i.e. information accessed through employment at the HMS Group and which is not made public. If you have any doubts or questions when dealing with confidential information, please seek guidance from your manager.

Human rights and working conditions



The HMS Group supports and respects the protection of internationally proclaimed human rights.

This means doing everything we can to avoid violating the human rights of people and communities, as well as creating a positive impact, throughout our supply chain and in the communities we operate.

RESPECT FOR THE INDIVIDUAL

Equal treatment and equal opportunity shall apply to everyone, regardless of ethnicity, nationality, gender, gender identity or expression, sexual orientation, religion or other belief, political opinion, social origin, disability, age or any other status protected by applicable laws.

Physical, psychological, sexual or verbal harassment is never tolerated.

SAFETY

Our workplaces shall be safe and secure. The necessary conditions for a safe and healthy work environment shall be provided for all employees, including appropriate information and training. We work together to ensure a safe and healthy work environment for all.

The use of illegal drugs, alcohol or violence during work or when effecting work performance or employee safety is never accepted. Any alcohol consumption in connection with company events and representation activities shall be moderate.

FAIR EMPLOYMENT CONDITIONS

Terms of employment and wages shall be fair and reasonable. Obligations to employees under national laws and social security systems must be respected and followed. Working hours, salary and other remuneration must comply with applicable laws and agreements, and generally accepted industry standards. All employees, including those temporarily employed, should have written employment contracts and be made aware of their employment conditions.

FREEDOM OF ASSOCIATION

All employees are free to exercise the right to form, join or refrain from joining unions or similar organizations and to bargain collectively or individually.

FORCED OR CHILD LABOR

The HMS Group does not tolerate underage labor in our operations or in the operations of any suppliers or business partners with whom we cooperate. The minimum employment age is 15 years and 18 years for hazardous work.

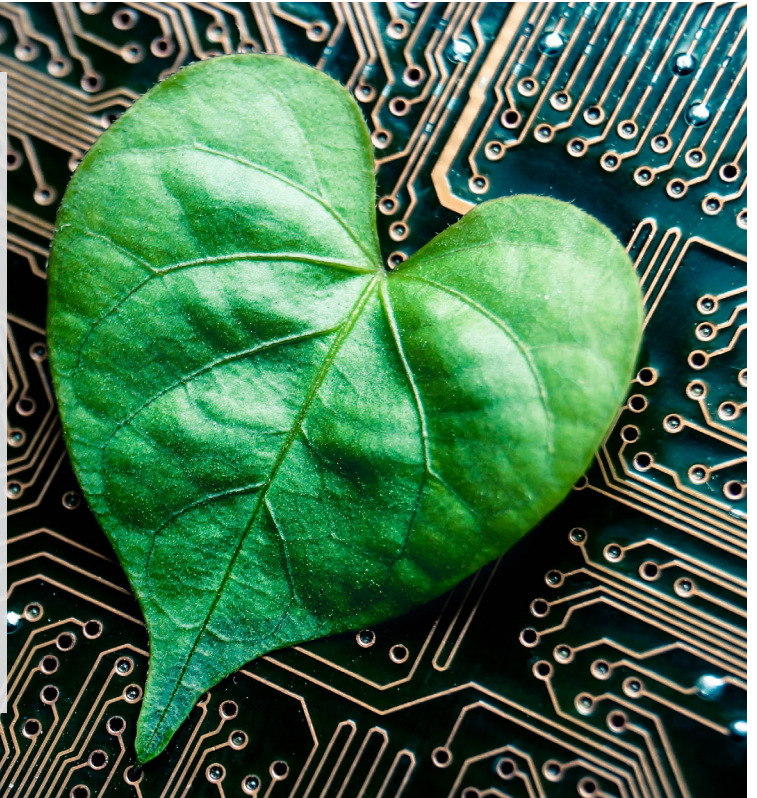
We do not allow forced or compulsory labor in our operations or in the operations of any business partners with whom we cooperate.

The term “forced labor” or “compulsory labor”, according to the International Labor Organization refers to all work or services for which a person has not offered themselves voluntarily. Examples are (but are not limited to), human trafficking, slavery, debt bondage, and identification retaining.



The environment

Long-term sustainable business shall be conducted with the environment and climate in mind. We develop and provide products and services that enable our customers to minimize their negative environmental footprint, improve resource efficiency and increase productivity.




We are committed to protect the environment and contribute to a more sustainable world. Our commitment involves reducing negative environmental impact of our operations, products and processes, throughout the whole value chain.

All employees shall comply with environmental laws and regulations and support the achievement of the Group's sustainability objectives. For us, it means that we take the time to understand the environmental risks and negative impacts associated with the daily work and look for opportunities to reduce them.

This includes the production of waste and greenhouse gas emissions, as well as the consumption of energy, water, materials and other resources. We follow the existing legal and market requirements and procedures for using, storing, labelling, transporting and disposing of chemicals and hazardous materials.

Internal reporting of concerns



It is important that we act when violations or other irregularities occur from the principles in this Code of Conduct.

If HMS employees encounters violations or other irregularities of the Code of Conduct or any Group Policy, concerns shall be raised with the manager of the employee, suitable person or function within the HMS Group.

Our whistleblower service is an alternative way of reporting serious misconduct in cases where HMS employees or representatives do not feel comfortable reporting through the above channels.

Whistleblowing can be used to alert about serious risks affecting individuals, our company, the society or the environment. Whistleblowing can be done by any person openly or anonymously. All issues reported will be investigated.

When using the HMS whistleblower service, the processing may only refer to data about perceived serious improprieties concerning:

- accounting, internal accounting controls, auditing matters, fight against bribery, banking- and financial crime, or
- other serious improprieties concerning the HMS Group's vital interests or the life or health of individual persons, as for instance serious environmental crimes, major deficiencies that regard the security at the place of work, or
- and serious forms of discrimination or harassments.

HOW TO REPORT

There are different ways to raise a concern:

- Alternative 1: Contact your manager, suitable person or function within the HMS Group.
- Alternative 2: Anonymous or confidential messaging through the whistleblower service to the Whistleblowing team:
<https://report.whistleb.com/hmsnetworks>

Further information about the whistleblower service and how to submit a report is available on HMS's intranet. HMS's Whistleblowing team are responsible for managing the notifications submitted via the whistleblower service.



 www.hms-networks.com