

BTS Code of Business Conduct

Revision History

Version	Date	Comments	Author
1.0	11 April 2023	Initial Draft	Stefan Brown
1.0	12 May 2023	Approved by Board of Directors	Stefan Brown
1.1	30 November 2023	Modern slavery statement added as appendix, Enclosure C1B.	Stefan Hellberg
1.1	30 April 2024	Reviewed with no changes	Stefan Hellberg
1.1	3 May 2024	Approved by the Board of Directors	Stefan Hellberg
1.1	28 Apr 2025	Reviewed with no changes	Stefan Hellberg

Document Control

Document Title:	BTS Code of Business Conduct
Version:	1.1
Date of Version:	3 May 2024
Created By:	Stefan Hellberg
Approved by:	Board of Directors
Document owner:	Stefan Hellberg
Confidentiality level:	Public

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BTS Group AB ("BTS")

CODE OF BUSINESS CONDUCT ("the Code")

1 Introduction

This Code is applicable to BTS Group AB ("BTS") in all its operations and in its relationships with stakeholders. Stakeholders primarily include employees, customers, shareholders, the Board of Directors and, when reasonable, suppliers and other interested parties.

BTS aims in every way, everywhere, and every time to act as a "good corporate citizen".

We used the UN Global Compact's principles in the areas of human rights, labor, the environment and anti-corruption as our guide. In this context additional normative standards are found in:

- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The Rio Declaration on Environment and Development
- The United Nations Convention Against Corruption

2 Basic Standard of Conduct

BTS is a fundamentally people-driven enterprise and is defined by its employees. Employee conduct with customers, employees, and other stakeholders, must therefore be characterized by a high standard of business ethics, compliance with laws and regulations and adherence to good business practices in a setting of honesty, integrity and respect for human rights.

3 Business Integrity and Confidentiality

- BTS is committed to providing safe and reliable, cost-efficient, high quality services to its customers in a context of fair competition.
- BTS aims to develop strong long-term relationships with its customers, suppliers and other stakeholders based on mutual trust, understanding and respect.
- Confidential information must be kept confidential and not used for personal gain or any purpose other than that for which it was given.

4 Employment

4.1 BTS Commitment

BTS is committed to:

- Developing a workforce characterized by mutual trust and respect, where every person feels responsible for the performance and reputation of BTS.
- Employing and promoting employees on the basis of objective criteria for the needs of a position.
- Providing employees with suitable personal development opportunities and helping them to meet their full potential.
- Maintaining good communication with employees through consistent information and consultation procedures.
- Ensuring that the privacy and confidentiality of our employees' personal information is respected.
- Providing mechanisms through which employees can confidentially raise concerns made in good faith regarding possible malpractice - without fear of retaliation.

4.2 Equal Opportunities and Diversity

- Everyone has the right to be treated with dignity and respect. All employees shall adopt fair and inclusive practices.
- BTS does not tolerate discrimination, bullying, harassment or retaliation on any ground. This relates to, among other areas, age, sex, nationality, education or professional background. Discrimination, bullying, harassment and retaliation can take many forms and interpretation of what constitutes such behavior can differ by both people and situation. As such, it can be difficult to establish an unequivocal truth in questioned behavior. As guidance, appendix A contains a discussion of these matters with examples.

4.3 Work Environment

- Employees are entitled to a safe and healthy work environment, whether in BTS or customer workplaces. BTS shall also actively work to prevent ill health and work injury, including initiatives that promote job satisfaction, well-being and efficiency.
- BTS strives to avoid emergency situations and is committed to preparedness as detailed in our emergency response procedures.

4.4 Personal Conduct

- Each employee has a personal responsibility to uphold and exemplify this Code in all day-to-day activities.

- Each employee is expected to behave respectfully and honestly in dealing with BTS customers, fellow employees and other stakeholders.
- Employees are expected to safeguard company assets.
- Employees are expected to use all corporate communication tools in a manner appropriate for BTS business purposes.
- Employees are expected to follow dress codes and other rules pertaining to the employment as established by local management.

4.5 Improper Payments

- BTS shall not offer payments or similar benefits, contravening laws or other regulations that are incompatible with good business practice. Nor shall employees accept third party compensation that may affect, or be perceived to affect, objectivity in making business decisions.
- An employee in any doubt must bring the issue to his or her line manager.

5 Community Relations

BTS and its employees often interact with different members of the community and shall always seek to maintain good relationships.

6 Implementation and Follow-Up

All managers are responsible for communicating the content of the Code to their direct reports and ensuring through regular follow-up that it is understood and complied with.

7 Review of the Code

This Code of Business Conduct shall be reviewed by the Board of Directors regularly, at least bi-annually.

Appendix A to BTS Code of Business Conduct (“the Code”)

Reference Section B (b) of the Code:

BTS does not tolerate discrimination, bullying, harassment or retaliation on any ground. This relates to, among other areas, age, sex, nationality, education or professional background. Discrimination, bullying, harassment and retaliation can take many forms and interpretation of what constitutes such behavior can differ by both people and situation. As such, it can be difficult to establish an unequivocal truth in questioned behavior. As guidance this appendix contains a discussion of these matters with examples.

Discrimination, Bullying, Harassment and Retaliation; a discussion on meaning; examples

General

A **person** may refer to “an employee” or other “individual” or in the following also refer to a group of persons (employees or individuals).

What is meant by discrimination?

Discrimination is the practice of treating one person or a group of people less fairly or less well than others on the basis of a group, class or category to which the person is perceived to belong. These include, but are not limited to, **age, disability, ethnicity, family status, gender identity, genetic characteristics, marital status, nationality, religion, and sexual orientation.**

What is meant by bullying?

Bullying means engaging in conduct which undermines another person’s dignity. A person may refer to “an employee” or other “individual” or in the following also refer to a group of persons (employees or individuals).

Conduct undermining a person’s dignity can reasonably be interpreted as conduct causing humiliation, fear, embarrassment or offense to that person, denigrating the person’s character or otherwise adversely affecting the person’s health or safety.

The following examples **referring to or aimed at a person** illustrate types of conduct that may suggest bullying. Other types of conduct not listed may also constitute bullying.

- Unwelcome or hostile comments, gesturing, jokes, kidding or teasing based on a person's physical or other characteristics/appearance or that otherwise may cause offense;
- Isolation and shunning, gossip, rumors, insults, name-calling including external media such as Facebook, Twitter, blogging, etc.;
- Circulating private images, videos, or messages;
- Slamming doors, throwing objects and/or making intimidating physical gestures or unsolicited physical or other contact.

What is meant by sexual harassment?

The following examples **referring to or aimed at a person** illustrate types of conduct that may suggest sexual harassment. Other types of conduct not listed may also constitute sexual harassment.

Sexual harassment means unwanted or unwelcome conduct of a sexual nature.

- It can mean engaging in conduct that contributes to a hostile environment based on an individual's sex, sexual orientation, sexual characteristics, gender identity, or gender expression, where conduct is known or ought reasonably to be known to be unwelcome.
- It can also mean making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought to know that the solicitation or advance is unwelcome.

Sexual harassment includes conduct by a person of any gender against a person of any gender. It goes beyond explicit requests for sexual favors, unwanted physical contact, or other attention of a sexual nature.

Examples of sexual harassment may include, but are not limited to the following:

- Unconsented-to or unwelcome touching or physical contact of a sexual or romantic nature such as grabbing, pinching, groping, massaging, hugging, pressing, brushing up against;
- Unwelcome sexual or romantic advances, including over text message, email, or other media;
- Comments about someone's body, weight, clothing, sexual experiences; Leering, whistling, commenting, or making nonverbal gestures related to an individual's physical appearance;
- Requests for sexual favors, whether or not sincere;
- Sexual jokes, games, innuendo, or other remarks that are told to or heard by any person who may find such jokes or remarks derogatory, degrading, or offensive;
- Questions or comments about an individual's sex life, desires, or preferences;
- Showing or displaying material (cartoons, articles, pictures, videos, etc.) with sexual content that others may find offensive, whether in public areas or private areas.

What is meant by other harassment?

Harassment is not limited to sexual harassment. It also includes conduct that creates or contributes to a hostile environment based on the discrimination categories above or any category under applicable law.

What is meant by retaliation?

The **act** of a person **hurting** or doing something **harmful** to someone having done or said something perceived as **harmful** to the person retaliating.

Our Code establishes a basic standard of conduct (section II):

“BTS as a fundamentally people-driven enterprise is defined by its employees. Employee behavior towards customers and other stakeholders and among themselves must therefore be characterized by a high standard of business ethics, compliance with laws and regulations and adherence to good business practice in a setting of honesty, integrity and respect for human rights.”

This means that at BTS, we believe in treating people as equals, respecting each other and the differences between us. We are committed to a work environment in which employees and others who experience harassment, bullying, or other inappropriate conduct feel safe and encouraged to ask for help without fear that it might negatively impact their employment.

Every employee has a personal responsibility to uphold the BTS Basic Standard of Conduct and to refrain from unacceptable conduct as outlined in this Code with its attachment. Employees are also responsible for complying with other relevant local rules or customs.

BTS Leaders should take the lead and work proactively to ensure a work environment in line with our values.

How do I report something?

Reach out to your regional human resources team or a manager or leader that you feel comfortable speaking with. Affected individuals may report to another member of management to ensure that the issue is reported.

Leaders should identify and make human resources aware of incidents contravening desired conduct and values being part of this Code and its attachment.

How will we respond to your concern?

When we become aware of a concern, BTS will respond in an appropriate manner, prioritizing safety, respect, and comfort. Often, this will warrant an investigation, which BTS will conduct in accordance with its legal obligations and in a manner respectful to the reporting employee, the employee/s subject to the investigation, and possible witnesses. BTS aims to be prompt and thorough with the investigation.

What may be the consequences?

Upon finding that unacceptable behavior has occurred, we will take appropriate measures to protect our culture and enforce our values. BTS will review applicable laws as well as the nature and extent of the conduct. It may include a formal disciplinary write-up, a warning, intensive remedial training, restrictions on presence in certain BTS settings, increased monitoring, incentive payment/salary increase ineligibility, and/or a period of probation, or termination of employment. BTS reserves the right to end relationships with any individual or business based on contravening this Code with its attachment.

Please note:

BTS recognizes that certain national, regional, provincial, and/or local laws may differ with respect to legal concepts dealing with unlawful conduct. Conduct may be prohibited under this Code with its attachment even if applicable laws would not prohibit it. Nothing in this policy is intended to contradict mandatory local law or to limit any individual's rights under those laws.

BTS also recognizes that different religions or local customs may entail activities or dress codes which may be in conflict with what may be prescribed Group wide or locally by BTS. In case of differences in these respects the BTS view shall prevail as decided by local or regional management.

Strategy made **personal**