

A photograph of a man and a woman from behind, looking towards a bright, out-of-focus background of circular light bokeh. The man is on the left, wearing a blue shirt and a red lanyard with 'COMBITECH' printed on it. The woman is on the right, with blonde hair, wearing a dark top and a red lanyard with 'COMBITECH' printed on it. The overall color palette is dominated by blue and teal tones.

# CODE OF CONDUCT

**COMBITECH**



A portrait of Jessica Öberg, President and CEO of Combitech, with long brown hair and a friendly smile, wearing a dark blazer over a light-colored top. The background is a blurred blue and white.

## COMBITECH A RESPONSIBLE COMPANY – WHAT DOES THAT MEAN?

Combitech supports efforts in our society to create sustainability and conduct business in an ethic manner. To be a responsible company we need to behave ethically in all aspects of business, care for the environment, set a good example in the way we act towards each other as employees and how we treat our business partners, and that we always respect laws and regulations wherever we do business.

To further develop our business and to be successful we must be – and be perceived as – a reliable partner to our customers regardless of their global location. Trust is the basis for our operations.

The Code of Conduct you are now reading sets out Combitech's ethical standards in a number of areas. All employees must be familiar with and live up to these standards. It is the top level of a framework, which consists of detailed policies and directives for specific areas.

Every Combitech employee, without exception, has a personal responsibility to preserve and maintain Combitech's reputation as a responsible company. We shall have a working environment where you feel you can raise questions and address issues without fear of retaliation.

**Jessica Öberg**

*President and CEO, Combitech*





Trust is a basis

# INTRODUCTION

## Why a Code of Conduct?

Combitech operates in a competitive market, primarily in Sweden but also in other Nordic countries and at other locations in the world, and we, as Combitech employees, represent the Combitech brand in our everyday work. Our vision and our values are only fulfilled if we all understand that we must represent the company in a way that meets Combitech's highly set ethical standards. In doing so we will gain respect on the market and in the societies where we operate, and we will create an attractive company for which to work.

One of Combitech's core values is Trust. By that, we mean that we are honest, reliable and keep our promises.

By following the standards and principles in this Code of Conduct, we demonstrate in practice what this value means to the company and to us as employees.

## What does the Code of Conduct cover?

The Code of Conduct is a summary of the standards and principles of conduct expected of all employees. However, it does not cover all aspects of behaviour. There will always be areas where we need to use our judgement as individuals.

Policies that are more detailed complement the Code of Conduct as well as directives for specific areas. Combitech employees are responsible to know when to go address Combitech's management system to get information about these policies and directives.

## Company commitments

The management of the company and its employees must commit to these standards and principles. Acts in violation of the Code of Conduct may cause damage to Combitech's reputation and may lead to legal actions against the company and its employees. It can also be a breach of the terms of employment, which are based on confidence and loyalty, and may lead to labour law actions.

## Seeking advice

It is inevitable that complex situations will arise where you feel that the Code of Conduct or management system does not provide any clear answers. When this is the case, we expect employees to discuss the matter with his/hers nearest supervisor or to seek advice from Head of Human Resources.

## Laws and regulations

# THE REGULATORY FRAMEWORK

### **We follow laws and regulations**

We are responsible for understanding and following local laws and regulations in Sweden and in countries where we are present or do business. If these are less restrictive than our own standard, we shall always apply the Combitech standard unless other instructions are given.

### **Combitech – A part of a listed company**

Combitech is a wholly owned subsidiary of Saab AB (publ). Consequently, Combitech as a company and we as employees must comply with all applicable stock market laws and regulations in order to maintain the shareholders' trust and Saab's accountability on the

financial market. When information is share price sensitive, we keep the financial market and stakeholders informed only through press releases.

Only the CEO or Head of Communications, or representatives authorized by them, are permitted to represent Combitech externally and to comment on disclosed information.

### **We do not allow misuse of inside information**

Inside information is information that is not public and is likely to affect the price of the Saab shares significantly. Typical examples of inside information include information about financial results and major orders. To maintain the public's confidence in the financial market, the

use and handling of inside information is strictly regulated.

For Combitech employees with access to inside information it is illegal to trade in Saab shares or other Saab securities, or to cause someone else to do so.

It is also illegal to disclose inside information to other people (including family and friends) or entities outside the company. This applies to everyone regardless of your position at Combitech, or whether you appear on the insider list or not.

Disclosure of inside information to a Combitech co-worker shall be on a need-to-know-basis only and the recipient shall be made aware of the inside nature of the information.

### **We comply with export control regimes**

Combitech, as a company operating in the defence and security sector, carries specific responsibilities towards the Swedish government and other governments. We are acting in a field of business that is highly regulated.

In order for us to continue to do business, it is necessary that we conduct our operations strictly in accordance with all required authorisations and licenses, and always, without exception, comply with the conditions applicable to our operations.

As of July 1st 2012, technical assistance is covered by the export control regimes of defence material and dual use products according to Swedish legislation. ■



# OUR WORKPLACES

## **Our workplaces are safe**

Combitech strives for a sound working environment and works to prevent accidents, illnesses and injuries. We are all responsible for protecting each other's health and safety, both physically and mentally, and we help one another in creating a sound working environment.

We do not tolerate any form of harassment, reprisal, bullying or other offensive physical or verbal treatments.

## **Diversity is a basis for successful business**

We firmly believe that workplaces characterised by diversity establish a solid foundation for greater creativity and innovation. We shall work actively to make Combitech more diversified at all levels of the company because we are convinced that it is a basis for successful business.

## **Discrimination is prohibited and in many cases, illegal**

Decisions on hiring, promotion, development and compensation are based on employees' knowledge and skills related to the job. They must never be based on irrelevant factors such as gender, age, ethnic or national origin, religion, disability, sexual orientation, union membership or political affiliation.

In conducting our work, we shall demonstrate respect for all people, regardless of differences.

## **We defend the right to organise and participate in trade unions**

We respect the freedom of association and all employees' right to form or join a trade union, as well as the right of employee unions to collective bargaining. Union representatives may not be subject to improper discrimination. Combitech permits union representatives to meet members and to access their workplaces.



## **We respect privacy**

We respect the fundamental human right of privacy. Personal information must be obtained correctly and lawfully, be relevant for the purpose for which it has been obtained and be handled with utmost care.

## **Social media**

We encourage employee participation in social media and other forums. Mutual respect between the company, employees and colleagues is fundamental. Social media and other forums are very important for Combitech's reputation and brand. It is of great importance that employees follow Combitech's "Policy on safety and ethics in Internet-related ICT use."

## **How we behave towards one another**

Job satisfaction is of vital importance in carrying out our duties with efficiency and quality. Creating a sense of well-being at the workplace is thus something we must all strive for so that everyone feels that they are welcome members of and feels motivated to participate in the Combitech social community. ■



Honestly, fairly and correctly

# BUSINESS ETHICS

## **We compete fairly and honestly**

We are firm believers in free enterprise and in fair competition on a level playing field. This system is protected and promoted by competitive law.

We always conduct our business in compliance with applicable anti-trust laws and other laws that regulate competition.

## **We work to prevent bribes and corruption**

Combitech applies zero tolerance when it comes to corruption. This means that under no circumstances may we be involved in, encourage or tolerate bribery. By bribes, we mean payments or other benefits to public officials or private sector employees with the aim of obtaining or retaining contracts or any other advantages.

We are aware of the risk that remuneration to market intermediaries may be used to improperly influence business decisions. We are committed to preventing this by implementing and adhering to requirements and processes in our operations that are consistent with best practices in the industry.

## **We do not offer improper gifts or hospitality.**

Moderate and reasonable gifts and hospitality which are customary in business are normally acceptable if given for the right reason, i. e. demonstrating Combitech's products and services, improving the image of the company or establishing cordial business relations. We shall however be aware that even customary gifts and hospitality may be inappropriate in connection with forthcoming or on-going business negotiations and we always pay attention to our customers' integrity policy.

We shall not offer gifts or hospitality of a value or nature or under circumstances, which may be seen as



an attempt to improperly influence business decisions or to obtain other improper advantages.

Openness, transparency and correct recording are key elements to demonstrate compliance with these requirements.

## **We do not accept improper gifts or hospitality**

As Combitech employees, we must always be – and be seen as – impartial and professional when dealing with others. This entails that we shall only accept gifts and hospitality offered by others if they are reasonable in relation to the business in question and are within the boundaries of customary business behaviour.

Gifts and hospitality of high value or of unethical or unusual character shall never be accepted. If you are in any doubt as to whether you should accept a gift or participate in an event, you must seek advice either from your superior or from Head of Human Resources.

## **We avoid conflicts of interest**

We shall always keep personal interests apart from company business. Decisions by and for the company must

never be influenced by personal preferences or relationships. Issues of conflicting interest may arise upon employing or otherwise engaging former public officials who have had a position with an authority where matters concerning Combitech are dealt with.

This must never occur unless we can ensure that the employment or assignment does not violate any laws, regulations or directives that regulate public sector employees' options for new employments.

We shall always seek to minimise the risk of conflicts of interest. ■

A valuable asset

# INFORMATION AND USE OF COMMUNICATION MEDIA



## **We protect information as a valuable asset**

Information about the company is internal or confidential unless publicly released through annual reports, press releases or through product descriptions or similar materials intended for public use. We shall not share information with others outside the company unless there is a business-related reason for doing so.

Company information of a technical, commercial or marketing character is of a particularly proprietary and sensitive nature and subject to confidentiality stipulations. This information may also include inside information. Combitech employees entrusted with such information must be familiar with the confidentiality requirements and procedures as regards such information and always ensure that the company's interests are preserved.

All information handled at Combitech shall always be assessed according to its value, to ensure that it is given the proper level of protection.

We must all be aware of the risk of unintentional exposure of information, such as by discussing company matters with colleagues while travelling or

in public places. When we as individuals speak about ourselves in the social media sphere, we must not spread any information about Combitech that is not intended for the public. Neither should we use social media in a way that can cause harm to Combitech's brand and reputation.

Only the CEO or Head of Communications, or representatives appointed by them are authorized to speak on behalf of Combitech in the media, including any form of social media.

## **Information systems are our work tools**

We use information systems professionally and as a means to increase efficiency in our work processes continuously. The company's communication tools must never be used for illegal or unethical purposes. Limited private use of company communication tools is acceptable if restricted to handling personal matters, which do not interfere with work.

When we communicate using an information system associated with the company we always, regardless of method, represent the company. This means that we shall act respectfully and correctly,

and always be conscious of the fact that our messages may be used for purposes other than those intended.

## **We are cautious in handling confidential information and proprietary third-party information.**

We treat information obtained from others in the same way as we expect them to treat information received from us, and in accordance with terms applicable to its disclosure.

We do not try to access or accept receipt of proprietary information from others unless the owner has agreed to its release. Proprietary information that is accidentally received shall not be further disseminated but instead be returned to its owner.

We must always be aware of our customers' regulations for protecting information for national security or export control reasons. We often need substantial amounts of information about procurement plans and other data to be able to support our customers' needs. However, we must never attempt to access any information not legitimately authorized for release or disregard the terms applicable to its disclosure to us. ■

A sustainable society

# COMBITECH CARE FOR THE ENVIRONMENT



## **Sustainable development and environmental approach**

In Combitech's view, sustainability is a vital factor in the success of our company, and this is why sustainability is an important part of our common values and of our vision. Minimizing environmental impact and striving for the assignments to contribute to environmental improvements are integrated aspects of our business operations. They strengthen our credibility and our brand.

Through our services, we shall contribute to sustainable community development. When carrying out our assignments this means that, we shall always strive for solutions that contribute to positive environmental effects. Knowledge is an important factor in

order to be successful in the environmental work. Therefore, our employees shall have fundamental knowledge of global environmental threats and our own environmental impact.

Our direct impact on the environment consists mostly of travel and operation of our offices. By selecting modes of transport with low emissions, products without hazardous chemicals and seek energy-saving measures, we minimize our impact on the environment.

## **Combitech contributes to positive community development**

Combitech's operations are characterised by taking responsibility. This also applies to a significant degree to our approach to community development. Combitech's operations create jobs and

positive economic impact in society. We encourage support to the societies in which we operate, especially with respect to education and the environment. ■



We work together

# REPORTING NON-COMPLIANCE



## **Reporting non-compliances is to be loyal to company values**

The Code of Conduct plays an essential role in creating a company-wide culture of responsibility and commitment to Combitech's values.

All employees are expected to report to their immediate supervisor any observed suspected violation of law or the Code of Conduct. Offences to be reported to the police. This is done by Head of Human Resources and the Head of Communication shall also be informed.

You may contact the CEO in the event of serious violations involving management, high-ranking officials or other key employees at Combitech and concerning accounting and financial reporting, insider trading, corruption or other

areas of vital importance to Combitech's business or the health and safety of individuals.

You may also report anonymously to Saab's Ethics and Corporate Responsibility Council by sending an email to [ethics.council@saabgroup.com](mailto:ethics.council@saabgroup.com) using an external email account that does not reveal your name (such as Hotmail, Yahoo or Gmail).

You should be aware, however, that anonymous reports may be more difficult to investigate. ■







## Ten principles for our operations

# UN GLOBAL COMPACT

Combitech applies the UN Global Compact policy and the ten principles in the areas of human rights, labour, environment and anti-corruption, to which the parent company Saab subscribes to and that even encompasses its subsidiaries. These ten principles also constitute the basic requirements for suppliers and partners to Combitech.

## Human Rights

1. Businesses should support and respect the protection of internationally proclaimed human rights; and
2. make sure they are not complicit in human rights abuses.

## Labour

3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. the elimination of all forms of forced and compulsory labour;
5. the effective abolition of child labour; and
6. the elimination of discrimination in respect of employment and occupation.

## Environment

7. Businesses should support a precautionary approach to environmental challenges;
8. undertake initiatives to promote greater environmental responsibility; and
9. encourage the development and diffusion of environmentally friendly technologies.

## Anti-corruption

10. Businesses should work against corruption in all its forms, including extortion and bribery.

The UN Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, the environment and anti-corruption.

## ABOUT COMBITECH

Combitech is one of the Nordic region's largest technology consulting firms, with nearly 1,900 employees in Sweden, Norway, Finland and Denmark. We combine technical expertise with in-depth industry knowledge, all-round capability and a particular focus on the environment and security. This results in customised, sustainable solutions for demanding clients who are active both in the Nordic region and internationally. Our clients mainly operate in the industrial and defence sectors, and the public sector.

**COMBITECH**