Reduxi FlexCo

Amibit d.o.o.

Reduxi DACH GmbH

Reduxi Nordics AB

(together referred to as Reduxi)

# CODE OF CONDUCT

# Contents

BASIC RIGHTS	3
Human Rights	3
Diversity	3
Clear internal communication	3
SECURITY AND SAFETY	4
Health / Safety	4
Company assets	4
Cybesrecurity and Data protection	4
ACCOUNTABILITY	5
Integrity and Conflicts of Interest	5
Free competition	5
Criminal activities	5
EXTERNAL ACTIVITIES	7
Communications	7
Financial reporting	7
Lobbying and communicating with public officials	7
Environment	7
Compliance & Whistlehlower system	7

# **BASIC RIGHTS**

## **Human Rights**

Employees are required to respect and uphold human rights at all times. All business activities must be conducted ethically and with integrity. The Company is fully committed to its responsibility for safeguarding human rights and adheres to the International Bill of Human Rights and the core labour standards of the International Labour Organization (ILO).

The Company's activities are guided by the UN Guiding Principles on Business and Human Rights (UN Global Compact), which provide the binding framework for action.

## Diversity

The Company promotes diversity, equal opportunity, and fair participation as binding principles. Discrimination of any kind is strictly prohibited. Employees are not permitted to engage in unequal treatment on the basis of ethnic or social origin, skin colour, sex, nationality, language, religion, belief, age, physical or mental disability, gender identity, sexual orientation, political opinion, or any other legally protected characteristic.

Employment decisions, including recruitment, hiring, and development, must be based solely on qualifications and skills.

#### Clear internal communication

Employees are required to report misconduct or violations of rules, even if doing so is difficult or uncomfortable. Silence in the face of wrongdoing is not permitted.

Supervisors are obligated to lead by example, enforce compliance with rules, and address violations. Managers must promote a culture of openness, provide guidance, and support employees in adhering to regulations.

#### SECURITY AND SAFETY

## Health / Safety

Employees are required to comply with all applicable occupational health and safety laws, regulations, and Company policies. Protecting health and safety is mandatory and essential for sustainable operations. Workplace accidents and work-related illnesses must be prevented to the greatest extent possible. Active cooperation of all employees is required.

Reduxi promotes occupational health and safety in compliance with national laws, regulations, and the Company's occupational safety policies.

#### Company assets

Company property, whether tangible or intangible, may only be used for legitimate business purposes and in pursuit of corporate objectives. Private use is strictly prohibited unless expressly permitted by internal policies.

Employees are required to protect Company know-how and intellectual property and must respect the intellectual property rights of competitors, partners, and third parties.

## Cybesrecurity and Data protection

Employees are required to comply with all IT security and information protection regulations. Personal data may only be collected, processed, stored, or used in accordance with statutory requirements. Employees are not permitted to misuse or improperly disclose personal data.

The obligation to protect the personal data of customers, employees (including former employees and applicants), and business partners applies to all staff without exception.

#### ACCOUNTABILITY

## Integrity and Conflicts of Interest

Employees must avoid conflicts of interest in the performance of their duties. Any potential conflict of interest must be disclosed without delay.

Conflicts of interest may arise from personal or financial interests, family or business relationships, secondary employment, memberships, or other circumstances. Business relationships with suppliers, customers, or Group companies may also give rise to conflicts and must be declared.

Gifts, invitations, and other benefits are only permitted if they are appropriate and in line with internal policies. Employees are not permitted to offer or accept benefits that could influence business decisions.

## Free competition

Employees are required to comply fully with all antitrust and competition laws.

Agreements or coordinated practices with competitors, suppliers, or customers that may restrict or distort competition are strictly prohibited.

In particular, employees are not permitted to:

- Exchange or agree on prices, terms, or market allocations;
- Share competitively sensitive information;
- Abuse a dominant market position;
- Circumvent merger control obligations.

Violations of competition law expose both the Company and employees to severe legal and financial consequences.

#### Criminal activities

Employees are strictly prohibited from engaging in any criminal activity, including but not limited to corruption, money laundering, or terrorism financing.

- Money laundering: Employees are not permitted to disguise or attempt to disguise the origin of criminal assets. Inadvertent involvement may constitute a criminal offense.
- Terrorism financing: Employees are prohibited from providing financial or material support to terrorism or related organizations.

 Corruption: Employees are prohibited from abusing professional positions for personal gain or third-party advantage. Invitations and gifts, particularly in relation to public officials, are permitted only under strict conditions defined by internal policies and law. Facilitation or expediting payments are prohibited under all circumstances.

#### **EXTERNAL ACTIVITIES**

#### Communications

Employees are required to ensure that all external communications and marketing measures are coordinated with the relevant department before implementation. Employees are not permitted to issue unapproved statements that could affect customers, investors, or other stakeholders.

## Financial reporting

Employees must comply with all statutory requirements for accounting and financial reporting. All records must be accurate, transparent, and timely. Misrepresentation, omission, or manipulation of financial data is strictly prohibited.

## Lobbying and communicating with public officials

Any lobbying or political communication on behalf of the Company must be conducted centrally, transparently, and in line with internal guidelines. Employees must maintain strict neutrality in dealings with political parties and interest groups.

Employees are prohibited from offering facilitation or expediting payments to public officials. Benefits in dealings with public officials must be avoided except where explicitly permitted by law and internal policies.

#### Environment

Employees must act in accordance with the Company's environmental policies. Resources must be used responsibly, environmental impacts minimized, and compliance with all environmental laws is mandatory.

Employees are required to support the Company's commitment to sustainable technologies and responsible product lifecycle management.

# Compliance & Whistleblower system

The Code of Conduct is binding on all employees. Employees are required to comply with its provisions and with all applicable laws and internal policies.

Violations are subject to investigation and may result in disciplinary measures, civil liability, or criminal prosecution. Proven misconduct may also impact remuneration.

Employees must report suspected violations to supervisors, HR, the Compliance Officer, or via the Whistleblower System.

The Whistleblower System protects the Company, the whistleblower, and those assisting investigations. Retaliation or discrimination against whistleblowers is strictly prohibited and constitutes a serious violation.

The rights of implicated persons are protected; the presumption of innocence applies until proven otherwise. Abuse of the Whistleblower System is prohibited and may result in disciplinary action.

Compliance Contact / Whistleblower Reports:

compliance@reduxi.eu