




# Code of Conduct

Nexus

 **Public Document**  
Nexus property.



Identification of the document		
<b>No pages:</b> 10	<b>State:</b> Released	<b>Reference:</b> Policy
<b>Creation date:</b> 11/27/2018	<b>Last updated:</b> 06/01/2022	<b>Version:</b> 3.0

Version history				
Version	Author	Date	What changes were made, where	Approved by
1.0	Sabina Olsson	2018-11-27	Yearly review	CEO
2.0	Sabina Olsson	2020-10-15	Yearly review	CEO
2.1	Sabina Olsson	2021-06-29	Yearly review	CEO
3.0	Elin Ekholm	2022-06-01	Yearly review. Added information about new whistleblowing routine	CEO
		Click or tap to enter a date.		
		Click or tap to enter a date.		

This document and the software described in it are copyrighted

© 2022 Technology Nexus AB. All rights reserved.

All other trademarks and service marks are the property of their respective owners.  
Information in this document is subject to change without prior notice.

## Table of Contents

1. Nexus' Code of Conduct.....	3
1.1 Who & why? .....	3
1.2 Legal compliance .....	3
1.3 Guidance and whistleblowing .....	3
1.4 Implementation and monitoring .....	3
2 Responsibilities.....	4
2.1 Nexus's basic ethical principles .....	4
2.2 Rules and regulations .....	4
2.3 At work .....	4
2.4 Outside work .....	6
2.5 Us and our costumers.....	6
2.6 Business ethics .....	6
2.7 Secrecy .....	8
2.8 Our social responsibility .....	8
2.9 Owning mistakes and failures.....	9
2.10 Internal information and education .....	10
2.11 Governance .....	10

# 1. Nexus' Code of Conduct

The Code of Conduct document is available in English. It's distributed to all employees and can be found on Nexus' intranet: <https://technologynexus.sharepoint> and on the external web site [www.nexusgroup.com](http://www.nexusgroup.com)

## 1.1 Who & why?

This document applies to all Nexus employees and business partners. The short answer to why Nexus's Code of Conduct is important is that we believe in constructive social and ethical behavior and recognize our responsibility to employees serving Nexus worldwide. High ethical standards are vital to ensure continued trust from all stakeholders and thereby ensure the trust in and success of our company.

Additionally, ethical behavior is a key building block for Nexus to be the type of employer we want it to be and to be able to keep and attract new employees. Ethics is about what is right, and about how to behave. Nexus is nothing more than the collective actions and behaviors of all its employees.

## 1.2 Legal compliance

The Code of Conduct does not replace legislation, and if any part of it is in conflict, then legislation takes precedence. Situations may occur for which there are no specific guidelines. In such cases, conduct should be in the spirit of the Code of Conduct.

## 1.3 Guidance and whistleblowing

Collectively we advocate ethical behavior, integrity and respect for individuals, in line with the laws, rules, codes and applicable standards of our professional roles. Anyone within the group can therefore report any behavior and/or actions that might be considered as a violation of the code of conduct via IN Groupes' ethics and compliance alert system. You are guaranteed confidentiality and no fear of reprisal – particularly in cases of doubt or concern over a situation that appears to breach the company's code of conduct

The report tool can be accessed via the red button named "Whistleblowing platform" on the landing page of Nexus' intranet, or directly via the following address: <https://imprimerie-nationale.integrityline.org/>

## 1.4 Implementation and monitoring

Nexus monitors the implementation of the Code of Conduct. Contact at Nexus: [HR@nexusgroup.com](mailto:HR@nexusgroup.com)

Stockholm, June 2022

Olivier Dussutour CEO

## 2 Responsibilities

### 2.1 Nexus's basic ethical principles

#### **A high standard of ethics is a prerequisite for long term success**

Nexus and its employees act fairly, decently and honestly, and with a high level of integrity.

#### **We promote equality, diversity and gender balance**

All people have equal value and our culture shall promote equality. We provide a work environment where everybody is treated with respect and dignity and is given fair and equal opportunities for development. We request that all our employees work actively to create an inclusive culture and strive towards diversity within the company. We do not tolerate any form of discrimination or harassment, sexual harassment or reprisals/retaliations in the workplace due to race, ethnicity, sexual orientation, gender, gender identity or gender expression, religion, age, disability, political opinion, nationality or any other potentially discriminatory factor.

### 2.2 Rules and regulations

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

In the event that the laws and regulations are less strict than our own standard, we shall apply the Nexus' standard unless other instructions are given.

#### **We have good relationships with public authorities**

Nexus strives for transparency and mutual respect in relation to inspectorates and supervisory authorities, as well as with other public authorities.

### 2.3 At work

#### **We care about each other**

We always listen and try to understand and are ready to help. We trust each other, show confidence and act with integrity.

We have a genuine interest in people and respect everyone around us, both within and outside the company.

We show empathy in all situations and in every relationship with colleagues and customers. We strive to protect the environment and conserve the earth's resources.

We aim to share joy as well as challenges and setbacks.

We aim for transparency, which is fundamental for creating trust, value and respect.

We always follow local labor law regulations.

### **We follow Nexus' Principles**

*Customer Engagement* – We know our customers and what problems we solve for them

*Own it* – We take ownership for what we do and for Nexus as a whole

*Collaboration* – We collaborate in everything that we do

*Get things out* – We ensure that things that can go out today is not left until tomorrow

*Constant improvement* – We listen to feedback and improve in everything we do

*Never assume* – We check the details and take decisions based on facts

### **We take responsibility for exercising sound judgment**

We act as mature, responsible persons who exercise sound judgment and think for themselves. The fact that something is not expressly forbidden in our policies does not make it right.

### **We work actively against discrimination and bullying**

We do not tolerate any form of discrimination, harassment, sexual harassment bullying or any other form of physical or verbal mistreatment. Neither do we tolerate any sort of reprisals for employees who stand their ground and report potential issues within the company.

### **We strive for inclusion and diversity**

We believe a diverse workforce and inclusive culture is key to success. When making decisions related to the workplace we shall always consider how to increase diversity within the company in terms of gender, age, background and different abilities. We are all responsible for creating an inclusive work culture and for reporting misconduct if this would not be the case.

Our decisions on hiring, promotion, development and compensation are based on the employee's abilities and skills only, and must never be based on irrelevant factors, such as gender, age, ethnic background, religious belief or sexual orientation.

### **We respect privacy**

We respect the fundamental right of privacy. Personal information on employees, customers or other stakeholders must be obtained correctly and lawfully. The information must be relevant for the intended purpose and be treated with the utmost care. We act according to applicable data protection regulations, such as GDPR (General Data Protection Regulation) which strengthens the protection of personal data within the European Union. We have implemented technical and organizational

measures to ensure that the provisions of data protection are applied both by us and by our external service providers. Nexus is also certified according to ISO 27001, in which information security processes ensure that sensitive company information remains secure, including people, processes and IT systems.

### **We take responsibility for the company's assets**

We treat Nexus's assets and the equipment we use in our work in a responsible way. Nexus's assets must only be used in compliance with Nexus' IT guidelines.

### **We have a safe and healthy working environment**

Nexus seeks to ensure a healthy and safe work environment. Nexus works continuously with health promotion and rehabilitation. Alcoholic beverages may not be consumed during working hours. The only exception is that a responsible use of alcohol may be allowed in connection with customer entertainment. Nexus's employees may not use narcotics.

## **2.4 Outside work**

We expect Nexus's employees to exercise sound judgement and caution also regarding activities outside work. Employees cannot, for example, take part in professional or private activities that compete with Nexus. Furthermore, employees should make sure that personal opinions and comments made in private or on social media are not perceived as connected to Nexus.

## **2.5 Us and our costumers**

### **Customer Engagement is key**

Engaging with and caring for our customers builds trust and confidence in us as individuals and in our company, therefore our principle Customer Engagement is true for everyone within the company.

### **Nexus's marketing activities shall be serious and professional**

The market/customers may never be given an erroneous or exaggerated image of Nexus or Nexus' products/services. Information about, and comparisons with, competitors shall be objective and may not contain elements of contempt. Competitor information may not be used improperly.

## **2.6 Business ethics**

### **Quality and long-term thinking**

Nexus stands for high quality and aims for good long-term results.

**We compete fairly and honestly**

We believe in open and fair competition. We always conduct our business in full compliance with antitrust laws and other laws that regulate competition. We do not enter into agreements, including informal understandings, with competitors for price fixing, bid rigging or market allocation to restrict supply.

**We do not participate in Insider trading**

We follow all applicable laws and regulations, including those prohibiting insider trading. Nexus employees may not trade in the stock-market or other securities based on non-public information that the employee received due to its employment at Nexus.

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

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. Moderate and reasonable gifts and hospitality which are customary in business are normally acceptable. Openness, transparency and correct recording are key elements to demonstrate compliance in these matters.

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

We shall only accept gifts and hospitality offered by others if they are reasonable to the business in question and they are within the boundaries of customary business behavior, both when it comes to value and content. In relation to gifts and hospitality, we are guided by applicable anti-corruption laws in the region where we participate in the business, for example the U.S. Foreign Corrupt Practices, the U.K. Bribery Act and the Swedish Anti-Corruption Institute's Code on Gifts and Rewards and other Benefits in Business. We do not offer, directly or indirectly, any type of payment (or kickbacks, gifts, favor, or similar) to improperly influence any government officials or representatives. If the Code deviates from the national law in the country where Nexus does business, the rules or equivalent code of that country shall apply.

**Our business relationships are professional**

Nexus's business decisions shall only be based upon business considerations such as questions of quality, price, capacity and such. Nexus does not engage suppliers or other counterparts who have substantially neglected their obligations to their business partners, employees or the general public. All Nexus' suppliers are bound to follow our supplier handbook. When we engage in business activities with any entity falling under governmental, federal or state control, we ensure to comply with the laws and regulations that may apply and we do not attempt to influence decisions by such entities in any other way than the laws and regulations allow us to.

**We avoid conflicts of interest**

Nexus's employees should avoid situations where their personal interests may be in conflict with what is best for Nexus. If a conflict of interest should nonetheless appear, the employee shall inform his or her manager and a decision on how to deal with the situation shall be made. Fairness, openness and transparency are key elements in avoiding or handling conflicts of interests between Nexus and its customers, as is a clear guidance to the customer on how to bring the case further to a relevant authority for a fresh evaluation.

## 2.7 Secrecy

**We protect the information about our customers**

Confidential information may not be distributed to or discussed with unauthorized persons and may not be stored such that it can be accessed by unauthorized persons. Any other information on customer circumstances shall also normally be treated as confidential.

Managers with specific responsibilities may void the confidentiality in certain cases, for example in connection with court cases. The affected customer can permit Nexus to use information publicly, for example for marketing purposes.

**We protect our business information**

Information on Nexus's products, business models and the like that is not already published externally is either internal or confidential and must not be disclosed to third parties unless there are business reasons for doing so. Caution must be taken when acting as a speaker at external conferences, so that competitors do not gain access

to information that is valuable to Nexus.

## 2.8 Our social responsibility

**Nexus takes responsibility for the communities in which we serve**

Nexus always strives to operate in a manner that meets or exceeds the ethical, legal, commercial and public expectations that society has on business.

**We act responsibly and with a long-term perspective to secure society**

We work to secure society, both at the societal level, such as through research and advocacy for securing the Internet of things and authentication of users for business transactions online; as well as on the corporate and personal level, through day to day deliveries and careful attention to our customers' needs.

**We care for the environment**

We shall always endeavor to find the best possible environmental solution – for our company, our customers, our suppliers and our partners. We always follow our Environmental Policy. We encourage and support our suppliers and partners in their efforts to use more environmentally friendly methods in their work.

**We do not accept child labor**

We recognize the right of every child to be protected from economic exploitation and from doing work that is likely to be hazardous to their physical, mental or spiritual health, harmful to their moral or social development, or to interfere with their education.

## **2.9 Owning mistakes and failures**

**We correct our mistakes**

Nexus shall deliver high quality in all parts of our operations. We work systematically to identify shortcomings, constantly improve and correct our mistakes quickly. Good handling of mistakes requires a positive attitude and a willingness to implement changes to everything from customer service to internal cooperation and product offerings.

**We learn from our mistakes**

Nexus encourages innovation and development. New improvement initiatives are a necessity for future success, but they do not always succeed. We learn from our mistakes, improve our processes and continue to try out new ways of working.

**We make it easy for our employees to report errors and omissions**

If an employee feels that Nexus' actions in any regard is not characterized by a high degree of ethics and wishes to make a complaint or report an ethical violation of any kind (including harassment, sexual harassment or retaliation) the line manager, a representative of the local management or the local person responsible of Code of Conduct issues, should be informed. If an employee finds it difficult to bring up an issue locally, Nexus' head office should be contacted. If the ethics breach concerns the immediate superior, the matter shall be reported to HR or Compliance Manager. The form provided in Appendix I can be used. HR is responsible for making sure an investigation takes place. An employee's information (in the case of whistleblowing) will be treated confidentially, and no employee will be discriminated against for reporting, in good faith, violations of the Code of Conduct.

## 2.10 Internal information and education

### **We have a living internal discussion about business ethics**

Nexus is actively working to stimulate a lively internal ethics debate, for instance during training courses, internal seminars and at individual workplaces.

### **We require that all employees as well as consultants or partners follow our Ethics policy/ethical values**

New employees shall be informed of the Ethics policy and confirm that they have understood and undertake to follow it. All employees as well as consultants shall be reminded of their obligations of secrecy as regards Nexus's information.

## 2.11 Governance

All managers shall, on his/her own initiative, ensure that the policy is followed and that a high level of ethics is observed within his/her own unit.

Breach of internal rules could result in disciplinary actions.