

Document name: Careium Business Ethics  
Date for approval: 2023-11-13  
Author: Mona Sahlberg  
Approved by: Christian Walén  
Confidentiality: Public



# Careium Business Ethics policy

## Code of conduct

This document includes policies for Quality, Environment, Information security and Occupational health and safety

Version 7

**Careium Business Ethics policy applies to all people who work for Careium group, both employees and consultants, regardless if permanently employed or temporarily contracted, and also students and voluntary workforce.**

**Careium companies may have additional policies, but the requirements in this document must always be met.**

## General rules for all

### Values

At Careium, we are proud to follow the values of the company: Show Care – Act Smart – Be Heroes.

We do this to work towards our vision: Millions are able to lead rich, safe and active lives supported by innovation and always-on human connection.

### Anti-corruption

At Careium, all forms of corruption are strictly forbidden, including but not limited to extortion, bribery, nepotism, fraud, and money laundering.

### Conflicts of interest

No employee may be involved in an activity or hold a position outside Careium that is in conflict with the company's business interests. Such conflicts of interest could also include directorships, significant shareholdings, or the employment of family members.

### Human rights

We support the principles contained within the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and the ILO Core Conventions on Labour Standards.

When representing Careium, we strive to respect all individuals and their human rights, no matter who they are.

### Prohibition of harassment and abusive behaviour

Careium does not tolerate any form of harassment or violence in the workplace, and the use of forced labour and child labour is strictly prohibited in all company operations.

A process is clearly defined and communicated in the event that harassment and abusive behaviour should occur. Control of compliance is the responsibility of each line manager and follow up is done in employee surveys twice a year.

Document name: Careium Business Ethics  
Date for approval: 2023-11-13  
Author: Mona Sahlberg  
Approved by: Christian Walén  
Confidentiality: Public



## **Whistleblowing**

Everyone can report anonymously anything you suspect may violate laws, other requirements or this code directly to a manager, to an employee organisation, or through Careium's reporting channel, without any risk of reprisals.

The report channel is found at the external web, including full Whistleblower information.

## How we treat our employees

Enabling and empowering employees and consultants of Careium to fully contribute to the company's development is the responsibility of all managers within the Careium Group.

## Occupational health and safety policy for Careium group

We want to

- promote good health among our employees,
- create a good and safe work environment for all,
- enable employees affected by diagnosed medical conditions to work on their terms by adjusting the work situation, as appropriate.

We believe in a connection between health, productivity, and quality.

The CEO has the ultimate responsibility for occupational health and safety in the company, but all managers have important roles, according to internal guideline. Each employee and consultant, regardless of position, has a responsibility to promote the common good work environment and a good company culture.

We enforce existing health and safety legislation and other applicable regulations and requirements.

Occupational health and safety work is conducted as a natural part of daily work, and also as a systematic approach in which we conduct regular surveys of the work environment and implement and follow up the decided action.

## Equal opportunities and non-discrimination

Employees are recruited and promoted solely on the basis of their qualifications for the job, regardless of race, religion, age, national origin, gender, sexual orientation, political opinion, union membership, marital status or disability unrelated to the task in question. Careium encourages the positive contribution a diversity of background and experience gives. Control of compliance is done in an evaluation about equal opportunities.

## Freedom of association and the right to collective bargaining

Employees have the right to union membership.

## Work-life balance

Where appropriate, Careium supports flexible work schedules and part-time arrangements.

Document name: Careium Business Ethics  
Date for approval: 2023-11-13  
Author: Mona Sahlberg  
Approved by: Christian Walén  
Confidentiality: Public



## **Employment security**

Careium commits to ensure employment security and responsible workforce restructuring. We use responsible redundancy procedures following legal requirements and union agreements in the countries where we operate. We strive to minimise redundancies, and if they are necessary, we shall select people objectively, fairly and not discriminate.

## **Compensation and development**

Each employee shall be rewarded in a correct and fair manner in accordance with their individual performance and behaviour, and contribution to the success of the company. All employees shall be offered opportunities for appropriate development to help them acquire relevant skills, grow within the company and progress their careers. Annual development talks are done with the appropriate manager, where training plans, targets and follow-up is discussed.

## **Employee consultation**

Careium strives to maintain good communications with each employee through company information and dialogue.

## Customer relations

### Quality policy for Careium group

Careium is committed to delivering products and services that answer real needs and enables users to continue doing the things they have always enjoyed doing.

Careium delivers premium products and services. Always with the end user's needs of simplicity and quality at heart.

We continuously improve our products and ways of working, to provide high and consistent quality, ensuring we meet legal requirements in our different markets.

To achieve this, we aspire to:

- evaluate customers needs to fulfill their requirements
- regard both our products and services as expressions of our quality
- inform and train our employees and suppliers, to understand the importance of quality
- actively seek feedback on products and ways of working

### Customer satisfaction

Loyal, satisfied customers are the basis of our reputation. Honesty and integrity in all dealings with customers are prerequisites for profitable, long-term business relationships.

### Marketing

Careium will provide customers with accurate product and services information, and will only make commitments about our products or our company that we can live up to. Our marketing shall be truthful, not misleading, accurate and balanced. Marketing communications shall be clearly distinguishable as such. We shall not make unsubstantiated product claims, e.g. environmental or health claims.

### Gifts and favours

At Careium, gifts, entertainment, compensation, and personal favours may be offered to a third party only if they are modest in value and consistent with customary business practice. Cash may never be used as a gift. No gifts, entertainment or personal favours may be offered in contravention of any applicable law or code of practice. Gifts that do not meet the above criteria should be reported immediately to Careium management, who shall determine what measures should be taken. Customers are encouraged to use the Whistleblower function to report violations.

## Supplier relations

As a company, we are responsible for our selection of suppliers.

New suppliers are evaluated regarding Environment, Social and Governance performance, and shall sign the Careium ESG Policy for suppliers.

## Gifts and favours

No employee should seek or accept any gift, entertainment or personal favour that might reasonably be believed to have an influence on business transactions. No gifts, entertainment or personal favours may be accepted in contravention of any applicable law or code of practice. Cash may never be received as a gift. Gifts that do not meet the above criteria should be reported to management, who shall determine how the matter will be dealt with. Suppliers are encouraged to use the Whistle blower function to report violations.

## Supplier behaviour

Careium will inform business partners of the company's values and business principles.

We will not do business with suppliers that fail to comply with:

- applicable local legislation, and
- requirements put on them in contracts and the Careium ESG Policy for suppliers.

## Control of suppliers

Careium does audits and follow up according to contracts. Non-compliance found at audits, whistle-blower action or other input will not be publicly reported but will be reported back to the supplier and can lead to ending of the contracts. We will not audit indirect suppliers in the extended supply chain but will require and control that our suppliers do relevant controls in the supply chain.

## **Society**

### **Legal compliance and local customs**

Careium employees must comply with all the applicable laws and regulations of the country in which the company and the employee operates. In cases where a conflict exists between more restrictive laws and this Code's principles and values, the law shall prevail. We will respect the local traditions and customs of each country. In cases where there is a conflict between local customs and this Code's principles and values, the Code shall guide the employee's course of action.

Careium respects intellectual property rights of others. If infringements on intellectual property rights are identified Careium's intention is to search for acceptable license agreement.

### **Community involvement and contributions**

Careium seeks to make a positive and sustainable contribution to the communities in which we conduct business. Employees are encouraged to participate in community affairs, but the company does not support political parties or make political donations.

### **Fair competition and integrity**

Careium conducts business operation in line with fair competition; Not participating in any form of bid rigging or other mechanisms that limit fair competition in tender situations, any form of cartel practices with competitors, such as dividing or allocating markets or customers or price fixing.

### **Taxes**

Careium group prohibits tax avoidance through transfer pricing, and we are committed not to be present in tax jurisdictions enabling tax base erosion and profit shifting.



## Environment

### Environmental policy for Careium group

Careium strives to offer products and services that meet customer requirements for safety and quality with a low impact to the environment.

#### Our products

It is important to us to develop and supply products with:

- long lifetime, including possibility to change worn parts and clean the products, making it possible to hand the product over from user to user
- conformity to applicable legislation
- low energy use
- relevant information about our products' environmental properties available
- possibility to recycle materials, where we also aim for materials with low environmental impact

#### Our services

The services we offer, based on the alarm receiving centres, are an important part of the customers' obligations for lowering their environmental impact. With our services, unnecessary visits to users can be avoided, especially when using remote monitoring.

#### Our promises

- We will work towards continuous improvement, pollution prevention and reduction of carbon footprints, using a Life Cycle perspective.
- We will comply with applicable laws and other requirements applicable to the organisation.
- We will encourage our suppliers to actively work with the environment and take responsibility for their products' / services' impact on the environment.
- Our environmental management system will make sure the environment is continuously on the agenda.

## Information Security, Data Privacy and Personal Data Protection

Careium handles sensitive personal data and is responsible for services where downtime is not acceptable. Our Information Security Management System, enforced by our ISO 27001 and ENS certifications\*, helps us achieve a relevant level of information security.

Data privacy and information security is everyone's responsibility. It is important that all Careium employees work together to build a strong and resilient digital security culture by following company procedures and guidelines, participating in e-learning courses, and complying with data protection laws such as GDPR.

### Information security policy for Careium group

We commit to proactively manage and improve our information security management system. We strive for secure handling of information and to protect the confidentiality, integrity and availability of all data held on our systems. We maintain a systematic approach to continually lower our exposure to information security risks and threats.

We aim, as far as reasonably possible, to:

- Assess information security related risks and implementing practical and cost-effective controls to mitigate identified risks and threats
- Meet applicable legal, regulatory, and contractual requirements
- Prevent interruption to business, and implement, maintain, and test business continuity plans
- Handle security incidents through an efficient response process and learning from incidents
- Provide continuous information security awareness trainings to all personnel
- Provide adequate resources required to manage and support effective implementation of this policy

\* ISO 27001 is an international information security standard and ENS is a Spanish High-Level National Security Framework

Document name: Careium Business Ethics  
Date for approval: 2023-11-13  
Author: Mona Sahlberg  
Approved by: Christian Walén  
Confidentiality: Public



## Careium AI (artificial intelligence) Policy

### Responsible AI Use

Use AI systems responsibly and ethically, and avoid any actions that could harm others, violate privacy, or facilitate malicious activities.

AI systems must be used in compliance with all applicable laws and regulations.

Recognize the limitations of AI and always use your judgment when interpreting and acting on AI-generated recommendations. AI systems should be used as a tool to augment human decision-making, not replace it.

### Transparency

There shall be transparency, including clear documentation and disclosure of AI's involvement, and mechanisms for understanding and challenge decisions made by AI.

### Accountability

If you use AI tools, you are responsible for the outcomes generated by AI systems and should be prepared to explain and justify those outcomes.

We must actively work to identify and mitigate biases in AI systems. They should ensure that these systems are fair, inclusive, and do not discriminate against any individuals or groups.

### Data Privacy and Security

We adhere to the company's data privacy and security policies when using AI systems.

Never upload confidential or restricted information to chat bots and other AI solutions that are not evaluated as secure systems.

Document name: Careium Business Ethics  
Date for approval: 2023-11-13  
Author: Mona Sahlberg  
Approved by: Christian Walén  
Confidentiality: Public



## **Shareholders and insiders**

Communication with shareholders and the financial world is regulated by law, and always goes through Careium head office. All relevant financial information will be published on the Careium website.

### **Communicating with shareholders**

Careium will provide accurate and timely information on the company's activities, performance, and financial situation to all shareholders in accordance with stock market regulations. Careium 's accounting statements will present a true and correct view of the company's financial performance in line with International Financial Reporting Standards (IFRS). Financial reports are validated by authorized auditors.

### **Insider dealings**

Employees and others with access to insider information are required to follow the Careium insider policy and signing procedures to prohibit insider dealings. We follow applicable legal requirements.

## Responsibilities and use of this document

This document is approved by Careium’s CEO.

Responsible for updates is Careium Sustainability and Compliance manager.

The document can be translated to local languages if needed.

This document shall be used for:

- Yearly training of all Careium employees, including temporary hired personnel and consultants.
- Extra training of personnel taking decisions on procurement and what suppliers to use.
- One of the inputs at the annual risk assessment of sustainability, done by group management.
- Basis for Careium ESG policy for suppliers

## Links to standards and declarations that this policy is based on and supports

The Universal Declaration of Human Rights	<a href="https://www.un.org/en/universal-declaration-human-rights/">https://www.un.org/en/universal-declaration-human-rights/</a>
International Labour Organisation (“ILO”)	<a href="https://www.ilo.org/global/standards/lang-en/index.htm">https://www.ilo.org/global/standards/lang-en/index.htm</a>
ILO Minimum Age Convention (No. 138)	<a href="https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138">https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138</a>
ILO Worst Forms of Child Labour Convention, 1999 (No. 182)	<a href="https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312327:NO">https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312327:NO</a>
Article 32 in The United Nations Convention on the rights of the child	<a href="https://www.unicef.org.uk/wp-content/uploads/2010/05/UNCRC_united_nations_convention_on_the_rights_of_the_child.pdf">https://www.unicef.org.uk/wp-content/uploads/2010/05/UNCRC_united_nations_convention_on_the_rights_of_the_child.pdf</a>
ILO standard Forced Labour Convention, 1930 (No. 29)	<a href="https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C029">https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C029</a>
ILO standard Abolition of Forced Labour Convention, 1957 (No. 105)	<a href="https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C105">https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C105</a>
ILO Equal Remuneration Convention, 1951 (No. 100)	<a href="https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312245:NO">https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312245:NO</a>
ILO Standards Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)	<a href="https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C087">https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C087</a>
ILO Standard Right to Organise and Collective Bargaining Convention, 1949 (No. 98)	<a href="https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C098">https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C098</a>
ILO Discrimination (Employment and Occupation) Convention, 1958 (No. 111)	<a href="https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C111">https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C111</a>
United Nations Convention against Corruption	<a href="https://www.unodc.org/unodc/en/corruption/tools_and_publications/UN-convention-against-corruption.html">https://www.unodc.org/unodc/en/corruption/tools_and_publications/UN-convention-against-corruption.html</a>
OECD Guidelines for Multinational Enterprises	<a href="#">Guidelines for multinational enterprises - OECD</a>