



MEGA TEKNIK

Your Cable Harness & Automation Partner

Code of Conduct

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The Board of Directors of Mega Teknik Landskrona (org nr 556376-1690) (the “Company”) decided at a meeting held on 5 September 2024 to adopt this

Code of Conduct

Introduction and Purpose

The Mega Teknik culture and work environment are made up of how each and every one of us acts, speaks and behaves, every day. With that in mind, we have set up this Mega Teknik Code of Conduct (the “Code”) defining the basic requirements we place on our employees, board members, officers, consultants and others working on Mega Teknik’s behalf - including suppliers and other third-party intermediaries, to the extent specifically stated. The Code is based on our policies and our core values Respect for Others and Openness. We expect every one of the above mentioned to know and follow the Code as a natural part of the employment, engagement and/or contract with Mega Teknik.

If you have questions, or if you find yourself in a situation where you feel the Code may be violated, please contact your immediate manager or the Managing Director of the company concerned. The Code applies to all companies within Mega Teknik, regardless of location. When using “Mega Teknik” in this Code, this should be read as any company in the group or the group as a whole.

Conflicts of Interest

You shall always act in the best interest of Mega Teknik. Any situation that involves, or might later involve a conflict of interest, should be disclosed promptly and agreed on how to be handled together with your immediate manager or the Managing Director of the company concerned. A conflict of interest arises when your private interests, personal relationships or external activities affect or give the impression of affecting how you perform your work duties. As a supplier or intermediary of ours we always need you to avoid all conflicts of interest that may influence our business relationship.

Confidentiality

When you receive access to confidential information at Mega Teknik, you must keep it safe and make sure it stays confidential. This includes all information that is not public and that can be of use to competitors or harmful to Mega Teknik if it’s disclosed. It also includes information that others, like customers, suppliers or partners, have trusted us with. This rule applies even after your employment, engagement or contract ends.

Legal Compliance

We always comply with the laws and regulations of the applicable legal systems, and they set the minimum standard for our actions. We respect the local traditions and customs of each country. If a conflict arises with local traditions and customs, this Code shall guide our actions. If you find that the law conflicts with this Code or any of our policies, always go with the law and discuss the perceived conflict with your immediate manager.

Human Rights and Labor Practices

We always respect human rights. We treat everyone in our business and supply chain with dignity and respect. Mega Teknik is opposed to all forms of child labour, human trafficking, slavery, servitude, forced or compulsory labour, and we don't ever use any of it in our business.

Non-Discrimination and Respect for Employees

The diversity of the Mega Teknik team is a tremendous asset and a strength that we cherish. All our workplaces must be safe, and we do not accept discrimination on the basis of gender, gender identity or expression, ethnicity, religion or other belief, disability, sexual orientation, age, nationality, political opinion, labour union membership, status, social background, language, health status or family matter.

Mega Teknik distinctly refuses to tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

Work Environment, Working Hours, Wages and Benefits for Employees

Our working environment should be based on collaboration, responsibility and openness. We must all contribute to keeping our work environments safe. You must immediately report incidents and accidents to your immediate manager. At Mega Teknik we respect and comply with all applicable working-hours regulations as well as wage and compensation laws.

We also recognize the legal rights of workers to form or join existing trade unions and to engage in collective bargaining; neither disadvantage nor prefer members of employee organizations or trade unions. As a Mega Teknik employee, please see our HR policy for more information on how we work in the HR field.

Environmental Protection

We are committed to continuously improve our environmental performance and seek to minimize our environmental footprint. As a Mega Teknik employee, please see our Environmental Policy for more information on how we work in the environmental field.

Anti-Corruption and Bribery

Mega Teknik has zero tolerance for bribery, corruption, fraud, facilitation payments or attempts at any of these. This means that we never offer, promise, authorize, give, request, accept or receive a financial benefit or any other type of advantage, either directly or indirectly, to influence a decision, to secure or retain business deals or to receive an undue advantage.

This includes all types of benefits for the recipient and includes but is not limited to cash, loans, gifts, jobs, political donations, donations, business opportunities, education, grants, entertainment, travel and accommodation, excessive commission rates, arrangements involving unnecessary advice, leases or rental agreements that are below market-based terms and unmerited debt write-offs.

It also includes intangible benefits such as access to information and preferential treatment. It is also forbidden to provide financial aid to a business partner when we suspect, or have reason to suspect, that such aid will be used, in part or entirely, to pay for a bribe or to cause, encourage or reward a decision. Due care must therefore be observed to ensure that money paid to business partners is not used for corruption.

Facilitation payments are payments, normally small or insignificant in relation to the gains from such payments, made to public officials to perform or speed up a standard process which they are legally entitled to receive in certain countries, for example, speeding up visa applications, customs declarations or administrative procedures.

Mega Teknik does not permit such payments, either directly or indirectly via third parties. All inquiries about and requirements for such payments are to be reported to the Managing Director of the company in question. Private funds may not be used to do anything that is forbidden under this policy or other relevant directives.

Gifts

None of us shall seek or accept any gift, meal, representation or personal favour that could reasonably be considered to influence business transactions. We never accept symbolic gifts, representation or other entertainment for our own gain. Occasions may arise when we do accept gifts of minor value that cannot be considered to be extravagant, for example, pens, mugs and meals, or that do not have the purpose of inappropriately influencing business decisions, for instance, by way of a polite gesture or according to local traditions.

Always consult with your immediate manager or the Managing Director of the company at which you are employed if you are uncertain. We only offer gifts, entertainment, compensation and personal benefits to customers, suppliers or other business partners if they are modest in value and are consistent with applicable laws and regulations, customary business practices and local restrictions on amounts. We never offer government employees or employees at companies owned by a government authority any form of gifts. We never make donations of a political nature, and never support political candidates or parties.

Fair Competition, Antitrust Laws and Intellectual Property Rights

We always act in accordance with national and international competition laws and do not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors. When we do business, we do not take unfair advantage of anyone through manipulation, abuse of privileged information or misrepresentation of facts. We do not lie or steal, cheat or use information that was obtained without the owner's consent or secret information that is wrongfully disclosed by past or present employees of other companies. We also respect the intellectual property rights of others.

Customers, Product Quality and Safety

and satisfied customers lay the foundation for strong brands and market positions. We always provide customers with accurate product information and only make commitments about our products, services or our company that we can live up to. We will provide products and services that deliver consistently high value, quality and reliability. Product safety is of utmost importance to us. All Mega Teknik's products and services must comply with relevant regulatory requirements in this regard. Our commitment to customer satisfaction also includes the provision of a high standard of after sales service and prompt attention to customer concerns.

Anti-Money Laundering, Terrorism Financing

None of us will ever directly or indirectly facilitate money laundering or terrorism financing.

Data Privacy

All of us will always process personal data confidentially and responsibly, respect everyone's privacy and ensure that personal data is effectively protected and used only for legitimate purposes.

Export Control and Customs

We, as well as our suppliers and intermediaries, will always do our best to ensure compliance with applicable export control and customs regulations.

Protection and Proper Use of Mega Teknik's Assets

The equipment provided by Mega Teknik to you is Mega Teknik's property even if you are the only one using it. Mega Teknik owns the equipment you are given, email accounts, software, other IT devices and materials. As our employee you should be careful about how you use Mega Teknik's credentials, equipment and software. You may only access customer data to the extent necessary to do your job.

Communication with Shareholders

Mega Teknik will provide accurate and timely information on the group's activities, performance and financial situation to all shareholders. Mega Teknik's accounting statements will present a true and correct view of the group's financial performance.

Suppliers and Supply Chain

As a supplier or third-party intermediary to Mega Teknik, you are expected to comply with this Code in your relation to us meaning also that your organization is compliant with the Code. We also expect you will use reasonable efforts to make your own suppliers comply with the principles of this Code. Mega Teknik does not do business with suppliers or third-party intermediaries who do not comply with applicable laws, do not respect human rights or ignore environmental issues.

Furthermore, Mega Teknik does not accept products from suppliers and subcontractors who use child labour in their contracts, subcontracts or other relationships for the manufacture of their products. Suppliers are to ensure that purchased materials in products or components supplied to Mega Teknik do not directly or indirectly contribute to violations of human rights in conflict areas and high-risk areas.

Lack of Compliance

Mega Teknik does not tolerate any violations of this Code. Any non-compliance by an employee, consultant or anyone else mentioned in this Code must be reported to the Managing Director of the concerned company. Other violations can be reported directly to your line manager. Reports on misconduct or harassment will be evaluated and followed up. Every case of violation of this Code will be evaluated and handled based on the severity of the violation. In the event of repeated or severe violations, Mega Teknik has the right to decide on appropriate actions, which can include termination. Compliance with this Code is reviewed quarterly by the Managing Directors and reported to Mega Teknik's Group CEO and Board of Directors.

Implementation and Communication

This Code has been adopted by the Board of Directors and the ultimately responsible for the implementation and follow up is Mega Teknik's Group CEO. The Managing Directors of the subsidiaries are responsible for implementing and communicating this policy to their organizations including all employees, temporary employees, board members, officers, consultants and others working on Mega Teknik's behalf. All new employees and employees of companies that Mega Teknik acquires including consultants and temporary employees must be informed of the Code within one month of the first working day.