



Code of Responsible Business Conduct

Arelion Holding AB

Reg. no 559269-6271

Approved on
29.10.2024
Approved by
Board of Arelion Holding AB

Owner
Arelion Legal Affairs
Version
(1)



Contents

1	Introduction.....	3
2	Building on our shared values.....	3
3	Relationship with our stakeholders.....	3
3.1	Relationship with our customers.....	4
3.2	Relationship with our employees.....	4
3.3	Relationship with our shareholder.....	5
3.4	Relationship with our suppliers, business partners and competitors.....	6
3.5	Relationship with authorities, administrations, and other governing bodies.....	6
3.6	Relationship with society.....	7
3.7	The environment	7
4	Compliance and whistleblowing.....	8

1 Introduction

The Group (Arelion Holding AB and the Subsidiaries) has adopted the principles stated in this Code of Responsible Business Conduct (the Code). In our day-to-day operations we expect every employee of the Group to follow the Code as our way of conducting the business.

The CEO of the Group has ownership of the Code.

2 Building on our shared values

The Group owns and operates one of the world's most extensive fiber backbones. Our mission is to provide exceptional network infrastructure and services – empowering individuals, businesses and societies to execute their most critical activities.

The Group has a long history of success as a result of fair and ethical business practices. We support international standards on human rights, labor conditions, the environment and anti-corruption. The Group strives to act as one company, based on a common set of values, business principles and performance management. It is our objective to be a clean company and a good corporate citizen, living by the letter and spirit of the law.

Our core values – Empower, Excite and Excel – guide how we act and behave on a day-to-day basis. The values require us to empower colleagues, customers and everyone around us through trust, friendship, and mutual respect. They require us to excite others by showing our genuine passion for what we do, and for the world around us. And they require us to excel with our ability to focus, get things done and assume full accountability for the final result.

The Code of Responsible Business Conduct applies to all of us: employees, directors and members of the boards. All contractors, consultants and free-lancers working as part of our operations must also follow the Code.

3 Relationship with our stakeholders

The Group interacts with a variety of stakeholders: customers, business partners, competitors, coworkers, shareholders, governments, and regulatory bodies, as well as the communities in which we operate. Our relationships and communication shall be honest, fact-based, and transparent within the bounds of commercial confidentiality. We value interaction and therefore encourage constructive dialogue with all our stakeholders. We advocate free and fair trade, striving for forthright competition and ethical conditions within the legal frameworks of the countries in which we operate.

3.1 Relationship with our customers

We strive to be the trusted, number one choice of current and potential customers, and aim to deliver high-quality and safe services that offer good value for money and contribute to our customers' success.

- We shall present our services and products in an honest manner; and we do not use unfair or deceptive practices.
- We shall never offer, authorize, or provide gifts, travel, payment, hospitality, sponsorships and donations in return for a favorable decision or business advantage.
- We carry out all financial activities with customers in a transparent and ethical way. We do not engage in deals that involve unconnected parties, unusual payment methods or abnormal terms and conditions.
- The Group does not deal with individual consumers; we conduct business only with the Business – to – Business segment. However, we strive to operate highly secure communication networks, and we protect personal data of our customers' consumers and safeguard their privacy. We collect only relevant personal data that we need in order to provide our services and run our business. The data we do hold, we protect in terms of confidentiality and integrity and use only for the purpose we collected it for. When it's no longer needed for the purpose it was obtained for, we delete or anonymize it, unless mandatory legal data retention requirements apply. We take actions to prevent unauthorized access to personal data, only disclosing it when required by the law. We commit to and are accountable for complying with the law and our own high standards on privacy.

3.2 Relationship with our employees

The Group acknowledges that our employees are key to our success. Our aim is to be an attractive employer and we strive to attract, develop and retain qualified and motivated people in a professional working environment.

- We support the international human rights and dignity of all employees as outlined by the United Nations declaration and core International Labour Organization conventions.
- We do not accept any use of child labor or forced labor.
- All employees shall be treated fairly and equally. We aim to create a work environment where people are respected regardless of individual differences, talents or personal characteristics. No employee or candidate shall be discriminated against or harassed due to age, race, gender, religion, handicap, nationality, sexual orientation, marital or parental status or political opinion.
- We respect that employees have the right to choose whether or not to be represented by a trade union for the purpose of collective bargaining. No employee who exercises this right shall be discriminated against. All employees

- should know the basic terms and conditions of their employment. Legislated minimum wages will always be a minimum rather than a recommended level.
- We aim to provide and constantly improve a safe and healthy workplace by ensuring safety in work processes, preventing and reacting to conditions of ill health and supporting measures to promote health and wellbeing. We are committed to providing employees with a drug-free workplace and will not tolerate any form of violence, abusive language or bullying.
 - All employees shall exercise special care to prevent unauthorized disclosure or inappropriate use of company confidential information. However, we aim for openness, and encourage exchange of knowledge and experience within the boundaries of confidentiality.
 - All employees shall process personal data fairly and lawfully in all operations including when processing such data outside the country where it has been collected. Employees shall process personal data only to the extent necessary for explicit and legitimate purpose applicable for that processing, while always paying attention to the protection of individuals' privacy. Processing of personal data should be limited to what is needed for operational purposes, employment matters, efficient customer care and relevant commercial activities, including the processing of anonymous user patterns.
 - The Group shall process personal data of the Group employees only if the processing relies on legitimate processing criteria. The Group shall be transparent and informative about personal data processed about employees in the Group, so that employees understand how their data is used, and shall outline their rights related to this data.
 - The Group employees shall avoid any contacts that might lead to or suggest a conflict of interest between personal activities and the business of the Group.
 - The Group employees shall ensure that business travel and meetings are always productive and safe for them as an employee and organized with cost-effective providers. Travel is not always necessary – employees are encouraged to consider virtual collaboration and think of environmentally friendly options.
 - Business gifts or hospitality shall be offered or accepted only in accordance with local legislation and business practices.
 - Remuneration is based on fairness and non-discrimination
 - The Group does not accept any form of use or possession of illegal or unauthorized drugs in the workplace.

3.3 Relationship with our shareholder

The Group aims for long-term, sustainable development of shareholder value. We inform our shareholder of all major developments that affect the valuation of the company promptly and transparently. We are truthful in our financial and non-financial

communication, and information is given to the best of our knowledge. Our aim is full accountability.

3.4 Relationship with our suppliers, business partners and competitors

The Group aims to be a reliable partner to suppliers and contractors. We focus on long-term, good business relations and healthy cooperation. We expect our suppliers and contractors to support international standards on human rights, labor conditions, the environment and anticorruption. We encourage our suppliers to align their operations with principles that are similar to the Code – we consider this as an important criterion when establishing or continuing our business relations.

- In our operations worldwide, we do not request, authorize or receive bribes or other illegal payments, gifts, travel, or hospitality to obtain or retain business.
- We select suppliers purely on the basis of merit and make clear to all suppliers that we expect them to compete fairly and actively for our business.
- We select and evaluate suppliers and subcontractors on the basis of predetermined criteria such as quality, price, availability, delivery, reliability, service and corporate responsibility requirements, which include social and environmental aspects. Adherence to the principles of the Code shall be an integral part of legal contracts and agreements with suppliers.
- Business decisions and actions shall be based on the best interest of the company, our customers and shareholder. Therefore, decisions shall not be motivated by personal relationships or interests, and these shall not affect our independent and sound judgement.
- We strive to establish relationships with our business partners (e.g., consultants, agencies) based on mutual trust and in line with the intent of the Code.
- We carry out all financial activities with suppliers, business partners in a transparent and ethical way. We don't engage in deals that involve unconnected parties, unusual payment methods or abnormal terms and conditions.
- We do not enter discussions or agreements with competitors concerning pricing, market shares or other similar illegal activities.

3.5 Relationship with authorities, administrations, and other governing bodies

The Group ensures that all contacts and meetings with authorities, administrations and other governing bodies always take place in a professional and transparent manner. In our operations worldwide, we do not offer, provide, authorize a bribe or other illegal payments (e.g., facilitation payments) either directly or indirectly, including through any

third party. We never offer gifts or business entertainment to public officials, or officials involved in public procurement to obtain or retain business.

3.6 Relationship with society

The Group is committed to bridging the digital divide by developing infrastructure and services that are accessible across our markets. Our services drive growth and economic development by creating direct or indirect job opportunities and financially contributing to the societies in which we operate. Our objective is to be a long-term, good corporate citizen.

- We operate with different offerings and price levels to make technology widely available and affordable.
- The Group does not engage in the politics of the countries in which we operate, nor do we make political donations. We do not comment on politics or make political statements when representing our company. However, the Group does engage in dialogue regarding regulations that affect our business.
- Sponsorships and donations are a great way of developing our business and supporting the societies in which we operate. We are careful to always plan and operate these ethically, in a way that supports our business objectives and creates social value.
- The Group acknowledges the concerns following legislative, administrative, license or law enforcement requirements to which we must adhere, but which may impact individual's privacy and freedom of expression. We protect and support freedom of expression and surveillance privacy through responsible decision-making and are as transparent as possible regarding the extent of government restrictions on communications and surveillance.

3.7 The environment

The Group is committed to conducting our business in an environmentally sustainable way. We contribute to global sustainability by developing, promoting and utilizing resource-efficient and environmentally friendly services and through our actions to minimize the environmental impact of our own activities.

- In our own operations we aim for efficient use of energy as well as to minimize related waste and CO2 emissions.
- Together with our partners and customers, we aim to reduce our carbon footprint, thereby fighting the climate change.

4 Compliance and whistleblowing

Day-to-day reinforcement and compliance follow-up is part of every manager's responsibility. Managers are expected to promote a culture of openness and integrity, to maintain an environment where their teams feel comfortable about raising concerns.

Each employee is responsible for acting in accordance with the Code and is encouraged to promptly voice concerns and to highlight examples of good practice.

Acts that are inconsistent with the Code must be promptly corrected and are subject to disciplinary action up to termination of employment. Employees are encouraged to report violations of the Code by reporting misconduct via the web-based whistleblowing channel or by contacting his/her immediate superior, any member of the Group's executive management or Human Resources. Regardless of the reporting channel, all allegations of potential violations of the Code that are made in good faith will receive a swift, fair and comprehensive investigation conducted with the relevant internal and/or external assistance.

The Code prohibits any retaliation against whistleblowing. Retaliation is the act of making an employee afraid to complain or assert their rights. We don't tolerate any attempt to sanction, disadvantage or discriminate against anyone who raises a concern or cooperates in a company investigation. We'll also take action, including possible termination of employment, if a manager intentionally or unintentionally leaks the identity of a whistleblower.