

Code of conduct

This code of conduct applies to each employee of SustainAX regardless of start date, contractual agreement or employee rank. We take our code of conduct seriously and we expect the same of you.

You should consider this Code of conduct together with the employee agreement and the employee handbook.

Compliance with law

You must follow the laws of the countries where you and relevant partners and clients operate. You are also expected to comply with all the safety, environmental and fair dealing laws. We do expect you to be ethical and responsible whenever dealing with our company finances, products, services, clients, partnerships and public image.

Respect in the workplace

You must respect all your colleagues. The company will not tolerate any instances of discrimination, victimization or harassment at the workplace. All employees will get equal opportunity to work and perform in the company.

Protection of company property

You are expected to treat SustainAX production's property with respect and care.

This means that you:

- Should not misuse company equipment or frivolously use it. Company provided computers and other equipment are only for professional use. Occasional, limited personal use of these resources is permitted, but cannot interfere with your work performance or that of your colleagues.
- Should respect all incorporeal property such as trademarks, copyright and other property. Employees should, however, use them to complete your job duties only.
- Should protect the company facilities and material property from damage and vandalism.

Professionalism at the workplace

You must show professionalism and integrity at the workplace.

Appearance

When it comes to your personal appearance, we expect all employees to follow our dress code.

Job authority and duties

You are expected to fulfil your professional duties and responsibilities with integrity. You should be honest while dealing with colleagues, stakeholders and the community. Managers and supervisors should respect their juniors and team members. They must distribute duties according to the proficiencies and workload of the employees. On the same note, you should also obey and follow the instructions of their managers. It will help you in completing their duties skilfully and on time.

Collaboration

You should be collaborative, friendly and you should make every possible effort to maintain peace and harmony at the workplace.

Communication

You should be open to communication with your manager, team members and colleagues.

Benefits

You should not misuse your employment benefits like insurance, time off and other facilities.

Social Media

The Company encourages the open exchange of ideas, discussion, learning and collaboration, in line with our code of conduct. Though social media provides forums for these types of communication, each of us must be mindful of, and manage, what we communicate in these public forums. Each of us is personally responsible and accountable for the content you post on social media. Social media use should not interfere with work commitments or job responsibilities. A general rule to remember when using social media is to think about the impact of statements that you make. Keep in mind that these transmissions are permanent, easily transferrable and can affect our company's reputation and relationships with coworkers and customers. When using social media, do not make comments on behalf of sustainAX without proper authorization. Also, you must not disclose our company's confidential or proprietary information, about our business, our suppliers or our customers.

Media Inquiries

Only designated sustainAX spokespeople are authorized to speak with the media, investors and industry analysts on behalf of our company, in accordance with local laws. Unless authorized, do not implicitly or explicitly give the impression that you are speaking on behalf of sustainAX in any public communication, including posts to online forums, social media sites, blogs, chat rooms and bulletin boards. This policy also applies to comments to journalists about specific matters that relate to our businesses, as well as letters to the editor and endorsements of products or services. If you receive a request to speak to a journalist or comment on sustainAX activities in a public forum on behalf of sustainAX, contact your manager.

Political Activities and Contributions

You are free to contribute your personal time to support a candidate or organization of your choice, however, your involvement must not be on company time. You are not allowed to use company funds or assets to contribute to a political party, candidate, or campaign, unless the activity is lawful in the country involved and approved by your manager.

Substance Abuse/Drug and Alcohol-Free Workplace

SustainAX requires you to work free from the influence of any substance, including drugs and alcohol, which may prevent you from conducting work activities safely and effectively. The company reserves the right to have any employee tested, where local law and policies allow, if there is reasonable suspicion that he or she is under the influence of drugs or alcohol.

Anti-corruption

We strongly discourage you to accept gifts from outside parties. Any gift, including meals, of a value over 200 SEK should be reported to the employee's manager prior to accepting it. We also prohibit bribes that can benefit an external or internal party.

It is primordial for SustainAX that you act in a manner without being influenced by external parties as the independency is a core element of the services the company provides.

Conflicts of interest

You are expected to avoid any personal, financial or other interests which may hinder their capability or willingness to fulfil your job duties in a manner that is required by SustainAX.

There are two potential conflicts of interest that requires special focus for SustainAX.

The first is in the relationship with our asset management clients. Potentially an asset manager can ask for a more positive outcome of an ESG research and ESG risk scoring. The other is in relationship with the corporate clients (the companies we ESG research). Potentially a corporate can ask for a more positive outcome of an ESG research and ESG risk scoring.

Should any of these situations arise or any other conflict of interest, you must immediately signal this to your manager. SustainAX require that you do not get influenced by this kind of pressure.

Environmental Stewardship

Whenever we can, we will strive to a lower our environmental footprint. This can be in choices during procurement of equipment we need in our activity. This can be laptops, screens and other office consumables. We will avoid printing on paper unless required. Our largest impact is when travelling and whenever it is a realistic alternative we will prefer to travel by train before plane. Any travel by plane shall be environmentally compensated.

Suppliers

SustainAX is a small company and most of our suppliers are much larger than us. We prefer suppliers with clear policies and programs that ensure good practices and low risk on the environmental and social side.

Doing the right thing

Each of us commits to do the right things and to do things right. It also means reflecting on your decisions. "Did I do the right thing?" and "Was there a better option?" are questions you should often ask yourself. In situations where you are not sure, talk to your manager. The manager wish to hear from you and for you to be heard.

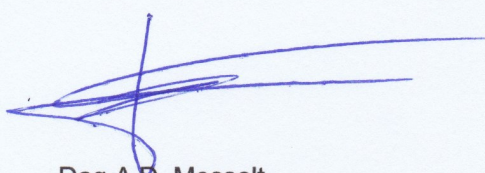
Whistleblowing

You shall signal any breach of law or company guidelines like this code of conduct to your manager or to any member the company's board of directors.

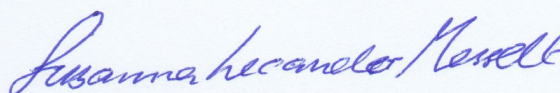
Policies

You are required to read, understand and follow all our company policies. If you should have any questions or doubt, ask your manager.

Approved by the SustainAX board of directors on 10 October 2022.



Dag A.D. Messelt



Susanna Lecander Messelt