# CODE OF CONDUCT Alligo Ab. Version 2.0 2023







### A word from the CEO We are Alligo

What do you fill a company with? How do we build a company culture? Who determines what Alligo is?

My simple answer to the fairly complicated questions is what we do. Every day. Everyone who works within Alligo. The way we are and do things makes up Alligo.

Alligo is a new company – but we are not in any way without history. We are a fusion of businesses with strong traditions of converting values into practical action. In our new organisation, we have a responsibility for anchoring and living Alligo's values. Letting them take their place. To every day, in practical action, build and strengthen Alligo from the inside.

The three words commitment, collaboration and competence constitute our values. We believe that this not only contributes to our success as a company, but also to the comfort and well-being of everyone who works here. We also know that the way we meet each other – internally in the company and externally in contacts with suppliers and customers – is crucial for strengthening the trust in us as a company. We are a listed company with high demands on ourselves. Our vision is to be unbeatable. The Code of Conduct together with the values are therefore important cornerstones of our business. I often repeat that our greatest advantage over our competitors is our employees. I really mean it! It is your competence, high degree of service and choosing to go the extra mile that makes it possible for us to achieve our goals and continue to grow. By working together, sharing knowledge and experience, and constantly striving to improve ourselves, we will continue to be a strong and competitive partner to our customers and suppliers.

The Code of Conduct has been adopted by the board of Alligo and it shows the importance of the code. All employees have an obligation to familiarise themselves with and follow the Code and act in line with the responsibilities and the powers invested in them.

But the Code of Conduct is not just a set of rules, but rather a promise to each other and to Alligo. It is a promise to act in a way that is line with our values and to be conscious of how our actions affect others. Together we can build and maintain a company culture that promotes well-being, trust and long-term success.

I want to give a big thank you to all of you for the terrific work you do for Alligo every day. Together we create a strong company culture based on Commitment, Collaboration and Competence.





#### About the code of conduct

Our Code of Conduct (also called the Code in this document) describes what is expected of Alligo and our employees.

The Code applies to all employees (regardless of terms of employment), members of the board and contracted personnel. We also require that our business partners – including suppliers, subcontractors and other external parties – comply with all relevant parts of our Supplier Code of Conduct.

Alligo complies with all applicable laws and regulations – and we expect all employees and business partners to do so as well. The Code of Conduct must be followed, even if legislation stipulates a lower standard. In cases where the laws are more far-reaching than the content of this code, the law must of course be followed.

In addition to this Code, there are a number of policies, guidelines and instructions that contain more detailed internal rules. As a company, we also follow a number of international agreements and guidelines that make up the foundation of our Code<sup>1</sup>.

1 The code is based on the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Core Conventions and Children's Rights and Business Principles

#### **Our values**

Our values are summarised in three words: commitment, collaboration and competence. The values describe how we as employees relate to each other and what external stakeholders should be able to expect in their contacts with us. Translated into behaviours, our core values form the basis of our company culture, i.e. how we do and are within Alligo.

### When we are at work

#### **Human rights**

Within Alligo, we must have a high level of knowledge of basic human rights. The rights must be respected and applied equally to all employees regardless of the type of employment. We should have a strong and lasting relationship with our employees that is based on mutual respect. We should ensure that we do not participate, directly or indirectly, in violations of human rights.

Within Alligo, we do not tolerate or use any form of child labour. We respect children's right to personal development and education. Nor do we accept any form of modern slavery, such as forced labour, debt slavery and human trafficking. We take no part in the purchase of sexual services and other activities that may involve supporting human trafficking, whether it occurs during or after working hours or in connection with a business trip.

If a violation of human rights occurs within our company, we must always remedy the concrete problem and ensure that it is not repeated.

#### A healthy and safe work environment

Within Alligo, we work to ensure a safe and healthy work environment. We want to be a workplace where employees thrive and we encourage our

employees to be committed and collaborate with the aim of facilitating the development of our organisation and our employees.

The employer bears the main responsibility for the work environment and managers therefore have an increased responsibility for health and safety in the workplace. All employees have a responsibility to actively contribute to a good work environment and a good company climate. Our aim is that everyone performs our working tasks in accordance with relevant instructions and we always use necessary protection equipment.

Alligo conducts surveys and risk analyses in order to manage and minimise risks in the workplace and prevent occupational injuries and illness.

We also work systematically with improvements regarding occupational health and safety in order to promote health, prevent ill-health and accidents and reduce the risk of harmful use of alcohol or other drugs. The work is carried out in collaboration between the company, trade union counterparts and elected employee representatives both locally and centrally.

All employees have a responsibility to report risks and deficiencies in the work environment to their immediate manager or through our incident reporting system. Where appropriate, employees actively participate in their rehabilitation and work adaption.



Our organisation should be free from all forms of harmful consumption of, for example, alcohol or drugs. All employees are obliged to notify their manager if they discover or suspect that any colleague has a harmful consumption of alcohol or drugs. Drug dependency is an illness and Alligo supports employees who have abuse problems. The employee always has a responsibility to seek help via occupational health care or by talking with their immediate manager.

#### **Diversity, equality and inclusion**

All employees have a responsibility to treat each other with respect and create a work environment that brings out the best in our employees.

Within Alligo, we do not accept any form of discrimination or special treatment based on gender, gender expression or identity, ethnic affiliation, religion or other belief, disability, sexual orientation or age. We comply with the national legislation in the countries we operate.

We do not tolerate any forms of bullying, violence, threats, xenophobia, harassment, violations of personal privacy or similar behaviour within our organisation or in our business relationships. This includes all forms of verbal, physical, sexual, financial or psychological abuse, psychological or physical coercion or other forms of harassment or threats.

As employees we all have a responsibility to report violations and

harassment to our immediate manager, HR or safety representative, or through Alligo's whistleblower function.

counterparts. Collaborations can consist of formal meetings,

e.g negotiations and fixed forums, as well as informal in the

daily work. All employees have the full right to join a union,

form an organisation and join collective negotiations in

accordance with labour law.

Alligo actively works with equality and diversity work as a natural part of our daily operations. Employees are selected on the basis of their competence, suitability for the position, and contribution to fulfilling our mission. The diversity it gives us is an asset to our business in that it brings new ideas and perspectives.

We have a positive view of parenthood and we make it easier for each other to combine work, leisure and family and we respect each other's right to free time after the end of the working day.

Salary levels within Alligo should be fair and based on criteria for each specific post.



#### We take responsibility for the environment

We strive to reduce the environmental and climate impact derived from our company, products and our value chain. Energy and other natural resources should be used efficiently and we comply with applicable environmental laws and regulations.

We work systematically by identifying the environmental aspects of our operations and value chain and, based on these, set targets, measure and improve our environmental performance. We report our impact and the efforts made concerning the environmental and climate in a transparent manner.

We work for more sustainable consumption by selling high-quality products and informing our customers about how the products are best taken care of. By working together with our suppliers, we strive to reduce the environmental and climate impact throughout the life cycle of the products that Alligo provides. We impose requirements on our suppliers regarding the chemical content of products.

Through information and training, we increase knowledge about the environment and climate among our employees. Available and communicated procedures must ensure that applicable laws and regulations are complied with. All employees are responsible for reducing the environmental impact of their own work.

#### Communication

Alligo's communication, both internal and external, aims to support our strategy and our business.

All employees have a responsibility to take part of information distributed, act according to what has been communicated and in a planned manner spread information. As a manager, you have a special responsibility for the unit planning its communication within the Group and in relation to others.

All employees are representatives of Alligo and communicate with external parties in a responsible manner and in accordance with our values.

As a public and listed company, it is our duty to provide the capital market with relevant, reliable, accurate and up-to-date information in accordance with the stock exchange's listing agreement, as well as other applicable laws and regulations. Our information and communication is active and based on openness, clarity, relevance and availability. The CEO and CFO are the ones who make statements about financial information.

In the case of other contacts with the media, the employee who is best suited for a certain issue is to act as spokesperson - but only after consultation with their immediate manager and communications officer.

In social media, all employees are ambassadors for Alligo and our different brands. We act with respect for our colleagues and stakeholders and keep a good tone. None of our employees may publish misleading content about the company, other employees, competitors or other stakeholders in their various channels or forums.

#### Security

Our assets are essential for our business to function. Examples of assets are our premises, machinery, office supplies and the products we stock and sell. Customer registers, contracts, financial resources, trademarks, expert knowledge and other business-critical information are also examples of assets.

Alligo's assets may not be used for personal gain or in an inappropriate manner. We protect our assets from loss, theft and intrusion. All employees must familiarise themselves with and follow our security procedures. As employees, we have a responsibility to report suspicions of crime to the immediate manager, HR or the Security Department. Alternatively, Alligo's whistleblower function can be used.

#### Information security

Data and information systems in all their forms are among the most valuable assets within Alligo. As employees, we have a responsibility to protect our information assets from all forms of threats, both internal and external, both intentional and unintentional.

All employees and others who work on behalf of Alligo should know what their own responsibility includes and have knowledge of which security rules apply regarding information security. As employees, we have a responsibility to draw attention to and report identified incidents to the immediate manager as well as to the Group's IT security department through regular support channels.

#### Taxes

Paying taxes is an important part of contributing to sustainable societal development. Alligo complies with applicable legislation and regulations in the tax area. We do not engage in aggressive tax planning or support the use of artificial business structures aimed solely at tax avoidance. We act openly and transparently in relation to tax authorities.

# When we do business

#### **Customer in focus**

Alligo should be the partner that best meets the needs and preferences of customers. We continuously have a dialogue with our customers about their needs and we listen to their views. The customer should be given a warm welcome and the feeling that we are prepared to go the extra mile for them.

We apply sound business and marketing practices and have the customer's best interests in mind in our internal decision-making processes.

By continuously measuring customer satisfaction and conducting systematic quality work, we identify opportunities for improvement and remedy shortcomings in the business.

The products we sell should be safe and of the right quality for the customer's needs and comply with statutory and other requirements. Customers should be given clear and simple information such that a product they buy can be used safely.

#### **Suppliers**

We always strive for long-term sustainable relationships with our suppliers and we respect agreements and commitments entered into with suppliers and partners. We expect our suppliers to comply with national laws and regulations, respect international conventions and comply with the requirements of our Supplier Code of Conduct.

Our purchasing policy and our purchasing processes must always be followed and in purchasing decisions, a balance of lead time, quality, price, minimum quantity and sustainability aspects must be made. Suppliers' sustainability work must be taken into account and suppliers with active sustainability work must be rewarded.

We have a risk-based approach and impose requirements from a sustainability perspective on our suppliers, purchased services and products. Requirements are set, among other things, through Alligo's Supplier Code of Conduct.

#### Anti-corruption

Corruption is taking advantage of one's position to obtain undue advantage for one's own or another's gain. This involves, for example, bribery, money laundering, conflicts of interest, embezzlement, bribery, extortion, fraud, nepotism or cronyism. It is therefore not the financial value alone that determines whether it is a matter of corruption.

Alligo does not accept any form of corruption, neither directly or indirectly, for example through an intermediary, such as an agent or consultant, even if this means that we lose a deal. We conduct regular analyses to assess the risks of corruption and need for measures.

Private or other external activities, financial interests or side jobs must not conflict with, or be perceived to conflict with, the company's interests. This means, for example, that it is not permitted to handle business, matters or issues that include relatives or other close relationships.

It is not permitted to give or receive improper benefits, or otherwise influence or allow oneself to be influenced by an external party in order to benefit oneself, the business or someone else. It is also not permitted to request any benefit that may be perceived as improper. Benefits and representation must be open and moderate and should always be work-related. If there is any doubt as to whether a gift or other advantage is improper, this should always be discussed with the immediate manager. When in doubt, it's always best to abstain.

#### Sales promoting actions and sponsorship

Sales promoting actions such as discounts, specific offers, targeted campaigns and sales competitions should be in line with applicable marketing rules, the International Chamber of Commerce's rules for advertising and marketing communications and this code of conduct. Sales promoting actions are always to be regulated in writing and must never prevent sellers from offering correct advice to customers.

Alligo's sponsorship collaborations should always contribute to creating business and customer benefit. A collaborative business must act in accordance with applicable law and this Code. A manager or an employee, who has a direct or indirect connection to a collaborative activity, may not participate in or influence a decision about collaboration. Approval of sponsorship should always be carried out through two-step attestation, i.e. no unit may sign on its own, but must have the manager's approval and certification. For example, a store needs to get approval from a manager above for a sponsorship.



#### **Fair competition**

Fair and effective competition is necessary for the market where we are active to work well. Collusion on pricing, market shares or output restrictions, so-called cartel formation, in all forms is not permitted with the exception of the collaboration of the parties which is a prerequisite for the collective agreements.

We always avoid unnecessary contacts with competitors. Alligo must never prevent, restrict or eliminate fair competition.

# Compliance with the Code of Conduct

#### Responsibilities

All employees have a responsibility to comply with the Code of Conduct, as well as applicable laws, policies, guidelines and other instructions. Managers have a special responsibility to act as good role models and to follow up to ensure compliance with the Code.

Managers also have a responsibility to ensure that employees have the conditions to act in accordance with the Code and be a support for their employees in ethical matters.

Alligo's board has decided on this Code of Conduct. Alligo's CEO is responsible for updating the Code and associated training.

#### Training

Alligo's interactive training on the Code of Conduct is compulsory for all employees and must be part of all employee's induction. The training is available in Swedish, Norwegian, Finnish, Estonian and English.

#### Consequences

If a violation of the Code of Conduct or a crime occurs, disciplinary action may be taken. It can lead to labour law consequences for the individual

such as a warning, reporting to the relevant authorities, or in serious cases dismissal.

#### **Reporting and whistleblower function**

All employees are encouraged to report if there is a suspicion or concern about something that is in violation of this Code or the law. The earlier a problem is discovered, the greater the chance that the situation can be remedied.

The report should first be made to the immediate manager. It is also possible to contact the HR manager, CEO or use Alligo's whistleblower function directly.

The whistleblower function is a channel for Group employees, customers, suppliers and other stakeholders to report suspected serious irregularities or violations of the law. The function provides the reporting person with privacy protection, which means that any information provided is treated confidentially. The whistleblower function is available via www.alligo.com

A person who expresses a genuine suspicion or concern under the Code of Conduct must not suffer any form of retaliation as a result of their report<sup>2</sup>.

#### How do you know that you are doing things right?

The Code of Conduct does not provide all the answers to how employees should act in different situations. If you have any doubts as to whether you are acting in accordance with the Code, use your common sense. Ask yourself the following questions:

- Is what I am doing legal?
- Am I providing a good example?
- Can my actions be influenced by my personal interest or any other conflict of interest?
- What consequences can my actions have for Alligo?
- Have I considered how our customers' interests are affected by my actions?
- Does my action strengthen trust in us as a company?
- Can I stand up for this in front of my boss?
- Is this in line with our values, collaboration, competence and commitment?

If the answer is YES to all these questions, everything is probably exactly as it should be! If you have any lingering doubts, however, do not hesitate to consult your manager. Document type: Publication date: Approved by: Code of Conduct 2023-09-19 Board of Directors Document ID: Document type: ALLIGO-C100 Policy Version: Produced by: 2.0 Head of HR

## We make businesses work

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