

# Code of Conduct

## Background and general guidelines

### Word from Karnov Group CEO

At Karnov Group we everyday work for the purpose of *Clearing the path to justice* and it is a true privilege to have the opportunity to add value to our society.

With this purpose follows an obligation to act as good citizens and it is of essence not only for Karnov Groups employees but also for our customers, business partners and other stakeholders to support that obligation.

For everyone working within Karnov Group it is important to know what it takes to be a Karnovian.

As a Karnovian we should make sure to know our purpose, what it means, truly feel its importance and act accordingly. To support that goal, we all share the same values in our organisational culture. One of them being *Trust and openness*, which is the foundation of this Code of Conduct.

Together we have the opportunity of making a positive difference for our society. Let us be grateful and act to build trust.

*Pontus Bodelsson, Chief Executive Officer, Karnov Group*

**Pontus Bodelsson**

Chief Executive Officer, the Group



## Purpose of the Code of Conduct

In order to uphold Karnov Groups trusted position and safeguard our values which are based on our core values of Customer centricity, Trust and openness, Curiosity and knowledge, and Collaborative community as well as adhering to high ethical and professional standards, Karnov Group has developed a number of policies, including this Code of Conduct.

The Code of Conduct serves as a foundation for our values and ethical commitment and describes the core principles of Karnov Group's business conduct and integrity and is intended to assist all employees by providing guidance to what behaviour is expected from each one of us in Karnov Group in the daily operation.

We expect our customers, business partners and other stakeholders to comply with all applicable laws, regulations, and industry standards within their area. This Code of Conduct is essential for our collaboration in order for customers, business partners and other stakeholders to always feel confident in the way Karnov Group do business and know what we expect from anyone that we interact with.

### Target audience

All employees in Karnov Group and the entities within and all customers, business partners and other stakeholders.

### Karnov Group

For this Code of Conduct Karnov Group means any entity over which Karnov Group AB (publ) has control (or joint control). Karnov Group AB (publ) controls an entity when Karnov Group AB (publ) directly or indirectly:

- (i) owns more than half the share capital of the entity, or
- (ii) owns more than half the voting rights of the entity, or
- (iii) has the power to appoint more than half of the board of directors of the entity or similar governing body legally representing the entity, or
- (iv) has the right to manage the entity's affairs.

## Social commitment

### Respect for human rights

At Karnov Group we support and respect the protection of internationally proclaimed human and children's rights and make sure that our activities are not complicit in such abuses. We ensure to follow applicable legal requirements relating to

human and children's rights and identify, prevent and address actual, or potential impacts from our operations.

### Work environment and employee well-being

A safe and sound working environment that enhances the health and well-being of Karnov Groups employees is of key strategic importance. We base everything we do on our core values and believe that with this solid foundation we ensure a psychologically safe workplace built on trust and with a strong focus on employee well-being and development. Having employees that grow and prosper is the foundation for a sound and healthy workplace and successful business.

We also see ourselves as contributors to flourishing student communities in the societies we are part of.

Karnov Groups minimum requirements are to comply with local Organisational Health & Safety (OHS) legislation, but we constantly strive for achieving higher levels of commitment. OHS related work is an integral part of the daily operations and aims to prevent illness and work-related injuries in order to keep a high level of motivation and a low level of absenteeism.

As an employer Karnov Group has the main responsibility for providing a safe and healthy working environment and is obliged to take all necessary measures in doing so and preventing the risks of work-related illness and accidents. In addition, all employees are expected to have and take a personal responsibility for the work environment and comply with safety regulations as well as pointing out any risks or deficiencies.

### Equality, diversity, and inclusion

Karnov Group values diversity and is committed to providing and promoting equal opportunities throughout all aspects of employment including recruitment. We offer an inclusive workplace where every individual is valued and have similar access to working conditions, benefits and terms as well as possibilities and career opportunities regardless of sex, age, physical abilities, sexual orientation, ethnicity or religious belief.

### Respectful workplace

In Karnov Group we firmly believe that treating each other with respect and dignity ensures a healthy and productive work environment. We respect our colleagues, customers, and others whom we deal with. Everyone must behave in a way that contributes to a workplace free from discrimination, harassment, bullying, social exclusion, sexual harassment, violence, and retaliation. Any such behaviour or negligence to report such behaviour is not tolerated under any circumstances.

## **Alcohol and drugs**

Karnov Group is committed to provide a workplace that is free from the effects of drug and alcohol abuse. Reporting to work, or being at work, while under the influence of alcohol or any illegal drug or controlled substance which, in the opinion of Karnov Group, impairs judgement, performance, behaviour, or poses a risk to the safety of the employee or other employees, is forbidden.

## **Compensation and benefits**

Karnov Group attracts, retains and motivates employees using correct and fair compensation and benefits conditions. We apply national based compensation determination in accordance with our commitments to equality, diversity, and individual and organizational performance, and in compliance with applicable labour laws and collective bargaining agreements.

## **Commitment to ethics and integrity**

### **Confidentiality**

Karnov Group is committed to protecting confidential information about the operations from illegal or damaging actions by individuals, either knowingly or unknowingly. Any confidential information about the operations, its employees, and business partners is kept confidential and divulged only to individuals with both a need and authorization to receive such information.

### **Public relations**

Karnov Group employees are encouraged to participate in public and educational matters that positively contribute to our lives and the prospering of our communities. However, when engaging in such activities, no employee is permitted to use Karnov Group's name or logo or identify themselves as being affiliated with Karnov Group without obtaining prior written consent from the Group CEO.

Karnov Group will not make any political contributions and employees are not entitled to make them on behalf of Karnov Group.

### **Media**

Karnov Group endeavours to cooperate with media where appropriate, however, we aim to do so with a unified and professional voice. Therefore, only designated individuals are authorized to speak publicly in media on behalf of Karnov Group.

## **Code of Conduct**

## **Business ethics**

Karnov Group is committed to business ethics and compliance with the applicable laws, standards and other legal provisions wherever we operate.

As an employee of Karnov Group, you must avoid any behaviour that is unlawful or seen as unethical and/or inappropriate. Such behaviour can involve but is not limited to, fraud, falsification of data and records, extortion, bribery, corruption, facilitation payments, kickback agreements and money laundering activities.

## **Gifts and representations**

Any profit or gain based on disregarding our values and integrity causes harm in the long run. With regard of this neither employees nor anyone acting on behalf of Karnov Group may promote, ask, offer, give or accept, directly or indirectly, gifts, entertainment, gratuities, special allowances or other financial or non-financial benefits for personal gain which can have a risk of influencing a business decision or is seen as unreasonable in the context. When representing Karnov Group local laws and regulations apply for representations as well as general expenses made in a business context.

## **Respect for intellectual property**

At Karnov Group we respect the fact that intellectual property such as trademarks, copyrighted works, inventions, trade secrets and know-how, are often valuable and may be of vital importance to the owner's success in the market. For both employees and business partners we expect that you protect and process intellectual property and fully respect the intellectual property of others.

## **Fair competition**

We are committed to vigorous but fair competition in our marketplace based on the unique customer value of our products and services. Laws protecting competition, especially anti-trust law and other regulations regulating a healthy competition, shall be observed and complied with. We expect that employees, business partners or those acting on Karnov Groups behalf never engage in any anti-competitive activities but support free and fair competition within the markets where they operate. Furthermore, we expect that they comply with applicable competition laws and regulations, when interacting with competitors and customers.

## **Environmental commitment**

In Karnov Group, we strongly believe that we have a responsibility to minimizing whenever possible the environmental impact from conducting our business. We realize that a healthy environment

is of critical importance to our global society and the severity of potential impacts that today's environmental challenges will have if left unaddressed.

Karnov Group expects business partners to approach operations with care for the environment and to strive to minimize adverse impacts on the environment, comply with all relevant local and national environmental regulations and maintain all applicable licenses, registrations or permits.

## **Role and Responsibility**

The Code of Conduct has been approved by the Board of Directors and it is the responsibility of the Group CHRO to ensure that all employees are made aware and introduced to the Code of Conduct.

All principles outlined in the Code of Conduct have been transformed into policies and guidelines to support the daily operations of Karnov Group in adhering to the Code of Conduct.