

# CODE OF CONDUCT



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## 1 Introduction

This code of conduct summarizes the common rules and values that everyone within FocusNeo must work according to in order to create trust and good relations with colleagues, customers, business partners and our surrounding world. FocusNeo strives for the highest level of ethical conduct and these rules shall be guiding in all situations that affect our work and business. We expect everyone, regardless of position, to behave and represent the company in the best possible way in terms of professionalism, business acumen and trust in those around them and to follow the high ethical requirements in their professional practice.

It is also important that our employees are happy and that we have a good working climate. All interaction between employees, be it leaders or equal colleagues, must also take place with respect, responsibility and consideration towards each other, which creates FocusNeo's success.

### 1.1 About FocusNeo

FocusNeo is a comprehensive supplier of brand signage, wayfinding and visual communication with operations in Sweden, Norway and Finland. FocusNeo has four

offices in the Nordics and partners all over the world. The company started in 1965 and the head office is located in Stockholm. The company has around 60 employees and in 2022 FocusNeo had a turnover of approx. 170 MSEK. We help companies, retail, hotels, restaurants and property owners with the entire process from preliminary study and design to complete installation and service.

#### 1.1.1 Our mission

We strengthen our clients' brands with eye-catching signage and create unique visitor experiences through carefully planned wayfinding.

#### 1.1.2 Our values

FocusNeo conducts business according to good business practice. We work long-term with our customers and suppliers with a strong focus on ethics and ethical rules. We distance ourselves from offensive and discriminatory behaviour.

Our company values are

- Innovative
- Knowledgable

- Committed
- Creative
- Together

## 2 Laws, regulations and rules

All employees and business partners must comply with applicable laws, standards and regulations in the industry areas and countries where we operate. This applies both to our own production, how we treat our employees and how we manage our bookkeeping, accounting and taxes.

## 3 Human Rights

FocusNeo supports and respects the United Nations Declaration of Human Rights and accepts our responsibility to uphold the rights of employees and society in our operations. We are active in international collaborations with the aim of improving the conditions for those who work to manufacture our products.

FocusNeo will not do business with any country, company or individual that has been sanctioned by the United Nations or the European Union. We will regularly monitor any published information from these sources

to ensure that we are acting in accordance with them.

### 3.1 Child labour

FocusNeo does not accept either forced or child labour, and supports the UN Convention on the Rights of the Child (CRC). We must ensure that the products we sell do not come from companies that use child labour.

### 3.2 Trade unions

FocusNeo respects the employees' right to form and join the trade unions they wish and to bargain collectively.

## 4 Ethics and Morals

FocusNeo's ambition is to constantly exceed the demands that customers and other stakeholders place on the quality of our services and products. We also keep what we promise in customer relations but also in our internal work. We conduct our business with high integrity and morality and follow our high ethical rules. We also take responsibility for our actions.

We also require that all employees are aware

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of and follow our purchasing guidelines, but also take responsibility for our costs as far as possible.

In order to maintain our business ethics, we must never act in violation of applicable competition laws, for example by abusing a dominant position, participating in illegal industry cooperation, for example by forming a cartel or being involved in the counterfeiting of goods.

We also manage our work with confidentiality in mind and we ensure that no unauthorized persons or companies have access to confidential information either internally or from our suppliers.

We all behave in an ethically defensible manner.

## 5 Bribery and gifts

We never accept, directly or indirectly, bribes or other improper benefits or compensation, for the benefit of the business and/or for financial gain.

Employees may receive and offer gifts, services and entertainment from and to customers and suppliers, provided that these are not of an overly lavish or excessive type.

Employees must be vigilant against strong expressions of favoritism and neither offer nor accept gifts, services or entertainment that fall outside reasonable business practices or specific company requirements.

We also never offer or give any gift or payment that constitutes or could be construed as a bribe.

## 6 Securities

We comply with securities trading laws. You may receive information about FocusNeo or other companies that FocusNeo deals or negotiates with that is “unofficial” – that is, not publicly known – such as provisional revenue figures, possible acquisitions or divestitures, marketing plans or new product introductions .

Information is considered unofficial until it is officially published. In these cases, you will not:

- trade in shares, bonds or other securities within the company or to which the said unofficial information refers.
- use such unofficial information for personal gain to you or others.

- disclose such unofficial information to persons outside FocusNeo.
- unreasonably discuss such unofficial information with persons outside FocusNeo.

If you leave FocusNeo, your duty of confidentiality regarding such informal information remains until the information has been published to the public.

## 7 Working environment

FocusNeo strives to create a supportive work environment where collaboration, individual responsibility, innovation and high performance are important core values. The company complies with health and safety regulations and laws and all employees are expected to take responsibility for ensuring that workplaces are safe for themselves and their colleagues.

We must annually evaluate the company and the employees' views through employee surveys and create joint action plans that are also followed up. We also have a continuous collaboration with our employees and the trade unions to create and develop a safe working environment.

We respect that all employees need a healthy balance between work and leisure. All employees' skills are an important asset and the company wants to give everyone individual development.

### 7.1 Alcohol and drugs

No employee may be under the influence of alcohol or illegal drugs during work. The use of alcohol and other drugs can be a problem for the individual employee as well as for colleagues and the company. Employees who have substance abuse problems must be given support and in that way create the opportunity to manage their work.

Employees must not be involved in any transactions involving the handling, sale or purchase of illegal drugs. Illegal drugs may not be brought into the company's or group's premises.

## 8 Our Business Partners

We strive to ensure that our suppliers are willing to meet the requirements set out in our Code of Conduct. We choose our suppliers in a professional, systematic and fair way. Our negotiations with suppliers take place in an

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honest and fair manner.

We cherish and respect the trust our customers and consumers place in our company. We do this by providing information about our values and our operations. In order to live up to and strengthen consumers' and customers' trust in us, we must have an open attitude in the dialogue with them. We respond to requests from outsiders and communicate quickly, correctly and efficiently.

## 9 Equality, diversity and discrimination

FocusNeo values diversity among its employees. We do not accept discrimination, differential treatment or harassment in any of our workplaces because of gender, gender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age. Nor should anyone be discriminated against or harassed because of political opinion or social or ethnic origin.

### 9.1 Wages and benefits

We ensure that wages and benefits at least reach statutory levels and/or minimum

industry standards in the countries where we operate. We also reward employees with individual salary development through performance without discrimination.

## 10 Environmental impact

FocusNeo AB provides open and factual information about our environmental work to employees and other stakeholders. We carry out active work to continuously reduce the company's direct and indirect environmental impact. Suppliers are expected to act in line with our environmental policy.

Suppliers must therefore be aware of and comply with requirements according to national legislation, regulations and industry standards. This includes having knowledge of and control over one's environmental impact, as well as continuously working with improving environmental measures in one's operations. We strive to constantly use the best environmentally friendly technology that is financially justifiable in every investment.

## 11 Conflict of interests

Any employee who comes into contact with a spouse, family member or other relative or

close friend in connection with business with a supplier, customer or third party with whom the company does business must immediately notify their supervisor so that appropriate action can be taken to redistribute work to avoid potential conflicts of interest.

The following guidelines apply to the most common conflict situations:

- Prohibition against employees owning shares or having an ownership interest in any company that competes with or trades with FocusNeo. If you have made such an investment before starting your employment, you must report this to your immediate manager. This prohibition does not apply if you own a small number of shares in a listed company.
- Get the go-ahead from your manager before doing business on FocusNeo's behalf with any company where you or a close family member could in any way benefit from your actions.
- Do not work for a supplier, customer or competitor while working for FocusNeo or
- perform any work for any third party that could adversely affect your performance - or judgment at work.

Do not use company time, resources or materials for outside work unrelated to your work at FocusNeo.

## 12 Company information and property

### 12.1 Protect company property

All employees must protect the equipment that we have in our environment or that is assigned and that is to be used at work. Above all, employees must ensure that valuable electronic equipment, such as laptops and mobile phones, are always stored securely.

It is not the company's intention to generally monitor e-mail, internet access, etc., but if the circumstances are such that it is required, for example through suspicion of crime, this may be done by authorized personnel.

### 12.2 Protect company information

Information about the company and our employees must be treated as sensitive information and must be protected and must

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not be disseminated to unauthorized persons or outside the company, with the exception of information forwarded for specific business purposes.

Examples of sensitive information:

- financial results
- acquisitions
- divestiture
- new products
- strategies
- client information
- design
- personnel and organizational information

All employees must be extremely careful so that electronic equipment containing sensitive and confidential material (eg USB sticks) is not lost or for any reason left to third parties outside the company. Anyone handling business information (especially financial data) has a duty to check that it is accurate and reliable.

Confidentiality also applies when your employment has ended.

## 13 Contact with media

Only the company's designated spokesperson may speak to the media on behalf of the company. If an employee, due to a company matter, is contacted by a representative of the media, this person must not say anything but immediately inform the group's marketing manager and/or CEO about the particular matter. Employees may under no circumstances speak to journalists without prior approval from the marketing manager and/or CEO.

FocusNeo's reputation and brand identity may be adversely affected by careless comments or the dissemination of incorrect or negative information. The company takes very seriously if an employee would leak information about the company to the media or speak to journalists without prior approval from the marketing manager or CEO.

Requests for interviews with any employee of the Company regarding the Company or its business, as well as the issuance of press releases by any employee of the Company, must be reviewed and approved in advance by the CEO. Interviews initiated by someone at FocusNeo must be approved before time can be agreed with the media.

## 14 Everyone's responsibility

This code applies to all FocusNeo employees. Everyone is expected to have access to and act in accordance with the Code. Managers must notify all their direct subordinates of the Code and regularly inform them about it. Although questions of interpretation may arise, the code describes the requirements that everyone working for the company is expected to meet. All FocusNeo employees have an individual responsibility to read and follow this code of conduct, and it is part of the employment contract.

## 15 Report violations

If an employee suspects that a violation of this code has taken place, the immediate superior must be informed in the first instance. If employees cannot raise the issue with their supervisor, the HR manager or, in serious and urgent cases, the CEO can be informed instead. We still take violations seriously because we see that we have a business that must be characterized by high business ethics and morals. In these cases, we make individual assessments of what has happened and then assess what possible consequences it may have for the individual.

However, FocusNeo always strives to offer a supportive climate where employees feel they can confidently report cases of suspected violations.

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