

## General principles

The most important task for AB Momento is to develop and maintain a financially sound and successful business with high integrity and morale. And we must conduct a good business ethic towards our customers and suppliers. And that we should protect and nurture our brand against counterfeiting. And protect the integrity of our employees and customers in accordance with laws and agreements. We do not use conflict minerals in our manufacturing.

Our responsibility applies to the environments in which we operate and to our employees, business partners, laws and society in general.

The Code of Conduct is based on the UN Declaration on Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the UN Convention against Corruption.

It is AB Momento's conviction that doing business should not only comply with local laws and regulations, but also follow well-established and widespread conventions on human rights, agreements and ethical standards. The Code of Conduct applies to all AB Momento employees. Failure to comply with this code is unacceptable and may be an indication of a lack of insight and understanding and will therefore always be the subject of dialogue between the person in question and his / her manager. In the areas where we have influence, we shall, as far as possible, strive to ensure that our suppliers, agents and other partners follow the principles of our Code of Conduct. As a manager, you must read and understand what the Code of Conduct means for your part of the business and its significance for AB Momento as a whole. It is your responsibility as a manager to introduce your employees to the Code of Conduct during the recruitment process and to ensure that they understand and work in accordance with the Code. You need to have a continuous dialogue with your employees on accountability issues and take these into account when creating business plans.

As an employee, you must understand and follow the Code of Conduct. If you have any questions, contact your nearest manager for guidance. For more information, please also refer to Momento's "Business Policy".

## Relationships with our employees

To have a strong and lasting relationship with all employees, which is based on mutual respect and dignity, which is very important for AB Momento.

- The terms of employment offered to employees must meet the minimum requirements of national law.
- We offer a safe and healthy work environment and we constantly try to make improvements.
- We provide individuals with equal opportunities regardless of race, color, gender, sexual orientation, nationality, religion, ethnic or other distinctive characteristics.
- We do not allow trafficking, discrimination or harassment.
- We offer employees different ways to report misconduct, and legitimate concerns so that proper review and action can be taken and without the reporting being subject to retaliation.
- We recognize the right of workers to form or join trade unions in accordance with the country's laws and principles.
- We offer employees training opportunities that support their current and future work plans.
- We do not employ any person under 15 years.
- We do not apply forced labor, slave labor or other forms of involuntary work at our workplace.
- We do not allow methods that restrict the free movement of employees.

## Acting in the market

### **Corruption, bribes, gifts and benefits**

A Momento employee may not offer or accept gifts, benefits, compensation or entertainment to or from a third party that would constitute a violation of the law or which may affect or be deemed to affect the employee's professional judgment in the performance of their work or service for Momento or a third party.

This does not prevent Momento employees from receiving or offering rewards designed to maintain and promote good business relationships with customers and other business partners. This is provided that such rewards are modest, openly accepted and offered and otherwise comply with this Code of Conduct and local regulations on gifts, rewards and other business benefits.

Momento does not under any circumstances accept corruption, abuse of power or improper profit from an employee's position.

- The term corruption refers to the abuse of a person who in a position of trust for their own or the company's profit, for example by using bribes to gain advantages over others.
- It is forbidden to offer, promise, give and request, accept a promise or receive bribes.
- Receiving a gift or other benefit that may affect another person, as part of their employment or duties.
- Corruption may include giving and receiving bribes, extortion, favoritism, fraud, conflict of interest and abuse.
- Other abuse of power, neglect and mismanagement can also be regarded as corruption.

### **Fair competition**

In our efforts to increase our market share and earn customer loyalty, we will never relinquish ethics and responsibility. Momento complies with the law on trust and competition in every market in which we operate.

- We do not enter into or initiate any illegal forms of anticompetitive agreements.
- We use honest methods in our business with customers, suppliers and other business partners.
- We cooperate with the competition authorities.
- We ensure that our employees have appropriate awareness of applicable competition laws and policies.

### **Management of conflicts of interest**

Momento's organization is politically independent and our employees work for the best of the company

- Momento's employees should always work in Momento's best interest and avoid any actions that may be perceived to benefit a company, organizations, individuals or other stakeholders at Momento's expense.
- Employees should avoid all types of activities that conflict with the company's interests or have a negative impact on the employee's judgment and integrity.
- Momento's does not take political stance and therefore we do not use funds to support political campaigns or other political purposes.

**Relationships with external parties, such as suppliers and partners**

Our business partners must follow the principles of this code.

- We strive to ensure that our suppliers and other business partners follow the principles of our Code of Conduct.
- When selecting suppliers and partners, the evaluation should include their ability to meet the requirements of this Code of Conduct.
- AB Momento may under no circumstances or be part of a violation of general or special competition rules, such as illegal cooperation on pricing, illegal market sharing or any other behavior that violates relevant competition laws.

**Accounting, information and financial reporting**

Momento aims to provide transparent, accurate, continuous and fast information of the highest quality.

- Momento must have accurate accounting that complies with applicable laws, regulations, accounting standards and standards. Financial information and other stock price sensitive information must be disclosed in accordance with applicable laws, stock exchange rules and other regulations.
- Money laundering absolutely must not occur.

**Respect for confidential information**

Momento's employees may not disseminate or misuse confidential information

- This principle can be waived if specific permission has been granted by the immediate manager.
- Examples of confidential information include non-public information about Momento's business, financial position, strategies, business transactions, business plans, business processes, etc.
- Momento requires employees and other persons performing services for Momento to sign a confidentiality agreement when applicable.
- We report all financial transactions correctly in accordance with local accounting practices, and comply with national laws.
- We have controls in our IT routines to ensure adequate data protection.
- Momento has procedures that deal with intellectual property rights, counterfeit parts, export controls and financial penalties.
- Company management communicates sensitive information that concerns the company.

## Working environment

- AB Momento has a collective agreement.
- AB Momento is affiliated with occupational health care.
- AB Momento complies with the Work Environment Act.

### **Which means:**

- AB Momento has a collective agreement with Swedish unions: “IF-Metall” and “Unionen”.
- AB Momento is connected to occupational health care.
- The terms of employment offered to employees must meet the minimum requirements of national law.
- We provide a safe and healthy work environment and we constantly try to make improvements.
- Security rounds are conducted regularly.
- We give individuals equal opportunities regardless of race, color, gender, sexual orientation, nationality, religion, ethnic or other characteristics.
- Gender equality work is conducted in accordance with applicable laws.
- The company has procedures for adaptation and rehabilitation activities.
- We have clear procedures for dealing with crises of various kinds and that there are introductory plans for new employees.
- There are action plans for long-term absence.
- We do not allow and exclude all types of discrimination, harassment or human trafficking.
- We offer employees different ways to report misunderstandings and legitimate problems so that proper review and action can be taken and without reporting being subject to retaliation.
- We recognize the right of workers to form or join trade unions in accordance with the country's laws and principles.
- We offer employees training opportunities that support their current and future work plans.
- We do not employ any person under the age of 15.
- We do not apply forced labor, slave labor or other forms of involuntary work in our workplace.
- We do not allow methods that restrict the free movement of employees.
- We do not allow any form of bribery.

## Environment

- AB Momento is convinced that development and improvements can contribute to a more sustainable world by having an active environmental management at all levels within the company.
- We have organizational structure, management systems and procedures to ensure that all relevant laws, regulations and norms are followed.
- Our environmental management system is ISO 14001 certified.
- We do not use any material that contains substances contained in the REACH or RoHS directives.
- To achieve continuous improvements, we involve our employees in environmental management work.
- Our ambition is to constantly find ways to reduce the negative environmental effects of our products throughout their life cycle.
- Our products are recyclable.
- We measure our emissions to air.
- We do not release any contaminated water. It goes to destruction.
- We try to find environmentally friendly alternatives when purchasing materials and chemicals.
- We try to phase out dangerous chemicals as much as possible.
- We have the Community Building Administration, the Environment Department, which manages our supervision.

AB Momento



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