



Global policy

HMS Networks Code of Conduct

Adopted by the HMS Board of Directors, November 1st, 2024



Doing business the HMS way

Honesty and fairness have always characterized the HMS way of doing business. This has resulted in a strong brand reputation built on a long and successful history of growth and loyal customers.

Our Code of Conduct aims to capture the way we do business, sustaining good long-term relations with all stakeholders.

By using the Code of Conduct in our daily work, we ensure that our business is conducted in a responsible and sustainable way.

Our commitment is to maintain the highest standards of business ethics and integrity in everything we do.

Thank you for contributing!
Staffan Dahlström, President and CEO



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GLOBAL POLICY

Introduction: The HMS way of doing business

The HMS Code of Conduct forms the basis for the way we work and conduct business. The Code aims to guide HMS employees in everyday business decisions, together with other group policies and HMS core values.

When developing the Code of Conduct, we have also been guided by the International Bill of Human Rights, the International Labour Organization's (ILO) Core Conventions and the UN Sustainable Development Goals (SDGs), among others.

RESPONSIBILITY AS AN EMPLOYEE

This Code of Conduct applies to all HMS employees and other representatives acting on behalf of the group. Our employees and representatives are expected to always act according to, and in the spirit of the Code. Managers and leaders are expected to lead by example and to be available to questions or reports of violations of the Code.

RESPONSIBILITY AS A SUPPLIER

HMS places equivalent expectations on suppliers, sub-contractors, distributors and business partners. The Supplier Code of Conduct therefore contains guidelines, responsibilities and duties of the group's suppliers and business partners in relation to business principles, human rights, working conditions and the environment.



INTEGRITY


HMS's integrity and reputation are highly valuable assets. Just as any other asset, they need to be developed and protected. Our Code of Conduct is aimed to guide us and to be a tool to maintain our integrity and reputation as a reliable partner for industrial ICT. It helps us to conduct our business in a reliable way and reminds us that every action counts. Failure to comply with the Code can severely damage HMS's reputation and business and may result in disciplinary action.

If you have any doubts about the purpose and principles of your actions in any situation, please do not hesitate to contact your manager, HMS Human Resources, or our ethics resource center through our whistleblower service for support and guidance.



*Our values as guidance:
We put Heart, Mind & Soul in what we do.*

Our business principles



The HMS Group is dedicated to being a responsible employer and a good corporate citizen. We are committed to ensure that all our business is conducted in a responsible, transparent and trustworthy manner.

CORPORATE COMPLIANCE

HMS shall follow the laws and regulations that affect our operations worldwide. The Code sets forth a framework that ensures all HMS employees act in accordance with our values, even if it stipulates higher standards than required by local law. If there are any differences between the Code of Conduct and any regulatory frameworks, the highest standard is to apply.

ANTI-CORRUPTION

HMS must, always, stay committed to exercise fairness in all dealings with business partners and stakeholders. We have zero tolerance for all forms of corruption or bribery, in compliance with all applicable laws and regulations, including the UK Anti-Bribery Act and U.S. Foreign Corrupt Practices Act ("FCPA").

HMS supports fair and equal competition. We compete in a manner that both ethical and fair, without engaging in any inappropriate activities or unfair trade practices.

Business decisions are based on the best interests of HMS, without regard to personal relationships or considerations. Employees must not generally accept gifts, benefits, reimbursements or entertainment, whether directly or through intermediaries, that could affect, or even appear to affect, the objectivity and professional judgment of the employee.

Any gifts, benefits, reimbursements or entertainment shall be business related, of moderate value, free from obligation and expectation and also avoided during ongoing negotiations. Never offer, promise or give a financial or other benefit to gain an improper advantage.

CONFLICT OF INTEREST

Conflicts of interest arise when your personal interests, activities, or relationships interfere, or appear to interfere with your job responsibilities. Employees may not engage themselves, with or without compensation, in activities that might conflict or appear to be in conflict with HMS interests, without disclosure and approval.

Employees must never use association with HMS for personal gain and shall avoid engaging in external financial interests that might conflict with HMS interests — for example personal or family interests in companies that has business relationships with HMS.

ACCURACY IN ACCOUNTING AND REPORTING

HMS is committed to being fair, accurate and timely in all communication. All financial transactions made by HMS must be conducted and recorded in accordance with generally accepted accounting practices in each jurisdiction. Accounting records must show the nature of all transactions in a correct and non-misleading manner. These practices are essential to fulfill our obligations to shareholders and to comply with law. All records shall be maintained and destroyed in accordance with HMS records retention principles.

COMPLIANCE WITH TRADE RULES

HMS complies with all applicable Import/export laws, which regulate where we may ship our products, share our technologies and conduct business. Trade laws follow products from the country of manufacture, through distribution, to wherever they are finally sold. Many countries place restrictions on items and related technical data that are designed, modified, created or adapted for military purposes. Countries also restrict shipments to certain countries or individuals. It is imperative that we maintain effective trade controls across our global operations to prevent unintended violations of law.



PROTECTING ASSETS, INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

Employees often have access to information about HMS, and sometimes also to information regarding customers or other third parties, that is not generally available to the public. Such confidential information must not be passed on to any unauthorized parties, family members included. Some confidential information may even be considered a trade secret (unregistered intellectual property). This obligation continues even after termination of employment.

INSIDER TRADING

Employees are not allowed to trade in HMS shares or any other kind of property based on insider information, i.e. information accessed through employment at HMS and which is not made public. If you have any doubts or questions when dealing with confidential information, please seek guidance from your manager.

Human rights and working conditions



The HMS Group supports and respects the protection of internationally proclaimed human rights. This means doing everything we can to avoid violating the human rights of people and communities, as well as creating a positive impact, throughout our supply chain and in the communities we operate.

HEALTH AND SAFETY

Our workplaces shall be safe and secure. The necessary conditions for a safe and healthy work environment shall be provided for all employees, including appropriate information and training. We work together to ensure a safe and healthy work

environment for all. We promote a culture of Zero Harm. We all have an obligation to act if we become aware of a potential risk.

RESPECT FOR THE INDIVIDUAL

Equal treatment and equal opportunity shall apply to everyone, regardless of ethnicity, nationality, gender, gender identity or expression, sexual orientation, religion or other belief, political opinion, social origin, disability, age or any other status protected by applicable laws. This includes the international Bill of Human Rights and the international Labour Organization's (ILO) declaration.

Harassment or discrimination is never tolerated. Employees should treat each other with dignity and speak up about any behavior that creates an intimidating, hostile or offensive workplace.

FAIR EMPLOYMENT CONDITIONS

Terms of employment and wages shall be fair and reasonable. Obligations to employees under national laws and social security systems must be respected and followed. All employees, including those temporarily employed, should have access to company documentation reflecting their current wages and benefits at all times, and be made aware of their employment conditions.

HMS will not keep or withhold any identity papers for employment. We strictly adhere to the labor laws and regulations in every country and region where we operate including laws governing working hours, overtime, and wage payments. Wages shall meet or exceed the legal minimum wage requirements in all regions where we operate.

FREEDOM OF ASSOCIATION

All employees are free to exercise the right to form, join or refrain from joining unions or similar organizations and to bargain collectively or individually, without any form of discrimination or retaliation.

FORCED OR CHILD LABOR

The HMS Group does not tolerate underage labor in our operations or in the operations of any suppliers

or business partners with whom we cooperate. HMS will adhere to all applicable laws concerning the employment of underage workers.

We do not allow forced or compulsory labor in our operations or in the operations of any business partners with whom we cooperate. Workers shall not be restricted from terminating their employment in accordance with their notice rights. The term “forced labor” or “compulsory labor”, according to the International Labor Organization refers to all work or services for which a person has not offered themselves voluntarily. Examples are (but are not limited to), human trafficking, slavery, debt bondage, and identification retaining.

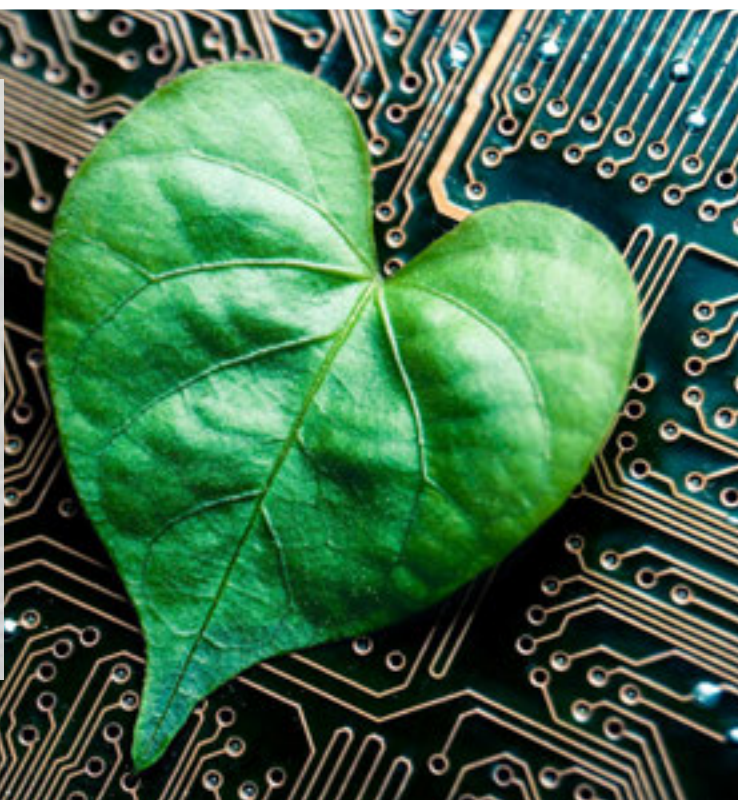
DATA PRIVACY — GDPR

HMS is committed to responsible and permissible collection, use, storage, disposal of the personal information of our employees, customers and other third parties with whom we do business. Personal information is data that can be used to identify a specific person such as a name, address, photo, birth date, phone number, driver’s license number, credit card number or email address. Improper use of personal information, that is, without the consent of the individual, is prohibited by law in many countries.



Our environmental responsibility

Long-term sustainable business shall be conducted with the next generation in mind. We develop and provide products and services that enable our customers to minimize their negative environmental footprint, improve resource efficiency and increase productivity.



We are committed to protect the planet and contribute to a more sustainable world.

Our commitment involves reducing negative environmental impact in our operations and value chain. All employees shall comply with environmental laws and regulations and support the achievement of the Group's sustainability objectives.

For us, it means that we take the time to understand the environmental risks and negative impacts associated with the daily work and look

for opportunities to maximize benefits to the environment and minimize negative impacts.

This includes reducing our impact of greenhouse gas emissions, responsible handling of hazardous materials and waste, optimization of energy consumption and to offer innovative solutions and services with circularity in mind.

Speak up!

It is important that we act when violations or other irregularities occur from the principles in this Code of Conduct.



OUR WHISTLEBLOWER SERVICE

If HMS employees encounter violations or other irregularities of the Code of Conduct or any Group Policy, concerns shall be raised with the manager of the employee, suitable person or function within the HMS Group.

Our whistleblower service is an alternative way of reporting serious misconduct in cases where HMS employees or representatives do not feel comfortable reporting through the above channels.

Whistleblowing can be used to alert about serious risks affecting individuals, our company, the society or the environment. Whistleblowing can be done by any person openly or anonymously. All issues reported will be investigated.

When using the HMS whistleblower service, the processing may only refer to data about perceived serious improprieties concerning:

- accounting, internal accounting controls, auditing matters, fight against bribery, banking- and financial crime, or
- other serious improprieties concerning the HMS Group's vital interests or the life or health of individual persons, as for instance serious environmental crimes, major deficiencies that regard the security at the place of work, or
- serious forms of discrimination or harassments.

HOW TO REPORT

There are different ways to raise a concern:

- Alternative 1: Contact your manager, suitable person or function within the HMS Group
- Alternative 2: Anonymous or confidential messaging through the whistleblower service to the Whistleblowing team:
<https://report.whistleb.com/en/hmsnetworks>

Further information about the whistleblower service and how to submit a report is available on <https://www.hms-networks.com/sustainability/whistleblowing>.

HMS's Whistleblowing team are responsible for managing the notifications submitted via the whistleblower service.



www.hms-networks.com