

Code of Business Ethics

Ericsson Nikola
Tesla Group



Introduction

This Code of Business Ethics (hereinafter: „**the Code**“) shall be applied in companies forming **Ericsson Nikola Tesla Group** (as defined below).

Management boards in these companies shall adopt a decision that will determine the application of the Code and where applicable the Supervisory Board shall approve such Management Board's decision beforehand.

Ericsson Nikola Tesla Group (hereinafter: „**ENT Group**“) comprises Ericsson Nikola Tesla d.d. company and companies in which Ericsson Nikola Tesla d.d. has a majority of shares as defined by applicable regulations concerning companies.

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Being a trusted partner

Our guiding principles

Integrity, transparency and responsibility have always characterized the way we conduct business. Operating with a strong sense of integrity is critical to maintain trust and credibility with our customers, partners, employees, shareholders, society and other stakeholders. Such trust and credibility require transparency and confidentiality in how we conduct business to protect business assets and the rights of individuals.

Creating an environment of transparency in the conduct of business is a top priority for all of us. This Code reflects our commitment to operate with transparency and sustainability as well as in accordance with applicable regulations in our dealings and communications to the marketplace. We expect that ENT Group will be operated in accordance with the principles set forth in this Code. Everyone, from the members of the Management Board and the executive management to each individual working for ENT Group, will be held accountable for meeting these standards.

The Code reflects our company's commitment to conducting business responsibly, including:

- Supporting the United Nations Global Compact ten principles¹;
- Respecting human rights throughout our business operations, according to The United Nations Guiding Principles on Business and Human Rights;
- Behaving responsibly and with a developed moral sense;
- Ensuring health and safety; and
- Encouraging sustainable development.

The Code also contains ethical principles for all individuals performing work for ENT Group, whether as an employee of ENT Group or a subcontractor, including:

- Ensuring full compliance at all times with applicable regulations;
- Promoting full, fair, accurate, timely and understandable disclosure in financial reports and other public communications;
- Appropriately dealing with conflicts of interest;
- Protecting and properly using company assets; and
- Protecting Confidential information (as defined below).



¹ UN Global Compact ten principles are derived from the Universal Declaration of Human Rights, the International Labor Organization's Declaration of Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention Against Corruption.

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Our responsibility for compliance

Everyone working for ENT Group is required to read the Code, to support and work in line with the concept stated herein and to follow the rules in the Code.

In addition, we must follow other internal rules set out by ENT Group, as well as its additional directives and instructions; failure to do so may result in various disciplinary actions specified by applicable regulations, including certain labor law actions and making reports and suggestions to authorities.

We place additional responsibilities on our managers. Through their actions, they shall demonstrate the importance of compliance.

Leading by example is critical, as is being available for those who have questions or wish to report possible violations of this Code.

Managers of organizational units must ensure that the Code is respected and is enforced in their organizations. Managers of organizational units may not turn a blind eye toward conduct which is contrary to the Code.



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Reporting compliance concerns

Employees and other individuals working for ENT Group

Employees and other individuals working under the staff management of ENT Group are encouraged to report any conduct that they believe, in good faith, to be a violation of the Code. A report can be made to one's manager or via one of the several available channels for making reports. If the manager is involved in the situation or cannot or has not adequately addressed the concerns (as applicable), employees can report to a manager of higher rank or via one of the several available channels for making reports.

Reporting non-compliance

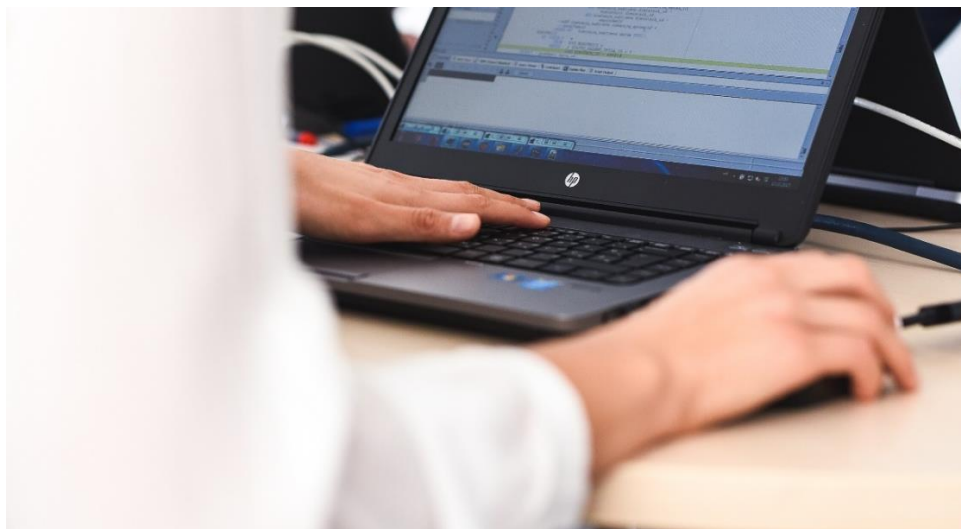
If a manager is not available or if the alleged violation includes a manager to whom it should be reported or the case is connected to him/her, the violation should be reported through the process of anonymous reports or in line with the Bylaw on internal reporting of irregularities to the elected Person of Confidence.

Information about all available channels for reporting is available at ENT Group's website:

<https://www.ericsson.hr/en/company-governance>.

Managers and other persons informed about the report are expected to approach seriously the reported issue and ensure a satisfactory solution in line with ENT Group's moral principles, values and actions as well as in line with local statutory and regulatory obligations.

ENT Group will not accept any discrimination or retaliation against the individual reporting the violation for having, in good faith, reported alleged violations of the Code or law.



Business partners

ENT Group's business partners may report, in good faith, suspected violations of applicable laws or the Code at compliance.etk@ericsson.com, anonymously via ENT Group's Compliance Line or to a Person of Confidence. Information about systems for reporting non-compliance is available at ENT Group's website: <https://www.ericsson.hr/en/company-governance>.

ENT Group prohibits any discrimination or retaliation against the individual for having, in good faith, reported alleged violations.

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Doing business responsibly

The company's commitment

Everyone who works for ENT Group is obliged to treat the corporate responsibility matters professionally, including issues related to human rights, health, safety and environment, and thus bear in mind the company's commitment to be a relevant and responsible initiator of positive change in the society due to responsible business in their daily work.

ENT Group's obligation as a responsible corporate citizen

ENT Group believes that communication is a basic human need that contributes to economic prosperity and social equity and provides solutions to many of society's sustainable development challenges. We strive to ensure that our technology is a force for good in the world and minimize any negative impacts. We firmly believe that information and communication technology (ICT) promotes greater transparency and enhances many fundamental human rights, such as the right to health, education, freedom of assembly, and freedom of expression.

It is important to behave in a socially and ethically responsible way and strive to act responsibly in the communities where we conduct business. We care about the people who take part in the production and support of our products and services worldwide, and users of ICT more broadly.

It is important that the Ericsson brand is always associated with respect for human rights, fair and safe working conditions, and ethically and environmentally sound business practice.



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Respecting human rights throughout our business operations

ENT Group respects all internationally recognized human rights, including the International Bill of Human Rights² and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, which address freedom of association and collective bargaining, forced labor, child labor, and non-discrimination.

We are committed to implementing the UN Guiding Principles on Business and Human Rights throughout our business operations.

We strive to avoid infringing on the human rights of others and address adverse human rights impacts with which ENT Group is involved. We shall, always and in all contexts, seek ways to honor the principles of internationally recognized human rights, even when faced with conflicting requirements.

We are aware of the specific challenges to certain human rights issues in our industry, such as labor rights, the right to freedom of expression and the right to privacy, and the impacts on other rights arising from potential misuse of technology, and we work actively to minimize any such risks and challenges.

Privacy and security are important elements in products and services delivered by ENT Group, and we align our product and business processes to ensure that human rights aspects of privacy and freedom of expression are respected throughout our business operations.

For the purpose of respecting human rights and promoting fair employment conditions, safe working conditions, responsible management of environmental issues, and high ethical standards, the Code is based on the UN Global Compact principles. They shall be applied throughout the company's operations including in the management, development, production, supply, sales and support of ENT Group's solutions, products and services worldwide.

It is the responsibility of each ENT Group employee to respect and promote the Code, and it is the responsibility of each unit, as well as of each manager, to ensure that ENT Group employees are treated in accordance with the Code.



² The International Bill of Human Rights consists of the Universal Declaration on Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.

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Labor standards

Freedom of association

All employees shall be free to form and to join, or not to join, trade unions or similar external representative organizations and to bargain collectively, as well as be entitled to other rights stipulated by applicable labor regulations. Information and consultation with employees can be done through formal arrangements or, if such do not exist, other mechanisms may be used.

Prohibition of forced labor

Modern day slavery, including forced, bonded or compulsory labor, and human trafficking are strictly prohibited. Employees shall be free to leave their employment after reasonable notice as required by applicable labor regulations, collective agreement, labor bylaws, and employment contract.

Fair employment conditions

Employees shall understand their employment conditions. Employment conditions shall be determined by applicable labor regulations, collective agreement, labor bylaws, and employment contract. Conditions of employment shall be written in a language understandable to the employee. The normal work week shall be defined in line with applicable labor regulations.

In exceptional circumstances (e.g. force majeure, exceptional increase of workload, and other similar case of emergency), an employee can work beyond the normal working hours (overtime), in which case the employee is entitled to an increased salary.

Every employee is entitled to breaks and holidays as stipulated by applicable labor regulations, collective agreement, labor bylaws, and employment contract.

Deduction from fixed salaries or wages as a disciplinary measure shall not be permitted.

The employer shall protect employees' dignity while they carry out their work.

Employment of minors

It is possible to employ minors on an exceptional basis, while respecting conditions set out by applicable labor regulations.

Minors may not be employed to carry out work that might jeopardize their safety, health or development.

Elimination of discrimination

All employees shall be treated with respect and dignity. All kinds of discrimination based on partiality or prejudice is prohibited. Grounds for discrimination can be based on, but not limited to, race, color, gender, sexual orientation, gender identity, transgender status, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic background, social origin, social status, indigenous status, disability, age, union membership or employee representation and any other characteristic protected by applicable regulations.

Employees with the same qualifications, experience and performance shall receive equal pay for equal work with respect to those performing the same jobs under similar working conditions.

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Fair, safe and healthy working conditions

At ENT Group we give high importance to the health and safety of our employees, our partners' employees, our suppliers' employees, and members of the public that may be affected by our operations. A healthy and safe working environment, including psychosocial considerations and, if applicable, housing facilities shall be provided for employees, in accordance with international standards and national laws. Our commitment is demonstrated by thoughtfully considering potential adverse impacts on health and safety, analyzing and planning necessary actions to avoid such impacts, raising awareness of the importance of safety at all levels with our leadership.

Appropriate health and safety information shall be provided to employees, including risks they are exposed to, arrangements for safe evacuations of buildings and correct handling and marking of chemicals and machinery.

At ENT Group, we have a vision and goal of zero major incidents and have systems and procedures that apply to all employees, suppliers and partners which will help the company achieve the zero-incident vision.

From a health perspective, ENT Group also encourages employees to maintain a positive work-life balance.

Responsible sourcing of raw materials

Due diligence shall be exercised with respect to the sourcing and extraction of raw materials, including e.g. tin, tantalum, tungsten, and gold used in products. The due diligence shall be consistent with relevant parts of the OECD Due Diligence Guidance³ or equivalent processes.



³ OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

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Commitment to sustainable development

ENT Group is committed to the sustainable development of society, which is development that meets the needs of the present without compromising the ability of future generations to meet their own needs. We define sustainability as long-term social equity, economic prosperity, and improved environmental performance. The Sustainable Development Goals provide a framework for how we describe our impact on society. We are committed to using our technology and expertise to help achieve the Goals.

ENT Group strives to develop, produce and deploy sustainable products, services and solutions. We shall continuously work to reduce the negative impacts of our operations and to maximize positive impacts of our technology in order to enable the sustainable development of society.

We shall increase the knowledge and awareness about sustainability among employees, and proactively engage with stakeholders in activities that have positive social, environmental and economic impacts on people, business and society. We shall also engage our suppliers to ensure adequate sustainability standards in our supply chain.



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Every action counts

Ethical principles apply to everyone performing work for ENT Group, whether as an employee of ENT Group or of its supplier.

Compliance with laws and other applicable regulations

ENT Group shall comply with all laws and other regulations that apply to its business. As you conduct ENT Group's business, you may encounter a variety of legal issues. Violations of any applicable law, rule or regulation may have serious consequences, both for ENT Group and for the individuals concerned. Therefore, it is your responsibility to be familiar with and comply with relevant laws and other regulations, including in the areas listed below.

Trade compliance

Specific laws and other regulations apply to ENT Group as a multinational group of companies in an international business environment, in particular when exporting and importing products and services. ENT Group employees must therefore be familiar with, and adhere to, all applicable domestic and foreign laws and other regulations related to, for example, export and import regulations, anti-boycott provisions, trade embargos, and sanctions. According to these regulations, individuals can be restricted from participating in certain business activities. Legal Affairs and Trade Compliance Officer are available to support employees with questions regarding Trade Compliance.

Fair competition

ENT Group is dedicated to promoting fair competition. Fair competition provides the best incentives for business efficiency. It encourages business development and innovation, and it creates a wider choice for consumers. Most countries have laws prohibiting business practices that interfere with fair competition (competition or antitrust laws). These laws govern the ways companies deal with their competitors, customers, and suppliers and they, for example, prohibit price fixing, market and customer allocation and bid rigging with competitors, as well as the abuse of a dominant market position. Everyone working for ENT Group shall compete in the open market as vigorously and constructively as possible, while consistently complying with competition laws in each of the countries in which ENT Group operates.

Accounting and financial reporting

ENT Group is required to follow strict accounting principles and standards, to report financial information accurately and completely, and to have appropriate internal controls and processes to ensure that accounting and financial reporting complies with applicable regulations and listing requirements. Employees are required to support ENT Group's efforts in this area.

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Insider rules and trading prohibition

Everyone working for ENT Group shall act in strict compliance with all applicable insider rules and regulations as well as trading tips and recommendations. "Inside information" is non-public information, which, if it were made public, would be likely to have a significant effect on the price of a financial instrument.

No one who possesses inside information is permitted to use the inside information for trading in financial instruments to which the information relates. No one who possesses inside information is permitted to advise or encourage another person to trade in based on inside information. Furthermore, no one is permitted to disclose inside information to anyone, including family, friends, co-workers, or other persons who are not entitled to receive such information.

Privacy

ENT Group is committed to protecting the privacy of personal information, including personal information relating to employees, partners, external workforce, customers, and end-users. Personal data shall be kept confidential and handled in a secure way. Personal data shall be processed in line with applicable regulations on personal data protection.



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Communication and financial information

It is important that ENT Group's employees have a good understanding of their units' operational and financial performance to increase involvement in improving operations. Access to information about performance must be balanced with ENT Group's financial disclosure policy and legal requirements, specified in frameworks such as the insider rules, and the listing and reporting rules of stock exchanges and supervisory authorities for securities.

The obligation to comply with these requirements defines the way that individuals working for ENT Group shall manage material news that might impact Ericsson Nikola Tesla joint-stock company's stock price. Comments about financial performance and prospects to external parties shall only be made by a spokesperson authorized by ENT Group. In line with guidelines on communication with stakeholders, contact with the media and public appearance is the responsibility of Marketing, Communications & Corporate Social Responsibility unit, which also prepares all official communication.

Everyone involved in financial reporting shall always provide full, fair, accurate, timely, and understandable disclosures in reports and documents that ENT Group files with or submits to government agencies or authorities or makes in other public communications.

Marketing, Communications & Corporate Social Responsibility unit may authorize experts for public communication about certain fields and topics. In such process, it is always necessary to contact and inform superior managers who give their opinion about the potential candidate for public appearance. In general, employees can publicly express their personal views, but not on topics concerning ETK and not on behalf of Ericsson and/or Ericsson Nikola Tesla without an official approval. Moreover, only an authorized spokesperson may communicate/comment on material information, financial performance, strategically sensitive matters or non-public customer-related information. Marketing, Communications & Corporate Social Responsibility unit is available to support employees when they have questions or are in doubt. If necessary, the unit shall ask for an opinion from other competent services in the company (Legal Affairs, Human Resources, Finance, etc.).



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Dealing with conflicts of interest

We shall make business decisions based on the best interests of the company rather than personal considerations or relationships. A conflict of interest arises when anything interferes with or influences the exercise of our independent judgment in the best interest of the company. We must avoid situations in which our personal interest may conflict with, or even appear to conflict with, the interests of ENT Group.

The following are examples of situations to be particularly aware of:

Business opportunities

You may not take business opportunities for yourself, your family or friends that are identified in the course of your work for ENT Group.

Nor may you otherwise use property or information or your position at ENT Group for personal gain or for the gain of your family or friends.

Other employment or engagement

You may not take any employment or engagement outside ENT Group, with or without compensation, that harms or may harm job performance at ENT Group or creates or may create a conflict of interest. ENT Group's employees may not engage in outside business interests that divert time and attention away from responsibilities in ENT Group or require work during ENT Group working time.

ENT Group's employees shall avoid any potential conflict of interest by not accepting employment or engagement from any ICT organization or any supplier, contractor, agent, customer, or competitor of ENT Group, unless the engagement is on behalf of or at the request of ENT Group.

Board assignments outside ENT Group

ENT Group's employees must not take a board position in any entity or association (including non-profit organizations) if it creates a conflict of interest or could adversely affect the employee's performance of the duties or work for ENT Group. For example, a position in a management board, supervisory board or similar management and supervisory body in competitor, customer, supplier, or strategic partner of ENT Group is not permitted.

Every position and activities in a management board, a supervisory board, a board of directors, or a similar management, advisory and supervisory body in another legal entity, association and entity is permitted only if it is approved in advance by ENT Group. The above position and activities for members of a management board in companies forming ENT Group shall be approved by the relevant supervisory board or the company's general meeting (as applicable). Members of a management board in companies forming ENT Group may not hold more than two positions in a management board or a supervisory board in companies outside ENT Group. Members of a supervisory board in companies forming ENT Group are obliged to inform the company's secretary of their position in a management board or a supervisory board in companies outside ENT Group (if applicable).

A position in a management board, a supervisory board, a board of directors or a similar management, advisory and supervisory or representative role in a public authority body, as well as public service role is permitted after the request of employee, when the approver in ENT Group estimates that such activities are not and will not represent a conflict of interest with ENT Group.

After given approval for such additional engagement, an employee is due to withdraw from advising or deciding in subjects that could represent a conflict of interest with ENT Group, the approver has right to annul previously given approval if a conflict of interest is determined after the approval was given.

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Political activities

ENT Group will not make contributions or payment or otherwise give any endorsement, directly or indirectly, to political parties or committees or to individual politicians. You may not make any political contribution on behalf of ENT Group or through the use of the company's funds or resources. Unless otherwise expressly stipulated by applicable, enforceable regulations, an ENT Group employee's political engagement and political beliefs may not be connected with ENT Group or their workplace at ENT Group. This especially applies to mentioning ENT Group's names and business activities as well as workplace and activities related to their workplace at ENT Group.

Disclosure of conflicts of interest

In all the cases when an employee would like to perform an additional activity or performs such activity already, to estimate if there is a conflict of interest, an employee is obliged to immediately reveal the nature of the conflict of interest: first to the manager of the organizational unit in which the employee works, then to People organization at ETK (hereinafter: "People") and ask for an approval to continue or start an additional activity.

The internal document Additional employment or engagement of ETK Group's employees describes a process that employees must adhere to get approval for additional employment or engagement.

If anyone considers that an employee is in a conflict of interest, one can report a conflict of interest at e-mail: compliance.etk@ericsson.com or anonymously via the [Internet](#). Upon receiving such report, ETK Compliance and Investigation Officer shall inform the manager of the organizational unit where the employee works and People, and a procedure will be followed to take measures for mitigating and dealing with conflicts of interest.

All the reported cases will be treated as strictly confidential and in line with applicable regulations on personal data protection.



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Corruption

Zero-tolerance

ENT Group has a zero-tolerance policy towards any form of corruption and financial irregularity, including bribery, kickbacks, facilitation payments, fraud, embezzlement, and money laundering.

Bribes and kickbacks

No one representing ENT Group may, directly or indirectly, demand or accept from, or offer or give to, employees or other representatives of business partners (such as customers, suppliers, and channel partners) or any other entities (e.g. authorities), any kind of bribe, kickback or any other unlawful or unethical benefit.

Gifts and entertainment

No one representing ENT Group may offer to, or accept from, business partners or any other third parties gifts, benefits, reimbursements, or entertainment that would constitute a violation of laws or that could suggest a conflict of interest, divided loyalty, or be perceived as an improper attempt to influence business decisions or otherwise affect the recipient's performance or work duties. ENT Group employees should normally not accept gifts from business partners or any other third parties except for promotional items with insignificant value.

All gifts or entertainment should be:

- business-related;
- made openly - normally addressed to the receiver's employer;
- of moderate value;
- free from obligation or expectation; and
- avoided during ongoing negotiations.

Certain gifts or benefits are never allowed to be either offered or accepted, including money, loans, gift vouchers, kickbacks, work for private purpose, unethical benefits, vacations, or similar benefits addressed to individuals. Further guidelines are available in ENT Group's steering documents and e-learning.

Public officials

Stricter rules apply when we interact with government entities and their employees or representatives. Be aware that this includes also state-owned companies, i.e. many mobile operators. Normally, nothing of value should be promised, offered, or provided to a public official, either directly or indirectly.

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Facilitation payments

Unofficial payments demanded by public officials intended to speed up or secure the performance of routine government actions (e.g. issuance of visas or permits) are not allowed by ENT Group. Such facilitation payments are illegal in most countries and may result in prosecution and punishment of the payer.

Fraud and embezzlement

ENT Group does not accept any type of fraudulent behavior or embezzlement.

Money laundering

ENT Group supports international efforts to combat money laundering and the funding of terrorist and criminal activities. We shall not engage in unusual payment methods, or payments to unconnected parties, in contradiction to Ericsson policies and directives.

Support and reporting

If you are ever in doubt as to what is permissible, contact Legal Affairs and ETK Compliance and Investigation Officer for advice. Any offer or proposed arrangement contradicting our zero-tolerance towards corruption policy must be reported immediately to Legal Affairs or ETK Compliance and Investigation Officer at compliance.etk@ericsson.com.

If you wish to remain anonymous when reporting, you may use the external line for anonymous reports on the [Internet](#).

If you wish to report to persons of confidence in line with the Whistleblower Protection Act, on the website <https://www.ericsson.hr/en/company-governance> you may find all the information about elected persons of confidence to whom you report, as well as a Bylaw on internal reporting of irregularities.



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Protection and proper use of company assets

In addition to tangible assets, ENT Group has valuable assets that need to be especially safeguarded, including people, business information, intellectual property and reputation in the market. Therefore, every participant in ENT Group's business processes is responsible for protecting and for helping to protect the property entrusted to them.

To do this, everyone must be aware of and understand security directives. You must always be aware of security and report any loss or risk of injury or loss of property as soon as they come to your attention. Below, you will find instructions for internal and external handling of information, business systems and intellectual property.

Intellectual property

Intellectual property represents intangible assets whose successful use may be a valuable foundation or contribution to ENT Group's business. Intellectual property includes a variety of properties. For ENT Group's business especially important are the following: copyright (e.g. computer programs), patent right (e.g. an invention relating to a new technical product or process), trademarks (e.g. a name or a logo), and industrial design (e.g. distinctive design of a product).

Intellectual property is subject to protection through applicable regulations and internal documentation of ENT Group, and you are obliged to comply with it or, in case of doubt, request for additional instructions and clarification.

A copyright-protected work created under the employment belongs to ENT Group. Moreover, an invention designed during work or in relation to work belongs to ENT Group, and the employee is entitled to remuneration defined by ENT Group's internal documentation.

Use of ENT Group's IT resources

ENT Group's IT resources, including communication systems and connections to the Internet, shall be used for conducting ENT Group's business or for other incidental purposes, authorized by your management or applicable company's steering documents. You may be authorized by management, or by applicable company's steering documents, to access ENT Group's IT resources with devices and storage media not provided by ENT Group.

To the extent allowed under applicable law, access to ENT Group's IT environment from any device or storage media (whether provided by ENT Group or not) may be checked for installed software, USB storage, firewalls, administrator information, additional network connections, encryption, antivirus or malicious software and components, etc.

For the purpose of protecting ENT Group's business and detecting unacceptable use of ENT Group's IT resources, you may be asked to provide access to any devices and storage media used to access ENT Group's IT resources or store ENT Group's information. Such a request can only be made by an authorized function and in accordance with applicable processes.

Unacceptable use of ENT Group's IT resources includes: processing, sending, retrieving, accessing, displaying, storing, printing or otherwise disseminating material and information that is fraudulent, harassing, threatening, illegal, racially or sexually oriented, obscene, intimidating, defamatory or otherwise inconsistent with a professional environment.

When you leave ENT Group

You must return all ENT Group's assets, including documentation and any media containing ENT Group's proprietary information. You remain bound by the restrictions for use and disclosure of ENT Group's proprietary information after you leave ENT Group.

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Protecting information

Protecting ENT Group's confidential and proprietary information and that of our customers, partners and suppliers

Persons working for ENT Group have access to non-public information owned by ENT Group and sometimes also to information owned by third parties (hereinafter: "Non-public information"). Such information may be financial information, business plans, technical information, information about employees and customers, and other types of information. Non-authorized access, use, and disclosure of Non-public information may damage ENT Group or the third party and, therefore, you are not allowed to access, use or disclose Non-public information unless you have been properly authorized to do so. Non-authorized access, use and disclosure of Non-public information may also be a violation of other applicable regulations, including regulations on personal data protection.

Here are some rules relating to the protection of Non-public information:

- All Non-public information must be processed only in line with applicable regulations and ENT Group's internal documentation.
- Non-public information shall not be disclosed to others, except to
 - persons working for ENT Group who, in their work, need access to Non-public information;
 - persons not working for ENT Group, but are legally authorized by ENT Group as the receiver of Non-public information or are authorized due to justified business-related reason to receive Non-public information; and
 - persons to whom you, according to applicable regulations, must give Non-public information (e.g. courts, regulatory agencies, authorities, etc.).
- Do not directly or indirectly access, duplicate, reproduce or make use of Non-public information other than in the course of your duties and work for ENT Group.
- When leaving ENT Group, any authorization to access or use Non-public information expires, and any Non-public information in your possession must be returned to ENT Group or disposed of.
- Upon learning of any wrongful use or treatment of Non-public information, promptly notify your manager and cooperate in full with ENT Group to protect such Non-public information.
- Do not store Non-public information on private computers, storage media or other devices not authorized by ENT Group. Third party cloud services or other online hosting services should only be used to store Non-public information if approved for that purpose by Security service and/or Data Protection Officer.
- Accesses and authorizations for Non-public information may only be approved in the manner in which they were intended by applicable regulations and ENT Group's internal documentation. Passwords and PIN codes and similar information must never be shared or provided for use to unauthorized persons.

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