

knowit

Knowit Code of Conduct

Approved by
Board of Directors

Date
2026.06.17

1 Introduction

Knowit's vision is to create a sustainable and humane society through digitalization and innovation. Our culture is built on trust, local ownership and the belief that we are stronger together – captured in our three core values: *Choose courage, Trust in transparency, and What's in it for we?*

This *Code of Conduct* sets out how we expect everyone working for Knowit to act towards each other, towards our clients, and towards society. It applies to all employees across the Knowit Group and, where relevant, to subcontractors working on Knowit's behalf. Managers have a particular responsibility to lead by example and to support compliance with this *Code of Conduct*.

Knowit is a signatory of the UN Global Compact. Its ten principles on human rights, labor, environment, and anti-corruption are reflected in this *Code of Conduct*.

Equivalent expectations on responsible business conduct apply to Knowit's suppliers and relevant subcontractors and are set out in Knowit's *Supplier Code of Conduct*. Suppliers assessed as carrying elevated risk are subject to review and follow-up.

This *Code of Conduct* is supported by topic-specific policies, procedures and guidelines that provide further detail on the expectations set out here. These documents are available to all employees through Knowit's intranet.

Knowit complies with applicable laws and regulations in the countries where we operate. Where this *Code of Conduct* sets a higher standard than local law, this *Code of Conduct* shall apply to the extent permitted by applicable law.

Knowit's progress on material environmental, social, governance and operational topics – including targets, metrics and actions taken – is reported annually in Knowit's *Sustainability Statement*.

2 Environmental

Knowit's greatest contribution to a sustainable future comes from the work we do with our clients. At the same time, we take responsibility for the environmental impact of our own operations, and every employee has a role to play.

Knowit is committed to conducting business in a way that supports responsible use of resources, reduced greenhouse gas emissions, and compliance with applicable environmental requirements.

Knowit measures and monitors its greenhouse gas emissions across relevant emission scopes and has established targets to reduce its climate impact over time. Knowit also works to reduce environmental impact across its value chain, including through responsible purchasing, resource efficiency, reuse, refurbishment and life extension of IT equipment, sustainable travel, renewable energy where feasible, and environmentally responsible digitalization.

As an employee, you are expected to:

- Consider environmental impact in relevant day-to-day decisions, including in client assignments, travel and purchasing
- Choose lower-emission alternatives where these are available and reasonable, including in business travel
- Support responsible use of resources, including reuse, refurbishment and life extension of equipment where relevant
- Complete mandatory sustainability-related training

Further information about Knowit's environmental commitments and targets is set out in Knowit's *Sustainability Policy* and *Sustainability Statement*.

3 Social

Knowit is committed to being a fair, safe, and inclusive workplace. We respect internationally recognized human rights and do not accept conduct that is inconsistent with human dignity, fair treatment or equal opportunity.

- Knowit does not accept child labor, forced labor, debt bondage, human trafficking or other forms of exploitation in its own operations. We respect employees' rights to freedom of association and collective bargaining in accordance with applicable law.
- Knowit shall provide employment conditions in line with applicable laws and market practice in the countries where we operate. Employees shall have written employment terms and working hours; rest periods and compensation shall comply with applicable mandatory requirements.
- We are committed to providing a safe, healthy, and respectful work environment. Discrimination, harassment, bullying, and abusive behavior is not accepted. This includes conduct that is intimidating, offensive or humiliating, whether in person, in writing or through digital channels.
- We work to promote diversity, equity and inclusion and to provide fair opportunities regardless of ethnicity, age, disability, gender, gender identity, nationality, religion, political opinion or sexual orientation.
- Knowit works to identify and address negative impacts on human rights, labor, ethics and the environment across its operations, value chain, client engagements and business relationships.

This is done through risk-based assessments and actions consistent with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

As an employee, you are expected to:

- treat others with respect, professionalism and fairness
- contribute to a safe, inclusive and respectful work environment
- avoid behavior that may be offensive, intimidating, discriminatory or abusive

Further information is available in Knowit's *Diversity, Equity and Inclusion Policy*, *Workplace Environment Policy*, *Human Rights Policy* and other relevant governing documents.

4 Governance and integrity

Knowit conducts business with integrity, transparency and respect for applicable laws and sound business practices.

- **Anticorruption and fair competition:** Knowit does not accept bribery, corruption, facilitation payments or other improper advantages. Gifts, hospitality or other benefits may only be offered or accepted where they are lawful, reasonable, and consistent with sound business ethics. They must never influence, or appear to influence, a business decision.

Knowit competes fairly and in accordance with applicable competition and antitrust laws. Employees must not engage in price-fixing, market-sharing, unlawful exchange of competitively sensitive information or any other anti-competitive conduct.

Knowit maintains accurate, complete and transparent records. Employees must not falsify, misrepresent or conceal business records, financial information, sustainability information or other information relevant to Knowit's reporting, decisions or stakeholder communication

Knowit provides anti-corruption training and guidance relevant to employees' roles and responsibilities. Completion of this training is mandatory for all functions considered to carry elevated risk, including CEOs of Knowit subsidiaries and designated sales representatives. Completion is monitored on an ongoing basis.

- **Conflicts of interest:** Employees shall avoid situations where personal interests, financial interests or close personal relationships conflict, or may reasonably appear to conflict, with the interests of Knowit. This may include, for example:
 - business decisions involving relatives, close friends or other personal connections
 - outside employment, board assignments or other external engagements
 - financial interests in clients, suppliers or competitors
 - any other situation that may impair objective judgement

Actual, potential or perceived conflicts of interest shall be disclosed without undue delay to the relevant manager.

- **Political and ideological activity:** We respect that employees may hold different personal beliefs and opinions. Political or ideological activities must be kept separate from Knowit, be conducted on personal time and with personal resources, and may not be carried out in a way that could be perceived as representing Knowit. In the workplace, we act professionally, respect differing views and stay focused on collaboration and Knowit's shared goals.
- **Financial crime and sanctions:** Knowit shall comply with applicable laws relating to anti-money laundering, terrorism financing, sanctions and export controls. Suspected violations shall be escalated through established channels.
- **Responsible procurement and business partners:** Knowit integrates relevant quality, sustainability, legal, business ethics and information security considerations into procurement, supplier selection, supplier evaluation and supplier management. Employees involved in purchasing or supplier relationships shall follow Knowit's Supplier Code of Conduct, Purchasing Policy and Supplier Management Procedure. Suppliers and business partners are expected to meet environmental, social, ethical, quality and security requirements proportionate to the nature, risk and significance of the relationship.
- **Intellectual property and confidentiality:** We respect intellectual property rights and protect confidential information belonging to Knowit, our clients, suppliers and other business partners. Confidential information may only be used for legitimate business purposes and shall be protected from unauthorized access, disclosure, or misuse.
- **Insider information:** Knowit is a publicly listed company on Nasdaq Stockholm Stock Exchange. Employees are required to comply with applicable laws, regulations and Knowit's governing documents regarding insider information, insider trading and market communication. Insider information and other non-public information must be handled strictly confidentially and never be misused, unlawfully disclosed or used for personal gain or to benefit others.
- **External communication:** When communicating externally, including on social media, employees shall act professionally, protect confidential and client information and avoid giving the impression that they speak on behalf of Knowit unless authorized to do so. Formal statements to media, investors, or the market may only be made by authorized representatives in accordance with Knowit's governing documents.

As an employee, you are expected to seek guidance if you are unsure how to handle an ethical or legal concern.

Further information is set out in relevant governing documents, including Knowit's *Communication Policy*, *Finance Policy* and *Insider Policy*.

5 Quality

Knowit's reputation is built on the quality of our work and the trust of our clients. Every employee contributes to that reputation through the way we deliver, collaborate, and handle risks and deviations.

Our clients are at the center of our quality work. We strive to understand their needs and to deliver services that create value and build long-term trust.

Knowit shall deliver in accordance with agreed requirements and act professionally, transparently and responsibly in all assignments.

As an employee, you are expected to:

- perform your work with appropriate care and competence
- follow agreed requirements, methods and internal governing documents relevant to your role
- raise quality risks, deviations, mistakes or delivery concerns at an early stage
- contribute to corrective actions and continuous improvement where issues are identified

Knowit does not compromise on quality, integrity or compliance due to time pressure, commercial pressure or personal interest.

Knowit's management system is certified in accordance with ISO 9001, ISO 14001 and ISO 27001. Knowit is committed to fulfilling applicable requirements, including legal and regulatory obligations, and to the continual improvement of its management system.

Quality at Knowit is measured across two dimensions: client satisfaction and employee satisfaction. Both are tracked systematically and reviewed regularly as part of Knowit's management system.

6 Security

Knowit handles information and digital assets that must be protected. This includes Knowit's own information as well as information belonging to clients and other business partners.

Every employee is responsible for acting in a secure and responsible manner and for following Knowit's information security and data protection requirements.

Knowit's work with information security and privacy is governed by applicable laws and regulations and by internal governing documents.

Personal data shall only be processed for legitimate business purposes and in accordance with applicable data protection legislation and Knowit's governing documents.

When developing, using or deploying AI or other automated technologies in our work, Knowit shall do so responsibly and in accordance with applicable law and internal governing documents.

As an employee, you are expected to:

- protect information, systems, devices and other assets against unauthorised access, disclosure, alteration, loss or destruction
- follow applicable security rules and instructions when working from Knowit offices, remotely or at client sites
- complete mandatory security training
- report suspected or actual information security incidents, cybersecurity threats or personal data breaches without undue delay through established channels
- ask for guidance when you are unsure how information or systems shall be handled

Further requirements are set out in Knowit's *Information Security and Data Protection Policy*, *AI Policy* and related instructions.

7 Compliance and reporting

Everyone working for Knowit is expected to be familiar with and act in accordance with this *Code of Conduct*. Responsibility for ethical and compliant conduct cannot be delegated.

- Managers have a particular responsibility to ensure that employees and relevant subcontractors in their area are informed about this *Code of Conduct* and are able to apply it in practice.
- Employees shall report suspected or actual breaches of this *Code of Conduct*, applicable law or other serious misconduct through available reporting channels. Concerns may be raised with a manager, local HR or through Knowit's dedicated whistleblower function, which is operated independently and allows for anonymous reporting where permitted by applicable law. All reports are handled confidentially, investigated in accordance with established procedures, and followed appropriately. The person who submitted a report will receive acknowledgement of receipt and, where possible, feedback on the outcome.
- CEOs of Knowit subsidiaries have a particular responsibility to report all incidents of corruption, bribery or related misconduct – including incidents involving business partners or subcontractors – to the Knowit General Counsel without undue delay.
- Knowit does not accept retaliation against anyone who raises a concern or reports a suspected breach in good faith.
- Reported concerns shall be handled appropriately, confidentially and in accordance with applicable law and internal procedures.

Breaches of this *Code of Conduct* may result in corrective actions, formal warnings or other disciplinary measures, up to and including termination of employment or contract, in accordance with applicable law.

The number of reported Code of Conduct breaches and incoming whistleblower cases is measured and reviewed annually at Knowit Group level. Relevant outcomes, trends and lessons learned are used to support corrective actions, training, internal controls, risk management and updates to governing documents. This *Code of Conduct* is followed up regularly and further developed when needed, based on legal requirements, business risks, stakeholder expectations and relevant lessons learned in Knowit's operations.