



**MERCURI**  
international

# Code of Conduct

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## Business principles

The Mercuri International (MI) Code of Conduct is a clear set of standards for our business. It provides the ethical and behavioral framework on which we base our business decisions internally as well as externally. The Code is anchored in the MI values REACH and underpins all that we do. The success of any MI business is largely dependent upon honesty and integrity in the quality and professionalism of our work as well as the interaction between colleagues and among customers.

This Code of Conduct, in combination with our corporate governance model and policies, provides the framework for all MI operations and how MI shall behave as a responsible business and employer. The Code is valid for all employees, managers, and representatives including Board members and hired consultants of the Mercuri International Group. "All Mercuri employees" refers to employees of Mercuri International Group AB and all subsidiaries and associated companies.

The code is available on MI ONE and all employees are expected to know and to comply with the code. In the event of questions or doubt surrounding the meaning of the guidelines, or how they are to be applied, the immediate relevant manager shall be consulted in the first instance.

## Working together in Mercuri International

The MI business is based on trust. To ensure continuous trust and long-term relations in employment and business relations all employees must be treated with respect and all Mercurians worldwide should live by our core values (REACH).

These values require that all employees are being treated equally, fairly and with respect regardless of race, gender, age, national origin, disability, religion, sexual orientation, union membership or political opinions. MI actively works for a company culture and work environment free from discrimination and harassment and expect that all employees of Mercuri take responsibility to ensure this is observed. MI respects the right of all employees to form and join trade unions of their choice.

MI also promotes a productive work environment, since it is vital to the success of our businesses and does not tolerate any bullying or harassment. MI fosters a culture that highly values staff contributions.

We strongly believe in the connection between the competence of our employees and the result we achieve. We are committed to cultivating a performance-driven culture that rewards results, and thoroughly follow-up on KPI's in the performance management process.

## Working with clients

The MI core values represent how MI, as a company, wants to be perceived also in customer relations. Our company values should therefore also be a guiding star in all client relations.

Our fundamental principle is that in all our business activities and relations with customers, business partners and authorities, sound business ethics must always prevail.

We do not accept the offering, solicitation or acceptance of any form of bribes, whatever the form, method or purpose. No employee shall seek or accept any gift, entertainment or personal favour that might reasonably be believed to have an influence on business or which is contrary to applicable laws or customary business practice.

Gifts, entertainment, compensation or personal favours may be offered to a third party only if they are modest in value and consistent with applicable laws and customary business practice.

MI is committed to working with sub-contractors who adhere to our quality requirements and business principles. Our ambition is to include the requirement of compliance with the global MI Code of Conduct also in sub-contractor's agreements. We will support and continuously also monitor the performance of our sub-contractors.

## Compliance with laws, rules and regulations

MI and All Employees of Mercuri complies with applicable laws and industry standards in each country where we operate. MI also complies with applicable competition legislation. Honest competition must be based on integrity, quality, innovation, price and customer service.

It is the responsibility of each employee to seek appropriate advice on relevant legal requirements and other legal issues. Specific laws and regulations apply to participating in international business.

Our fundamental principle is that all entities and employees of the Mercuri International Group must at all time observe and be in compliance with applicable laws and act in an ethically correct way.

Information on employees shall always be kept confidential and stored according to relevant data protection laws.

Certain types of agreements that are particularly sensitive with regard to e.g. competition law must not be negotiated or entered into without the involvement of the legal department.

## Acting with professional integrity

MI believes in honesty, integrity and fairness and is strongly committed to uphold and promote the highest ethical business standards in all aspects of our global business.

We support efforts by international and national authorities to establish and enforce high ethical standards for all businesses.

Business decisions must always be based on objective reasons and criteria and employees must avoid conflict of interest between private activities and taking part in the conduct of the MI business.

MI Group strives to maintain a fair workplace free from special advantages due to family or other personal relationships. Therefore the employment of closely related persons shall be subject to prior approval by the MD of the local MI unit or CEO of MI Group. Furthermore, a closely related person must not be employed in any position where the other related person has an influence on the other person's job or on a permanent basis form part of the same management team.

## Confidential information

MI's employees, partners and consultants may not distribute or abuse confidential information that is owned by MI or by a third party to which access have been given through the business relationship. Example of confidential information includes business strategies, financial information, information on clients and suppliers and business transactions etc. All Employees of Mercuri should sign a personal confidential agreement which remain in effect also after the termination of employment or completion of a project.

## Maintaining our objectivity and independence

It is of particular importance that all managers lead by example, and act with integrity, making ethical behaviour a cornerstone of business conduct at MI. If you lead or manage others, you should:

- Be a positive role model by showing what it means to act with honesty and integrity.
- Ensure that others have the knowledge and resources they need to adhere to MI standards.
- Set clear, measurable, and challenging goals that promote good business results and ethical behaviours.
- Enforce MI global standards consistently and fairly, and promote compliance with those you lead.

## Respecting intellectual capital

Intellectual property rights (IPR) is an asset of utmost value to MI and must be treated with appropriate care. Each employee must follow and, in case of doubt, seek instructions on how to act to protect this asset. All MI employees should also have signed the global IPR agreement or otherwise have it covered by the individual employment contract.



Intellectual property created by the employees during the employment is transferred and assigned to MI by law and/or employment contract or other agreement, with the exceptions stated in international conventions or laws.

Read the Corporate Guidelines on Mercuri International Intellectual Property Rights on MI PLACE.

### How to apply the code

Each MI partner, manager, employee, board member and hired consultant is personally responsible for following the Code of Conduct, professional, legal and ethical standards that apply to his/her job function and level of responsibility.

If an employee has questions relating to, or becomes party to knowledge pertaining to a possible violation of the Code of Conduct, or laws and regulations, he or she is required to report it to their most immediate manager or a more senior manager. Such a report can be made anonymous or include contact details. All reports will be treated as confidential and reprisals against an individual who has filed such a report are unacceptable.

Recipient of such reports or information are required to immediately take appropriate measures designed to determine whether, and how potential violations of laws, regulations or internal policies could have occurred and, when appropriate or necessary, correct and prevent a repeat of the offence. MI will ensure that immediate measures are taken in response to violations of laws, regulations or internal policies, and when necessary ensure that such offences are reported to the relevant authorities.

The code is available on MI ONE and all employees are expected to know and to comply with the code.

*Latest update: November 2024*