

# Code of Business Ethics

Ericsson Nikola Tesla Group



# Introduction

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

**Ericsson Nikola Tesla Group** (hereinafter: **ENT Group**) comprises the company Ericsson Nikola Tesla d.d. 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

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## Our guiding principles

Integrity, transparency and responsibility are the foundations of our way of conducting business. Operating with a strong sense of integrity is critical to maintain trust and credibility with our customers, partners, employees, shareholders 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 will be held accountable for meeting these standards, from the members of the Management Board, Executive Management and the Supervisory Board to each individual working for ENT Group.

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

- Supporting the United Nations Global Compact ten principles<sup>1</sup>;
- Respecting human rights throughout our business operations, according to the United Nations Guiding Principles on Business and Human Rights;
- Behaving in an ethical and socially responsible way;
- 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).

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<sup>1</sup> 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 comply with it 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 complying with the Code.

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 for the 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 subject situation or if they cannot or have 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 reporting available on the ENT Group's website: <https://www.ericsson.hr/en/company-governance>.

### 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 by mail: [compliance@ericssonnikolatesla.com](mailto:compliance@ericssonnikolatesla.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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# Conducting business responsibly

Everyone who works for ENT Group is obliged to treat the corporative 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.

At ENT Group, we believe 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 technological solutions are a force for good in the world and that they 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.

It is important for us that the ENT Group 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 Rights<sup>2</sup> 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 undertake to always and in every context respect the principles of internationally recognized human rights.

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.



<sup>2</sup> 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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Treating colleagues with respect, dignity and appreciation brings out the best in each individual. At Ericsson Nikola Tesla Group, we consider it extremely important to ensure the psychological safety of our employees, and therefore there is no place for harassment, threats, bullying or violence against anyone.

We do not tolerate any form of harassment, discrimination, retaliation, threats or violent behavior, including:

- physical, verbal or written harassment directed at employees or any third party at work (whether in the office, outside the office or online),
- harassment, intimidation, hostile treatment, humiliation, discrimination or psychological harassment,
- offensive or disparaging remarks, jokes, pictures or name-calling,
- physical contact or other form of violation of privacy or personal space,
- behavior with the intention of disrupting or preventing normal work activity.

## Labor standards

Employees shall understand their employment conditions. Employment conditions shall be determined by applicable labor regulations, collective agreement, labor bylaws, and employment contract. 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 cases 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 contractual salary or salary compensation as a disciplinary measure shall not be permitted. The employer shall protect employees' dignity while they carry out their work.

Employees have the right to form and join trade unions or other workers' associations.

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

## Elimination of discrimination

At ENT Group, we treat everyone with respect and dignity. Any type of discrimination based on race or ethnicity, skin color, gender, language, religion, political or other belief, national or social origin, property status, membership in a trade union, education, social position, marital or family status, age, health condition, disability, genetic heritage, gender identity, expression or sexual orientation.

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## Fair, safe and healthy working conditions

ENT Group attaches great 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 Guidance<sup>3</sup> or equivalent processes.



<sup>3</sup> 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 who works for ENT Group.**

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## Compliance with laws and other applicable regulations

ENT Group complies with all laws and other regulations that apply to its business. 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

ENT Group employees must 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 embargoes, 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. 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 who works for ENT Group must consistently comply with the regulations on the protection of market competition in each of the countries in which we operate.

### Accounting and financial reporting

ENT Group adheres to strict accounting principles and standards, reports financial information accurately and completely, and has appropriate internal controls and processes to ensure that accounting and financial reporting complies with applicable regulations and listing requirements.

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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.

## Protection of personal data

ENT Group is committed to protecting personal data which include personal information relating to everyone who works for ENT Group, customers and their end users. Personal data are confidential, handled in a safe manner and processed in accordance with the applicable regulations on the protection of personal data and the internal rules and instructions of the ENT Group. The protection of personal data is the responsibility of everyone who works for ENT Group, and handling data contrary to the applicable regulations of the Republic of Croatia and those of ENT Group constitutes a violation of this Code. ENT Group's documents governing the protection of personal data are published and available to ENT Group employees on the company's intranet page [Personal data protection: https://intranet.ent.internal/etk-en/employee-info/personal-data\\_protection](https://intranet.ent.internal/etk-en/employee-info/personal-data_protection) and are regularly updated. In addition, information about data processing in the ENT Group is also available on the company website [Protection of Personal Data: https://ericsson.hr/en/protection-personal-data](https://ericsson.hr/en/protection-personal-data) For all questions related to the protection of personal data, everyone who works for the ENT Group can contact the Data Protection Officer: [dpo@ericssonnikolatesla.com](mailto:dpo@ericssonnikolatesla.com) and the Privacy Team: [privacy.team@ericssonnikolatesla.com](mailto:privacy.team@ericssonnikolatesla.com).



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## Financial information and 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.

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. ENT Group employees can officially appear in public with the consent and coordination of the aforementioned unit.

Employees can publicly express their own personal views, but not on topics concerning the ENT Group and not on behalf of 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

At ENT Group, we make business decisions based on the best interests of the company and its stakeholders rather than personal considerations or relationships. Everyone working for the ENT Group must avoid situations where our personal interests may conflict or appear to conflict with the interests of the ENT Group as described in the document Policy on Management of Conflict of Interest:

[https://www.ericsson.hr/documents/20607/112223/ETK\\_Policy\\_on\\_Managing\\_CoI.pdf/ec892311-bef4-457d-913b-3756223fc0d1](https://www.ericsson.hr/documents/20607/112223/ETK_Policy_on_Managing_CoI.pdf/ec892311-bef4-457d-913b-3756223fc0d1).

**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 and its subsidiaries, 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).

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Additional employee activity, membership and activities in the management board, supervisory board, board of directors and similar management, advisory, supervisory and representative bodies of public-legal authority as well as the performance of public duties are allowed when, at the request of the employee, it is assessed that such activities are not and will represent a Potential or Actual Conflict of Interest with ENT Group.

### 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.

### Informing about a Conflict of Interest

ENT Group requires that its employees disclose situations or transactions that reasonably would be expected to give rise to a conflict of interest. If you suspect that you are involved in a transaction or any other arrangement that creates a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it to your manager and then to Human Resources. All the reported cases will be treated as strictly confidential and in line with applicable regulations on personal data protection.

An employee of the ENT Group can report a conflict of interest by email at [compliance@ericssonnikolatesla.com](mailto:compliance@ericssonnikolatesla.com) or anonymously online at: <https://compliance-line.ericssonnikolatesla.com/ComplianceLine/report/en>.

Upon receiving such report, the Compliance Officer shall inform the manager of the organizational unit where the employee works and Human Resources, and a procedure will be followed to take measures for mitigating and dealing with conflicts of interest.

The Compliance Officer provides professional support to Human Resources during the process of verifying if there is a risk of conflict of interest. Human Resources together with the Compliance Officer inform the competent governing body<sup>4</sup> about their verification and give it clear recommendations and suggest adequate measures. Final decision on every particular case shall be made by the competent governing body. Your manager, Human Resources and Compliance Officer will cooperate with you in order to verify if there is a conflict of interest. When necessary, they will suggest adequate measures for dealing with conflicts of interest.

<sup>4</sup> The Management Board of the parent company and/or the subsidiary

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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 may on behalf of the ENT Group, directly or indirectly, request or receive any bribe, commission or any other illegal or unethical benefit, nor may it be given or offered to them. The above refers to employees or other representatives of business partners (such as customers, suppliers and distribution partners) or other entities, especially employees or representatives of public authorities and public services (including state-owned companies, which means some mobile network operators).

### 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 not accept gifts from business partners or any other third parties except for promotional and other 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.

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## Facilitation payments

ENT Group does not allow unofficial payments for the purpose of speeding up regular activities of authorities (e.g. issuing visas or customs permits).

## Money laundering

ENT Group supports international efforts to combat money laundering and the funding of terrorist and criminal activities. ENT Group makes all payments in accordance with applicable regulations.

## Support and reporting

Any offer or proposed arrangement contradicting our zero-tolerance towards corruption policy must be reported immediately to Legal Affairs or ENT Compliance Officer at: [compliance@ericssonnikolatesla.com](mailto:compliance@ericssonnikolatesla.com) to whom you can always reach out in case of doubt.

If you wish to remain anonymous when reporting, you may use the external line for anonymous reports on the website: <https://compliance-line.ericssonnikolatesla.com/ComplianceLine/report/en>.

If you want to submit your report to confidential persons in accordance with the Act for the Protection of Persons Reporting Irregularities at the website: <https://www.ericsson.hr/en/company-governance> you can find all the information about the elected confidential persons to whom you submit the report and the 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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