



speira

**Code**  
of  
Conduct



# Welcome to Speira's Code of Conduct

**Dear colleagues,**

Speira has been built on Integrity and we will continue basing our business conduct on ethics and values.

We want to be able to demonstrate to our customers and other stakeholders that our products and solutions have been made in the most responsible way possible – resource and energy efficient, with minimal footprint on environment and climate, with respect for human rights and labor rights, and compliant with applicable laws and regulations.

Building lasting, sustainable value is important. To do so being compliant, always with integrity, and being a good corporate citizen is not just the only viable way – it is the Speira Spirit.

Stakeholders' expectations regarding responsible business conduct are constantly changing. Although our core principles and standards remain the same, we will periodically update the Code of Conduct to ensure that we stay ahead of the development.

The principles, standards and requirements set out in the Code of Conduct reflect what we consider responsible business conduct. The Code of Conduct also provides guidance to help us all make sound and ethical judgements and decisions in our daily activities.

We expect everyone to read and understand the Code of Conduct and ensure compliance with the requirements. Only this way will we continue to be recognized as the trusted company we are.

And please keep this in mind; we can never compromise on integrity.



**Sincerely yours,**

**Einar Glomnes**

CEO of Speira

together with his Executive Management Team



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# 1 Understanding and living our Code of Conduct

This Code of Conduct is built on Speira's values. Together with Speira's policies and procedures and applicable laws and regulations, the Code provides a framework for what we consider responsible conduct.

## 1.1 Our commitment to compliance and integrity

The Code of Conduct reflects our continued commitment to applying ethical business practices and compliance throughout our global organization wherever we operate and conduct business on behalf of Speira. This Code of Conduct creates the foundation that supports our efforts to do the right things and to always act with integrity. The Code of Conduct is designed to help you make the right decisions for yourself and for Speira. As a Speira employee, you must follow the rules of the Code of Conduct and always strive to exercise good judgment, care and consideration in everything you do for the company. This version of the Code of Conduct supersedes all prior versions of the Code of Conduct in Speira's past and has been approved by the Executive Management Team (EMT).

### How the Code of Conduct applies

As a company with global business, we must act in accordance with the laws and regulations of the countries in which we operate.

References in this Code of Conduct to "Speira" or "the company" shall be understood as Speira BidCo II AS and their wholly owned subsidiaries as well as Speira Midco GmbH and their wholly

owned subsidiaries. The Code of Conduct applies, regardless of location, to all Speira employees as well as to all temporary personnel, consultants and others who act on behalf of or represent Speira, and to the members of the EMT and the Supervisory bodies of Speira. It also applies to the employees of partly owned companies if, and to the extent, approved by the governing body of such companies. For legal entities where Speira holds less than 100 percent of the voting rights, Speira's representatives in the boards of directors or in other governing bodies shall act in compliance with Speira's Code of Conduct and endeavor to implement the principles as laid down herein.

### Deviation handling

Any requested deviation from the requirements of this Code of Conduct will be handled by the EMT.

## 1.2 Our responsibilities

All employees are expected to contribute to Speira's ethical culture by understanding Speira's Code of Conduct and embracing Speira's commitment to compliance and integrity, enforcing compliance requirements and avoiding violations. You shall avoid acting or encouraging others to act contrary to this Code of Conduct, even if such deviations under the circumstances may appear to be in the company's interest.

### Responsibilities of employees

As a Speira employee, you are expected to conduct business with integrity and transparency and to demonstrate commitment to the highest ethical standards in your dealings with customers, business partners, colleagues and other stakeholders. Every employee has the responsibility to:

- Always act in compliance with the Code of Conduct, other steering documents, work rules, and applicable laws and regulations.
- Avoid any activity that might have the appearance of being unethical or illegal.
- Promptly raise questions and seek advice if you are unsure about the meaning of any part of the Code of Conduct or are confronted with an ethical question or issue.
- Promptly raise concerns about suspected violations of the Code of Conduct, other steering documents, work rules or any law or regulation.
- Cooperate completely and honestly with company investigations.
- Never retaliate against anyone who raises a concern in good faith.
- Participate in required compliance trainings.

### Responsibilities of leaders, managers and supervisors

Our leaders, managers and supervisors are accountable and have additional responsibilities to ensure that activities within their area of responsibility are carried out in compliance with the Code of Conduct, other steering documents and applicable laws and regulations. Speira leaders, managers and supervisors shall:

- Lead by example and be a positive role model to inspire employees to follow the Code of Conduct and to conduct business with honesty, transparency and integrity.
- Openly discuss the requirements of the Code of Conduct with their teams to make sure they understand and follow the standards.
- Reinforce the importance of ethics and compliance.
- Create a work environment of trust in which employees feel comfortable raising concerns and are provided with adequate support, and guidance.
- Create an ethical culture that promotes compliance, encourages employees to raise their questions and concerns, and prohibits retaliation.
- Promptly address employee concerns about suspected violations and promptly escalate concerns to the Plant/ Location Manager, Human Resources, or the Legal & Compliance department.

### Employee compliance with the Code of Conduct

All employees are required to confirm on request that they have read and understood the Code of Conduct, that they will comply with the standards of the Code of Conduct, and that they agree to report any violations through the available reporting options.



### 1.3 Seeking guidance, raising concerns, and reporting suspected violations

Speira is committed to building a culture of trust where employees are comfortable to ask questions, seek guidance, raise concerns, and report suspected violations. Your questions and concerns will be taken seriously, and you are encouraged to raise them in good faith. Providing concrete information regarding the matter will help to enable an adequate follow up.

We all have a responsibility to speak up promptly about ethical issues and suspected violations. Normally you should discuss your concerns and complaints with your superior. If, for any reason, you feel uncomfortable reporting concerns to your supervisor, or if you believe your supervisor has not appropriately addressed a concern, you may also raise your concerns to:

- Your supervisor/manager's manager
- Your union or works council representative/safety representative
- Your Plant/Location manager
- Any member of Human Resources
- Any member of Legal & Compliance
- Any member of HSE

Speira has also implemented an electronic whistleblowing system that you can use: Speira Speak up. Reports can also be submitted anonymously and Speira will protect the anonymity of complainants to the extent possible. Once implemented for your unit, you can submit your report in German, English or Norwegian, among others, to the Speira whistleblower hotline online or by telephone. Details are or will be provided to you by notices at all Speira locations, on the intranet and on Viva Engage. More detailed information can be found in the Speira Hub and, once set up for your unit, via notices at your Speira location.

#### Zero tolerance for retaliation

Speira will not tolerate retaliation against anyone who speaks up in good faith to ask a question, raises a concern, reports a suspected violation or participates in an internal company investigation.

Good faith means that you sincerely believe that a legitimate issue exists.

Retaliation is the act of making someone afraid to speak up or taking an action against someone for reporting a concern. It is a violation of this Code of Conduct to retaliate against anyone for reporting a concern. On the other hand, malicious and intentionally false reports will not be tolerated. Anyone who knowingly participates in retaliation or knowingly submits a false report may be subject to disciplinary action, including termination. If you suspect retaliation in the workplace, you must promptly report it to the Speira Whistleblower hotline or another reporting option.

## Making ethical decisions

We expect you to be well informed and exercise good judgment when making business decisions on behalf of Speira. When faced with an ethical issue, ask yourself the following questions:

- Could this action be illegal?
- Is my action consistent with Speira's Code of Conduct and other steering documents?
- Do I have sufficient information to make a good decision? If not, have I sought advice from the available resources?
- Would I feel comfortable justifying my action to my co-workers, my supervisor, my family and friends?
- Would my action reflect positively on Speira's reputation?

If you cannot answer "yes" to these questions or if you are not sure, do not make a decision or take the action until you seek guidance to help you make the right decision.

## 1.4 Violations and accountability

You are never authorized to act illegally or unethically, even when doing so may seem to you to be in the best interest of the company or if a supervisor or any other employee has directed you to do so.

### **Violations of law may be reported to the appropriate enforcement authorities.**

Violations of this Code of Conduct are not tolerated and may lead to severe consequences for you and for Speira, such as disciplinary actions, including termination of employment, criminal prosecution, significant fines, penalties, and reputational damage. Violations may jeopardize our relationship with our customers, colleagues, regulators and business partners and could result in the loss of our ability to do business.



# 2 Our workplace

We build and maintain the trust of our colleagues, our customers, business partners and local communities where we operate by working responsibly and safely, acting with integrity, treating others with respect and honoring our commitments. This section relates mainly to Speira's workplace and responsibility towards all employees and the communities we are a part of.

## 2.1 Human rights and labor rights

Speira is committed to respecting and promoting human rights of all individuals potentially affected by our operations. We respect the fundamental principles set forth in the Universal Declaration of Human Rights and related UN documents, as well as the laws and regulations of the jurisdictions in which we operate.

Speira supports and respects internationally recognized labor rights, including the freedom of association and the right to collective bargaining within national laws and regulations. We are opposed to all forms of human trafficking and child labor abuse and shall not employ or contract any forced or compulsory labor.

## 2.2 Working conditions, equal opportunities and respect

### Diversity and inclusive workplace

A diverse and inclusive work culture enables higher levels of innovation, learning, customer understanding, and culturally aware leaders and specialists and contributes to compliance. Therefore, we bring together employees with a rich variety of backgrounds, skills, races, nationalities, genders and cultures. We appreciate and recognize that all people are unique and valuable and must be respected for their individual abilities and views.

### Treating each other with respect

In our relationships with each other, we strive to be open, honest and respectful. It is everyone's responsibility to contribute to a supportive work environment, based on mutual trust, transparency and respect.

### Harassment-free workplace

Speira does not tolerate any form of harassment or bullying in the workplace. We all have the right to work in an environment that is free from intimidation and harassment and where we can feel safe and comfortable. Harassment in the workplace can take many forms and be experienced differently from one person to another; it can be physical, verbal, sexual or other. We do not tolerate any form of harassment or discrimination, including but not limited to harassment or discrimination based on gender, race, color, religion, political views, union affiliation, ethnic background, disability, sexual orientation, veteran status or marital status.

We do not tolerate any form of physical punishment or harassment. Speira will not tolerate any level of violence in the workplace or in any work-related setting. Violations of this policy must be immediately referred to Human Resources. Threats or assaults that require immediate attention should be reported to the police or local authorities.

### Promoting equal opportunity

Speira is committed to providing equal employment opportunities and treating all employees fairly and with respect. Speira's employees and business units shall only use merit, qualifications and other professional criteria as a basis for employee-related deci-

sions, such as recruitment, training, compensation and promotion. We strive to develop programs and actions to encourage a diverse organization based on the principle of equal opportunities. Speira is committed to the principles of non-discrimination.

## 2.3 Health, safety and environment

### HSE by choice, not by chance

Health and Safety first: We value human life above all other considerations and will not compromise in health and safety. We are committed to providing a healthy and safe workplace for our employees, contractors and visitors.

Speira acts with a sincere sense of responsibility for the environment. Areas such as reductions in emissions, efficient use of raw materials energy, operational efficiency and recycling are key elements of how we support sustainability. We are committed to fostering innovation and to implementing continuous improvement activities to reduce the influence our activities and products have on the environment.

Speira is committed to safeguarding its employees, business and assets against harm from accidental and intentional acts.

Speira believes in health, safety and environment (HSE) excellence. Strategic pillars are the building of a strong and sustainable HSE culture, a strong focus on high-risk prevention, and the striving to meet or exceed compliance with all applicable HSE laws and internal HSE requirements.

This is achieved through a consistent integration of HSE in all business processes, a mutual supportive organization, visible leadership of all our line managers

and a high competence level combined with a vivid engagement of our workforce through a culture characterized by continuous learning and improvement.

### Our HSE responsibilities

It is the responsibility of all of us to adhere to the health, safety and environmental laws and rules and to demonstrate commitment to HSE excellence. You are expected to execute your tasks in a secure and safe manner in compliance with applicable requirements. You have the right to refuse to work in situations that may cause harm to yourself, your co-workers, or the environment. In addition, you have the responsibility to bring unsafe situations and behavior that you observe to the attention of others at risk and to management, HSE personnel, or local human resources. You must immediately report any accident or incident at work that has caused or may cause injury or damage. All employees at Speira are accountable for conforming with and implementing our HSE policy and procedures.

## 2.4 Quality

Our success depends on operational excellence throughout our activities.

Quality is stability in production processes, precision in metallurgy, product consistency, attentiveness to detail, exemplary workmanship, a relentless drive to always improve, delivery on time and provision of measurable value to our customers. It is through these principles that we convey our commitment and mission to consistently meet the agreed upon specifications and requirements of our valued customers.

# 3 Our business conduct

As a global company, it is our policy to act in accordance with applicable laws and regulations of the countries we operate in. We interact with a variety of stakeholders, including our customers, competitors, suppliers, business partners, representatives, authorities and local communities. We are committed to interacting with all of these groups in an ethical and legal manner, always demonstrating integrity in everything we do.

## 3.1 Anti-corruption and anti-bribery

Speira does not tolerate corruption in the private or the public sector. We are committed to complying with all applicable laws and regulations enacted to fight corruption and bribery.

We prohibit payments of bribes and kickbacks of any kind, whether in dealings with public officials or individuals in the private sector.

You shall not, in order to obtain or retain business or other advantage in the conduct of business, offer, promise or give anything of value or an undue advantage to a public official or to any third party to influence such person to act or refrain from acting in relation to the performance of her/his duties. This applies regardless of whether the advantage is offered directly or through an intermediary.

You shall not, in the conduct of your work for Speira, request, accept or receive any improper advantage that may influence your decisions.

Non-compliance will be treated as a serious violation and a disciplinary matter. You shall be protected against any sanctions from Speira or any Speira representative for refusing to participate in any action that is or can be perceived as corruption, bribery or a facilitation payment.

## 3.2 Working with business partners

Speira's success is dependent upon the cooperation from our business partners – suppliers, customers, contractors, agents, distributors, consultants or joint venture partners and others. Our business partners are expected to comply with all applicable laws and regulations. Suppliers that have a direct contractual relationship with Speira have to adhere to the principles set out in Speira's Supplier Code of Conduct. Speira's Supplier Code of Conduct sets out the minimum standards in key areas including business ethics and anti-corruption, as well as human rights, labor conditions and sustainability for Speira's suppliers. Failure to comply with these requirements may result in the termination of the business relationship.

We carry out risk-based integrity due diligence processes to ensure that the business partners' reputation, background and abilities meet our standards.

We must exercise caution when entering into agreements with intermediaries, i.e. business partners who are acting on Speira's behalf, which may include agents, distributors, and resellers, as Speira may be held responsible for the actions of such intermediaries. For the same reason, we must be vigilant in exercising oversight and supervision of such intermediaries throughout their engagement with us. Our intermediaries shall follow all applicable laws and regulations and are expected to adhere to Speira's Code of Conduct. It is our responsibility to ensure that intermediaries understand Speira's Code of Conduct and our requirements.

### **3.3 Facilitation and extortion payments**

Facilitation payments, are payments made to secure the performance of a routine governmental action or public service to which you have a legal right or other entitlement. Facilitation payments are prohibited and you must never initiate or encourage facilitation payments on behalf of Speira, whether the payment is made directly or indirectly through a business partner.

In contrast, extortion payments are made in the face of credible imminent threats to the life, safety, or health of our personnel or the integrity of our facilities. Even where these payments are low in value, they should only be made in exceptional circumstances. If you have been requested to pay an extortion payment, you must immediately report it to the Legal & Compliance department and ensure documentation and proper recording of the transaction.

### **3.4 Gifts and hospitality**

We must always use prudent judgment, moderation and consider Speira's reputation and integrity as the ultimate guideline when giving or accepting gifts or hospitality in business settings. We do not offer or accept gifts or other business courtesies like hospitality, expenses or other benefits where they might influence or appear to influence business decisions, our independence, integrity or our ability to make objective decisions in the best interest of Speira.

Gifts and business courtesies can only be accepted or offered if they are modest in value and frequency and if the time and place are appropriate. Gifts and hospitality practices may vary in different cultures; however, any gifts and hospitality given or received must be in compliance with applicable law, and the recipient's compliance rules and must be consistent with locally accepted good business practice.

The ability to provide gifts or entertainment to public officials is limited by Speira's policy and by law. As the legal definition of public officials may be broadly interpreted to include employees of state-owned entities and government instrumentalities, we must exercise great caution when business courtesies involve public officials. Many countries have laws restricting gifts and hospitality provided to public officials. Many government entities also have rules prohibiting their representatives from accepting gifts and hospitality. Always seek guidance from the Legal & Compliance department in respect of gifts and hospitality involving public officials. It is your responsibility to become familiar with our gifts and hospitality rules, which provide additional recommendations for how to apply these requirements in your area of responsibility.

Always ask your manager or the Legal & Compliance department if in doubt.

### 3.5 Charitable donations, sponsorships and community investments

Speira is committed to sustainable value creation. We aim to have a positive impact on economic and social development in the local communities in which we work through our operations, business relations, community investments, charitable donations and sponsorships.

Charitable donations, sponsorships and community investments shall be based on a business case and should aim at benefiting both society and Speira. They should be given in an open and transparent manner, based on objective criteria, and be properly recorded, documented and reported.

No employee shall make charitable donations, sponsorships or community investments in Speira's name or on Speira's behalf without prior written authorization from Head of Sustainability.

### 3.6 Political contributions and activity

Financial or other contributions to political parties, officials thereof or candidates for public office shall never be made on behalf of Speira. This does not prohibit Speira from supporting political views in the interest of the company through trade associations, or prevent employees from participating in political activities as private citizens.

### 3.7 Fair competition

We believe in free, fair and open competition. Our policy is to compete vigorously and fairly, but always in full compliance with applicable laws and business ethics. We shall therefore comply with all applicable antitrust and competition laws and are committed to dealing with our competitors with honesty, fairness and integrity.

We look to gain competitive advantages through our product offering based on innovation, R&D and engineering and not through unethical or illegal business practices:

- We do not enter into anti-competitive agreements with competitors, including price-fixing, market allocation or segmentation, or bid rigging.
- We do not exchange commercially sensitive information with competitors. You should be particularly careful at conferences, industry fairs or trade association meetings and when participating as a Speira representative in any joint ventures where competitors are involved.
- We do not impose illegal restrictions on customers or suppliers.
- We do not abuse any position of market power.

You should seek advice from Legal & Compliance in all matters involving risk of antitrust exposure for Speira, yourself or any of the employees who report to you.



### 3.8 Obtaining competitive information

Knowledge and understanding of competitors are important aspects of any business and a vital element of any well-functioning competitive market. However, any information about competitors must be collected and used in accordance with applicable laws and good business practice, see above 3.7. We collect competitive information only from legitimate sources and should never do so illegally or unethically. When collecting data regarding our competitors, you should always keep a record of the source of the information.

### 3.9 Data protection and privacy

Speira observes all legal regulations for handling and processing information and personal data and the protection of such data.

Speira's handling of personal data must always maintain proper protection and be in accordance with applicable laws and regulations that apply to the treatment of personal data including requirements and obligations on confidentiality. This applies regardless of whether the information concerns customers, employees or others.

The handling of personal data must be limited to what is necessary for relevant business purposes, fulfillment of customer needs or proper administration of employees and in accordance with applicable data protection principles and should not be shared or disclosed outside of Speira unless you are specifically directed to do so by your direct supervisor.

### 3.10 Accurate and complete data, records, reporting and accounting

Speira is committed to transparency and accuracy in all the company's dealings, while respecting confidentiality and other applicable obligations. Speira is obligated to provide full, fair, accurate and understandable disclosure in its periodic financial reports, other documents filed with regulatory authorities and agencies, as well as in its other public communications. You must exercise the highest standard of care in preparing such materials, with particular attention to the following:

- Compliance with generally accepted accounting principles and Speira's internal control framework is required at all times.
- All Speira accounting records must be kept and presented in accordance with the laws of each applicable jurisdiction. They must not contain any false or intentionally misleading or artificial entries. Moreover, they must reflect fairly and accurately Speira's assets, liabilities, revenues and expenses as well as all transactions or related occurrences which shall be fully and completely documented.
- No transaction may be intentionally misclassified as to accounts, departments or accounting periods; unrecorded or "off the books" assets and liabilities must not be maintained unless permitted by applicable law or regulation.
- No information may be concealed from internal or external control functions or external auditors.

The above also applies to extra-financial reporting requirements, both Speira internal or other legal requirements of your jurisdiction, including information related to HSE, Sustainability, human resources or corporate governance.

### **3.11 Trade compliance and anti-money laundering**

Speira is committed to comply with national and international trade restrictions and sanction regulations that are applicable in the countries in which we operate.

Trade restrictions (sanctions and embargoes) relate either to the export or the import of certain goods, technology, software and services and/ or trade with certain countries, persons and entities. In particular, certain laws may prohibit Speira from doing business with certain persons and organizations that are associated with narcotics, or human trafficking, terrorism or other criminal activities together with those involved in the proliferation of weapons of mass destruction.

Money laundering supports criminal activity and is the attempt to convert proceeds of crime into legitimate currency or other assets.

Speira is also committed to taking reasonable steps to prevent and detect any illegal form of payments, including any effort by any other party to use Speira to launder money.

You should seek advice from the Treasury department in all questions related to trade compliance and anti-money laundering.

### **3.12 Intellectual property**

We comply with applicable laws and regulations that govern the rights to, and protection of our own and others' intellectual property, including patents, trademarks, copyrights, and trade secrets. Using intellectual property without proper authorization is prohibited. You should immediately contact Speira's IP Management if you receive notice, written or oral, accusing Speira of infringing on a third party's intellectual property, or if you suspect Speira may be violating a third party's intellectual property.

Speira's trademarks, copyrights, patents, trade secrets and other intellectual property are valuable assets of Speira. To maintain and protect these assets, it is important that employees always use our intellectual property with the proper notices and attributions and in accordance with any style guides or manuals that Speira may provide to you. Do not use the trademarks, logos, copyrights, patents or other intellectual property of a third party unless authorized by your supervisor.

### 3.13 External communication

Speira's profile in domestic and international markets is greatly influenced by our ability to communicate consistently and professionally with external parties, including the media. Consequently, Speira shall maintain a principle of honesty and be responsive when dealing with interested parties outside Speira and society at large.

To secure a consistent company profile, only the following persons are authorized to speak to the media on behalf of Speira, without prior consultation with Speira's Communication department:

- Communication department staff
- Senior executives of Speira (EMT) or executives authorized from time to time
- Plant managers or persons they authorize may speak with local media within their area of responsibility. Speira's Communication department should be consulted when appropriate.

This does not limit the legal rights of the members of the works councils and of the relevant labor unions to speak to the public as representatives of the employees of Speira.

Inquiries from external lawyers should be passed on to Legal & Compliance.



# 4 Our personal conduct

Our success depends on each and every one of us consistently doing what is right. We are expected to conduct business and generally behave respectfully towards one another, our customers, suppliers, business partners, and others. This includes being sensitive to and respecting cultural differences and traditions.

## 4.1 Conflict of interest

A conflict of interest exists whenever you have a competing personal interest that may interfere with your ability to make an objective decision and act in the best interest of Speira.

You shall not seek to obtain an improper advantage – directly or indirectly - for yourself, your family, relatives or friends.

You shall not take part in, or seek to influence, any decision which could give rise to an actual or perceived conflict of interest. This could result where you, or someone closely related to you, may have a personal interest economic or otherwise in the outcome of such decision.

You should avoid having any personal ownership interest directly or indirectly in any other business or enterprise if it compromises or could appear to compromise your duties in Speira. If you are in such a situation, you shall immediately inform your superior.

Each of us is expected to use good judgment and to avoid situations that can lead to a conflict or the appearance of a conflict that may undermine the trust others place in us.

Speira relies on you to uphold the highest standards of integrity and to seek advice when needed. Before engaging in any activity that may be perceived to advance the interests of a competitor, customer or supplier (or other business associates) at the expense of Speira's interests, including serving on supervisory bodies of such company, you shall consult with, and get approval from, your immediate superior. If you believe a conflict or potential conflict of interest exists, you must disclose it to your manager, Human Resources, Legal & Compliance or the Whistleblower hotline. There are ways to resolve conflicts of interest, and the key is to be transparent and openly communicate it to ensure that it is addressed appropriately.

## 4.2 Use of company property and assets

It is the responsibility of all Speira employees and other representatives of the company to safeguard the assets, property and records of Speira and its customers, suppliers and other business partners. Tangible assets include physical facilities and equipment, computer systems, PCs, mobile phones, files and documents, inventory, supplies and real estate. Intangible assets include patents, trademarks, copyrights, other intellectual property, know how, confidential information, reputation and goodwill.

It is everyone's responsibility to use Speira's assets with care. We are all responsible for using good judgment to ensure that Speira's assets are properly managed and protected and not stolen, misused or wasted. The use of Speira materials, financial and other assets or facilities for purposes not directly related to company business is prohibited

without authorization from an appropriate Speira representative. The same applies to the removal or borrowing of company assets without explicit permission. Business-related information shall only be stored on PCs and mobile devices and in systems and tools approved or managed by Speira. PCs and mobile devices provided by Speira are considered Speira's property and shall only be used by Speira employees or contractors.

In most instances, our computer software is protected by copyright. Software programs which are licensed by the Company for use by our employees are subject to specific use requirements as outlined in the applicable licensing agreement. It is a violation of these agreements to make, acquire, or use unauthorized copies of computer software for uses that are not in accordance with these licensing agreements or to share passwords, user names or log-in credentials with another employee or third party unless authorized by your supervisor. Any questions concerning computer software licensing should be directed to the Head of IT and IP Management.

### **4.3 Substance abuse and other personal conduct**

Speira is a drug-free workplace. Accordingly, you may not be under the influence of intoxicating substances, including alcohol, while at work for Speira.

Limited amounts of alcohol may, however, be served in work-related events when the local custom and occasion makes it appropriate to do so, and provided the consumption will not be combined with operating machinery, driving or any other activities that are incompatible with the use of alcohol. You shall refrain from using, or encouraging others to use, intoxicating substances in a manner that might have a negative impact on Speira's or any of its business partners' reputation.

Speira strictly prohibits the purchase of sexual services when on assignment or on a business trip, irrespective of whether permitted by local law, or not. You must not visit any sexual service establishment or participate in any related activity while on duty that could reflect negatively upon Speira.

## 4.4 Confidentiality

We are committed to safeguard and not to misuse any confidential information in our possession, regardless if it is information belonging to Speira or to our business partners. Confidential information may also include intellectual property, information concerning individuals, commercial conditions, technical or contractual matters and other types of information protected by law.

Be aware that your duty of confidentiality continues after your employment or other contractual relationship with Speira has ended. At the end of your employment, you must cease all use of any confidential information of Speira learned or used by you prior to or in connection with your employment and you agree to return to Speira any confidential information in your possession as requested or directed by Speira. You may be required to provide written certification that you have returned all such confidential information.

Any information other than general business knowledge and work experience that you acquired in your service for Speira shall be regarded as confidential and treated as such. Employees shall not improperly use or disclose any confidential information or trade secrets, if any, of any former employer or any other person or company to whom an employee has an obligation of confidentiality. You are responsible for protecting confidential information you may have received from outside sources that are not affiliated with the Speira.

It is your responsibility to protect confidential information. In order to do so, you should do the following:

- Use confidential information only when authorized and only for legitimate business purposes.
- Do not share Speira's or our business partners' confidential information with any other person, including other colleagues who do not have the need to know such information, friends, family or former Speira colleagues.
- Do not discuss or share confidential information in public places where third parties may listen.
- Do not work with documents containing confidential information (either in hard copy or electronically) in public places or unsecured networks where third parties may see them.
- Ensure confidentiality agreements are used when deemed necessary.
- Only store confidential information in areas with encryption and access control, and give access only based on business needs, such as explicit job duties.
- Label documents as "confidential" where appropriate.



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