

Arcticus Systems

Code of Conduct

2022-11-18

1 Background

Arcticus Systems AB develops, delivers, and supports state-of-the-art, safety critical embedded real-time system products and services. The products are called Rubus®. The Rubus product line consists of a Real Time Operating System (Rubus Kernel) and Rubus Tool Suite. Thus, Arcticus Systems' business is limited to developing, selling, and supporting software tools and no physical manufacturing or production of goods is performed by using raw materials, etc.

Arcticus Systems wants to create added value for customers, employees, suppliers, and shareholders, while contributing to the sustainable development of society. To achieve this, we actively work with good business ethics and social commitment. We take the climate and the environment into account and strive for long-term and trusting relationships.

This Code of Conduct describes our values and the demands that we place on employees and business partners.

2 About the Code of Conduct

The foundation of the Code of Conduct is Arcticus Systems' core values, which guide us in everything we do. The Code of Conduct is based on the UN Global Compact's 10 principles in the areas of human rights, labor rights, the environment and anti-corruption. The principles of the Code of Conduct are also based on the UN Declaration of Human Rights and the ILO Core Conventions on labor rights.

The Code of Conduct applies to everyone in Arcticus Systems, from the Board and management to individual employees, and the contents of the Code shall be respected and followed.

We also require that the Code of Conduct be respected and followed by our business partners (e.g., suppliers) and we expect that our business partners in turn require no less from their respective suppliers and employees. Arcticus Systems may ask its business partners to make a self-assessment and provide Arcticus Systems with documentation thereof, e.g., in the form of a filled-in self-assessment questionnaire

3 Business ethics and principles

3.1 We comply with laws and regulations.

Arcticus Systems complies with the laws, rules, and regulations applicable to Arcticus Systems and its activities. We require our business partners to act accordingly. Without limitations, this means that we will comply with:

- privacy laws and regulations.
- Arcticus Systems' responsibility is to report and disclose its financial and non-financial information.
- Rules on intellectual property and to respect any third party's intellectual property by not using counterfeit parts.

3.2 We do not accept corruption.

Arcticus Systems always acts responsibly and ethically in business relationships. We do not tolerate any form of corruption, bribery, or extortion. This means, among other things, that:

We act and make decisions without regard to personal gain for ourselves or our affiliates. Nor do we exploit relationships with business partners for personal gain.

We avoid situations that may create or give the appearance of creating conflicts of interest. If a conflict of interest cannot be avoided, it must be reported openly to the immediate superior. If an employee engages in business activities outside Arcticus Systems (so-called secondary activity), this must be approved by Arcticus Systems.

We never violate applicable laws on giving or taking bribes. We do not give or receive gifts or favours with a value exceeding Arcticus Systems' established level, and do not participate in representation beyond normal business activities. We comply with business partners' rules on gifts, representation etc., if they are stricter than Arcticus Systems'.

3.3 We comply with competition laws.

Arcticus Systems operates in accordance with applicable competition laws. We support fair competition in tendering, quoting, procurement and purchasing.

We do not accept any form of unlawful anti-competitive action, such as price fixing, cartels, or abuse of dominant position.

3.4 We work to combat financial crime.

Arcticus Systems takes responsibility for combating financial crime.

We apply and adhere to applicable rules on export control and economic sanctions.

4 Health and Safety

4.1 We prioritize safe working environment and health.

Arcticus Systems' workplace(s) must be safe and secure, without accidents. We prioritize the health and happiness of our employees.

We work long-term and systematically to develop the working environment and promote employee health, to prevent injuries and illness.

At Arcticus Systems' workplace(s), everyone must be involved in health and safety management and comply with Arcticus Systems' guidelines and workplace rules. Arcticus Systems' employees shall take responsibility for their own work environment and that of others.

Arcticus Systems' workplace(s) shall have adequate equipment and skills for the protection of people and property.

We are committed to promoting a healthy and safe working environment in accordance with applicable working environment legislation.

4.2 Key Areas

Arcticus Systems focuses on the following key areas concerning health and safety. Depending on the worksite not all areas may be applicable.

- Personal protective equipment.
- Machine safety.
- Emergency preparedness.
- Incident and accident management.
- Workplace ergonomics.
- Handling of chemicals.
- Fire protection.

5 Human rights and working conditions.

5.1 We promote equality and diversity.

The equal value of all people is self-evident. Arcticus Systems works to increase diversity and equality in all aspects of its operations. Everyone should have the same rights and opportunities regardless of gender, gender identity or expression, ethnicity, religion or other belief, disability, sexual orientation, or age.

5.2 We do not tolerate discriminatory treatment, harassment, or discrimination.

Arcticus Systems has zero tolerance for any form of discrimination, harassment, sexual harassment, bullying and discrimination. We have a responsibility to prevent, deter and act. All employees and business partners who see or suspect violations have a duty to report them.

5.3 We do not accept child labour.

Any form of violence, coercion or exploitation of children is unacceptable. A child is defined here as a person under the age of 15 unless a higher minimum age is prescribed by law. Workers under the age of 18 must be specifically protected from dangerous work that poses a risk to health and safety, such as night work.

5.4 We do not accept forced and bonded labour.

Work should be done voluntarily. Personal documents and possessions must not be seized for compelling work. Workers shall be free to leave the workplace at the end of their shift. Illegal labor must not be used.

5.5 We defend the right to freedom of association.

Arcticus Systems does not accept restrictions on workers' rights to freedom of association or collective bargaining. Workers should be able to exercise these rights without hindrance or risk of harassment or reprisals.

5.6 We protect fair employment conditions.

Arcticus Systems does not accept employment conditions that fall below national and local legislation or ILO core conventions.

Signed collective agreements shall be respected and adhered to.

Working hours and minimum wages shall comply with national laws of the country of product manufacture or service provision.

6 ENVIRONMENT

6.1 We care about the climate and the environment.

Arcticus Systems contributes to the sustainable development of society and works continuously to prevent environmental risks and minimize our impact on the environment and climate.

Our environmental work is systematic and integrated into our operations.

We comply with and respect laws and other relevant environmental social requirements.

Our employees shall have relevant skills based on the environmental impact of their work tasks.

6.2 We work to reduce the environmental impact of our operations.

Given the nature of Arcticus Systems' business and to the extent relevant, Arcticus Systems actively focuses on the areas where its operations have the greatest environmental impact from a life cycle perspective and works with:

- Phasing out environmentally and health hazardous substances in materials and production.
- Reducing the climate impact of transport and production.
- Material efficiency in production by preventing material waste and increasing recycling rates.
- We strive to make use of energy more efficiently.
- We strive to implement more use of renewable energy wherever possible.
- We were possible strives to improve air quality.
- In the use of chemicals, we strive to improve the responsible use of chemicals.
- We strive to reduce GHG emissions
- We strive to reduce water consumption and where possible improve water quality.

Arcticus Systems works progressively and with continuous improvement to achieve better environmental performance.

Employees and business partners at Arcticus Systems' workplace(s) are responsible for reporting deviations and environmental events.

6.3 We set requirements for business partners.

Arcticus Systems' business partners, and their environmental performance play a key role in our environmental work. This may be reflected in purchasing processes in the form of requirements and guidelines.

7 COMPLIANCE

7.1 We require compliance with the Code of Conduct

The principles of the Code of Conduct are monitored on an ongoing basis as an integral part of the business. Arcticus Systems' management and executives at all levels have a particular responsibility to set a good example. Employees who feel uncertain about how to apply the Code in their daily work can seek guidance from their manager or Arcticus Systems' CEO.

Employees of Arcticus Systems must raise the alarm if they suspect that something conflicts with the Code of Conduct or law. Employees of Arcticus Systems or of business partners are invited to report such suspicions to their immediate supervisor, or if this is not appropriate, to Arcticus Systems' CEO.

Failure of a Company employee to act in accordance with the Code of Conduct will result in corrective action. If a business partner repeatedly or seriously violates the Code of Conduct, the business relationship will be terminated.

6.2 Training

Arcticus Systems will provide yearly training for all its employees to ensure that all employees are up to date with the latest version of the Code of Conduct.

8 Adoption and updating

This Code of Conduct is reviewed, updated (if needed) and adopted annually by Arcticus Systems' Board of Directors.