



# TriTiCon Policy

## POL-03 Company Conduct

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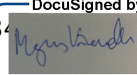
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## TriTiCon Company Conduct

*TriTiCon is committed to maintaining a trusting environment, adhering to regulations, upholding ethical standards, and ensuring compliance with legal and regulatory requirements, including anti-corruption measures.*

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### 1. Objective

This Policy aims to ensure that TriTiCon (TTC) maintains a trusting environment with its employees, contractors, and clients, protecting confidential data and adhering to regulations and laws.

### 2. Confidentiality and immaterial rights

Employees and contractors of TTC commit to act loyally towards the company, both during and after leaving their employment, and end of partnership agreement. E.g., this means they will not spread confidential information about TTC, its business or dealings. Employees and contractors in the organisation may not communicate externally, e.g., to investors or the media, about TTC's prospects, performance, and policies, or disclose sensitive information without appropriate authority. Employees must also respect the confidential information of other parties, with whom the Company does business or competes.

Materials and results, which the employee produces as part of his or her employment, shall be the property of TTC. Business related materials and documents which the employee has taken part of during his or her employment shall be returned to TTC at the end of employment.

TTC shall safeguard and make only proper use of confidential information to ensure that also worker and patient privacy rights are protected.

### 3. Competition and secondary assignments

Employees of TTC commit to not engage in competing business in the Nordic countries (by own account, or through another company), during a period of six months after ending their employment with TTC.



Employees are not permitted to undertake assignments or carry on activity which could affect their work or duties whilst working on behalf of the employer. If the Employee has a secondary assignment/employment, it should be reported to a Director for assessment. Assignments in union, political or non-profit organisations are excluded.

#### **4. Conflicts of interest**

TTC expects its employees to be free from actual, apparent or potential conflicts of interest, when dealing with other persons or businesses on behalf of TTC. Employees must promptly disclose to a Director any situation that may involve a potential or actual conflict of interest and ask for appropriate guidance.

The employment of a close relative within a reporting line, or the existence of a personal relationship within a reporting line, is a conflict of interest which must be disclosed in accordance with above.

#### **5. Compliance with all applicable legal and regulatory requirements**

Our business is always in compliance with all applicable legal and regulatory requirements. Staff are required and encouraged to promptly report unethical and illegal conduct, without threat of reprisal, intimidation, or harassment.

Employees are not permitted to make or engage in agreements, contracts or activities that restrain competition or violate Competition Law prohibitions such as abuse of dominant position, monopolisation or attempts to monopolise. Agreements with competitors to avoid competition are prohibited.

Employees must not use or spread inside information regarding clients' business for their own gain. TTC expects its employees to cooperate fully in any audit, enquiry, review, or investigation by the Company.

TTC employees and contractors must become familiar with and comply with company policies and procedures, and promptly report to the company any violations of these that come to Employee's attention. TTC Employees and contractors must also become familiar and comply with the policies and regulations agreed on (often in written contract) with clients, when involved in projects for the client.

#### **6. Anti-corruption**

##### **6.1 Bribery**

- TTC employees and contractors must not offer any payment or incentive to improperly influence any person, regardless of the recipient's status and whether they are in the private or public sector or are government officials. Payment covers anything of value, i.e., not just cash, but also gifts, services, job offers, loans and expenses.
- TTC must not use intermediaries such as agents, consultants, advisers, distributors, or any other business partners, to commit acts of bribery.
- Interactions with Government Officials must be in full compliance with laws and regulations to protect TTC's reputation.

##### **6.2 Third party**

- TTC employees and contractors must ensure that all TTC dealings with third parties are carried out with the highest standards of integrity and are in compliance with all relevant laws and regulations.
- TTC employees and contractors, shall not offer, or authorize, any improper inducements to any third parties.



### 6.3 Gifts and hospitality

- Gifts, hospitality, and entertainment must be modest, reasonable, and infrequent so far as any individual recipient is concerned.
- Before giving a gift or providing hospitality or entertainment to anyone, consider whether the reputation of Client, TTC, yourself, or the recipient is likely to be damaged if news of the gift, hospitality, or entertainment appeared on the front page of a newspaper. If this would embarrass either party, do not proceed.

### 6.4 Payments

- TTC prohibits facilitation payments to individual government officials for the purpose of securing or expediting a routine governmental action.
- Payments to healthcare professionals for services must not exceed the fair market value of the services provided. Payments must never be used to create an incentive or to reward or secure any improper business advantage for clients or TTC.

### 6.5 Sponsoring and contributions

- Political contributions must not be made.
- Sponsoring must not be used (or perceived to be used) to receive an improper commercial advantage in return. At the same time, sponsoring must never reward (or be perceived to reward) an improper commercial advantage.

### 6.6 Financial information and law

- TTC employees and contractors must maintain accurate information in TTC's books, records, and accounts so that our legal and regulatory obligations are fulfilled.
- All laws, external accounting requirements and TTC procedures for reporting company financial information must be followed.

### 6.7 Disciplinary action

TTC employees engaging in conduct prohibited by this Policy or applicable law will be subject to disciplinary action up to and including termination of employment with the company. A contractor engaging in conduct prohibited by this Policy or applicable law may lead to termination of ongoing work order and partnership agreement.