

CLAVISTER®

# Clavister Code of Conduct



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## Purpose

At Clavister, we deliver innovative cybersecurity solutions trusted by organisations with mission-critical applications. Trust is fundamental to our business. This Code of Conduct describes the principles that guide how we work – with customers, partners, colleagues, and society.

The purpose of this Code is to:

- Clarify our shared expectations
- Support sound decision-making
- Strengthen a culture of responsibility and integrity

The Code applies to all employees, managers, executives, board members, and others representing Clavister. We rely on professionalism, dialogue, and individual responsibility to uphold these standards.

## Our Foundation

Clavister's work is guided by five core values:

**Growth** – We learn, adapt, and grow stronger through feedback and action.

**Innovation** – We explore with curiosity and openness, experimenting and learning our way forward.

**Care** – We care for each other, for what we do, and for our mission.

**Collaboration** – We collaborate openly across teams and perspectives, building confidence and belonging.

**Bravery** – We face challenges with courage and resilience to grow with change.

These principles support both our long-term business success and our role in society.

## Compliance with Laws and Regulations

Clavister operates in regulated environments and complies with applicable:

- Legislation in the markets where we operate
- Export control regulations
- Sanctions regimes
- Data protection laws (including GDPR)
- Defence and security-related regulations

Each of us is expected to understand the legal and regulatory requirements relevant to our role. When uncertainties arise, we seek guidance and clarification. Compliance is a shared responsibility.

## Business Ethics and Anti-Corruption

We conduct our business ethically and with transparency. Clavister does not accept bribery, improper benefits, or any form of corruption. We avoid situations that could compromise – or appear to compromise – our objectivity and integrity.

### Gifts and Hospitality

Gifts and hospitality should be:

- Modest and reasonable
- Transparent
- In line with applicable laws and internal guidelines

Particular care is required in interactions with public authorities and defence-related stakeholders. When unsure, we consult internally before acting.

## Conflicts of Interest

We make business decisions in Clavister's best interest. If personal relationships, financial interests, or external engagements could influence – or be perceived to influence – our professional judgment, this should be openly disclosed and discussed with management. Transparency enables sound decisions.

## Information Security and Confidentiality

Information security is central to Clavister's mission.

We protect:

- Customer information
- Technical and commercial data
- Intellectual property
- Personal data
- Classified or export-controlled information

All employees are expected to:

- Follow internal security policies
- Handle information carefully
- Use approved systems and tools
- Report potential security incidents without delay

Security is not only a technical matter – it is a cultural commitment.

## Data Protection and Privacy

We respect the privacy of individuals.

Personal data must be:

- Processed lawfully and fairly
- Limited to what is necessary
- Protected through appropriate safeguards

We handle personal data in accordance with GDPR and other applicable legislation.

## Export Control and International Trade Compliance

Given the nature of our products, export control and sanctions compliance are essential.

For all export of products under export control, Clavister:

- Conducts appropriate due diligence
- Verifies end-users and intended use
- Obtains required licenses

Employees involved in international sales, delivery, or technical cooperation must follow established procedures and seek guidance when needed.

## Fair Competition

We compete based on the quality of our solutions and our expertise.

We respect competition laws and do not engage in practices that restrict fair competition.

Professional interactions with competitors and industry peers must always be lawful and appropriate.

## Working Environment and Culture

Clavister strives to maintain a workplace characterised by:

- Openness
- Collaboration
- Mutual respect
- Professional dialogue

We value diverse perspectives and believe that inclusion strengthens innovation and decision-making. Discrimination, harassment, or exclusionary behavior is not compatible with our values. Everyone contributes to a constructive working environment.

## Equality and Equal Treatment

Clavister is committed to equality and equal treatment in all parts of our organisation. We believe that long-term success requires an inclusive environment where everyone has equal opportunities to contribute, develop, and lead. Diversity of perspectives strengthens innovation, decision-making, and resilience.

### **GENDER EQUALITY**

We actively promote gender equality in:

- Recruitment and career development
- Compensation and employment conditions
- Leadership opportunities
- Access to training and professional growth

We strive for balanced representation and fair conditions across the organisation. Differences in pay, responsibilities, or opportunities shall always be based on objective and work-related criteria.

### **EQUAL TREATMENT**

All employees and job applicants shall be treated with respect and fairness, regardless of:

- Gender or gender identity/expression
- Ethnicity
- Religion or other belief
- Disability
- Sexual orientation
- Age
- Or other characteristics protected by law

We work proactively to:

- Prevent discrimination
- Identify and address structural barriers
- Promote equal opportunities

### **SHARED RESPONSIBILITY**

Creating a workplace characterised by equality and equal treatment is a shared responsibility.

Leaders are expected to:

- Actively promote inclusion and fairness
- Address inappropriate behaviour promptly
- Ensure that decisions are objective and transparent

All employees are expected to:

- Contribute to a respectful and inclusive environment
- Raise concerns if something appears inconsistent with our principles

Openness, dialogue, and professionalism guide how we handle these matters.

## Leadership Responsibility

Leaders at Clavister have a particular responsibility to:

- Act as role models
- Promote open dialogue
- Encourage ethical reflection
- Support their teams in difficult decisions

Leadership is based on trust, clarity, and accountability.

## Health, Safety, and Wellbeing

We aim to provide a safe and healthy working environment. This includes:

- Compliance with occupational health and safety requirements
- Preventive risk management
- Support for sustainable work practices

Wellbeing is a shared responsibility between the company and each individual.

## Environmental Responsibility

Clavister seeks to operate responsibly in relation to the environment. We:

- Strive for resource efficiency
- Comply with environmental legislation
- Consider sustainability in our operations and product development

Responsible long-term thinking guides our decisions.

## Responsible Use of Company Resources

Company resources – including IT systems, financial assets, and intellectual property – must be used responsibly and for legitimate business purposes.

Sound judgment and professionalism guide our use of shared resources.

## Communication and Public Representation

Clear and accurate communication is important for maintaining trust. Only authorised representatives may speak on behalf of Clavister in official matters.

Employees should exercise discretion when using social media and ensure that confidential information is not disclosed.

## Speaking Up and Dialogue

Clavister promotes an open culture where concerns can be raised constructively. If something appears inconsistent with this Code, company policies, or applicable laws, it should be discussed with:

- A manager
- HR
- A relevant function (e.g., Legal, Compliance, Security)
- The whistleblowing channel, where appropriate

Concerns raised in good faith are taken seriously and handled respectfully. We view dialogue as a strength and an opportunity for improvement.

## Implementation and Follow-Up

This Code provides guidance for everyday decision-making. It is:

- Approved by the Executive Management Team
- Reviewed periodically
- Supported by internal policies and procedures

All employees are expected to familiarise themselves with the Code and reflect its principles in their daily work.

## Closing Reflection

Clavister operates in areas where reliability, security, and integrity are essential.

Our credibility depends not only on technical excellence but on how we conduct ourselves.

By acting thoughtfully, responsibly, and with respect for the broader societal context in which we operate, we strengthen both our company and the trust placed in us.

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