centiro®

Code of Ethics
The Centiro Code of Ethics
Doing the Right Thing – The Centiro Way

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The Centiro Spirit

Over the years, Centiro has grown and evolved, with numerous achievements, awards, and prestigious client projects on our track record. Years of innovation, experimentation and development have helped us find our core values. The brand has found its identity. Our foundation is solid and the elements that build our success are timeless.

The Centiro Spirit goes beyond values that can be put down in writing, but in this Code of Ethics, you will find the cornerstones of our culture – our values, ethics and boundaries.

In our ecosystem, we include Centiro colleagues, partners, suppliers and other relevant business parties who conduct work for, or with Centiro. We expect everyone working with us to adhere to and respect the values and principles expressed in this Code of Ethics.

We must all work together to infuse the spirit of our values in everything we do. We must all be our best selves when it comes to business conduct and bring our commitment, energy and ourselves into our work. We must all work to create a spirit that lasts, all the way. This is what has shaped our success so far and what will continue our success into the future.

Niklas Hedin
CEO
Preserving and Protecting the Centiro Brand

Business runs from person to person. The way you act, how you approach situations and challenges, and the way you treat other people makes a difference.

Professional competence, integrity and personal commitment are the qualities that build our reputation. Our business is based on trust, common sense, fair play and integrity. The purpose of creating a Code of Ethics is to ensure that there is a common understanding of our values and ethical boundaries throughout Centiro as well as in relation to Centiro’s business partners, clients and suppliers. Our business partners, such as agents, distributors, consultants, representatives, attorneys, independent contractors, external temporary workers and suppliers are expected to observe the same standards of conduct as Centiro employees when conducting business with or for Centiro.
Our Vision and Mission

Our vision is the reason why we exist and who we aspire to be. Our mission is how we breathe life into the vision and succeed with our intent.

**The Centiro Vision**
*Our purpose is to empower commerce for companies with winning aspirations, who seek to make a difference.*

**The Centiro Mission**
*By having superior understanding of customer needs, we create value by the way we interact, through our robust solutions and our constant appetite for innovation and improvement.*
Our Values

Centiro is defined by our values, and the practices create our true core. We honor our values by living them, by challenging, debating and renewing them. Our values and practices are present in everything we do and form our DNA as a company.

Discover and Renew
We shall constantly – and where appropriate – make room for new thoughts, challenge borders, and renew ourselves by taking controlled risks. In each and every aspect of what we do, we shall continue to push the envelope* and aim for the stars. We are curious and become stronger when we admit we are wrong. We always have the courage to change.

* To attempt to extend the current limits of performance, to innovate or go beyond commonly accepted borders, just as Chuck Yeager did when breaking the sound barrier.

Relaxed Seriousness
Balance in life, true performance, and results in our company come from the yin and yang fusion of personality and humor combined with razor-sharp professionalism and top-level competence. We realize results come from preparation, accountability, respect for others, and releasing the potential of ourselves and the team.

Transparency
Openness and honesty to colleagues, clients, and society build trust. Trust is the foundation of engagement and results. We live to learn, to teach, and to make information available for those who need it so they can make better decisions. You are always responsible for operating under the principle see and be seen.

You + We
We believe in inclusion and collaboration combined with a strong individual contribution. We realize diversity provides us with the speed, agility, and power we need to achieve our mission. Relationships, and how we nurture and energize them, are at the core of our journey – one for all, all for one. We make sure we can celebrate and be proud over our achievements.
Business Integrity

Centiro strives towards meeting the highest standards of business ethics and integrity. This is a shared responsibility for all of us working at Centiro and we expect our suppliers and business partners to apply similar standards for themselves as well as in relation to their partners and suppliers.

- We treat each other, our clients, partners and other business relations with kindness, integrity and respect.
- We comply with the laws and regulations in all jurisdictions where we do business.
- We do not offer or accept any rewards or benefits that violate any applicable legislation or this Code of Ethics.
- We have zero tolerance for any type of corruption.
- We do not make decisions based on personal considerations or relationships.

Centiro is committed to comply with this Code of Ethics and to adhere to international standards and conventions, including the United Nations’ Declaration on Human Rights, the United Nations’ Global Compact, the OECD Guidelines for Multinational Enterprises and relevant ISO standards.
Legal Compliance

At Centiro, we are committed to follow applicable laws and regulations in the jurisdictions in which we operate.

We are also committed to comply with this Code of Ethics. In any situation where there is a conflict between the Code and the law, the law prevails over the Code unless the Code stipulates a higher requirement than the law.

Anti-Corruption

We comply with local laws and international anti-corruption conventions and shall not engage in, or cause Centiro to engage in, any form of corrupt practices.

Centiro does not tolerate any illegal contributions, directly or indirectly, to any third parties or public officials.

No Centiro employee may offer or provide, directly or indirectly, any undue advantage in exchange for personal gain of any kind.

Be aware that Centiro will not accept any benefit intended for a Centiro employee to facilitate the supplier’s business with Centiro. In the event that accepting a modest gift or hospitality is legitimate in the pursuit of a good business relationship, the accepted gift must be an item of little commercial value and not exceed EUR 50.
Labor and Human Rights

Child labor
Centiro does not tolerate any form of child labor and child exploitation, by use or support thereof.

Forced labor
No form of forced, compulsory or illegal labor, including trafficking, prison labor or bonded labor is accepted.

Working hours
We comply with applicable laws and industry standards on working hours. Workers shall not, on a regular basis, be required to work overtime.

Freedom of association
Employees shall have the right to freely associate, organize and bargain collectively in accordance with the laws of the countries in which they are employed. In the Centiro spirit, open communication and direct engagement between employees and management are encouraged.

Employment conditions
Employees shall be informed of their employment conditions, including rights and obligations, in the employee’s native language or a language they understand, for example in a written labor contract.

Remuneration
We comply, at a minimum, with all laws and regulations relating to wages, including minimum wages, overtime wages and other elements of compensation, and provide legally mandated benefits, including social insurance.
At Centiro, we do not tolerate discriminatory behavior. Discrimination based on gender, race, age, ethnicity, nationality, religion, disability, sexual orientation, citizenship, genetic information or other is unacceptable.

At Centiro, we do not tolerate any form of physical, sexual, racial, psychological, verbal, or any other form of harassment.

Discrimination and Harassment

Centiro is committed to the fair and equal treatment of all individuals. We do not tolerate any form of discrimination or harassment.

At Centiro, we do not tolerate discriminatory behavior. Discrimination based on gender, race, age, ethnicity, nationality, religion, disability, sexual orientation, citizenship, genetic information or other is unacceptable.

At Centiro, we do not tolerate any form of physical, sexual, racial, psychological, verbal, or any other form of harassment.
Health and Safety

Centiro strives to provide a safe and healthy working environment.

We believe you will perform at the highest level if there is an equal balance between work and private life. At Centiro we live by the philosophy "Life-Life Balance", to embrace balance in life and treat work as an integral part of that.

The operations within Centiro are conducted in compliance with applicable health, safety and environmental laws and regulations, company standards and best practices. We take action to ensure a safe and healthy working environment.

Environment and Sustainability

Centiro supports sustainable choices in the workplace and in our business operations.

We work together to identify areas for improvement and continuously work towards a better environment.

We make sustainable choices in our everyday work as well as in equipment and materials.
Protection of Assets and Confidential Information

Centiro’s most important assets are our intellectual property assets such as computer systems, software solutions and all the information and data that is put in our trust by our clients. It is of utmost importance that this is handled in the most strict and confidential manner.

Confidential information
We protect confidential information by never leaving computers, mobile phones or printed documents unlocked or unattended. We handle information carefully to protect the interests of Centiro, our clients and business partners.

Privacy
Centiro is committed to handling the personal information of our employees, clients, partners and others responsibly and in compliance with applicable privacy laws around the world. Applicable security measures have been implemented to maintain the safety of this information.
Situations to Avoid

We act professionally and with integrity in all business relations, refraining from engaging in morally or ethically condemnable situations.

Business opportunities
No business opportunities may be considered or undertaken based on personal considerations.

Other engagements
Outside business and commitments may not be undertaken by Centiro employees or contractors, should it divert time and attention from or conflict with, Centiro’s business and operations.

Bribery, corruption & improper advantages
No gifts, benefits, reimbursements or entertainment to, or from, a third party that would constitute a violation of this Code of Ethics or relevant laws may be offered or accepted.

Conflict of interest
Be observant of any conflict of interest that may arise should a family member, relative or close friend be involved in any business situation.

Morals and ethics
Do not engage in actions or activities which may be perceived or interpreted as ethically or morally offensive, or which may reflect negatively on Centiro, its customers or partners, or on the business relationship.
Use common sense
Sound judgment and common sense are at the heart of all our decisions. Sometimes we are put in difficult situations. If in doubt, go through the checklist below:

Is it legal?
Is it ethical?
Am I being consistent with the Code of Ethics and Centiro's values?
Will it reflect well on me, Centiro, our partners and clients?

If the answer is “no” to any of these questions, do not do it. If you are uncertain, be open and honest and consult with a Centiro colleague for guidance.

Living as we learn
We all have the responsibility to communicate and demonstrate the spirit of the Centiro culture and the Code of Ethics. We lead by example and help each other succeed by infusing the spirit of our Code of Ethics values in everything we do. As colleagues, partners and suppliers we support one another in making good decisions and choices.

You have the potential to make a difference – together we drive change for a better world.