

Code of Conduct

RVM Systems Group



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Message from CEO

RVM Systems is a global group active in providing products and services for automated beverage container return. RVM Systems Group is headquartered in Kista, Sweden.

RVM Systems Group is developing its own products and services, and the sales is carried out mainly through its own group subsidiaries but also to some extent via distributors and partners. RVM Systems Group is available to support and service its product via its own subsidiaries and distributors and partners. RVM Systems Group wants to be the preferred partners of Deposit Return Systems globally.

RVM Systems Group recognizes that its business has an impact on environmental and social issues, as our products enable circular economy, facilitate recycling, and reduce energy and resource needed to manufacture virgin products. RVM Systems Group's reach is both local and global as we are a key supplier to Deposit Return Systems which leads to many favorable social and environmental outcomes. RVM Systems Group strongly believes that RVM Systems Group can increase business while being a good business partner to its customers, suppliers and to the many everyday persons using its products through the world.

It is vital that RVM Systems Group acts in a responsible and ethical way and our Code of Conduct, we believe, is something that basically all our customers and partners can agree with.

We expect that we share the same vision and ambition with our customers, partners, and suppliers. This is the foundation and the reason why RVM Systems Group has adopted this Code of Conduct. RVM Systems Group respects the laws and regulations in the countries in which it operates and requires that its personnel and representatives, along with all other stakeholders, do the same.

The Code of Conduct does not replace local legislation, and if the Code of Conduct is in conflict with legislation, the legislation prevails. However, if the Code of Conduct stipulates higher standards than legislation the Code of Conduct shall be followed. This Code of Conduct applies to RVM Systems Group, its affiliates (the "Affiliate"), and to all staff and directors including staff and directors of any Affiliate. The Code of Conduct also applies to third parties such as agency workers, consultants, sub-contractors, and others working on behalf of RVM Systems Group. The Affiliates may not implement their own Code of Conduct, but they may establish appendices to the Global Code of Conduct with stricter interpretation in specific areas. The provisions set forth in this Code of Conduct shall be the minimum standard. The term "Affiliate" means any legal entity that directly or indirectly controls, is controlled by, or is under the same control as RVM Systems Group, regardless of country of registration.

RVM Systems Group

Niklas Engström
CEO

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Introduction

Why do we have a Code of Conduct?

This Code of Conduct provides the basic foundations to guide our colleagues in ethics of conduct, set standards of behavior and respect the human rights of others. The Code establishes our principles of business conduct, ensuring we do the right thing for our employees, our customers, and our other stakeholders around the world. We expect everyone working at RVM Systems Group, as well as everyone in our supply chain, to adhere to the Code and to think carefully about how they do business on our behalf.

How do we use the Code of Conduct?

The Code is a practical tool you can apply to embed our values into the day-to-day behaviors and ethical decision making. It is principle-based guidance that helps us think about difficult questions and encourages us to speak up if we have concerns.

It is divided into clear sections with key topics in each section. Each topic explains the company's position, sets out some practical steps we must all follow, and directs you to where to get further help. Finally, at the end of the Code there is guidance on how to deal with ethical dilemmas and where to seek further advice and how to report concerns.

What about different country laws?

This Code describes a common set of expectations for our conduct and is intended to give guidance on common legal or ethical issues. A key element is that we abide by applicable laws and regulations. To the extent any local law or regulation is more restrictive than this Code, local law or regulation governs. If there is any doubt about complying with a local law or this code, you should comply with that which sets the highest standard for standard of behavior.

Does the Code of Conduct include all policies?

The Code is not meant to replace detailed policies but is a statement of our principles in several important areas and sets the framework within which all other policies should be interpreted.

Our Mission, Vision, and Values

Mission

"Our mission is to use trusted technology to give packaging an infinite life".

Vision

"Bringing Scandinavian sustainable recycling to you".

Customer Value Proposition

"Reliable service with personalized service".

People

Healthy and Safety

All businesses within RVM Systems Group must implement a Health and Safety policy to protect the health and safety of our colleagues, our customers, and anyone else who may be affected by our work activities.

All businesses in the RVM Systems Group must implement a Health and Safety policy.

- Our leaders shall provide strong safety leadership and engage with colleagues to create safe behaviors and a strong safety culture.
- Colleagues shall have the training and tools to enable them to do their job safely and are empowered to make the decisions about their safety, first time and every time.
- All health and safety risks are understood, evaluated, and controlled by adopting best practices in all our work procedures.
- Health and safety performance is regularly monitored, reviewed, and publicly reported.
- We act on what we learn to continually improve our health and safety performance.

Health and safety are everyone's responsibility!

Health and safety are everyone's responsibility. Therefore, all colleagues must take personal responsibility for both their own health and safety, and that of other people affected by their work and the decisions that they make. All colleagues are expected to:

- Conduct their work safely and responsibly and in a way that complies with company rules, safe working procedures, and applicable health and safety legislation.
- Report any unsafe behavior or situation that poses a risk to health and safety.
- Promptly report any accidents or incidents.
- Stop work if there is an immediate risk/danger to safety and contact their manager.
- Cooperate fully with managers on any matter relating to health and safety.

Equality and Fairness

We value diversity and inclusion and insist on fair treatment for everyone in the work environment. We encourage collaboration across countries and around RVM Systems Group. We respect and encourage open dialogue, to create a climate for open and honest discussions. We do not tolerate harassment, discrimination, retaliation, intimidation, bullying or disrespectful behavior.

RVM Systems Group is committed to treating all colleagues, customers, supplier and all other individuals with dignity and respect and to complying with all relevant employment laws and regulations to ensure a discrimination-free environment for all. The company's values promote a culture where mutual respect and individual development are important ingredients in our business success.

Everyone must be treated with dignity and mutual respect!

It is usually unlawful and always contrary to this Code to give less favorable treatment or engage in any conduct that negatively affects another colleague (such as imposing discipline, rejecting someone for promotion, affecting someone's pay or benefits) or to harass another person based on gender (including gender identity), age, race, skin color, ethnic or national origin, trade union membership, marital status, pregnancy, disability, religion, sexual orientation, or other discrimination forbidden by local law. Anyone who directs or approves violations or has knowledge of them and does not immediately escalate them, will be held accountable.

Human Rights and Modern Slavery Statement

RVM Systems Group and all employees follow the principles of the United Nation's Declaration of Human Rights and follows the labor laws and best practices in our industry that are applicable in the countries where the company operates. The company has zero-tolerance against the use of child labor and is committed to follow The United Nations Convention on the Rights of the Child. The International Labor Organization (ILO) is the UN's professional organization for working life issues. RVM Systems Group has undertaken to follow the ILO conventions and recommendations adopted by the International Labor Conference up to and including its 110th meeting in 2022.

RVM Systems Group is particularly vigilant to ensure that basic human rights are upheld when operating in territories where human rights norms are of interest. The Group has strict rules for establishing business operations in new territories to ensure that no individual's basic human rights are compromised.

We are committed to ensuring that no basic human rights are compromised when doing business.

RVM Systems Group is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. RVM has implemented policies and procedures to ensure that all personnel as well as suppliers and subcontractors comply with all applicable anti-slavery and human trafficking laws, regulations, and codes.

Employees at RVM Systems Group must respect the human rights of all employees and all other parties with whom you deal. All employees will be provided training and guidance that is necessary to ensure they understand what modern slavery and human trafficking is, areas where it is a particular risk and how to report any suspicions of modern slavery and human trafficking in our business or our supply chains. Checks are conducted on suppliers and subcontractors to ensure that there is no slavery or human trafficking in the supply chain.

Protecting Personal Information

RVM Systems Group routinely handles information relating to individuals, such as employees (former and current), job applications, customers, suppliers, and other business partners (and their staff). We owe it to the people we work with to ensure that personal data relating to individuals from whom they can be identified (such as names, addresses, telephone numbers, email addresses, employment contracts, etc.) is handled responsibly and securely.

We protect all personal data.

RVM Systems Group respects data protection laws and implements appropriate technical and organizational measures to protect all personal data that we process. Most countries in which we operate have laws relating to the collection, use, storage, and transfer of personal data. Although such laws vary around the world and change frequently, it is our policy to ensure that all personal data must:

- Be fairly and lawfully processed.
- Be processed for limited purposes.
- Be accurate, adequate, relevant, and not excessive.
- Not to be stored longer than necessary.
- Used only for valid business purposes.
- Be processed in accordance with the rights of individuals.
- Be held secure at all times.
- Not transmitted without adequate protection.
- Stored and used in accordance with local legislation.

Additional care must be taken when personal data is classified as sensitive. Sensitive data includes information about an individual's health, race, religion, political opinions, criminal convictions, or sexual practices. We can only disclose such information where the individual has given valid consent, or where there is a legal obligation for us to do so – e.g., an accident report.

Failure to comply with data protection laws may result in civil, criminal, and financial penalties for RVM Systems Group and individuals.

All employees are expected to immediately report any data breaches of which they become aware to IT department.

For further information and if you have any questions, please speak to your manager.

Ethical Business

Bribery and Corruption

We have a zero-tolerance approach to bribery and corruption. Bribery means giving, offering, receiving, or requesting a corrupt or improper payment or advantage in exchange for something in return. We never engage in bribery or corrupt practices, whether directly or indirectly through third parties. This is vital to maintaining the trust of our colleagues, customers, suppliers, and others we work with. We avoid actions that create the perception of bribery or corruption. We don't solicit, accept, offer, promise, or pay bribes.

We have a zero-tolerance approach to bribery and corruption!

A bribe can consist of anything of value such as money, gifts, entertainment, services, employment, charitable donations, political contributions, or any other benefit. Extra payments to individuals during public tenders are a type of bribery and therefore equally prohibited.

Meals, hospitality, and small gifts can be legitimate activities when done appropriately. However, they can be considered a form of bribery if they are too high in value, too frequent or intended to have an undue influence on a business decision. In case of the slightest uncertainty as to whether such activities are considered a form of bribery, the employee must immediately contact CFO by e-mail for advice.

If a third party acting on our behalf, such as a supplier or agent, pays a bribe, we may be held liable as if we paid it ourselves. We do not want contracts with customers who seek bribes because that type of business is unethical, illegal, and unsustainable. We must therefore avoid working with people or organizations that engage in corrupt practices.

Any association with bribery, wherever it occurs in the world, would likely cause serious damage to our reputation, and could have serious legal and financial consequences for our business.

For our employees, bribery constitutes serious misconduct that would lead to disciplinary action and possible criminal proceedings.

Trade Sanctions

We are committed to working in accordance with the trade sanctions that have been imposed by the United Nations and the European Union.

Sanctions are a tool that is introduced with the aim of influencing the behavior or policy and limiting the room for action for a state, an entity, or individuals. Sanctions may prohibit some or all business activities within certain countries and/or with specific individuals or entities. Examples of targeted sanctions are:

We work in accordance with the trade sanctions imposed.

- Financial restrictions, such as freezing assets of a person a state, entity, or individual.
- Trade restrictions for specific goods, for example dual-use goods or products.

For example, it is NOT permitted to:

- Provide goods or services to or do business with individuals, entities, or countries subject to sanctions, including merger and acquisition activities.
- Engage in or facilitate transactions or business activities involving individuals, entities, or countries subject to sanctions.
- Make payments to or receive payments from individuals, entities or countries which is subject to sanctions.
- Engage in any activity that may help avoid sanctions.
- Provide false or misleading information to relevant authorities in relation to compliance with sanctions.

Violation of these sanctions can have serious consequences for our business and the individual, including significant fines and/or imprisonment.

Competition and Antitrust

We are committed to competing fairly and legally wherever we operate!

RVM Systems Group is committed to competing fairly and legally wherever we operate. Competing for and winning business from customers is critical to our success. RVM Systems Group expects all its operations to compete in a manner that is legal, ethical and enables healthy competition. This means that we cannot engage in ways that may limit competition and/or distort the market, such as price fixing, market segmentation, sharing of confidential/sensitive information and bid rigging with competitors.

Most countries have laws that prohibit anti-competitive behavior and regulate dealings between competitors, customers, suppliers, and distributors. Sanctions for competition violations can be severe and can subject RVM Systems Group, and also individuals, to:

- Significant civil and criminal penalties, including huge fines and imprisonment.
- Investigations and legal processes.
- Damage of our reputation and loss of business.

Accurate Reporting, Accounts and Records

It is important that our accounting and reporting are accurate and give a fair picture of our business. Our management, board members, shareholders, authorities, and other stakeholders must be able to trust our financial reports and accounting documents in order to make informed decisions about our operations.

We shall comply with all applicable laws, regulations, and accounting standards as well as our internal accounting principles to ensure that the financial information gives a true and fair view of our

business and is not misleading in any way. All colleagues must ensure the accounts and reporting are correct and comply with applicable legal requirements and the company's internal control system. All colleagues must be aware of possible fraud or misreporting and immediately report any problems. This applies to all information relevant to our business, including our annual report, monthly reports to our management, sales figures, and agreements as well as non-financial information such as safety reports and supplier audits.

We must ensure that accounts and reporting are correct and comply with legal requirements and our internal control system.

Revenue and profit figures must be accurate and reported in the correct period in line with the requirements of applicable accounting standards. All sales and customer contracts must be appropriately documented and properly recorded. All business expenses must be accurately recorded and supported by documentation. If a colleague is unsure whether an expense is legitimate, they should consult the CFO.

Respecting the World

Environment

Our vision is a more sustainable world for future generations. We encourage consumers to recycle single-use plastics which helps to limit waste, protect the environment for future generations and contribute to a circular economy. Using trusted technology, we can give packaging an infinite life and help to create a more sustainable environment. The company will strive to continue to develop and use materials and products and to identify methods and materials that reduce our impact on the environment. The company strive to use resources efficiently, reduce our consumption of scarce resources and use sustainable resources as and when possible.

Through our technology we help to create a more sustainable environment!

The company will comply with applicable environmental laws and regulations.

For further information and if you have any questions, please speak to your manager.

Community, Charity, and Political Activity

We must respect the communities in which we operate and be sensitive to culture and customs and where it is possible, engage and contribute in cultural and social development.

Charitable donation approvals on behalf of the Company must occur prior to donation and must never be used to gain an improper advantage. Any charitable contribution that is, or can be construed as, for the purpose of seeking a business or personal advantage or influence may never be given. Written approval for charity donations is given by CEO.

Charity donations must be approved by the CEO!

RVM Systems Group is a non-political organization and will never make any contributions, either in cash or in kind, to any political candidate, party, or organization whose activities are designed to promote the interests of political parties or political ideologies. As an employee of RVM Systems Group, you may never get involved in any political process on behalf of the company.

On a personal level, all employees are of course free to participate in any community, charity, trade union or political activity of their choice on an individual basis, with their own money and during their leisure time. Employees at RVM Systems Group must keep personal, political, and charitable activities separate from work at RVM Systems Group. This must not interfere with their work for the company, create a conflict of interest or bring the company into disrepute.

All employees are urged to exercise caution and to ensure that any such activity cannot be interpreted as being on behalf of or related to our business. In case of uncertainty, your manager must be consulted.

Protect our Organization

Contracts

Contracts define our business relationships with customers, suppliers and third parties with whom we do business. They are important means of managing risk by setting out each party's obligations, providing clarity on how the relationship should play out, and limiting our exposure if something goes wrong. It is important that we are careful and observant of our duties and obligations included in these contracts to preserve the company's commercial success and maintain its reputation.

We must be careful and observant of duties and obligations included in contracts.

Agreed terms and conditions (T&C's) must always be documented in writing in our agreements. We can never enter into agreements that oblige us to carry out any unauthorized business activity or provide services to individuals, companies or countries that are subject to sanctions (see section 4.2. Trade Sanctions). All agreements and their T&C's must be reviewed and signed by an authorized signatory.

Company Assets and Confidential Information

All company assets, whether physical or intangible, may only be used for legitimate and authorized business purposes. A significant part of the Group's value is represented by intellectual property rights and all employees have a responsibility to protect these important assets. Intangible assets refer to trade secrets, patents, trademarks, copyrighted material, and instructions for use, as well as other business and marketing materials, ideas, designs, databases, registers, customer lists or unpublished financial data and reports.

All employees at the RVM Group must protect and may not use company property or confidential company information in an inappropriate manner, either for personal gain or to provide an unfair advantage to a third party. All non-public information about the company is confidential information and should be kept secure and not discussed with or disclosed in any way to any outside party. Confidential information includes details about customers and suppliers, how the company operates its services and how the company's products are manufactured or purchased. All employees are asked to be discreet when discussing or working on confidential matters.

All non-public information about the company is confidential information!

When a business decision has been made to disclose information to third parties, such as advisors and business partners, there must be contractual arrangements that contain clear rules that information is not disclosed. A Non-Disclosure Agreement (NDA) must be entered into and signed with third parties before any confidential information is made available to third parties.

Limited and temporary personal use of the company's property and IT resources (tools, products, and equipment) is allowed, if it does not interfere with the employee's productivity and duties or negatively affect the company's reputation. The physical assets and IT resources that the company provides to carry out our work must never be used for personal gain. Carelessness, misuse, and theft have a direct impact on the company's profitability. Suspected misuse of company equipment, systems data will be investigated and may result in disciplinary action being taken.

Fraud and Money Laundering

RVM Systems Group has a zero tolerance for fraud and works to prevent fraud and to maintain an appropriate anti-fraud culture. Fraud can potentially seriously damage a company's reputation, profitability, and liquidity. Fraudsters have always existed and always will and their methods are constantly changing. All employees must be aware of the possibility that fraud may be committed within the RVM Systems Group or by an external party.

We must all use our common sense and be aware that fraud may be committed within the Group or by external parties!

Think logically, use your common sense, and do not click on links you don't recognize. Phishing (a common form of fraud via email) means, among other things, that fraudsters impersonate legitimate banks, authorities, or companies and often these e-mails look serious. The email address must always be checked to ensure that the email comes from a secure email address and correct sender. Information in email must always be checked via a self-sought secure source. Be careful with advance payments and verify identity and bank details via secure source before payment. Never request or approve any payment where you feel unsure or suspect fraud may be involved.

Examples and potential indicators of fraud:

- Excessive use of write-offs or credit notes.
- Request for changes to supplier or colleague's bank account details.
- Forgery or unauthorized alteration of documents.
- Paying or receiving unusually high or low prices.
- Payments made for unclear reasons and/or no or substandard documentation such as e.g. email.
- Fictitious expenses.

All employees are encouraged to act upon any suspicions and immediately report any fraud or other dishonest activity they discover. If something doesn't seem right, seek advice. Any problems should be reported immediately to your manager or CFO at RVM Systems.

Any behavior that is potentially fraudulent will result in an investigation that may lead to disciplinary action being taken against the offending party.

Money laundering is a process by which criminals attempt to hide or disguise the proceeds of their criminal activities and convert them into legitimate funds. This is a major threat as it allows criminals to profit financially from their illegal activities. These means are often used to continue committing crimes. Under the money laundering laws in most countries, it can also be punishable to "tip" others to commit money laundering.

Circumstances that may indicate money laundering of a customer or other party;

- who is not willing to provide personal information,

- who wish to pay large amounts in cash,
- seem unconcerned about the amount they must pay,
- with multiple accounts or payment methods, or
- with an account based in a country or state that is considered a tax haven.

All RVM Systems Group employees must be alert to circumstances or behavior that may indicate money laundering and must immediately report any dishonest activity they discover. If something doesn't seem right, seek advice. Any problems should be reported immediately to your manager or CFO at RVM Systems Group.

External Communication

RVM Systems Group takes disclosure of information and communication very seriously. It is important to protect our reputation by being consistent and accurate and not misleading in our communications to the public and other stakeholders. Only specifically authorized employees have the right to speak or write on behalf of RVM Systems Group, which means that only they may have contact with the media, the public or government agencies on behalf of the company.

All information relating to financial results, acquisitions or divestments, joint ventures, investments or major new contracts or contract losses that have not already been communicated publicly, may only be communicated by group management following a decision by the Board and the group's ownership company.

Employees must obtain permission before speaking at an event, giving an interview, or writing material for publication on behalf of RVM Systems Group. This authorization can only be given in writing by group management following a decision by the Board. This does not include business as usual marketing and PR activities that are part of an employee's normal duties. If any doubts, always consult your manager.

Use of social media includes using or participating in social or professional networking sites, such as Facebook and LinkedIn, posting or reviewing content on photo or video sharing sites, such as YouTube, Reddit, TikTok or Instagram, creating "wikis" and writing or commenting on blogs, as X (formerly known as Twitter).

When using social media, it is important to be careful with communications that could affect the company or our colleagues, regardless of whether we are speaking on behalf of the company or in private communication. Employees at RVM Systems Group may not carry out any political lobbying on behalf of the company. All employees are asked to be aware of harassment and bullying and observe the confidentiality of company, colleague, and customer information, etc.

We must all observe the confidentiality of company, colleague and customer information.

Maintain Personal Integrity

Conflict of Interest

A conflict of interest exists when an employee's own interests or external relationships interfere with or compete with the company's interests or affect the employee's ability to make the right decision. All employees should always act in RVM Systems Group's best interest and ensure that they can

perform their work effectively and exercise objective judgment. Employees should be loyal in all matters affecting RVM Systems Group including matters relating to customers and others with whom the company has a commercial relationship.

We must always act in the company's best interest and be loyal in all matters.

Examples of conflict of interest;

- Secondary employment
- Not to disclose close personal relationships with colleagues, competitors, customers and/or suppliers.
- Start, be involved in and/or run a business that provides services similar to the company's.
- Work for, or have an interest in, a competitor, customer, or supplier.
- Use company information, products, or equipment for personal gain or to benefit friends/family.
- Engage in political or charitable activities that interfere with duties to company.
- Choosing to use a particular supplier because of the hospitality they offer.

All employees at RVM Systems Group are asked to avoid situations where personal interests may conflict with their employment at RVM Systems Group. A conflict of interest is not necessarily a breach by the employee but failure to inform is one. Many conflicts of interest can be solved satisfactorily for both the employee and the company if all relevant details are fully disclosed and discussed in an open and transparent manner. An employee must immediately notify his manager of an actual or potential conflict of interest. All agreed measures must be confirmed in writing where the employee and the company each have a copy of the agreement and the company files its copy together with the employee's personnel document.

An employee should never put themselves in a situation where they are solely responsible for making decisions about business with or employment of a relative or friend or someone with whom they have a close personal relationship. The employee must disclose their relationship and stay out of the process.

Gifts and Hospitality

There can be a positive and legitimate role in offering or receiving reasonable gifts and hospitality to build relationships with business partners, but gifts and hospitality received and given must be reasonable, legitimate, and approved and not lavish or extravagant. Gifts and hospitality must never be used to gain any undue advantage or in a manner that may create a conflict of interest, lead to a sense of obligation, or influence the judgment on the part of the recipient or influence business decisions or cause others to perceive such influence.

Gifts and hospitality must never be used to gain any undue advantage or create a conflict of interest!

It is therefore not permitted to:

- Give, promise, or offer a gift or hospitality with the expectation, intention or hope that a business advantage will be obtained, such as the award of a new contract, or the retention of an existing one, or to reward a business advantage that has already been given.
- Accept a gift or hospitality from a third party if it is known or suspected that it is being offered or that it will provide a business advantage or may result in the colleague not acting objectively or effectively.
- Ask partners (suppliers, business partners, subcontractors, or advisors) to contribute to the costs of entertaining customers on behalf of RVM Systems Group.

- Receive cash or cash equivalents (such as gift cards, lottery tickets or coupons).
- Attempt to conceal gifts or hospitality given or received.
- Give or receive gifts or hospitality from government officials or representatives, or politicians or political parties.

If in doubt, all employees must seek advice from their manager before offering or accepting gifts or hospitality.

Speak Up

Resolving Ethical Dilemmas

Ethical behavior and decision-making extend beyond legal requirements and require employees to exercise judgment and take personal responsibility. The basis of our ethical culture at RVM Systems Group is having integrity which means compliance with moral and ethical principles and being reliable, honest, professional, and fair. Speaking up when something doesn't seem right shows integrity and that you have the courage to do the right thing.

Creating a respectful workplace empowers our employees to be brave enough to speak up when something doesn't seem right, helps prevent misconduct and shows that we care about each other and our business.

Regardless of your role at RVM Systems Group, we all have a responsibility to raise concerns and report situations that don't seem right, even if problems involve more experienced colleagues and managers. Speaking up means being true to our values, integrity and care and it's the right thing to do. When faced with an ethical dilemma, start by asking yourself the following questions;

- Do my intended actions comply with relevant laws and regulations?
- Do my intended actions reflect the company's values?
- Do my intended actions follow the ethical principles in this Code of Conduct?
- Would I be happy if my intended actions were done to me or a loved one?
- Would I and those I respect be proud of my intended actions both now and in the future?
- Does it feel right?

RVM Systems Group is committed to protecting our employees and all employees should be able to feel safe to report actual or suspected problems in good faith or participating in an investigation. All managers at RVM Systems Group are responsible for raising concerns and problems that come to our attention. All concerns and issues raised will be taken seriously and will be dealt with in a thorough and professional manner with confidentiality. We are committed to conducting appropriate, prompt, and objective investigations and taking appropriate action. We are all responsible for cooperating during the investigation process and for answering questions truthfully, accurately, completely and with integrity. Failure to cooperate may result in disciplinary action.

We all have a responsibility to speak up and report situations that don't seem right!

All employees are encouraged to seek help with ethical dilemmas. If you feel unsure and need to discuss an ethical dilemma and identify the best course of action or want to report a suspected problem, in most cases, it is best to consult your manager. In particular cases, where you feel it is inappropriate to consult your direct manager, you may consult your manager's manager for advice or to report problems. For managers, it is appropriate to discuss any ethical issues or dilemmas in the local management team.