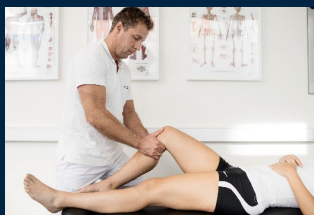


Litorina

Code of Conduct



LITORINA'S CODE OF CONDUCT

This Code of Conduct (the “Code”) is a statement of Litorina’s commitment to adhere to the highest ethical and professional standards, to deal fairly and honestly, to act with integrity and transparency and invest responsibly.

The Code applies to all employees within Litorina and is an integral part of the employee’s employment contract. We expect our business partners and their employees to follow similar standards in their own businesses.

Any breach of this Code should be reported to the Managing Partner of Litorina. The Managing Partner in liaison with the Executive Chairman of Litorina will evaluate the violation and take adequate actions.

This Code shall ensure that we act professionally and responsibly in our relationship with each other, our business partners and other stakeholders.

Background

Litorina’s vision is to be the preferred partner to Nordic management teams that want to take their companies to full potential. We are passionate about contributing to the development of small and medium sized Nordic companies and thereby creating value for our stakeholders and for society at large. We invest in profitable businesses where we can support further growth and sustainable value creation. As part of our sustainability commitment, Litorina is a signatory to the United Nation’s Principles for Responsible Investment (PRI) and a member of Invest Europe and the Swedish Private Equity & Venture Capital Association (SVCA). Our ESG framework builds on the Ten Principles of the United Nations Global Compact (UNGC) and recognises the UN Sustainable Development Goals (SDGs) as a guideline in our investment process.

Basis of the Code

Litorina abides by the laws in all countries in which we operate, and we strive to conduct business according to the highest ethical and professional standards. This Code is based on international rules and regulations, and primarily on the Ten Principles of the UNGC, covering human rights, labour rights, environment and anti-corruption. The provisions in this Code are minimum requirements. If local, national or international legislation or regulations set out a more stringent position than this Code, these shall prevail.

We have emphasized the principles of the UNGC which best apply to our business. This however does not signify that the remaining principles are excluded from the Code of Conduct.

Responsible Investment and Ownership

Our investment framework contains guidelines and principles for the role of sustainability throughout the investment cycle. Environmental, social and governance considerations are integrated into every aspect of Litorina’s investment process, from evaluating investment

opportunities to the development work in the portfolio companies and eventually the exit process. Litorina strives to take a holistic view of ESG matters across the value chain of our portfolio companies, and therefore we encourage our portfolio companies to influence their suppliers, subcontractors, distributors and other business partners.

ENVIRONMENTAL RESPONSIBILITY

Climate and environment

We recognize that our decisions and activities have an impact on the environment and the people and communities where we and our portfolio companies operate. As active owners, it is Litorina's ambition to manage those impacts and promote sustainable business practices.

We have incorporated a precautionary approach to environmental challenges into our investment process and active ownership model.

We strive to reduce carbon emission by, when possible, using new environmentally friendly technologies such as videoconferences instead of physical meetings involving business travel. We will continuously work on reducing the energy consumption in our workplace and actively promote the use of renewable energy.

SOCIAL RESPONSIBILITY

Human rights and labour rights

Litorina believes that business can only grow in societies where human rights are protected and respected. Respect for human rights is a fundamental value for Litorina. It is every employee's responsibility to know and respect the human rights principles.

We have zero tolerance against child labour and forced labour and support the effective abolition of both. Any form of discrimination, whether based on race, sex, religion, age, political opinion, ethnicity or other grounds, is not accepted in our workplace.

Litorina promotes diversity and equal opportunities for all our employees. We treat our employees and business partners with the utmost respect and dignity and expect our employees to act respectfully towards each other.

Everyone has the right to work in an environment free from the demoralizing effects of harassment, and of offensive and improper conduct. At Litorina, we do not tolerate any form of harassment, bullying or conduct that could lead or contribute to harassment of employees.

Working environment

A good and safe working environment is important for Litorina. Good health is an asset and essential for our employees and our long-term development. We promote gender equality

and work actively to advance employee health, job satisfaction and efficiency. We encourage all our employees to keep a healthy work-life balance and tolerate neither discrimination nor harassment in our working place.

Privacy and confidentiality

We uphold the highest respect for our employees and investors' right to privacy. We commit to maintaining the accuracy, confidentiality and security of the personal information in our custody and, unless required by law, will only disclose personal information to individuals with proper authorization to receive such information.

Given the nature of our work, all employees are bound by confidentiality undertakings in their respective employment contracts. All employees are prohibited from disclosing confidential information received while being employed by Litorina.

Transparency

Transparency is essential to an ethical climate in organisations and should be evident in communications, practices, policies, meetings and other interactions. Litorina promotes transparency to facilitate a workplace with healthy relationships and to build strong relationships with our stakeholders.

We comply with tax laws and regulations wherever we conduct business. This includes providing the necessary information to relevant authorities such as our financial status, but also disclosure on how we manage ESG matters to ensure our position as a responsible company.

GOVERNANCE RESPONSIBILITY

Anti-corruption and anti-bribery

The adverse economic and social consequences of bribery and corruption are a major deterrent to development, everywhere in the world. All forms of bribery and corruption are strictly forbidden at Litorina and we will work proactively to detect and deal with cases that might occur. All employees of Litorina must fully cooperate in the investigation of any potential breaches or accusations made in this regard.

Neither Litorina nor anyone acting on behalf of Litorina may authorize, offer or make available any payments, gifts or other benefits that could affect or appear to affect objectivity in business decisions or the actions of a government official.

Employees of Litorina are only allowed to offer or accept gifts, meals and entertainment that are considered as a gesture of hospitality and are a reasonable complement to a legitimate business relationship. If an employee is uncertain about the intention or value of a gift, meal or entertainment, it should be discussed with the Managing Partner of Litorina.

Financial crime

Litorina and our employees are committed to the prevention of financial crime such as money laundering, the funding of terrorist activity, bribery, extortion, corruption and fraud. We strive to assure that high standards of crime prevention and awareness are maintained by our employees to mitigate financial crime risks. We abide by and adhere to all applicable laws and regulations regarding anti-money laundering in all jurisdictions where we conduct our business.

Our employees are obliged to refrain from all forms of criminal activities and are obliged to cooperate with any inquiry in relation to any potential financial crime.

Conflict of interest

Litorina's employees shall always work in Litorina's best interest and are expected to show honesty, integrity and professionalism in their daily work with other employees, companies, customers, suppliers, business partners, organisations and authorities.

Employees shall avoid all acts that are or might be perceived as favouring the employee itself, a company, organisation, individuals or other stakeholders, at Litorina's expense. Employees shall avoid all types of activity that violate the company's interests or have a negative effect on the employee's judgment and integrity.

Examples of conflict of interest includes own, direct or indirect, investments or business commitments that may be in conflict with Litorina's interests, the use of insider information or confidential information for personal gain or favouring personal related parties. Litorina's employees are required to be transparent and inform Litorina as soon as they become aware of such potential conflicts of interest, so that these can be avoided.

Fair competition

Litorina abides by all competition and anti-trust laws to ensure fair competition and to protect customers from unfair business practices. Non-compliance with these rules can lead to large fines and is unacceptable for Litorina. All employees have a responsibility to adhere to the competition laws and regulations in force in the countries where Litorina does business. Situations which can lead to illegal and anti-competitive behaviour such as suggestions from competitors to collude on prices must be avoided at all time.

December 2020

Lars Verneholt

Managing Partner

APPENDIX 1 – THE UN GLOBAL COMPACT

Corporate sustainability starts with a company's value system and a principles-based approach to doing business. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption. Responsible businesses enact the same values and principles wherever they have a presence and know that good practices in one area do not offset harm in another. By incorporating the Ten Principles of the UN Global Compact into our Code we acknowledge our basic responsibilities to people and the planet, but also set the stage for our long-term success.

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour Standards

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility;

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.