



CODE OF CONDUCT



WE ARMOR IT.™

Letters. Words. Codes. Coordinates. Orders.

Every moment vital information is transmitted around us and at risk.
Enter MilDef. We create rugged IT solutions for the harshest conditions
and most challenging environments, which prevent your information from
being interrupted, intercepted or disrupted.

Put simply; we armor your IT, when and where the stakes are the highest.

PURPOSE

At MilDef we believe in healthy business relations with customers, suppliers, partners, colleagues, and other stakeholders. At all levels, people shall be treated with a service minded approach and utmost respect.




MilDef's business concept is to develop, deliver and offer tactical IT products and services for operations and functions that are crucial for society. We customize solutions to meet customers' specific requirements in the demanding environment which they are used. MilDef's hardware and software products are combined with services to deliver effective digitalization. MilDef operates in the global security and defense market and in other areas that are crucial for society.

We want to make sure we all mean the same things and know what to do if we have questions. We are one MilDef and we need to be unified to be the best we can possibly be. This Code sets the path and guides us in our conduct and applies to all employees in all entities of the Group.



THE MILDEF WAY

To reinforce this approach, the MilDef Group of Companies has adopted a set of core values:

<p>Proactivity</p>  <p>Plan for the future; act today</p>	<p>Priority</p>  <p>Put 80% effort on the 20% that matters most</p>	<p>Integrity</p>  <p>We say what we do and we do what we say</p>	<p>Unity</p>  <p>Work together as one</p>
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The MilDef Way machines are connected to each other:

Priority helps us understand what is most important, more mathematically than emotionally.

Once we know what is truly important, we can increase our efforts on proactively planning relevant activities; reacting much earlier to risks and opportunities.

Our plans and insights into possible scenarios are transparently shared with those we work with, which protects integrity. Since we know what is important and have planned accordingly, we are also better equipped to meet our commitments, which reinforces that integrity. We say what we do, and we do what we say.

Most important is the understanding that in isolation our actions mean very little. When we do things together and join forces to accomplish a common goal – that’s when we make a real difference. That’s what we mean with unity.

Adding to the core values, MilDef has through this Code of Conduct adopted the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labor, Environment, and Anti-Corruption. We disclose our continuous efforts to integrate the Ten Principles into our business strategy, culture, and daily operations, and contribute to United Nations goals, particularly in the Sustainable Development Goals.

MilDef is a systems integrator and full-spectrum provider specializing in rugged IT for military, government and critical infrastructure sectors. We provide hardware, software, and services that help digitalize vital information streams in the harshest conditions and most challenging environments.

We shield and protect the most critical information streams and systems when the stakes are the highest. We ensure secure, resilient, and reliable IT, which ultimately protects not only human lives, but also, our common way of life, freedom, and democracy. The very fabric of our society.

In close cooperation with our customers and partners, we integrate durable, reliable and bespoke hardware into highly flexible and customizable systems and solutions. Solutions that are rigorously tested — not only in our laboratory and environmental test facilities, but also in real life.

OUR PROMISE

We offer many values to our customers making them stronger and more successful.

RUGGED, RELIABLE & RESILIENT

We are built tough. We are built to be the one you can depend upon. We are built to never back down or bail out. Rugged, reliable, resilient.

It is not just words. It is how our products are made. It is what our products deliver.

It is how we make a difference, when and where the stakes are the highest.

For us that means: Leadership and employeeship!

How well our leadership works can be measured in the best way we achieve our business goals. To achieve these goals, leadership must be exercised in such a way that there are development opportunities for each employee in a working environment that creates commitment, job satisfaction and motivation. Continuous delegation of responsibilities, in line with the development of the employee, are important elements for us.

The overall goal is to combine the willingness and ability of employees to develop, along with the company's ongoing need for competence.

Nondiscrimination and equal employment

MilDef strives to be an Equal Opportunity Employer. Employment opportunities should be based upon one's qualifications and capabilities to perform the essential functions of a job. All employment opportunities shall be provided without regard to any characteristic protected by law.

People who manufacture products or perform services for MilDef should be respected in their trades and shall not be discriminated in any way that conflicts with above.

Whistleblowers

MilDef strives to protect stakeholders and address our commitment to integrity and ethical behavior. In accordance with anti-retaliation and whistleblower protection regulations, MilDef will not tolerate any retaliation against anyone who makes a good faith complaint, threatens to make a good faith complaint, or provides information in relation to alleged violations of the law.

Occupation health & safety

Working hours and minimum wages shall comply with national legislation in the countries where our products are manufactured, or our services are performed.

Work environment, health, safety, and welfare

Employees at MilDef must work accordingly to national or local Occupational Health and Safety (OHS)-regulations. Managers have the responsibility for ensuring the well-being of the employees, including a reasonable workload in compliance with labor laws. For more information, see our HR Policy.

SECURITY & PROTECTION

We are the enemy of “oops”. The opposite of wishful thinking. The antidote to short-sightedness. Our reason for being is to give the good cause the upper hand. To stand up for freedom and democracy. To make the world a safer place and to protect the fabric of our society

For us that means: Risk and Security Management!

Security should be integrated within all processes within the group. When integrated this mitigates and decreases security risks within departments processes, risks that could affect the possibility to achieve desired objectives in business.

Risk Management Operating Model

A successful Risk Management operating model is based on knowledge of internal processes, vulnerabilities, and requirements. To ensure this knowledge within Risk Management the responsibility of identifying, assessing and mitigating risks are delegated to each process owner in the organization. Traditional liability model is defined and executed within the Enterprise Risk Management (ERM) program.

Human Rights

MilDef commits to respect human rights, which means to avoid infringing on the human rights of others and to address these impacts where they occur, as set out in the UN Guiding Principles on Business and Human Rights. MilDef commits to respect any internationally recognized human rights standards – understood, at a minimum, as the International Bill of Rights and the ILO’s Declaration on the Fundamental Principles and Rights at Work.

Modern slavery & Forced labor

Products and services bought by MilDef, shall be provided by people who are working by their own free will. We do not accept human trafficking or any form of forced labor. The conditions of employment offered to employees must meet the minimum requirements in national law and/or collective agreements.

All personnel shall have the right to join any trade union by choice and to bargain collectively.

Child Labor

MilDef does not accept child labor or any practice that inhibits the development of children. MilDef employees and partners shall comply with the UN Child Convention as well as national legislation in the country where the product is manufactured, or the service is performed.

Environmental commitment

MilDef is committed to protecting the Environment, the prevention of pollution and fulfilling our compliance obligations.

At MilDef we are fully aware that our business has an impact on the environment and by determining and analyzing our material Environmental aspects we strive to determine actions to reduce or mitigate that impact.

FIELD PROVEN

We stand behind our products because we know what they are capable of. We put a lot of effort into testing our products to find out how they perform in the harshest conditions. But the real test is out there in the real world. In the mud. In the cold. In the heat. In the never-ending rain. We have been there. Done that. And so have our products.

For us that means: Quality assurance!

Integrating Quality management in everything we do is vital to ensure us staying focused on what really matters. Our business shall be characterized by openness, accountability, and efficiency. We implement relevant management standards to support the business and to fulfill the expectations from our interested parties.

Compliance obligations

We strive to operate in compliance with mandatory requirements, such as applicable laws and regulations, applicable organizational and industry standards, contractual requirements, and relevant codes of practice.

Non conformances

MilDef Management Case System is implemented to raise and handle any issues concerning MilDef Management system. The main purpose of MMS Case is to learn from our mistakes, solve issues before they potentially cause harm or risk, identify root causes and continuously improve our methods and processes.

FLEXIBLE & CUSTOMIZABLE

Working with systems integration means being part of a greater context. Which means that we constantly need to adapt and adjust our way of working as well as align and comply with a wide number of products, systems, and solutions. We know the importance of fitting in. Therefore, we do not have a set menu. The products and systems we build are the ones our customers need. More than anything, it is a matter of attitude and mindset. To us, impossible is only temporary. If there is a will, we will surely find a way.

For us that means: Taking care of each other!

The MilDef group of companies are committed to the continual improvement of our Occupational Health and Safety performance and our Social Sustainability. The Management teams shall recognize the important role of the company's staff and by establishing and promoting a positive health and safety culture, demonstrates to everyone the relationship between the identification and elimination of hazards, the control of risk and their personal safety, health, and welfare.

This is achieved by nurturing an environment where our people can grow, develop themselves, and reach their personal goals. Together we ensure a fun, stimulating workplace where we all thrive; something that enables long sustainable careers in MilDef.

INTEGRITY & TRUST

Our business is built on integrity and trust. Neither of them comes in a gift box. They have to be earned. And at MilDef we are hardworking earners.

People turn to us because our word and pledge means something. They turn to us because we have always stood up for our beliefs, ideas, and actions – and always will. Something that can be costly in the short perspective. But something that always pays off in the long run. For everyone.

For us that means: Ethics and morals!

We highly value ethics and morals at MilDef. At all levels of the company, all employees should treat each other with the utmost respect. Customers and others in the world, of course, must also be met with the utmost respect and service feeling. Pledges and agreements are to be honored. All employees must be loyal to the company and not look at their own gain before the company's. It is the duty of each employee to counteract actions and behaviors that may harm the trust of the company.

With being a listed company comes additional expectations and obligations that must be met in order not to jeopardize trust in the company. At MilDef we understand the responsibilities that come with working in a publicly traded company. We are particularly aware of our owners' high expectations of business acumen and compliance, including the avoidance of insider trading.

Export compliance and trade ethics

MilDef has a strict ethical view on who we do business with that goes beyond the legally regulated restrictions for export. We do not sell our products outside our core markets (selected EU and NATO countries) without a careful examination of whether such business is justified, considering in particular the degree of corruption and the level of respect for human rights and democracy in the country in question.

Anti-bribery, anti-corruption and anti-trust

MilDef promotes healthy long-term business ethics with all its stakeholders and counteracts any form of corruption. MilDef is strongly committed to comply with applicable antitrust laws that prohibits illegal agreements between competitors that undermine competition, this includes bribes, influence payments, kickbacks or other unlawful payments to any government or similar agency officials. When representing MilDef, corruption and bribery are never accepted.

UNSTOPPABLE

Unstoppable would be the perfect description of the spirit of MilDef. Of our approach to challenges, difficulties, and our customers' needs. Of our responsiveness, alertness and swiftness. And of the success story we have been writing together for the past few decades. But it goes beyond that. Unstoppable is at the very essence of our brand promise and offer. We make sure that the information streams we protect never get interrupted, intercepted or corrupted.

For us that means: Securing information!

The purpose of information security is to maintain a high level of security and credibility towards customer, shareholders and other stakeholders. Credibility is achieved by ensuring access to and protection of information and by anticipating threats and minimizing risks using relevant information technology resources.

This will ensure our business and financial performance.

Data privacy

To be able to operate, MilDef needs to record, store, process, transmit, and otherwise handle personal information about individuals (“data subjects”). The company take these activities seriously and shall provide fair, secure, and fully legal management of private information. It is the responsibility of all employees to ensure that the personal information to which they have access is treated in accordance with the Information Security and Data Privacy Policy.

Scope and availability

The policy applies to all entities within the Group.

The Policy applies to all employees at MilDef, including managers, executive officers, contract employees and members of the Board of Directors. The Policy also applies to those who represent MilDef or act on its behalf, such as consultants, distributors and agents.

Possibly affected key stakeholder groups: Employees, Consultants, Customers, Suppliers and Investors.

This Policy is disclosed internally on the Company Intranet and externally on the Company website.

Roles and responsibilities

The Board of Directors and the CEO have the overall and ultimate responsibility for the overall oversight and implementation of this Policy.

The Chief Legal and Compliance Officer is the owner of this Policy.

Every manager is responsible for communicating this Policy to their employees.

Every employee is responsible for acting in accordance with this Policy.

Every employee who is in contact with relevant external stakeholders such as customers, suppliers and consultants are responsible for ensuring that also such stakeholders are aware of this Policy.

Exceptions

There are no exceptions to this policy. Any need of exceptions to this policy must be clearly defined and documented. All exceptions shall be approved by the Board of Directors.

Training and monitoring of compliance

This Policy is part of the internal onboarding Policy awareness training and the annual Policy Awareness training program for all employees.

All employees are required to understand and comply with this Policy, violations may result in disciplinary actions including termination of employment.

The Policy is approved by Board of Directors. The Policy is reviewed annually and revised if needed.

References

MilDef Management System

MilDef Policy Portfolio

MilNet