

# **Boston Group**

## **Code of Conduct**

## **Boston Nordic Group – Code of Conduct**

### **Introduction**

At Boston Nordic Group, we are committed to conducting business with the highest standards of integrity, professionalism, and fairness. This Code of Conduct applies to all employees, contractors, suppliers, and business partners across all subsidiaries, regions, and operations. We expect all individuals and organizations associated with Boston Nordic Group to adhere to these principles.

### **1. Business Integrity**

We believe in conducting business with honesty, transparency, and accountability. Employees and business partners must comply with all applicable laws, rules, and regulations. Fraud, bribery, corruption, and unethical conduct are not tolerated under any circumstances.

- **Anti-Corruption:** No employee, supplier, or business partner may offer or accept bribes or other improper payments, whether directly or indirectly. Gifts and entertainment should be reasonable and given in good faith to avoid any perception of improper influence.

### **2. Respect for People**

We value the diverse contributions of all individuals and maintain an inclusive workplace that fosters respect, dignity, and fairness. We are committed to creating an environment free from discrimination, harassment, and bullying.

- **Equal Opportunity:** We are an equal opportunity employer and do not discriminate on the basis of race, ethnicity, gender, sexual orientation, disability, or any other characteristic protected by law.
- **Harassment:** All employees and partners must refrain from discriminatory, offensive, or harassing behavior. We promote a respectful and supportive workplace culture.

### **3. Compliance with Laws and Regulations**

We are committed to full compliance with all laws and regulations in every market where we operate. This includes adherence to environmental laws, labor standards, product safety regulations, intellectual property, and competition laws.

- **Data Protection:** We respect privacy rights and ensure compliance with global data protection regulations (such as GDPR in the EU and other regional laws) to protect personal and sensitive data.

### **4. Health, Safety, and Environment**

We are committed to providing a safe and healthy work environment for all employees and business partners. We comply with all workplace safety standards and environmental regulations.

- **Safety:** All employees must adhere to workplace safety protocols to avoid accidents and injuries. Suppliers and contractors are expected to meet the same safety standards.
- **Environmental Responsibility:** We strive to minimize our environmental footprint and promote sustainable practices. Employees and business partners are encouraged to reduce waste, conserve resources, and follow environmentally responsible practices.

## 5. Conflicts of Interest

Employees must avoid situations where personal interests conflict with the interests of the company. Any situation that may create or appear to create a conflict of interest should be disclosed immediately.

- **Personal Relationships:** Employees should avoid situations where personal relationships (including family and financial interests) could influence business decisions or the company's reputation.
- **Outside Employment:** Employees must obtain prior approval before engaging in any outside business activity that could conflict with their duties to the company.

## 6. Confidentiality and Information Security

Employees and business partners must protect the confidentiality of the company's proprietary information, including trade secrets, business plans, and financial data.

- **Confidential Information:** Any confidential information, whether in physical or electronic form, must not be disclosed to unauthorized persons. Employees must use such information only for its intended purpose.
- **Intellectual Property:** We respect intellectual property rights, and employees should avoid infringing on patents, trademarks, copyrights, and other intellectual property.

## 7. Fair Business Practices

We are committed to fair competition and business practices. We will not engage in anti-competitive behavior, deceptive marketing practices, or illegal sales tactics.

- **Fair Competition:** We adhere to antitrust laws and do not participate in any form of price-fixing, market allocation, or other anti-competitive practices.
- **Supplier Relations:** We select suppliers and business partners based on merit, ensuring fairness and transparency in all transactions.

## 8. Reporting Violations

Employees and business partners have a responsibility to report any concerns or violations of this Code of Conduct. We provide multiple channels for reporting issues, and all reports will be treated confidentially and investigated thoroughly.

- **Reporting Mechanisms:** Employees can report violations through their managers, or our directly to the CEO. Suppliers and business partners are encouraged to raise concerns through their designated contacts within the company.
- **Non-Retaliation:** Boston Nordic Group does not tolerate retaliation against any individual who reports violations in good faith.

## **9. Accountability and Enforcement**

Boston Nordic Group is committed to enforcing this Code of Conduct across all levels of the organization. Violations may result in disciplinary action, including termination of employment or contracts.

- **Disciplinary Actions:** Depending on the severity of the violation, consequences may include warnings, suspension, termination, or legal action.

---

## **Closing Statement**

At Boston Nordic Group, we are committed to conducting business in a way that is ethical, sustainable, and in compliance with all applicable laws. We expect all employees, suppliers, and business partners to follow this Code of Conduct and contribute to maintaining the company's values and reputation for integrity.