Ettiketto / Interket Code of Conduct

Purpose

The purpose of this Code of Conduct is to describe Ettiketto Group's position regarding human rights, principles and rights at work, wages and working hours, the environment, as well as health and safety. The Code of Conduct also describes the requirements for business ethics and responsible business conduct that apply throughout the Group.

This Code of Conduct constitutes a minimum requirement for the entire Group and shall be implemented, monitored and continuously improved across all operations.

The Code of Conduct is based on international guidelines such as the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights.

Ettiketto Group operates in accordance with the principles of long-term thinking, development and responsible business conduct. The Code of Conduct shall serve as guidance for employees, managers and others acting on behalf of the Group in situations where legislation, internal rules or established practice do not provide a clear answer.

Scope

This Code of Conduct applies to Ettiketto Group and all its employees.

It also applies to all suppliers and subcontractors of Ettiketto Group.

The Code of Conduct also applies to consultants, temporary employees and others acting on behalf of Ettiketto Group. It applies in all countries where the Group operates, directly or indirectly.

Ettiketto Group expects suppliers, business partners and other partners to act in accordance with the principles set out in this Code of Conduct. Where relevant, these requirements shall be ensured through contracts, supplier assessments, codes of conduct or equivalent governing documents.

Responsibility

Ettiketto Group aims to be an attractive employer where employees thrive, develop and enjoy their work. Our management philosophy emphasises the importance of creating job satisfaction and motivation by encouraging everyone to make full use of their competence, knowledge and ambition in their work.

CEO Responsibilities

The Managing Director of each company is responsible for the implementation, compliance and follow-up of the Code of Conduct, including ensuring that relevant processes, training and controls are in place.

Compliance with the Code of Conduct shall be monitored regularly as part of the company's work on internal control, risk management and continuous improvement. Risks related to, for example, corruption, human rights, information security and environmental impact shall be identified, assessed and managed in a systematic manner.

Manager Responsibilities

Our managers have extensive responsibility for ensuring that the workplace and other conditions provide adequate protection against physical and mental ill health, accidents and strain injuries.

Managers shall lead by example and actively promote compliance with the Code of Conduct. Managers are also responsible for ensuring that employees are familiar with the Code of Conduct and understand how it shall be applied in their daily work.

We shall analyse work environment-related risks and establish objectives, action plans and procedures to monitor and improve the organisation's work environment performance.

Employee Responsibilities

Every employee shall demonstrate personal responsibility for health and the environment in their daily work. It is the responsibility of each individual not only to follow instructions and procedures but also to remain vigilant and report risks and threats to a healthy work environment.

Each employee is responsible for reading, understanding and complying with this Code of Conduct and for reporting suspected violations or situations that conflict with its contents.

Individual Influence

Ettiketto Group shall provide employees with opportunities to influence the content of their work and to develop professionally and personally. We achieve this, among other things, by delegating responsibilities and authority as far as possible.

Performance and Development Reviews

Regular performance and development reviews shall be conducted between managers and employees, focusing on the individual's professional and personal development. Through these reviews, conditions are created for management by objectives and individual development plans.

Procedure

IMPLEMENTATION

The Code of Conduct shall be implemented through relevant policies, procedures and training initiatives for employees and managers. All employees shall receive regular training on the Code of Conduct and related areas such as business ethics and sustainability. The Code of Conduct shall be reviewed regularly within the framework of the company's internal control system. The results of the reviews shall be reported to management and form the basis for improvement measures.

If a situation arises where it is not clear how an action or decision should be assessed, employees and managers shall exercise good judgment and ensure that the decision is consistent with applicable legislation, internal governing documents and this Code of Conduct. Consideration shall be given to the impact on people, the environment, the business and the reputation of Ettiketto Group. In cases of uncertainty, guidance shall be sought from the immediate manager or another relevant function before a decision is made.

The Code of Conduct shall be reviewed regularly and updated when necessary to ensure that it remains relevant, complies with applicable legislation and reflects the risks and circumstances of the business.

EQUALITY & DIVERSITY

Ettiketto Group's ambition is to provide a working environment that is positive, secure, safe and inclusive for everyone within the Group. We welcome employees with different backgrounds and experiences. With reference to fair labour practices and good human rights practices, the following shall be ensured:

Ettiketto Group respects the United Nations human rights conventions and the ILO Core Conventions.

Our employees are one of our most important resources, and our relationship shall be based on mutual respect and trust.

Ettiketto Group strives to attract, develop and retain qualified and motivated employees.

Working conditions and terms of employment comply with applicable laws, regulations, directives and any collective bargaining agreements.

We shall maintain a high level of awareness regarding international conventions.

We do not accept child labour or forced labour.

We are an inclusive workplace.

We shall have processes and procedures in place to prevent discrimination or harassment based on age, skin colour, nationality, ethnicity, gender, religion, ethnic origin, sexual orientation or other personal attributes.

We shall promote a corporate culture and working environment free from discrimination and harassment.

We strive for diversity with regard to gender, ethnicity and social background.

Gender equality shall be an integrated part of the HR agenda and an annual analysis of equality efforts shall be carried out.

We shall ensure that a gender equality perspective is applied in recruitment processes.

We respect our employees' right to act collectively.

We respect employees' rights to freedom of association and collective bargaining in accordance with local labour legislation.

Ettiketto Group Has Zero Tolerance for Child Pornography and the Purchase of Sexual Services

The purchase of sexual services, sexual exploitation of children and child pornography are illegal under the laws of many countries, including the United Kingdom, and may support human trafficking, which constitutes a violation of human rights.

Employees travelling on business or acting on behalf of the company are expected to respect Ettiketto Group's zero-tolerance policy.

Ettiketto Group Respects Personal Data and Handles It with Care

Ettiketto Group complies with applicable laws and regulations, including current data protection legislation such as the GDPR.

Discrimination and Harassment

Should discrimination, harassment or any other form of unfair treatment nevertheless occur, we have clear procedures in place to investigate and stop such behaviour. We strive to ensure equal conditions and opportunities for all employees, regardless of gender, age, ethnic or national origin, religion, disability, sexual orientation or any other factor.

Political and Religious Activities

We do not interfere with our employees' personal beliefs or political opinions. Religious practices, such as personal prayer, dress and dietary considerations, should be permitted wherever possible, provided they do not jeopardise the health and safety of others or seriously disrupt business activities. Religious and political propaganda shall not be conducted during working hours or on company premises.

Compensation Principles

Ettiketto Group's compensation principles are based on the concept that salary shall be remuneration for work performed and reflect the employee's performance in relation to established objectives. Our compensation principles are non-discriminatory and clearly communicated to all employees.

Gender equality shall be an integrated part of HR activities and shall be monitored regularly throughout the organisation. Ettiketto Group shall work to ensure that equality and diversity perspectives are considered in recruitment, competence development, promotion and other personnel-related decisions.

ENVIRONMENT

Ettiketto Group shall establish and monitor measurable targets to reduce its climate impact. Environmental performance shall be monitored regularly and reported internally.
The work shall be aligned with international guidelines such as the OECD Guidelines and the United Nations Global Compact.

Ettiketto Group strives to reduce waste and emissions to air, land and water. We handle chemicals in an environmentally responsible manner and store and dispose of hazardous waste in an environmentally responsible manner.
Noise, dust, odours, particles and other sources of local disturbance shall be identified and, where possible, minimised.

More specifically, this means:
Complying with applicable local environmental legislation, including regulations regarding the handling of hazardous substances and hazardous waste, and striving for energy efficiency.

Complying with applicable laws and regulations relating to environmental aspects.
Working to reduce our climate footprint by mapping and taking action in the areas where the greatest impact can be achieved. This includes both changes in behaviour and ways of working, as well as product innovation and the development of sustainable solutions.
Ettiketto Group's owner, Volati, complies with applicable environmental laws and regulations, including mandatory sustainability reporting and reporting in accordance with the EU Taxonomy Regulation.
Ettiketto Group shall also promote the sustainable use of natural resources and resource efficiency throughout its operations. When developing products, services and processes, environmental impacts shall be considered from a life-cycle perspective. Where relevant, consideration shall also be given to impacts on biodiversity and other natural values.

HEALTH AND SAFETY

Ettiketto Group shall provide a safe working environment that complies with or exceeds national laws and regulations.
Employees shall be informed of all risks associated with their work tasks and shall, where necessary, have access to personal protective equipment.
We shall maintain emergency preparedness plans for emergency situations. All employees shall be made aware of these plans.
Employees shall have access to clean toilet facilities, drinking water and hygienic facilities for food storage, food preparation and meals.

BUSINESS ETHICS

Ettiketto Group’s relationships with customers, suppliers and other business partners are characterised by professionalism, respect and honesty. We maintain strict business relationships to avoid any suspicion of misconduct.
Ettiketto Group shall conduct systematic and risk-based efforts to prevent corruption, including the identification of high-risk roles and processes. Management is responsible for ensuring that adequate controls and procedures are implemented.

Ettiketto Group shall conduct its operations in accordance with applicable laws and regulations in all countries where the Group operates. Employees shall exercise sound business judgement and act responsibly in all business relationships.
Ettiketto Group shall comply with applicable regulations relating to export controls, customs management, trade sanctions and tax legislation. Employees working in areas where such requirements apply are responsible for ensuring compliance with applicable legislation and internal procedures.
All accounting records, reporting and business documentation shall be accurate, complete, traceable and prepared in a timely manner. Incorrect, misleading or incomplete information shall not be permitted, and established control procedures shall not be circumvented.

External Representation and Gifts
Representation shall not be conducted with the purpose of improperly influencing decisions or giving rise to suspicion regarding integrity or motives. Continuous and repeated representation shall not be directed towards any individual person or group of persons.
All representation shall be consistent with the recipient’s own policies and guidelines. The financial value shall be moderate and the activity shall be regarded as normal and accepted business practice. Representation shall have a clear connection to business activities, such as business negotiations where customary hospitality is generally accepted.
Gifts or hospitality given or received shall be documented and archived in accordance with accepted auditing principles.

Representation, gifts or other benefits shall never be offered or accepted in a manner that may influence, or be perceived to influence, business objectivity. As a general rule, travel or accommodation for business partners shall not be paid for by Ettiketto Group. Consumption of alcohol in connection with representation shall always be moderate.

Fair Competition
Ettiketto Group applies fair business practices and does not engage in or participate in any unlawful forms of competition restriction, such as agreements on pricing or other sales conditions towards customers, market allocation, agreements on production limits or production quotas, or agreements to boycott specific customers.

Direct or Indirect Contributions and Compensation
We shall not directly or indirectly provide compensation to, or accept compensation from, employees of public authorities, customers, suppliers or other business partners other than what is consistent with applicable legislation and business ethics principles.

Improper payments or so-called facilitation payments shall never be offered, requested or accepted, regardless of local practices or business culture.

Suspected Money Laundering
We do not participate in transactions that we suspect constitute attempts at money laundering.

Corruption
Within the framework of this Code of Conduct, the following principles shall be promoted:
Opposing corruption in all its forms, including extortion and bribery.
Compliance with applicable antitrust and competition laws.
Working systematically to prevent corruption.
Ettiketto Group has zero tolerance for all forms of corruption and shall actively work to ensure that corruption does not occur within the Group.
Corruption means the abuse of a position of trust for personal or company gain, for example through bribery.

It is prohibited to offer, promise or provide, as well as request, accept a promise of, or receive a bribe.
A bribe is a gift or other benefit that may influence a person, within the scope of their employment or assignment, to improperly favour the provider.

Conflicts of Interest
Our employees shall not participate in external business activities that conflict with the interests of Ettiketto Group. Employees may not use Ettiketto Group's name or their position for personal gain.

Employees shall always consult their immediate manager regarding whether a conflict of interest exists in business activities involving themselves or a related party, or where the activity may be expected to benefit themselves or a related party. The same applies where any other circumstance could undermine confidence in the employee's impartiality.
Examples of conflicts of interest may include financial interests in a supplier, customer or competitor, business relationships with family members or other related parties, external assignments or board memberships that may affect objectivity, and participation in decisions that directly or indirectly affect personal interests. Potential conflicts of interest shall be reported to the immediate manager.

Information, Data Protection and Digital Conduct

Ettiketto Group shall protect confidential information, personal data and other information entrusted to the business by customers, suppliers, employees and other stakeholders. Information shall be handled responsibly and in accordance with applicable legislation, internal governing documents and established security procedures.
Personal data shall be processed lawfully, fairly and only for legitimate business purposes. Access to personal data and other sensitive information shall be restricted to individuals who require the information to perform their work duties. Personal data shall be processed in accordance with applicable data protection legislation, including the GDPR.
Ettiketto Group's information assets shall be protected against unauthorised access, loss, damage or misuse. This includes documents, customer information, technical data, business information, IT systems, software, databases, know-how, intellectual property rights and other information of importance to the business.
Employees shall use the company's IT systems, communication tools and digital resources responsibly and professionally. Company equipment and resources may only be used for legitimate business purposes and must not be used in a way that could harm the business or its reputation.
Internal and external communications shall be accurate, objective and consistent with Ettiketto Group's values. This also applies to the use of social media and other digital platforms. Employees speaking on behalf of the company shall ensure that communications are accurate, relevant and aligned with company guidelines.

Suspected information security incidents, data breaches or other events that may affect information security shall be reported without undue delay to the responsible function in accordance with established procedures.

Artificial Intelligence (AI)
Ettiketto Group views artificial intelligence as a tool to support the business, improve work processes and create value for customers and stakeholders. The use of AI shall be carried out responsibly and in accordance with applicable legislation, internal guidelines and this Code of Conduct.

When using AI-based tools, employees shall ensure that confidential information, personal data and business-critical information are handled securely. AI must not be used in a manner that may result indiscrimination, lack of transparency, violations of human rights or any other improper impact on individuals or the business.
Decisions that have a significant impact on individuals, customers, employees or the business shall always be based on human judgement and accountability. AI shall support decision-making but must not replace professional judgement and responsibility.

SUPPLIERS AND BUSINESS PARTNERS

Ettiketto Group does not accept cooperation with parties where there is reason to suspect illegal activities or violations of fundamental human rights. We expect our business partners to promote environmental and social responsibility among their own business partners and to comply with applicable legislation, the United Nations Universal Declaration of Human Rights, the United Nations Convention on the Rights of the Child and the ILO Declaration on Fundamental Principles and Rights at Work.
Furthermore, Ettiketto Group expects all suppliers and subcontractors to respect, share Ettiketto Group's views on and comply with the fundamental principles set out in this Code of Conduct.

Suppliers shall be evaluated and monitored regarding compliance with this Code of Conduct, relevant sustainability requirements and applicable legislation. When selecting, approving and monitoring suppliers, sustainability-related, ethical, commercial and regulatory compliance risks shall be taken into consideration. Identified risks shall be managed through relevant corrective actions, follow-up activities or other appropriate control measures. Ettiketto Group shall promote long-term and responsible business relationships with suppliers and business partners who share our values and our approach to sustainable business conduct. Suppliers are expected to impose equivalent requirements on their own suppliers and business partners.
If serious violations of human rights, environmental legislation, business ethics principles or other requirements set out in this Code of Conduct are identified at a supplier or business partner, appropriate actions shall be taken. Such actions may include requirements for corrective actions, follow-up activities, special audits or termination of the business relationship.

Ettiketto Group does not accept cooperation with suppliers and subcontractors where we have reason to suspect that illegalities or violations of human rights occur. We expect that our partners work to ensure that their business partners take environmental and social responsibility, are in compliance with current legislations, the UN Declaration of Human Rights, the UN's Convention on the Rights of the Child and the ILO Guidelines on Fundamental Principles and Rights at Work. **In addition, Ettiketto Group expects all suppliers and subcontractors to respect, share the Ettiketto Group´s point of view and comply with the basic points set out in this code of conduct.**

Suppliers shall be evaluated and monitored regarding compliance with this Code of Conduct and relevant sustainability requirements. Suppliers are expected to impose equivalent requirements on their own suppliers.

REPORTING OF MISCONDUCT

All employees are required to report suspected misconduct and improper behaviour. More specifically, this means the following:

- Employees within the Group shall report suspected misconduct or improper behaviour to their immediate manager.
- If the misconduct involves the immediate manager, or if the reporter wishes to remain anonymous, reporting may be made through the WhistleB whistleblowing system.
- Employees themselves determine what constitutes misconduct. Examples may include illegal activities, fraud, breaches of competition law, threats to the environment, health and safety, violations of the Code of Conduct or other inappropriate behaviour. Misconduct may also include serious deficiencies in information security, data protection, human rights or other violations that may pose a risk to people, the business or society.
- No employee shall be subject to retaliation for reporting concerns in good faith. This protection also applies to individuals who participate in investigations or provide information in connection with the reporting of suspected misconduct.

Immediate managers, members of the management team, HR managers, Managing Directors and Volati undertake to handle reports correctly and with discretion.

- The reporter shall have provided accurate information in good faith and without personal or financial gain as a motive. False or malicious reports are considered a serious disciplinary offence.
- Reported misconduct shall be handled with care and integrity.
- Reports submitted through WhistleB are handled anonymously.

- Only Volati's CEO, CFO and Chairman of the Board ("the Investigators") are responsible for handling misconduct reports submitted through WhistleB.
- The Investigators are responsible for investigating reported misconduct, which may subsequently result in the involvement of relevant persons within the Group, a report to law enforcement authorities, or the engagement of an external auditor or independent investigator.
- The Investigators aim to provide feedback to the reporter within ten working days.
- Cases shall be handled objectively, impartially and with respect for all parties involved.
- Information shall only be made available to individuals who require it for the handling or investigation of the matter.

Handling of Information Provided Through WhistleB

- Individuals affected by collected information shall be informed when disclosure of such information will not jeopardise the investigation.
- Information shall be disclosed to any individual who submits a written request, provided information relating to that individual is registered.
- Information disclosed upon request must not reveal the identity of the reporter.
- Personal data contained in whistleblowing reports and related investigations shall be deleted within 30 days after the conclusion of the investigation, unless otherwise required by law.
- The handling of information described above is based on the General Data Protection Regulation (GDPR) and applicable requirements regarding the processing of personal data in whistleblowing systems.

Individuals covered by applicable whistleblower protection legislation have, in addition to internal reporting channels, the right to report wrongdoing through external reporting channels designated by competent authorities.