

# **CODE OF BUSINESS CONDUCT ENAD GLOBAL 7 AB (PUBL)**

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# 1. Background and purpose

Founded in 2013, headquartered in Stockholm Sweden, Enad Global 7 (also referred to as 'EG7' or 'the Group') is a group of companies within the gaming industry that develops, markets, publishes and distributes PC, console and mobile games to the global gaming market. EG7 develops its own original IPs, as well as act as consultants to other publishers around the world through its game development divisions.

For EG7, responsible acting means that we conduct our business in a manner that is fair, reliable, and transparent. That includes what is commonly referred to as compliance - full observance of all applicable laws, internal regulations and binding voluntary commitments. EG7 operates to the highest standards and has policies in place governing our behaviour both internally and externally. Consequently, this code constitutes an essential part of EG7's way of doing business.

The standards in the Code are mainly, and in some cases exceed legal rules to reflect EG7's values. EG7 supports and works to comply with international guidelines regarding environment, human rights, working conditions, anti-corruption, and business ethics, including the ten principles of the UN Global Compact, the International Charter of Human Rights, the International Labor Organization's Declaration of Fundamental Principles and Rights at Work and the United Nations Convention against Corruption. This Code is not meant to be an exhaustive list of matters governing the Employees conduct.

## 2. Audience

This Code is a guide to ethical decision-making and applies to EG7 and all of its respective directors, officers, employees, consultants, contractors, agents, and others who do business on behalf of EG7 (all together "**Employees**").

This Code should be read in conjunction with any other relevant company policies and each individual group company must adopt adequate compliance procedures to comply with local legal requirements, where relevant. To obtain the policies applicable to your location, consult the local Human Resources representative.

## 3. Fundamental Human Rights and Labor Standards

### 3.1 General Compliance

EG7 acts with integrity and respects fundamental values such as human and labor rights, equal treatment and non-discrimination. EG7 is committed to prevent any forms of modern slavery, forced labor, child labor, or human trafficking and we respect all internationally proclaimed human rights as reflected in this Code. Via meetings with business partners, and occasional site visits EG7 ensures that its business partners do not use or benefit from forced labor or any other form of involuntary labour, and that business partners comply with all applicable laws on working hours and wages. Corporal punishment, physical or verbal abuse or other unlawful harassment and any threats or other forms of intimidation are prohibited.

## 3.2 Non-Discrimination and Anti-Harassment

EG7 is committed to provide a work environment that is based upon dignity and respect. No Employee shall be discriminated against on the grounds of, including but not limited to, race, color, sex, sexual orientation, parental status, religion, political opinion, nationality, ethnic background, disability, age, union membership and any other characteristic protected by local law, as applicable. All Employees shall be treated strictly according to their abilities and qualifications in any employment decisions, including but not limited to, hiring, advancement, compensation, benefits, training, layoffs, and termination.

## 3.3 Freedom of Associations

Employees are free to join associations of their own choice. EG7 will not penalize or interfere with workers who wish to lawfully and peacefully associate, organize or bargain collectively.

## 4. Environmental impacts

Environmental and climate protection are key corporate objectives for EG7 and lifted in our Sustainability policy. Operational practices that reduce any environmental burden associated with our activities are promoted. Innovative developments in products and services that offer environmental benefits are supported. As an established global company, EG7 bears the responsibility to see and understand the environmental impact we contribute to and support a precautionary approach to environmental challenges.

## 5. Compliance with Laws

Wherever we do business, we must comply with applicable laws, rules, regulations, and contracts that EG7 has entered into, as violation of laws and regulations can have severe consequences on our business, such as criminal convictions, fines and reputational damage.

### 5.1 Preventing Corruption, Extortion, and Bribery

It is illegal and prohibited for an EG7 Employee to be in any way involved or implicated in the payment of bribes or corrupt practices, whether directly or indirect.

Employees are prohibited from giving, offering, or receiving anything of value (e.g., cash, gifts, business opportunities, charitable donations, etc.) if such is intended to secure an improper benefit. Paying or receiving bribes through third parties, agents, consultants, and other intermediaries is also prohibited. EG7 and the Employees can be held responsible for bribery committed on behalf of EG7, so we must be vigilant in monitoring and ensuring the compliance of our agents, consultants and anyone performing services on our behalf. Conducting appropriate due diligence is central to mitigating the risk of bribery and corruption.

Facilitation payments, such as payments to expedite a non-discretionary service or action are also prohibited.

Modest gifts and corporate hospitality can be part of building and maintaining good business relationships and are often a normal courtesy. However, gifts and benefits can also be offered as a subtle form of influence to gain preferential treatment. No gifts or benefits (given or received) with the purpose of gaining preferential treatment are allowed.

Giving anything of value to a public official such as government employees, candidates for political office, political party members, and any person acting in an official capacity on behalf of a government entity is generally forbidden. Employees must consult with the EG7 Legal Department and obtain a specific approval before making any payment or giving anything of value to a public official.

EG7 employees are strictly forbidden from engaging in any form of extortion, whether directly or indirectly. Extortion is defined as making demands accompanied by threats that jeopardize the personal integrity or life of individuals involved in private affairs.

## **5.2 Anti-Money Laundering**

EG7 strictly follows all applicable anti-money laundering laws. Conducting appropriate third-party due diligence to verify the identity of our partners is central to mitigating the risk of money laundering. To ensure that there are no legal barriers when entering into agreements with business partners we conduct credit reports. Employees should exercise particular caution when EG7 is requested to receive or make payments to an entity that is not a party to the transaction, where money is routed through unrelated countries, or where payments are made or received in anonymous forms (such as cash or prepaid cards).

Good-faith suspicions that a colleague or third party has engaged in criminal conduct should be immediately reported in accordance with this Code. If the Employee feels a need to report the accident anonymously, they can do so via the groups Whistleblower system. Furthermore, Employees must **NOT** tell any person, including the person that the Employee has reported the suspicion of money laundering.

## **5.3 Export Control and Sanctions**

With global business partners all around the world, EG7 Employees must use adequate procedures to ensure that transactions with third parties comply at all times with all applicable laws relating to sanctions and export controls, including but not limited to, economic, financial and trade sanctions and export controls administered by the European Union (“EU”), the United States (“US”) and the United Nations (“UN”). Failure to comply with these laws can lead to severe civil and criminal penalties, as well as significant reputational damage for EG7.

## **5.4 Ensuring Fair Competition**

EG7 employees shall act in accordance with national and applicable international competition laws and not enter into discussions or agreements with competitors concerning pricing, market or customer allocation, market sharing, bid rigging or other similar activities which could have anti-competitive effects.

Particular care should be taken when attending meetings of trade associations and similar industry organizations. While discussions of some sensitive information may,

under certain circumstances, be permissible, no such discussions with competitors should take place without prior approval of the EG7 Legal Department.

## **5.5 Accurate Records and Insider Trading**

EG7's shares are publicly traded on Nasdaq Stock Market. As a result, EG7 is obligated to make various disclosures to the public and governmental regulators and is committed to doing so accurately. All EG7 books and records must be accurate and complete. False, misleading, or incomplete entries are strictly prohibited. EG7 has implemented disclosure controls and procedures to ensure that its public disclosures are timely, compliant, and otherwise full, fair, accurate and understandable.

In the course of your duties, you may learn material information about EG7 or other companies that is not available to the general public. The use of such non-public or "inside" material information to trade securities is strictly forbidden and illegal, whether by you, your family or friends, or any other person to whom you have communicated the information. The law also prohibits anyone who possesses material, non-public information from using it to tip off or communicate to anyone else who might trade on it.

Violation of insider trading laws may result in civil and criminal penalties, including fines or jail sentences, and discipline up to and including termination of employment.

## **6. Business Ethics**

### **6.1 Conflicts of Interest**

All business decisions must be made with EG7's best interests in mind. A conflict occurs whenever an Employee's private interests interfere with the interests of EG7. Employees must therefore refrain from entering into interests that might divide their loyalties or impair their professional judgement.

If you believe you cannot avoid a conflict of interest, you must fully disclose the circumstances in writing to the EG7 Legal Department. Moreover, you must fully disclose any personal interests you have with respect to any proposed transaction between EG7 and any third party, including without limitation any ownership, commercial, financial, business, or other interest or relationship that you have with such third party.

### **6.2 Confidential and Proprietary Information**

EG7 Employees have a duty to protect confidential and proprietary information about EG7, as well as non-public information that our business partners have entrusted to us. Confidential information may include trademarks and trade secrets, as well as financial information, corporate strategy, and information about relationships with our business partners, or information concerning a game in development.

Confidential or proprietary information should never be discussed in public places (such as in taxis, elevators, airplanes, or restaurants), or be disclosed to third parties, including family members.

If you are unsure about whether information should be treated as confidential or proprietary, consult with your immediate supervisor or a member of the EG7 Legal Department.

### **6.3 Protection and Proper Use of Company Assets and Property**

All electronic media and communications systems provided to Employees for work are the property of EG7. Employees have a responsibility to protect the assets (including information systems and equipment, software, data, e-mail, and intellectual property) from loss, damage, misuse, theft or sabotage. Employees must also ensure the efficient use of EG7's assets for business purposes only, however, limited private usage is acceptable as long as such use does not violate this Code.

### **6.4 Social Media and Government Relations**

Employees should not give company statements to the media or any government or governmental agency without prior authorization from the EG7 Legal Department. Unless explicitly designated and authorized by EG7, no Employee may speak publicly on behalf of the company. Only an authorized spokesperson for EG7 may make official public statements concerning the company, its business, its performance, or its products.

### **6.5 Reporting Violations and Protection from Retaliation**

Employees are required to promptly report any actual or suspected activities that are illegal or are not aligned with EG7's moral and ethical values as stated in this Code. Violations should be directed to the EG7 Legal Department or submitted via the whistleblower process. EG7's Whistleblower Procedure reinforced these processes with channels to circumvent management layers depending on the nature of the complaint the employee has. To ensure a credible whistleblower process, EG7 works with external tool providers to guarantee that employees are anonymous when reporting events that are not in line with EG7's Code of Business Conduct.

A report of an actual or suspected violation should be as specific and detailed as possible to allow for proper and complete assessment and remediation. No disciplinary, retaliatory, or adverse action of any kind will be taken against any person who in good faith reports an actual or suspected violation of applicable law or this Code, regardless of whether such violation is ultimately determined to have occurred.

### **6.6 Disciplinary Action**

Appropriate internal disciplinary action for any violation of this Code may include consequences under applicable labour law, mandatory education or counselling, oral or written reprimand or warning and prosecution under civil and criminal law.

## **7. Roles and responsibilities**

The CEO of Enad Global 7 AB (publ) is the owner of this code, and the Head of IR is responsible for coordinating and updating this Code of Business Conduct.

## 8. Monitoring of compliance

EG7 will conduct periodic audits of compliance with this Code. Any potential wrongdoing will be properly investigated.

This Code of Business Conduct has been adopted by the Board of Directors of Enad Global 7 AB (publ) and is reviewed by the board of Enad Global 7 AB (publ) on an annual basis.

## 9. References

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| ● Whistleblower Procedure                         | Internal |
| ● Sustainability Policy                           | Internal |
| ● HR Policy                                       | Internal |
| ● Insider Policy                                  | Internal |
| ● Information Security and Data Protection Policy | Internal |

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