



Code of Conduct

Acapela Group

Principles of Acapela Group's Code of Conduct

The Acapela Group's employees have to make sure that the actions they take are legal, ethical and compliant with the code of conduct.

The principles included by Acapela Group's code of conduct are described below. A relevant part of Acapela Group's ethical principles is its concern about the environment. Acapela Group's environmental policy statement is a separate document.

1. Freedom to join a trade union

The employees have the right to join the trade union. Acapela Group regards it as a fundamental human right.

2. Prohibition of child labor and forced labor

As long as it is possible, Acapela Group makes sure that neither suppliers nor customers use child or forced labor. If Acapela Group notices that the existing labor laws are violated, any business contacts will be stopped as soon as it is contractually possible if the business partner does not act according to Acapela Group's demands on this respect.

3. Prohibition of discrimination

All kinds of discrimination are prohibited at Acapela Group. No one can be discriminated because of age, disability, language, nationality, ethnicity, religion, gender or sexual orientation.

4. Declaration of regulated working hours

The working hours principles applied by Acapela group meet the national legal regulations.

5. Correct employment agreements

All the staff work according to the national labor regulations. The work assignment and the salary are specified by the employment contract signed by the employer and the employee. Any kind of unreported employment is prohibited.

6. Safety of working environment

The work places meet all the national legal regulations. The working environment contributes to the employees' well-being. It is an environment where the creativity, efficiency and the identity of being a member of the Acapela Group family are key words.

7. Demand of correct salaries

The salary is specified in the employment contract and adjusted according to Acapela Group's Remuneration Policy document. It is affected by the employee's position, education, seniority, and recruitment market.

8. Use of the equipment

Acapela Group's computers and equipment should not be used for other than work-related activities. It is strictly against Acapela Group's policy to use the equipment for illegal or unethical activities, copyright violation (e.g. file sharing), gambling, pornography.

9. Privacy

Acapela Group respects the privacy of the employees, business partners and customers. The personal and customer data are handled in compliance with all the applicable laws and with care. The access to the personal and customer data is limited to the employees who have direct business reasons of it.

10. Outside employment

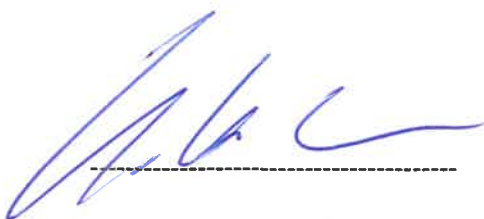
The employees might be employed outside Acapela Group as long as it does not affect their ability to work for Acapela Group. Any kind of business relation to Acapela Group's customers, suppliers or competitors is not allowed unless Acapela Group gives a written approval for it. Similar policy applies to holding speeches and presentations with connection to the Acapela Group employment.

11. Gifts

The Acapela employees do not accept gifts or any favors from customers or suppliers if it affects (or can be perceived as such) the ability to make objective business decisions. Similarly, the Acapela employees do not offer any gifts or favors to suppliers or customers that may appear being bribes. Bribes are prohibited.

12. Market and Competitors

Collecting, sharing and using information about Acapela Group's market and the competitors is valuable to the company but it must be conducted in a legal and ethical way. The sources that are not public are prohibited.



Lars-Erik Larsson, CEO