



FreshDrive AB's Business ethics policy

1. Anti-Corruption and Anti-Money Laundering

We have a zero-tolerance policy and take a proactive approach in preventing corruption. We position to act with high ethics and against all forms of corruption. We see it as an obvious part of our responsibility to have systematic preventive work and to promote a corporate culture with a high awareness of corruption risks. We conduct regular corruption risk assessments.

2. Data Protection and Data Security

Compliance with GDPR and high data security is always a priority for us. We use strict security measures to protect our staff and our organization's data. Internal staff trained in security awareness can detect fake emails and other fraud attempts. A functioning interaction between people, processes and technology is key to a secure IT environment.

We have an external company that manages our IT security and continuously checks and reviews risks.

We recognize the importance of data security. We comply with all laws that protect personal data and privacy of personal data. We take appropriate measures to properly manage and protect staff personal information from unauthorized or improper access or use. We comply with applicable laws and regulations governing data privacy.

3. Financial responsibility

We have a responsibility to ensure that our accounting takes place in accordance with legislation and good accounting practice. We have a responsibility to release correct financial information to not mislead external and internal stakeholders. Our annual report is reviewed and approved by external authorized auditors.

4. Disclosure of Information

No one at FreshDrive AB shall ever disclose confidential information in any way to anyone outside or within the company, except to persons, organizations or authorities to whom disclosure is necessary for the purpose of the employment or other company agreement. You should only use confidential information that is naturally associated with your duties.

5. Fair competition and anti-trust

We compete fairly in the market. We support strong competition and do not tolerate unfair business practices. Our managers, officers and employees deal fairly with customers, suppliers, competitors and their employees. We do not obtain unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or other practices that constitute unfair trade. When we collect information about the



activities of others, we do so in a manner that is both legal and ethical. We do not cooperate with competitors.

6.Conflict of interest

We have guidelines regarding potential conflicts of interest. We must work actively to identify and manage any conflicts of interest. For efficient and prompt handling of an actual or potential conflict of interest, the matter must be handled as follows: - Identification - Reporting - Assessment - Handling – Documentation.

9.Export controls and economic sanctions

We comply with Swedish legislation and EU regulations for each country directly applicable in Sweden in terms of export control and sanctions should this become relevant for us.

10.Whistleblowing and protection against retaliation

There is a whistle-blowing mechanism in place, where employees can anonymously report cases of ethical misconduct. All employees are trained to know how to use the opportunity when necessary. We ensure through specific measures that all employees should feel safe when they do this and that they are protected against retaliation.