

## **FONDITA CODE OF CONDUCT**

### **1. Purpose**

As a fund manager we are entrusted by our clients to manage their interests. Through managing their interests, we enable companies to grow and act sustainably while aiming for long term returns for our clients. Our success is dependent on our stakeholders' trust. To safeguard this trust, we publish our Code of Conduct which serves as our main policy in how we act and conduct business.

### **2. The foundation of the Code of Conduct**

The foundation of the Code of Conduct is built on relevant legal and regulatory requirements and uses the ten principles of the United Nations Global Compact as the foundation for the Code.

### **3. Scope**

All Fondita employees, permanent or temporary, are subject to the Code. All employees are required to be familiar with the Code of Conduct.

### **4. Our values**

We want to be a long-term partner to our clients by targeting value adding long-term returns to our clients while respecting sustainable development. We ensure that we have the right competencies to perform at our best in our respective roles and support and coach colleagues to develop and improve in their tasks. We provide constructive feedback on conduct and performance.

### **5. Equality and diversity**

Fondita rejects all forms of discrimination. We offer a workplace where everybody is treated equally and with respect.

### **6. Compliance**

The primary objective of Compliance is to ensure Fondita follows regulation and law. The purpose of Fondita's compliance principles is to support Fondita to act in a responsible and sustainable manner, promote sound financial market practices, protect the interests of the fund unit holders, support the investment activities and prevent both risks associated with the investment activities as well as operational risks from materializing.

### **7. Confidentiality and trust**

Fondita does not disclose confidential information to third parties, the only exception being if law and regulation forces Fondita to do so, for example inquiries by FIN-FSA. We keep our promises, and make sure to have data of high quality. We follow the agreed upon schedules and make sure to deliver in agreed upon timeframes.

### **8. Sustainable responsibility**

Our sustainable responsibility is rooted in our responsible investment framework, including our principles for responsible investments, assessment of ESG opportunities and risks and methodology. Furthermore, Fondita is a signatory of several voluntary initiatives, such as UN Principles for Responsible Investments and Net Zero Asset Managers Initiative, which sets requirements, on us as fund managers with regards to sustainability or the obligation to promote sustainability such as CDP investor. Additionally, we have external certifications for two of our funds; Fondita Sustainable Europe holds the Nordic Swan and EU-Ecolabel (Austria) and Fondita Global Megatrends holds the EU-Ecolabel (Austria) Fondita has established an ESG committee in 2021 to provide oversight and advice to the management and board of directors in ESG related matters when necessary.

## **9. Stakeholder management**

Fondita respects and follows fair competition. We do not discuss pricing, business secrets or similar topics with anyone outside of Fondita. We are open for dialogue with public authorities, regulatory supervisors, and other interest groups. We communicate in a clear and transparent manner and strive to avoid misunderstandings.

## **10. Prevention of financial crimes and corruption**

Fondita condemns any type of financial crimes and corruption. Fondita has internal and external Compliance resources to ensure that we follow all regulatory and legal requirements. All employees are required to stay vigilant and report any suspected unlawful or suspicious business transactions to Compliance.

## **11. Conflict of interest**

Board members or employees may not undertake assignments as a board member, consultant or equivalent in companies whose interests may conflict with the interests of Fondita or the fund unit holders. We follow the internal instructions for Conflict of Interest to avoid such situations and always consult our Compliance Officer if there are any uncertainties.

## **12. Gifts & donations**

Employees may not receive gifts or other incentives that may affect their independence in the performance of their duties. We adhere to the internal instructions on receiving and giving gifts.

## **13. Health and safety**

Fondita wants to ensure a safe, healthy, and productive work environment that supports individual development and teamwork. Fondita respects working hours and supports well-being by ensuring our employees have a good work-life balance through comprehensive occupational health services, exercise and wellbeing vouchers and opportunities to ensure a healthy working environment.

## **14. Data protection**

We process and store client data carefully, and in accordance with regulation and law. Fondita employees are required to be aware of the safety and data protection internal guidelines. All employees are to behave responsibly online and protect Fondita's network against unauthorized use. Any personal data breaches must be reported to Compliance.

## **15. Control and monitoring**

Fondita has an internal process for reporting misconduct and practices that are not in line with our values and business ethics presented in the Code of Conduct. The internal audit function is responsible for monitoring Compliance. The risk control's function is to reduce the likelihood and potential impact of risks for the organization.