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		Author reference E.ON SE	Telephone +46 40-25 50 00		e-mail compliance@eon.se	
		Our reference Katarina Lundeslöf	Telephone +46 431-40 25 40		e-mail Katarina.lundeslof@airson.se	

Acting responsibly at AirSon Engineering AB

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<h2>AirSon Engineering AB</h2>				
e-post info@airson.se	Telefon +46 (0)431-40 25 80	Adress Metallgatan 33 262 72 Ängelholm Sweden	Bank (Swift) Handelsbanken (HANDSESS)	Kontonummer 6875 281 717 281
Hemsida www.airson.se	Organisationsnummer SE559193923501		Bankgiro 160-1970	IBAN SE20 6000 0000 0002 8171 7281

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1 Introduction

AirSon Engineerings purpose is to improve people’s lives and create a better tomorrow. Our ability to deliver on this is dependent on our people, our ethical standards and our ability to build long lasting relationships.

Our Code of Conduct defines our responsibilities and how we expect our people to behave to ensure a constructive and productive working environment that supports our core values and beliefs. It guides and supports our people to take the right decisions and do the right thing. A violation of the Code of Conduct may cause damage to AirSon Engineering, our employees and our partners, and could result in legal action against AirSon Engineering and its employees. The Code of Conduct and People Guidelines therefore apply to all AirSon Engineering employees, including the members of the AirSon Engineering Board of Management and all executives.

The Code of Conduct is supplemented with People Guidelines which give additional guidance to employees and executives. A blue lightbulb within this Code of Conduct will be shown whenever such a People Guideline is available.

The members of the AirSon Engineering Board of Management and the executives will confirm in writing at the end of each year that they, and those within their areas of responsibility, have acted in compliance with this Code of Conduct.



Please refer to the Appendix for an overview of all People Guidelines

2 Taking care of people and the environment

2.1 Human rights

We are committed to the freedom and equality of people irrespective of race, color, sex, language, religion, political or other opinion, national or social origin, birth or other status. To show our commitment, we support the Universal Declaration of Human Rights of the United Nations and the European Convention for the Protection of Human Rights.

Diversity is a key part of our daily business and culture. We expect all our employees to always respect the dignity, privacy and personal rights of each individual. We do not tolerate discrimination, harassment or abusive language under any circumstance.

2.2 Health, safety and security

Ensuring a secure, healthy and safe environment for our employees and all our stakeholders is one of our key priorities. We mitigate risks and promote health, security and wellbeing through the constant improvement of our processes, and health promotions and preventive measures.


We do not compromise on safety practices, behaviors or conditions. No job is worth putting someone’s health or life in danger. Thus, we expect all employees to comply with our health, safety and security regulations, promote a safe and healthy work environment and improve our health and safety culture. It is essential that we work together to achieve a common understanding on how to act and work together safely.



The People Guideline “Health & Safety in the workplace” provides further information



The People Guideline “Security for Employees” provides further information

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2.3 Environmental protection

Environmental protection is one of the most important concerns in our society. It presents a great challenge in politics, businesses and our daily lives. At AirSon Engineering, it is our objective to keep our environmental impact responsibly low by understanding our impact, as well as our customers' impact, and by continuously improving our sustainability performance.

We strive to be the environmentally-conscious energy partner of choice for our customers. Our efforts and solutions enable both us and our customers to reduce emissions, increase energy efficiency and contribute to a sustainable, cleaner future.

3 Creating sustainable relationships

3.1 Fair competition and tax obligations

At AirSon Engineering we are convinced that we can only win and keep customers and have sustainable relationships with all our stakeholders if we act responsibly and fairly. Therefore, we are committed to open markets and fair competition. It is important for us to always comply with the rules of national and international laws. We also expect this of our business partners and all other market participants.

We expect our employees, our executives and parties we engage with to comply with their tax obligations. We do not tolerate anyone who knowingly assists or encourages tax evasion.

3.2 Conflict of interests

A conflict of interests is a situation in which there is a risk that personal interests of an employee or third party may impact AirSon Engineering's or our customers' interests. It is very important that our employees do not enter into conflicts of interests or loyalty. We rely on all our employees to make their decisions solely on the basis of objective criteria, and not to be influenced by personal interests and relationships in business decisions.

Employees are obliged to notify their superiors immediately of a possible conflict between their work and private interests. Conflicts of interests may particularly arise if an employee acts as a competitor of AirSon Engineering, is active for or involved in another company which concludes legal transactions with AirSon Engineering.

3.3 Anti-Corruption

Corruption generates decisions for unlawful reasons, prevents progress and innovation, distorts competition and harms companies. Corruption is therefore prohibited under penalty and can hence lead to fines for the company and criminal prosecution for the employee, executives and Board Members concerned.

We are committed to fighting corruption in any form all over the world and thus are a member of the Global Compact. We therefore support national and international efforts to combat corruption and reject any corrupt behavior. This applies, in particular, to granting so-called acceleration payments ("Facilitation Payments" - payments of small





The People Guideline "Anti-Trust" provides further information



The People Guideline "KYC-check" provides further information



The People Guideline "Anti-Corruption" provides further information

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amounts directly to the responsible officials). These are unlawful and punishable in most countries and can lead to very significant penalties depending on the region.

The Anti-Corruption People Guideline must be adhered to when accepting and granting gratuities in dealing with business partners as well as public officials and mandate holders.

3.4 Donations and sponsorship

We ensure transparency in our donation and sponsorship activities. We use our sponsorship to promote certain objectives, such as cultural activities, educational purposes, science, and sports events.

We donate voluntarily, demand nothing in return, and comply with applicable laws and local regulations. We categorically exclude donations to political parties, political candidates, managers of political offices, or representatives of the public administration.



The People Guideline "Anti-Corruption" provides further information

3.5 Money laundering and trade restrictions

Money laundering means the introduction of illegally generated money or illegally acquired assets into legal financial and economic circulation.

We combat all forms of money laundering, take precautions to avoid being involved in money laundering issues, and comply with applicable national and international sanctions, embargo regulations, and other restrictions of foreign trade legislation. This also applies to our business partners who act on our behalf.



The People Guideline "Know your counterparty-Check" provides further information

3.6 Dealing with suppliers of goods and services

We maintain a wide range of business relationships with suppliers. These relationships enable us to offer our own products and services at a competitive price. Our economic success depends, among other things, on a careful selection of strong and reliable partners. We therefore carefully select suppliers and service providers according to internal specifications and thereby avoid any improper preference.

Any employee involved in the selection of suppliers, service providers or other contracting parties who has a personal link and could influence the selection process must notify his superiors because this could be a conflict of interest. No employee may have a provider with whom he is professionally involved, execute any private orders for him, unless authorized by his superiors.



The People Guideline "Supply Chain" provides further information

4 Protecting information and assets

4.1 Corporate assets

AirSon Engineerings corporate assets are used to achieve our business objectives and it is in our interest to protect our property and assets. Assets can be financial, physical or intangible. AirSon Engineerings assets should only be used for suitable and authorized purposes; the unsuitable or unauthorized use of the assets is prohibited. In this regard, payments to employees or anyone working for AirSon Engineering granted excessively or for inappropriate reasons are prohibited.

4.2 Privacy protection

Special legal regulations exist for the protection of personal data. Data is considered to be personal if it includes personal or factual information about an individual. Examples include address, bank details, smart meter data, usage profiles or data in cookies of customers, employees, or suppliers. There are also particularly sensitive categories of data, such as religious denomination and health data.

We have a great interest in protecting personal data against unauthorized processing, unauthorized modification, distribution or deletion. We oblige our employees to protect the personal data entrusted to AirSon Engineering and our subsidiaries against unlawful processing and misuse.

4.3 Company and business secrets

AirSon Engineering has valuable know-how and extensive business and trade secrets. This knowledge is the foundation of our business success. It is our responsibility to ensure the confidentiality, availability and integrity of this information, whether in electronic form or on paper.

The unauthorized transmission of trade or business secrets, their unauthorized alteration, destruction or disclosure, may cause great damage to AirSon Engineering. It can lead to labor, civil and criminal penalties for the employee concerned. We therefore take all necessary and appropriate measures to prevent misuse of company and business secrets.

We acknowledge the intellectual property of competitors and business partners. All employees are obliged to keep third party business and trade secrets and to only use them as agreed with the respective third party.

4.4 Insider information and trading

We are committed to fair and sustainable securities trading. It is important for our reputation that we treat insider information as confidential. Insider information is any non-public information that is likely to have a significant effect on the stock or market price of the insider security, such as mergers and acquisitions, technical innovations or important changes to the management organization.

Breaches of confidentiality relating to insider information or insider trading can lead to substantial fines for AirSon Engineering and criminal prosecution for the employee concerned. Violating insider trading laws can be avoided by strictly abiding to the following rules:

- Do not buy or sell securities on which you possess insider information.
- Do not make insider information available or discuss it with any other person unless this person is an authorized AirSon Engineering employee or a third party who is entitled and requires such information to perform his or her duties.
- Contact the General Counsel of E.ON SE in case of doubt on whether information should be classified as insider information.




The People Guideline "Data Protection" provides further information



The People Guideline "Information Security" provides further information



The People Guideline "Media Relations & Social Media" provides further information on how to share information with media outlets

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5 Seeking advice

Compliance with law, rules and regulations is for us an essential basic principle of responsible business conduct. AirSon Engineering adheres to legal prohibitions and requirements at all times, even if this involves short-term business disadvantages or difficulties for AirSon Engineering or individuals. This Code of Conduct will help understand our culture and our way of working. However, employees may be confronted with complex situations where they feel that these documents do not provide a clear answer. When this is the case, we expect the employee to discuss the matter with their line manager or with the respective Compliance Officer.

Contact directly Chief Compliance Officer

Dr. Guntram Würzberg

General Counsel, Chief Compliance Officer

E.ON SE Brüsseler Platz 1, D-45131 Essen

T: +49 201 184-7053

M: +49 160-74 93 048

guntram.wuerzberg1@eon.com

Contact Compliance Officer for RU Sweden

Patrik Håkansson

Director Legal, Compliance & Security, Compliance Officer RU Sweden

E.ON Sverige AB, Carl Gustafs väg 1, SE-205 09 Malmö

M: +46 703 25 51 28

patrik.hakansson@eon.se

You can also report via an Internet-based whistleblower system, email or phone (anonymously) any possible violations of the law or of company policy, particularly in areas such as antitrust law, capital market law/insider rules, corruption, fraud (deception, embezzlement), tax evasion and non-compliance with the Code of Conduct by AirSon Engineering employees (referred to as the “whistleblower hotline”).

Whistleblower Sweden

Internet-based system <https://eon-wb.compliancesolutions.com/>

Email compliance@eon.com

Phone +46 10 7502429

Whistleblower International telephone numbers

Germany	+49 711 95339973
Belgium	+32 800 70683
Croatia	+43 720 778281
Czech Republic	+420 800 022513
Denmark	+45 808 30118
Italy	+49 711 95339974
Netherlands	+31 97 010280332
Poland	+48 22 1530879
Romania	+40 37 1700157
Slovenia	+386 80 755701
UK	+44 20 37696413
USA	+1 385 2495224

6 Appendix: List of People Guidelines

The Code of Conduct is supplemented with People Guidelines which give additional guidance to employees and executives working with the respective topic. This appendix provides an overview of all people guidelines at AirSon Engineering.

People Guideline number	People Guideline name	Author
PG-01	Anti-Corruption	Legal & Compliance
PG-02	Antitrust Prevention	Legal & Compliance
PG-03	Know Your Counterparty-Check	Legal & Compliance
PG-04	Data protection	Legal & Compliance
PG-05	Information security	CIO
PG-06	Media Relations & Social Media	Comms & Public affairs
PG-07	Safety and Health in the workplace	Sustainability & HSE
PG-08	Safety for Employees	Legal & Compliance
PG-09	Procurement of goods & services	Supply Chain-Organisation
PG-10	Booking business trips	Supply Chain-Organisation