

Enhancing the driving experience

Code of Conduct

Guide for
Kongsberg Automotive Group

EN

A message from our CEO



At Kongsberg Automotive (KA), we believe that it takes more than strong performance to build a great company. It also requires an unwavering commitment to our core ethical values and the highest standards of ethics and integrity while making sure that we are safeguarding KA's assets. As a publicly traded company, that commitment is crucial.

The purpose of this Code of Conduct (CoC) is to ensure that all KA employees understand our core ethical values and, more importantly, demonstrate those values at the individual, team, and company-wide levels.

We must demand of ourselves and each other the highest standards of individual and corporate integrity. We safeguard our assets. We comply with all laws, regulations, and Company policies. We are dedicated to diversity, fair treatment, mutual respect, and trust.

In other words, each and every one of us is expected to do the right thing, take responsibility, and work together. I believe that doing so will contribute to making KA a great company.

This CoC, together with any Company or business-specific approved policies your location may have, provides an outline to help you understand what is expected from you and to help you make good decisions.

We all share the commitment to live by our CoC. Our Board of Directors, the senior management, myself, and all KA managers and employees are accountable to the highest standards of integrity and full compliance with the regulations and policies that affect the conduct of our business. We expect and tolerate nothing less.

Please join me in making KA a great company.

A handwritten signature in black ink, appearing to be 'H. Jensen', written in a cursive style.

Henning E. Jensen
President & CEO

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Our Code of Conduct, Introduction

The KA Code of Conduct of 7 February 2018 (“the Code”) defines KA’s ethical standards of business conduct and sets a framework for ensuring that we act with the highest standards of integrity in our day-to-day activities. The Code is a resource to provide information on the company’s policies, laws and regulations that affect our worldwide operations.

The Code applies to all group companies ultimately owned by Kongsberg Automotive ASA, joint ventures and partially owned companies where Kongsberg Automotive ASA owns or controls at least 50% of the shares, equity or voting stock. The group of companies are in the following referred to as “KA”.

THE CODE APPLIES TO EVERYONE IN KA

Operating with integrity is critical for our success. You are therefore required to familiarize yourself with the Code, applicable laws, KA policies and guidelines that apply to you in your role in KA.

The Code applies to the board directors, all officers and employees of KA and, in addition, agents, sales representatives and persons and companies that represent KA, collectively hereafter referred to as “KA Personnel”. Agency supplied personnel and hired consultants will be

considered part of KA Personnel if they work consecutively more than 3 months for KA or if they perform their work on KA’s facilities. We also require that suppliers and other entities acting for or on behalf of KA to comply with the principles of the Code. Suppliers are requested to confirm their commitment to the principles of the Code by signing of a particular Supplier Declaration.

Our Code represents a commitment to an honest ethical workplace. By working for KA you have a responsibility to uphold this commitment.

WHEN AND WHERE DOES THE CODE APPLY?

The Code applies not only to the place where KA Personnel ordinarily do their daily work, but in all situations where anyone represents KA, for example when KA Personnel are on business trips, take part in meetings with customers or suppliers, or participate at conventions, trade shows or KA team building events. The Code further applies to activities and situations connected to KA or may be perceived as being related to KA, like company-organized activities and sponsored events, such as team building and social events organized by KA, even if the event is outside the ordinary workplace or normal working hours.

INTEGRITY CAN ONLY BE BUILT BY BEHAVIOR

Almost all global companies have ethical guidelines and codes of conduct. You will find various forms of codes and guidelines on the web and on printed material. Remember however that ethics and integrity is not first and foremost about presentations and printed material, but how we all behave as representatives of KA. Integrity and ethical standards can only be built by our own behavior.



Our Responsibilities

As a member of the KA team you have a responsibility to yourself, to your co-workers and to KA to conduct business legally and ethically. Be alert to activities going on around you and speak up if you suspect illegal or unethical behavior by KA Personnel, KA's contractors, vendors, suppliers, customers or other persons or companies related to KA.

Sometimes it might be easier to look the other way, but doing nothing is, in itself an action that can have serious negative consequences for you and the company.

Do the right thing!

PRESERVE AN ETHICAL WORKPLACE

KA offers a number of ways to reach out to people in KA who will listen and help if you have questions or believe that someone may be violating the Code. By raising concerns early, we will have the opportunity to address and resolve the problems before they escalate harm others or damage the company. All reports will be handled promptly and discretely. Information on whom to report to is found in "Reporting a Concern" on page 30 of this Code.

RAISE CONCERNS

If you do not speak up about a potential issue, KA cannot address the problem. In some cases failure to report violations of the law, the Code or other KA policies, practices and regulations can also lead to disciplinary actions, up to and including termination of employment.

Always remember you are responsible for your decisions, actions and omissions. Your participation and commitment is instrumental in sustaining our ethical culture. Seek advice when you need it and report possible misconduct when you see it.

ASK FOR HELP

KA operates in a global marketplace and we have a wide diversity of social customs and cultures. We recognize that the Code cannot address every possible situation you may face in your job. Therefore, use your best judgement, seek guidance and ask questions whenever in doubt about the right course of action.

Keep in mind that the Code is meant as a complement to KA policies and procedures. If you encounter an inconsistency or conflict, seek the help of your supervisor, the KA HR department, KA Legal Counsel or KA internal Controls.

DO NOT FEAR RETALIATION

KA Personnel who raise questions or report suspected acts of misconduct in good faith will be protected against any form of retaliation. "Good faith" means that you have made a genuine attempt to provide honest and accurate information to fulfill the objectives of the Code, even if it later turns out that you are mistaken.

Allegations about retaliation will be taken seriously and will be investigated. Retaliation for good faith reporting of irregularities under the Code are subject to disciplinary action.

CONFIRM YOUR COMMITMENT

You may from time to time be requested to attend training on our Code and be required to complete E-learning sessions. Participation in these training sessions is mandatory. You will further annually be requested to confirm that you will comply with the Code, that you understand the Code and that all questions you may have concerning the Code have been asked and answered to your satisfaction.

Particular responsibility for managers and supervisors

As stated above, the Code applies to everyone in KA. We should all be good examples to our colleagues. Personnel in managerial or supervisory positions do however have a particular responsibility to lead by example. Managers and supervisors have a particular obligation to promote ethical behavior, to correct irregularities and to encourage KA personnel to report acts or omissions that violate the Code.

KNOW THE CODE

As a manager, make sure you are familiar with the Code and all laws and policies that apply to your team and your operation. When employees come to you for advice or bring up questions, make sure that you refer to the Code. Do not hesitate to consult with the KA HR team or KA Legal Counsel if you have questions or need support. Remember to lead by example, walk the talk, and demonstrate the principles of the code to your colleagues. Do not cut ethical corners.

HAVE AN OPEN DOOR POLICY

Managers should encourage employees to come forward and bring up questions and issues concerning the Code. Make sure that all employees understand that making honest reports on possible irregularities will not lead to retaliation or other negative consequences. Managers should also inform employees that they may talk to other managers in KA if they are uncomfortable discussing matters with his or her direct superior.

GET THE FACTS RIGHT

If an employee comes to a manager to report irregularities or to discuss a matter concerning the Code, the manager should demonstrate in the communication that he or she is concerned and takes the matter seriously. The Employee should be encouraged to tell his or her story uninterrupted. The manager should take good and accurate notes from the statement. The employee should be informed that the issue will be handled discretely, as far as possible confidentially and only be shared with other KA personnel to the extent necessary.

TAKE ACTION

Whenever managers receive information about possible irregularities, the matter should be reported in writing to the EVP Human Resources, the Chief Financial Officer and/or the General Counsel with all available information. The manager should further include a list with contact details of all KA personnel who may possess further information about the issue.

Note that the KA Compliance Committee, which consists of the EVP Human Resources, the Chief Financial Officer and the General Counsel, will manage the investigation of possible irregularities. KA Personnel should under no circumstances take any investigative steps yourself or engage outside resources to investigate KA matters.



Integrity

WE COMPLY WITH APPLICABLE LAWS

All KA Personnel must comply strictly with all applicable laws and regulations in any country where KA conducts its business. It is the obligation of everyone to familiarize themselves with local law that applies to the business they conduct on behalf of KA; also when doing business in countries where KA does not have any legal entities. Further, KA Personnel must not accept the violation of applicable laws by any supplier, consultant or other person or company that delivers goods or render services of any kind to KA or in connection with any transaction or business with KA.

KA has in a number of areas stricter rules that set higher standards than applicable legislation. KA and its employees must in such cases follow the KA regulations provided it is not in conflict with law.

KA and its personnel must further comply with the recognized ethical standards that apply for international corporations.

Note that legislation varies significantly from country to country. The fact that an act may not be explicitly prohibited by local law in one country does not mean that it is acceptable if said act would be in conflict with the Code, KA's policies or the laws of the jurisdictions where KA's companies are incorporated.

There may be situations where the laws of several countries may be applicable and provide conflicting directions. You are in such situations expected to ask for assistance from KA Legal Counsel.

REPUTATION – A VALUABLE ASSET

Our integrity is essential for building our reputation, which is one of KA's most valuable assets and of vital importance to attract customers, shareholders and recruiting talents to the company. Always keep in mind that reputation is easily lost but is hard to build.

If you have any questions, regarding applicable laws and regulations please contact KA Legal Counsel for advice.

WE SUPPORT FREE COMPETITION AND FAIR DEALINGS

Almost all countries of the world have implemented laws designed to promote competition and keep the marketplace thriving. KA complies fully with antitrust and competition law wherever we do business. These laws are complex, differ from country to country and impact almost every aspect of our business. It is therefore important that everyone representing KA have a good understanding of how the applicable laws affect our work for KA and avoid conduct that might even suggest a violation.

Always make sure that KA competes lawfully and ethically in all markets where KA pursues its business. For guidance on applicable laws and regulations, please do not hesitate to contact KA Legal Counsel.

Examples of anti-competitive behavior in the market:

- Agreements between competitors to keep prices at a certain levels.
- Market sharing arrangements; for example to the effect that supplier A will focus on one part of a market whereas its competitor supplier B will focus on another part of the markets. Illegal market sharing may be by territory, by product, or by customer.
- It should be noted that the above behavior is illegal, even if no formal agreement is entered into, what appears to be an informal “understanding” or a “coordinated behavior” will also be considered illegal.
- Discrimination with regard to prices, terms and services you offer to similarly situated customers.
- Making disrespectful or uncomplimentary comments about our competitor’s products or services.
- Entering into “tying” agreements where a customer is required, as a condition for buying one product to have to buy something else.

Exchange of information

Information about how competitors will act in a market will in many cases make it possible for other competitors to take measures to the effect that competition is reduced to the disadvantage of the customers. Exchange of certain information between competitors is therefore prohibited in almost all markets of the world.

Examples of illegal exchange of information between competitors is information relating to prices, calculation of prices, marketing strategies, new products that will be introduced in the market in the future or “old” products that will be phased out. Exchange of such information will make it possible for the players in the market to “position” themselves and get more favorable terms and conditions. Exchange of such information is therefore prohibited.

Generally, the prohibited behavior can be summarized as follows:

“Exchange of any information that will reduce uncertainty with regard to a competitor’s future behavior in a market is illegal.”

KA personnel should therefore not under any circumstances take part in exchange of such information.

Particular caution should be shown in all communication with representatives of competitors.

Note that violation of competition law frequently leads to severe penalties in the form of substantial fines for companies and even imprisonment for individuals. Compliance with competition law is closely monitored by authorities around the world. “Dawn Raids” of companies are also frequent in the automotive industry.

PRACTICAL EXAMPLE

EXCHANGE OF INFORMATION

Q:

One of our customers has implemented new purchasing conditions which are far more demanding for the suppliers than the previous ones. Some of the provisions are clearly not acceptable. Could I discuss this difficult situation with other suppliers, which also happen to be competitors to KA, to find the best way to relate to the new practice? Could I discuss the matter in a trade organization where we and other suppliers are members?

A:

No, discussion of the customer's terms and conditions with competitors would be illegal and KA cannot take part in it. Discussing the matter in a trade organization would not make it any better, it would still be illegal.

However, discussing the matter with non-competitors is usually permitted. Please note that the assessment whether a company is a competitor to KA may be complex and you are therefore encouraged to contact KA's Legal Counsel for support.

PRACTICAL EXAMPLE

Q:

I need to meet a supplier to discuss a possible contract for deliveries of certain components to KA. The supplier is also a competitor to KA for sale of other products. Is it prohibited to initiate discussions and have a meeting with the supplier?

A:

No, it is not prohibited to meet with the potential supplier, but it is of utmost importance that precautions are taken to avoid illegal exchange of information and to be able to substantiate that no illegal exchange of information has taken place. It is therefore mandatory for KA personnel to obtain advice from KA Legal Counsel before communication with competitors is initiated.

What to do if you receive a proposal for an arrangement that may be illegal or if illegal information is offered to you?

- Reject the offer or information immediately and state clearly that you consider the offer inappropriate and illegal.
- If the proposal is made in a formal meeting, in a trade organization etc. leave the meeting immediately and make sure that the minutes reflect that you left the meeting.
- Report the attempt to the General Counsel immediately.
- If in doubt do not hesitate to contact KA Legal Counsel for advice.

Further information: This matter is complicated and the above is a short summary only. Please also study the KA Competition Law Guideline; **LA-IPL-003**
Please don't hesitate to contact KA Legal Counsel for further information and advice.

WE DO NOT TOLERATE ANY FORM OF BRIBES AND CORRUPTION

KA does not tolerate any form of corruption or bribery.

Corruption and bribery are severe obstacles and hindrances for development of the economies of many countries around the world. Corruption and bribery is therefore considered a serious criminal offense in almost all countries and is subject to criminal penalties for both companies and individuals. Note that laws in a number of countries state that corruption is illegal and subject to prosecution even if the corrupt act takes place abroad. Examples are the US Foreign Corrupt Practices Act, the UK Bribery Act and the Norwegian Penal Code.

KA Personnel may not in any way offer or provide any undue monetary or other advantage to any person, including public officials, representatives of customers, suppliers or other business partners, in order to influence such persons to do something or abstain from an act for the purpose of obtaining an advantage for KA, oneself, or any other party.

Similarly, no KA person is allowed to accept any payment or other thing of value from anybody in connection with KA's business.

Further; KA does not accept that any form of bribes are made indirectly on behalf of KA by third parties such as consultants, freight forwarders and sales agents. Be careful when selecting business partners and require that they confirm in writing that they will conduct their business in accordance with the principles of KA's Code of Conduct.

Note that the offering of money or other advantages will be a violation of the Code even if the offering may not have actually influenced a person to an act or omission. Further, the ban on corruption and bribery will apply to all persons taking part in such activity even though the role of each person in such activity may be remote. Note also that an "arrangement" will be considered as illegal corruption even if money or other benefit is paid or provided to a third party for example to a relative or friend of the party that is sought to be influenced or an organization where said person may have an interest.

WHAT IS BRIBERY?

Bribery can be defined as the offering or acceptance of something of value to induce or reward someone to do something improper or to abstain from an act they are obliged to.

Examples of bribery are:

- A supplier offers a commission to you in exchange for securing a long-term agreement.
- During a tender process, one of the bidders offers 100 Euros to you for information about the lowest bid submitted by the other bidders.
- A vendor donates Euro 1000 to a charity project you are involved in at the same time as the vendor bids for a contract with KA.

Report

All cases of bribery related to KA and its personnel and representatives must be reported to the General Counsel. This applies even if the attempt to bribe is rejected or unsuccessful.

Facilitation Payments

A facilitation payment is a payment of relatively small amounts to lower ranking public officials in order to influence the official to do or abstain from doing something. This will in most cases be routine tasks, which regardless of the payment, would be entitled to, such as having goods declared by customs, or a visa checked by an immigration officer. Facilitation payments are prohibited within KA. Note also that the offering of facilitation payments is illegal in a number of countries and may be subject to criminal prosecution, for example the UK Bribery Act.

Exceptions may only be made in cases in which any person's integrity, life or health is threatened. A written report must in such exceptional cases be sent to the General Counsel as soon as possible.

PRACTICAL EXAMPLE

WE DO NOT TOLERATE ANY FORM OF BRIBES AND CORRUPTION

Q:

Equipment for a new production line has been held back in customs for a long time. The customs clearance is complex and extensive. The equipment is urgently needed at a new KA facility, which is scheduled to open shortly. The freight forwarder offers to speed up the process by having the goods declared as “Express Goods” which will require payment of an extra USD 3.500. Is this acceptable?

A:

Such offers are often likely to be part of a corrupt practice, and, if so, would not be acceptable. Before deciding whether or not to accept the proposal, verify and seek reliable confirmation that clearance as Express Goods is a legitimate practice and that the payment of the fee is an official fee for which you will receive an appropriate receipt from the relevant authorities.

Red Flag List

The following is a list of possible “red flags” that may arise which should raise concerns under anti-bribery and anti-corruption laws with regard to third parties with whom KA does business or is considering doing business. The list is not intended to be exhaustive and is for illustrative purposes only. If you encounter any of these “red flags” in connection with any transaction, you must report them promptly to your manager and to the General Counsel or by using the procedure set out under the section “Reporting a Concern” below:

- (a) you become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- (b) you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a “special relationship” with foreign government officials;
- (c) a third party insists on receiving a commission or fee payment before committing to sign up to a contract with KA, or carrying out a government function or process for KA;
- (d) a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- (e) a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- (f) a third party requests an unexpected additional fee or commission to “facilitate” a service;
- (g) a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;

- (h) a third party requests that a payment is made to “overlook” potential legal violations;
- (i) a third party requests that you provide employment or some other advantage to a friend or relative;
- (j) you receive an invoice from a third party that appears to be non-standard or customised;
- (k) a third party insists on the use of side letters or refuses to put terms agreed in writing;
- (l) you notice that KA have been invoiced for a commission or fee payment that appears large given the service stated provided;
- (m) a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to KA;
- (n) you are offered an unusually generous gift or offered lavish hospitality by a third party;

WE UNDERSTAND OUR RULES ON GIFTS AND HOSPITALITY

Gifts

In general, offering or receiving gifts is not encouraged. The occasional exchange of gifts in some cultures may however be considered an acceptable business practice, but it can become unacceptable if it is considered lavish, compromises professional judgements or suggests favorable or preferential treatment.

Generally, in giving or receiving a gift; an acceptable gift is one that:

- is of a value less than 30 Euros, and
- is infrequent and not in cash, and

- complies with applicable law and the policies of the companies of both the giver and receiver, and
- does not influence or appear to influence a person's independent judgment.

Note that with exception for promotional giveaways like pens, calendars and T-shirts with company logos, offering of gifts requires the prior written approval by a member of the KA Global Leadership Team. Likewise, gifts offered to KA Personnel must be reported to the superiors at the same level.

PRACTICAL EXAMPLE

GIFTS

Q:

I will attend the opening of a new KA plant abroad. It is customary that the construction company that has erected the factory buildings will present a gift to the KA representative at the opening. The gifts are usually expensive. I feel it will be considered impolite and even embarrassing to decline the gift, what should I do?

A:

If the situation makes it difficult to decline the gift, you may accept it, but make sure that you file a written report to the General Counsel immediately thereafter. The gift should then be considered as a gift to KA and not a personal gift to you and be sent to the KA corporate headquarters.

Hospitality

KA Personnel should never accept or offer entertainment or hospitality that is excessive. Ordinary meals, such as lunch or dinner in a business setting are however permitted provided that it is customary, generally accepted in KA and accepted in the local business community.

KA personnel may offer and accept invitations to sport events, cultural events and similar events to the extent that this is customary and generally accepted in KA and in the local

business community. However, it is a condition that all such invitations accepted by or offered to KA personnel must be pre-approved in writing (e-mail) by a member of KA's Global Leadership Team.

Travel and accommodation for KA Personnel paid by others, except in connection with provision of services to customers, and the offering of travel and accommodation to Non-KA personnel at KA's expense must be pre-approved by KA's CEO.

PRACTICAL EXAMPLE

HOSPITALITY

Q:

A construction firm is bidding for a contract for extension of one of KA's manufacturing plants. The representative of the construction firm invites you to come to see a similar building erected by the construction firm in another country as an example of the construction firm's capabilities. Airfare, accommodation and meals will be covered by the construction firm. Could a KA employee accept the invitation?

A:

No this would be considered as a bribe. The invitation should be declined. Further; the attempted bribery should be reported to the KA General Counsel.

Please note that particular rules apply for the offering of gifts and hospitality to governmental officials. This follows for example from the US Foreign Corruption Practices Act ("FCPA"). Gifts must not be offered to governmental officials and hospitality must be limited to what is strictly necessary for the conduct of business, like the serving of food in a break during a lengthy meeting and must be modest. Please also note that the term "governmental official" includes not only employees of public authorities but also employees of commercial companies owned or controlled by a government. The FCPA also applies to activities outside US territory by entities and individuals that have a connection to USA.

WE UNDERSTAND THE RULES ABOUT DOING BUSINESS WITH GOVERNMENTS

The sale of goods to customers owned by a government is heavily regulated by laws of several countries and your work with government owned entities follow stricter rules than sales to commercial customers. If you work with governmental customers, you have a duty to know and comply with the applicable laws and regulations and comply with the highest standards of integrity and avoid even the appearance of impropriety.

Note also that particular rules may apply to gifts and hospitality to governmental officials. Hospitality must be reasonable and legal and should never be offered to influence an official decision.

Payment directly or indirectly to governmental officials, their family members, intermediaries or closely related individual or company is strictly prohibited.

WE ARE COMMITTED TO FIGHT FRAUD

KA does not accept any form of fraudulent acts. Misrepresentation, cheating, stealing and deception are examples of fraudulent acts and have no place in a company that values integrity.

Fraud also includes preparation of documentation that conceals or misrepresents facts.

Other examples include false or misleading expense reports or timesheets, dishonest accounting practices, and misappropriation or misuse of company property.

Fraud awareness

Like most international companies, KA experiences from time attempted fraudulent scams whereby third parties try to swindle money from the company. These frauds are becoming more and more sophisticated. In a number of cases, persons alleging to be officers or executives of KA have contacted KA entities by mail or phone and given false instructions about payments or alleged transactions. In most cases the instructions appear to be "exceptional", "urgent" and required to be kept "confidential without involvement of anyone else" including top management.

It is the obligation of all KA personnel to keep a high degree of awareness and vigilance with regard to such activities; this is simply a part of protecting KA's assets. When something happens which is out of the ordinary; always ask some extra questions and contact senior personnel in KA to verify whether the alleged instruction is real or not.

WE DO NOT TRADE ON INSIDE INFORMATION

You may from time to time be exposed to information concerning the company, its customers, suppliers and business partners that is not publicly known and is not available to the public and which potentially may influence the pricing of the KA shares. "Inside Information" can be defined as information related to a company that is not generally known or available to the public, which would be likely to influence an investor in the decision to buy, sell or retain shares.

Trading in shares and other securities in public, listed companies like KA based on Inside Information is illegal and can be subject to prosecution. KA personnel must therefore not trade in KA shares while in possession of Inside Information. The same applies for the spouse, co-habitant, family members or anyone else with whom you may be closely related. Passing along Inside information or a "tip" on trading

PRACTICAL EXAMPLE**WE ARE COMMITTED TO FIGHT FRAUD****Q:**

When I travel on business I often meet my brother who happens to live in the same area as a KA location. When we recently had a meal at a restaurant, he suggested that I claim both his meal and my own as travel expenses. This would, according to him, be a reasonable compensation for all the time I have to spend away from home. Would this be acceptable?

A:

No, this would not be acceptable. Your brother's meal is not business related. You have a responsibility to be honest and accurate on expense reports.

in the shares is also illegal. You must therefore also abstain from rendering advice on the KA shares in periods when you are in possession of Inside Information.

The above applies to all KA employees, officers and directors, regardless of position.

Some examples of Inside Information:

- Contract awards
- New significant projects for development of technologies and products
- Claims against the company
- Financial information such as unpublished results, future earnings or losses
- The gain or loss of a major customer or supplier
- Proposed mergers, acquisitions or divestments

KA will implement a stricter trading policy for KA Personnel in certain positions that are more likely to be exposed to Inside Information than others; for example employees who have access to the KA's financial information and personnel designated by primary and secondary insider lists.

WE COMPLY WITH IMPORT AND EXPORT REGULATIONS AND TRADE COMPLIANCE LAWS

Most countries have import and export regulations to protect their products and technologies. These laws regulate where KA may sell its products, share its technologies and with whom we can conduct business. We are required to comply with all applicable laws, regulations and restrictions in the import and export of products, services information and technologies, and trade compliance laws wherever we operate in the world. This includes without limitation laws and regulations related to export control, trade embargoes, economic sanctions, and country of origin marking.

It is important to understand that for some transactions the laws of more than one jurisdiction may apply. For example, the US places controls on certain products and technologies that were developed in the US, regardless where in the world the items may be located. Many countries place additional restrictions on items and related technical data designed for military and defense purposes.

PRACTICAL EXAMPLE

WE DO NOT TRADE ON INSIDE INFORMATION

Q:

I learned that KA is in negotiations with another public company regarding cooperation on development of new technologies. If the negotiations are successful, the cooperation will have significant positive effects for both companies. Can I a) buy shares in KA and b) buy shares in the other company?

A:

No, the information about the discussions must be considered Inside Information, you can therefore not buy shares in either of the two companies as long as the discussions regarding the cooperation are ongoing. This applies until the cooperation is either appropriately made public to the market or the discussions with the business partner are finally terminated without leading to any form of cooperation.



Respect for others

WE TREAT EVERYONE WITH RESPECT

Every person acting on behalf of KA must conduct his or her business and generally behave impeccably towards business associates, colleagues and others. Representatives of KA must treat everyone politely with respect and honesty and act with respect for foreign cultures and customs. KA does not accept any form of harassment, discrimination or other behavior that colleagues, business associates or others may regard as disrespectful, threatening or degrading and such actions may be illegal in some countries.

WE EMBRACE DIVERSITY

KA represents a blending of individuals with a diverse set of experiences, cultures and backgrounds. We appreciate and celebrate our diversity everywhere we operate in the world. We take care to extend understanding, respect and inclusion to everyone in the KA team.

WE PROMOTE EQUAL OPPORTUNITY AND FAIR TREATMENT

KA is committed to equal opportunity and fair treatment. Discrimination on basis of an individual's race, color, religion, sex, age, national origin, ethnicity, disability, and sexual orientation is prohibited within KA and is prohibited by law in many countries. This commitment is reflected in KA's employment practices and decisions regarding recruitment, hiring, training, promotion, compensation and benefits, which must be based solely on the individual's qualifications and work performance.

KA complies with applicable civil rights, human rights and labor laws in the locations where it conducts its business. We require that all KA employees must have a clean and safe working environment. Regardless where you work you are prohibited from engaging in practices that violate individual dignity and respect even if the activity is not prohibited under local law.

WE DO NOT TOLERATE HARASSMENT

Everyone has the right to a harassment-free working environment and in many countries harassment is illegal.

KA is obligated to maintain a work environment where everyone can do their jobs undisturbed by harassment and other inappropriate behavior. At KA facilities worldwide, we are expected to treat each other with dignity and respect and to speak up immediately about any behavior that creates intimidating, hostile or an offensive work place.

Harassment includes any unwelcome physical, verbal or visual contact and in particular, comments and communication based on a person's race, color, religion, sex, age, ethnicity, national origin, citizenship status, disability, sexual orientation or any other relevant status.

Abusive language, aggressive or disorderly conduct, threats or intimidation may also be forms of harassment and should be promptly reported whether directed at yourself or someone else.

Sexual harassment is also strictly prohibited in KA and includes acts and verbal communication with a sexual content towards any person of the same or opposite sex, including unwelcome sexual advances, comments, requests for sexual favors as other physical, verbal or visual conduct.

The harassment free principles apply on all KA facilities and wherever KA personnel conduct their work and in settings related to KA such as social gatherings arranged by KA. Further, we must show the same respect for our business associates such as customers, suppliers, agency supplied personnel as for our own colleagues.



PRACTICAL EXAMPLE

WE DO NOT TOLERATE HARASSMENT

Q:

Are comments and jokes with a sexual content acceptable between colleagues if everyone is in on it and no one complains?

A:

Be careful, you should be aware that tolerance varies a lot from one person to the next, even where this behavior does not violate the law, people may feel uncomfortable even if they do not object to the behavior. Such communications should therefore be avoided.

WE WORK TO MAINTAIN A SAFE WORKPLACE

KA is committed to keeping you safe while working for us. Our commitment is not only to meet the standards determined by applicable laws and regulations, but to exceed these because safety is one of the most important benefits we offer to our employees and their families. Our goal is to be an industry leader in safety by keeping everyone injury free at all locations.

We therefore insist on strict safety policies and encourage you to take an active role in ensuring your own safety by complying with all workplace safety rules and observing safe practices when operating machinery and equipment, obeying posted warning signs and restrictions, and wearing approved personal protective equipment whenever required. You further have a responsibility to immediately report any safety related issue including accidents, injuries and near hits to your supervisor or HSE manager.

EXAMPLE

WE WORK TO MAINTAIN A SAFE WORKPLACE

Unethical behavior that can affect personal safety:

- My production supervisor told me not to report a workplace injury to the plant HSE responsible.
- Equipment recently transferred from another plant is missing a safety guard but is put into operation as we are on a tight schedule and cannot wait for one to be provided and installed.



WE PROMOTE A SUBSTANCE FREE KA

Substance abuse can negatively affect job performance, create safety hazards and put yourself, co-workers and others at risk.

KA has therefore put into place the following requirements:

- The use and possession of illegal drugs or other controlled substances (including marijuana, even if legal) in the workplace is prohibited. Prescription medications prescribed by a doctor are permitted provided they are used in accordance with the relevant prescription and you can perform your work in a safe and efficient manner.
- KA does not accept the use and possession of alcohol in the workplace unless specifically approved by the highest ranking management employee and the human resources manager at your location.
- Under no circumstances may anyone under influence of alcohol or drugs demonstrate or operate any vehicle, machinery or other similar device.
- Where serving of alcoholic beverages is approved, everyone must comply with all appropriate regulations regarding serving and use of alcohol and use good judgement to ensure there is no excessive drinking or intoxication.
- Being under the influence of illegal drugs or other controlled substances on the job is prohibited.
- Smoking of cigarettes, cigars or other forms of smoking is restricted to particular areas designated by the company for such purposes.

WE ARE CAREFUL IN OUR COMMUNICATION AND USE OF SOCIAL MEDIA

KA's reputation and its brands are valuable assets. We must therefore be careful how we refer to KA in public. As a listed company, there are also legal requirements that must be followed in terms of when and how company information should be communicated. It is therefore important that KA Corporate Communication coordinate all external communication. Therefore, in the event where you are contacted by the press or others asking for information about KA, you should refer them to KA Corporate Communication.

Use of social media offers an opportunity for KA to market itself and enhance its brands. Social media can also be used to build stronger internal and external relationships to employees, customers, suppliers and shareholders, and further as a

tool for recruiting; to attract talent for positions in KA. Note however, that the same rules apply for use of social media as for all other communication; all information about KA must be approved and coordinated by KA Corporate Communication. You may therefore not write about KA on Facebook or similar social media. This applies for all forms of information, hereunder for photos and videos of KA products and from KA facilities. Excepted from the above restriction for use of social media are professional networks like LinkedIn.

In your communication, you must not:

- Make maliciously false, slanderous, harassing or discriminatory comments which violate our policies regarding KA, its employees, customers or suppliers.
- Disclose confidential or proprietary business information such as technical specifications, development of new products and technologies, financial information etc.
- Disclose personal information on any KA employee, director or officer.
- Use company logos, trademarks or company names or post pictures of yourself wearing company uniform on social media.
- Use a company e-mail address to register on social media sites
- Always remember that you are responsible for the information you post online. The laws and policies that apply to your everyday activities also apply to your online activities.

WE RESPECT DATA PRIVACY

The increasing use and dependency on information technology when conducting business today raises many questions concerning the right of individuals to determine how their personal information may be used. During the course of KA's activities we will collect, store and process personal data about our employees, customers, suppliers and other third parties, and KA recognizes that correct and lawful treatment of this data is of utmost importance. Therefore, KA is committed to comply with applicable personal data protection regulations where we operate. We will process personal data in accordance with the guiding principles for data processing as laid down in the General Data Protection Regulation (EU) 2016/679 (hereinafter "GDPR"). Hence, any processing of personal data must be:

- (a) Processed fairly and lawfully.
- (b) Processed for limited purposes and in an appropriate way.



- (c) Adequate, relevant and not excessive for the purpose.
- (d) Accurate.
- (e) Not kept longer than necessary for the purpose.
- (f) Processed in line with data subjects' rights.
- (g) Secure.
- (h) Not transferred to people or organizations situated in countries without adequate protection.

To ensure consistent treatment of information related to individuals through-out KA, "Personal data" in the Code has the same meaning as defined in the GDPR, i.e. "any information relating to an identified or identifiable natural person".

Examples of Personal data are:

- Name
- Photograph of an individual
- E-mail address
- Phone number
- Social security no
- Employment no
- Car registration plate no
- GPS location
- IP-number in devices and computers

KA may from time to time transfer personal data we hold to a country outside the European Economic Area ("EEA"), provided that one of the following conditions applies:

- The jurisdiction in which the recipient is located is deemed to provide an adequate level of data protection by the European Commission;
- The data exporter puts in place appropriate safeguards, such as, but not limited to, Binding Corporate Rules or Standard Contractual Clauses adopted by the European Commission or by a national authority and subsequently approved by the European Commission; or
- A derogation or exemption under the GDPR applies.

PRACTICAL EXAMPLE

WE RESPECT DATA PRIVACY

Q: As an employee of KA I wonder what kind of personal data the company possess about me and for what purpose(s)?

A: In general, the main reason why KA possesses personal data of its employees is to fulfil its legal and contractual obligations towards them. For example, in order for KA to pay salary to the employees, the company must collect and store information about the employees' name, address, social security number, bank account, log hours at work, etc. Another important reason for processing personal data of employees is to comply with mandatory legal reporting requirements. By way of example, it is necessary for KA to possess employees' names and social security number in order to file accurate income reports to the national tax authorities.



Accountability

WE AVOID CONFLICTS OF INTERESTS

KA Personnel may not have any interests that may actually, or be perceived as being in conflict with the interests of KA. It is important that all decisions made by KA personnel are made objectively and based solely on the best interests of KA without considerations to the personal interests of KA personnel or their relatives. Avoiding conflicts of interest means avoiding situations that conflict or appear to conflict with advancing KA's interests or its reputation. While it is not possible to list every situation that could represent a conflict of interest, there are certain areas where conflicts typically arise:

Outside Employment

Working for KA competitors

KA personnel may not work for any competitors of KA. You must immediately report to your manager, Corporate HR and the General Counsel if your spouse, co-habitant or immediate family member or anyone living with you works or has temporary assignments with a KA competitor.

Working for a supplier, service provider or customer of KA

These situations would be potential conflicts of interest and are not allowed. Exceptions require the prior approval by Corporate Human Resources and KA General Counsel. Under no circumstances may KA employees be involved in any procurement process where they have personal interests. KA personnel must further immediately notify their managers and corporate HR if a spouse, co habitant, immediate family member or anyone living with a KA person works for a company with which KA does business.

Working for a non-competitor of KA

KA personnel must avoid any part time employment, outside business or consulting activities that would detract the employee's time, interest or talent in KA's business. Before you accept such employment, you must obtain approval from your manager and Corporate Human Resources.

Joining a Board

KA personnel may not serve on boards if the directorships conflicts with the responsibilities as a KA employee. In general, KA personnel may serve on boards that do not share the same interests as KA, for example religious, charitable, educational or family foundations. Memberships of other boards require prior approval from the Corporate Human Resources. KA directors, Vice Presidents, Presidents and officers may not accept board positions without prior approval by the General Counsel and CEO.

Personal Relationships

KA discourage having relatives employed in the same departments or functions and close relatives are not permitted to report to each other, either directly or indirectly. The same principle applies to people who share a close personal relationship. Close relatives of directors and officers may not be employed by KA unless proper disclosure are made and approval obtained from Corporate Human Resources. KA personnel may not be involved in procurement of goods or services if a close relative is employed by or has other interest in the supplier, contractor or consultant.

PRACTICAL EXAMPLES

PERSONAL RELATIONSHIPS

Q:

I am considering establishing a small company together with some friends and former KA colleagues. The business idea is to make prototypes for mechanical products. Would it be acceptable to establish the enterprise and to offer its services to KA?

A:

First of all you and the other KA employees would have to seek the approval from your manager and Corporate Human Resources before you become involved with the establishing of the new company.

The offering of services to KA must be considered as a potential conflict of interest. Your role must be appropriately disclosed to your manager and require prior approval from Corporate Human Resources and the General Counsel.

Q:

The company where my husband works is bidding for a contract with KA, but it is for another department, one where I do not have any decision making authority, do I need to disclose it to my superior?

A:

Yes, even though you might not have any direct control over the outcome of the bid, the fact that your husband has connections to the company might give the appearance of a conflict of interest.

WE PROTECT KA ASSETS AND PROPERTY

It is the responsibility of all KA personnel to ensure that company assets are used for the company's business in accordance with KA's policies and guidelines and to protect them from damage and misuse. Company assets consist of everything KA owns including:

- Financial assets – cash, bank accounts and credit standing
- Physical assets - KA facilities, vehicles, equipment and inventory.
- IT/IS related assets – computer hardware, software and information systems including data they create, transact and/or store.
- Intellectual property rights.

All KA personnel have an obligation to protect KA information systems. Do not download, copy, install, implement or share software unless you have received permission from the software provider, for example through a license agreement, and the license is expressly approved by KA IS/IT department. Illegal downloads and distribution of software may violate intellectual property laws and expose you and KA to risk. This applies even to so-called "Free-ware" or "Shareware" available on the internet free of cost. This is prohibited because such software may contain code licensed under one or more Open Source licenses, which may require KA and its customers to disclose their source code, including modifications and derivative works of the software developed under such Open Source license, to third parties upon demand. Use of "shareware" may even threaten KA's intellectual property rights as the use could open up unintended licensing rights. Do not enter into contractual obligations related to IS/IT tools or services without prior review and approval by IS&T department.

Further, take care to prevent theft, loss or unauthorized use of company equipment like laptops, smart phones and electronic information and systems by appropriate physical security measures.

You may use KA IT equipment limited for personal use provided that:

- Your use is limited.
- The use does not comprise any commercial activity such as selling of products or services that is not part of KA's business.
- It does not affect your ability to get your job done, or prevent others from doing theirs.
- It does not result in any incremental cost to KA.
- The use complies with the Code, KA policies and applicable law.
- You don't disclose any information that is proprietary or confidential to KA or its business partners.

For further guidance, refer to the following Agreement, Policy and Procedure which are mandatory to all KA personnel: FO-IT-001-KA IS&T Appropriate Use Agreement, PR-IT-004-KA Management of IS&T Business Systems and PR-IT-001-KA IS&T Information Security. All can be accessed on KA DMS via KAI.

PRACTICAL EXAMPLE

WE PROTECT KA ASSETS AND PROPERTY

Q:

Is it acceptable to use the KA e-mail to correspond with family and friends?

A:

Incidental use of the KA e-mail for private purposes is acceptable. Remember however that the e-mail account may be accessed by KA and that KA cannot guarantee privacy.

Q:

The municipality where I live has rejected my application for a building permit to extend my house. Is it acceptable that I use the KA e-mail when I file the appeal to the administrative appeal body

A:

No, you should not involve KA in a formal process where KA is not a party.

Q:

I see that some of my colleagues bring office supplies home for private use, is this acceptable?

A:

No, this is not acceptable; the total cost for KA would be significant if all employees did the same, in fact, this is actually theft; speak up and stop the practice.

Q:

I am going to move some large furniture from my home as my son is moving to a new flat, is it ok that I use the company van?

A:

The local KA plants and companies may allow limited use of company vehicles for private purposes. Make sure you have an express permission in advance from the manager who is responsible for the vehicles. Note that the use is restricted to short time and distances. You must also pay for the consumed petrol and make sure that the vehicle is returned in the same condition as when you took it over.

WE SAFEGUARD COMPANY INFORMATION

KA's knowledge base is the most important and valuable asset of KA and each employee of KA has a responsibility to protect it. KA's technical and commercial information that is not generally known by others is valuable and gives the company a competitive advantage. The information must therefore be kept confidential and not shared with anyone. This applies also in relation to colleagues who do not have a need to know the information in their performance of their work. The information must further be protected by appropriate physical measures and compliance with applicable IT procedures.

All employees have a further obligation to safeguard personal information about fellow employees, employees of customers, suppliers and other companies with whom we do business.

The obligation to protect confidential and proprietary information applies even after the end of the employment with KA.

Particular care should be taken with regard to information that is protected by particular non-disclosure agreements and other confidentiality obligations that follows from KA's contracts.

Information of a confidential nature belonging to other parties that inadvertently comes into our possession should be handled with care. Such information must not be used by KA and measures should be taken to prevent further distribution and disclosure.

Examples of confidential information:

- Agreements between KA and our employees, agents, strategic partners or other third parties.
- Trade secrets, development projects for new products and technologies.
- Inventions and unfiled patent applications.
- KA financial information.
- Unpublished information on new products.
- Customer lists and agreements.
- Employee information.
- Customer information entrusted KA.

PRACTICAL EXAMPLE**WE SAFEGUARD COMPANY INFORMATION****Q:**

My colleague used to work for one of KA's competitors before joining KA, is it acceptable for him to talk to his team in KA about technical data he developed with his former employer?

A:

No, he has an obligation to protect the proprietary information of his past employer – the obligation did not end when he left his previous employer and it would be inappropriate of KA to use such information.

WE ARE ACCURATE IN KEEPING OUR BOOKS, RECORDS AND DOCUMENTATION

KA is committed to transparency and accuracy in all the company's dealings. KA Personnel must ensure that no documents or representations are made that are false, misleading or misrepresenting actual facts. All business transactions must be properly and accurately recorded in KA's books and records, which must be safely stored for such periods of time as determined by KA's policies.

Accurate financial records are required to fulfil legal requirements, our obligations to shareholders and governmental authorities.

Requests for documentation from Governmental Authorities.

Governmental authorities may from time to time issue requests for particular documentation or information. Such requests for financial information and documentation must be directed to the CFO. Requests for other information should be directed to the General Counsel.

Legal Hold Notices

In situations where KA may be involved in legal processes or subject to public inquiries, the management may send out Legal Hold Notices. These notices mean that the document retention policy should be suspended until further notice and that all documentation that are comprised by the defined scope of the notice must be retained in a safe manner and kept available.

EXAMPLE

WE ARE ACCURATE IN KEEPING OUR BOOKS, RECORDS AND DOCUMENTATION

It would not be acceptable to:

- Prepare incorrect or incomplete documentation for goods that must be exported in order to "ease" the customs clearance.
- Provide a reference for a former colleague where his competences are exaggerated in order to make it easier for him to get a new job.
- Book purchased test equipment for our lab as consumables because there are no funds available in the budget for test equipment.

For further information on records and record retention, please see procedure PR-42-002-KA Control of Records and Records Retention.



Innovation and Creativity

WE THINK CREATIVELY AND PROMOTE IMPROVEMENTS IN ALL ASPECTS OF OUR WORK

Innovation is not restricted to engineering. We all need to think creatively and to continuously improve in our work to become faster, smarter and better in order to deliver innovations to our customers. As a general rule, the innovations, software codes, technical improvements, system or product designs and enhancements that you develop while employed at KA, whether technical or not, are the sole property of KA. You are required to disclose all such materials and ideas to KA.

WE PROTECT KA'S PROPRIETARY INFORMATION, IDEAS AND PLANS

Innovations, concepts and improvements must be considered by the KA IP & Law department in order to determine how the intellectual property can best be protected by patents and other legal remedies. In the event that a patent application is not yet filed, or that KA should not find it beneficial to apply for patent protection for an innovation, one should ensure that the ideas and innovations are nevertheless protected by other means, for example by the use of Non-Disclosure Agreements.

You must therefore never disclose innovations or new ideas to customers or third parties without first making sure that there are adequate protection in place for the information you will disclose.

In the same way KA seeks legal protection for its own intellectual property, KA is determined to respect to intellectual property of third parties. Therefore before developing new inventions, concepts and ideas, make sure that appropriate patent clearance is performed by KA IP & Law.



KA in the society

WE CONDUCT OUR BUSINESS IN AN ENVIRONMENTALLY RESPONSIBLE MANNER

We are committed to minimizing the impact of our activities on the environment. We conduct our business in compliance with all applicable environmental laws and regulations. We strictly comply with all terms of all environmental permits and authorizations. We do not allow unlawful or unpermitted discharge of waste of hazardous substances, wastewater or air emissions.

As you perform your work at KA, you are encouraged to seek solutions that improve performance and reduce the environmental impact of our operations and if you become aware of, or have reason to believe that there are any actual or potential environmental hazard, it is your responsibility to immediately notify your supervisor, HSE responsible or plant manager.

WE RESPECT HUMAN RIGHTS

KA is committed to human rights for all people in the world and comply with employment laws in the markets where we operate.

Child Labor and Forced Labor

KA supports the United Nations convention on the Rights of the Child stating that all children have the right to leisure and education. KA must therefore not use children below the age of 15 years as part of its work force except as part of governmental approved work training, apprenticeship or similar programs, which beyond doubt would be clearly beneficial to the participants.

KA will not accept employment or engagement of people against their own free will nor should employees be required to lodge “deposits” or identity papers in connection with employment.

KA complies with the UK Modern Slavery Act. KA must require that all its suppliers adhere to the same principles.

Freedom of association

KA respects the rights of all employees to join an association to represent their interests as employees, to organize and to bargain collectively or individually. KA respects recognized unions. An employee's right to refrain from joining a trade union is equally respected.

Political activities and contributions

KA is politically neutral and will not contribute to any political party or politician. No KA Company brand name or logotype name is permitted to be used in political campaigns or for the benefit of a specific political interest.



No Rights Created

This Code is a statement of certain fundamental principles for KA, policies and procedures that govern KA and KA Personnel. For the avoidance of doubt, this Code does not create any

rights for any customer, supplier, competitor shareholder or other person or entity.



Reporting a concern

It is the obligation of all KA personnel to report violations of the Code. Improvements can only be made if unsatisfactory issues are brought to the attention of the right authority within the company.

KA expects all KA Personnel to follow the procedure for reporting if they have reason to believe that the Code is not fully complied with.

KA Personnel who in good faith report concerns about compliance with this Code, applicable laws and KA policies to a relevant body within KA will be protected against any sanction from KA and KA Personnel. It is a violation of the Code to discriminate, retaliate against or harass anyone for making a report in good faith. However, anyone submitting a false report with the obvious intention to harass, may be subject to disciplinary action.

HOW TO REPORT A CONCERN:

Your (direct) manager

The first person for KA Personnel to approach when raising a concern is your direct manager. If this is not possible or you do not feel comfortable doing so, please feel free to raise questions using any of the channels described below.

Corporate Contact Persons

It is also possible to directly contact Reports on issues relating to the Code may be sent to KA's General Counsel, EVP Human Resources or Chief Finance Officer.

You may also report through the following channel that goes to an external, neutral service provider who will ensure that the report will be handled appropriately and that the person reporting the issue will be protected in accordance with the Code.



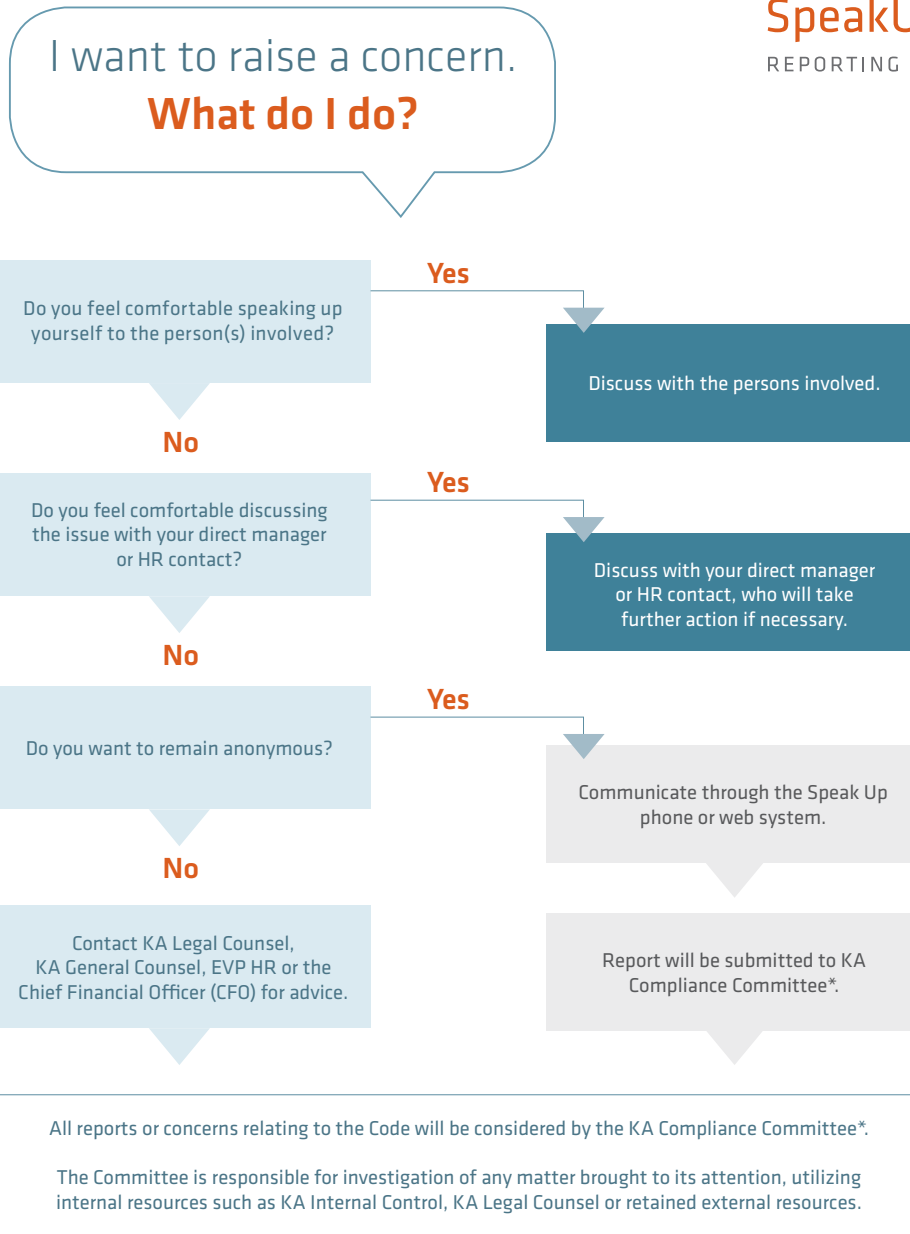
SpeakUp®

In case you suspect misconduct and genuinely believe that the matter cannot be dealt with through any of the above channels, you can use SpeakUp. This communication tool gives you the opportunity to raise concerns confidentially, anonymously, and in your own language. SpeakUp is run by an independent service provider and is available 24/7/365.

HOW DOES IT WORK:

You can choose to leave a message online via web, or via a free phone number. When calling the number, there is an

automatic menu that allows you to leave a message in your language – no one will answer the phone. When you leave your message, you will receive a personal 6 digit case number that you must remember. The KA Compliance Committee receives your translated message within one working day, and will be able to further confidentially communicate with you via SpeakUp®. It is important that you return to SpeakUp® using your 6 digit case number, so you can follow-up on your case and read the reply that was left for you. It is also possible to upload documentation into SpeakUp®.



* The committee consists of the KA Chief Finance Officer, EVP HR and General Counsel.



All reports or concerns relating to the Code will be considered by the KA Compliance Committee, which consists of the KA Chief Finance Officer, EVP Human Resources and General Counsel. The KA Compliance Committee will be responsible for investigation of any matter brought to its attention utilizing internal resources such as KA Internal Control, KA Legal Counsel or retained external resources.

Any questions concerning the code of conduct?
Please feel free to contact any KA Legal Counsel
for advice:

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