

Code of Conduct

Adopted June 1, 2024.

Last approved by Grant Thornton Sweden AB's board of directors August, 25 2026.

Effective September, 1 2026.



Together into the future

“When we say in our vision that we create the future together with our clients, we mean exactly that – we will grow entrepreneurial companies and evolve with them. To achieve this, we work together towards clear goals and shared values. We challenge, support and uplift each other, and embrace the diversity of perspectives within Grant Thornton.”

Henrik Johansson, CEO





Our vision

Together with entrepreneurial companies, we create the future

At Grant Thornton Sweden AB and its subsidiaries (“Grant Thornton”), we recognise the value of a strong business community, where we can and want to contribute to sustainable growth. With expertise and dedication, we guide our clients in an increasingly complex world. As auditors and consultants, value creation and quality are at the heart of what we do – when we work with entrepreneurial companies, we foster relationships and businesses that drive sustainable growth, with increased credibility and competitiveness.

We are strong in our commitment and strive to embody something distinct: a business ethos that considers the whole picture – where people, the environment, and the business synergise in an unbeatable combination. This approach allows us to create value for all our stakeholders: customers, employees, owners, and society.

Overall, we aim to be a role model and a game changer. We strive to develop our company so that it can be proudly handed over to the next generation.

Grant Thornton's Code of Conduct: For you and for us

Grant Thornton's Code of Conduct is a compilation of ethical rules and expectations. It is based on our success factors and the principles of the UN Global Compact concerning human rights, labour conditions, the environment, and anti-corruption. The Code of Conduct forms the foundation for our activities and defines the framework for how we are expected to act in our relationships with clients, business partners, employees, and other stakeholders. Grant Thornton's Code of Conduct applies to all employees.

We operate in a complex and increasingly globalised business environment and regularly face challenging situations and difficult choices. By acting with integrity, honesty, and professionalism, we contribute to the creation of long-term relationships and a strong brand. Our Code of Conduct serves as a shared ethical compass, providing support when we encounter challenging situations and difficult choices, and is supplemented as needed by additional internal rules and procedures. We recognise our role in acting responsibly to contribute to society and sustainable development.

As a co-worker, you are expected to:

- Read, understand, and adhere to the Code of Conduct
- Stay informed and updated on policies and instructions as well as other governing documents (see the Policy Hub under Know)
- Report deviations from the Code of Conduct, incidents, and/or irregularities. The company's whistleblower channel allows for anonymous reporting
- If the Code of Conduct and other governing documents do not provide sufficient guidance, contact your manager or QRO

If you are a manager or partner, you have a special responsibility to ensure that the Code of Conduct and our governing documents are applied in daily operations.

For Grant Thornton, the Code of Conduct is essential. Serious deviations from the Code of Conduct or other governing documents may lead to disciplinary or legal actions. Grant Thornton has a specific Supplier Code of Conduct that outlines the company's requirements and expectations on suppliers.

Success factors

As the world around us changes, we must continually challenge and develop ourselves. Our culture is built on having leaders and co-workers who are willing and brave enough to drive change.

We operate in a complex external environment and need to understand and comply with its conditions. Providing a positive client experience, collaborating, and creating an inclusive culture, as well as continuously learning and developing, are crucial for our success and achieving our vision. These are central aspects of leadership at Grant Thornton. We also actively work to enhance our value-driven approach, self-leadership, and inclusive leadership.

The foundation of our culture and actions is based on our four success factors:

- **Building good relationships.** We invest time and commitment in all our relationships and see differences as strengths. We offer and ask for continuous and direct feedback.
- **Innovation and improvement.** We are curious about our external environment and what our clients do and allow ourselves to be challenged to find new ways to create value. We are driven by continuous development and take responsibility for the company's development and our own learning.
- **Taking responsibility.** We are professional in our client interactions, consider issues from the client's perspective and always deliver high quality. We have a clear vision, which we use to create consensus and work together to succeed.
- **Joy in everyday life.** We maintain an open mindset where we inspire each other and allow ourselves to be inspired. We are unpretentious, show care for one another, and have fun together.

“The quality of our consulting services is essential to build the long-term sustainable customer relationships we strive for. As the external environment becomes increasingly complex, we choose to in a clear way combine our specialist expertise with a high awareness of risk, compliance, and ethics. In this way, we also shape our culture, which is characterised by professionalism, trust, and quality.”

Annika Odelros
Chief Quality & Risk Officer



Professionalism

Our company is built around our clients, and our success depends on theirs. We are driven by creating client value and consistently delivering high quality.

We build networks that share insights, ideas, and resources to unlock growth potential. We believe that business relationships founded on openness, honesty, and trust create growth and value for clients, co-workers, suppliers, and society.



How we work with a safe and open process for collaborations:

- **We prioritise long-term, sustainable relationships** where trust is based on exemplary conduct and considering both the client's and our company's best interests. We remain alert to potential conflicts of interest and take measures to address any missteps that may occur.
- **New clients and engagements** are approved through internal processes that consider ethical, legal, and regulatory requirements. No client relationship is more important than our company meeting its high standards of ethics and independence and safeguarding our company's reputation.
- **We are transparent and open** with intentions and information as much as possible without hindering operations. Marketing and sales activities describe our services in a legal, fair, and honest manner. The use of Grant Thornton's brand should be consistent and correct.
- **We document client and engagement-related information** in accordance with both external and internal requirements and expectations.

"I strive to create involvement in all client projects and offer the client a team with diverse expertise and many points of contact. Involving more people in our work with clients makes us stronger and enhances our ability to help our clients with their challenges and create sustainable growth. Additionally, we learn from each other and develop in our roles."

Fredrik Wikner
Partner Assurance

We reduce climate impact

We contribute to minimising climate change through both the projects we undertake for our clients and through our supply chains and own business activities.

We aim to set an example and share our commitment and knowledge with the world around us. By doing so and acting with environmental consciousness, we can inspire others so that together we can promote sustainable growth and societal value.

Our approach:



We aim to **utilise our role in the climate transition** for Sweden's entrepreneurial businesses by assisting our clients in avoiding climate-related risks and capitalising on emerging opportunities. Advisory services and quality assurance/audit are central to our efforts to reduce our clients' climate impact.



We work continuously to **limit our carbon emissions** throughout our value chain. We set annual goals that we monitor and use to inform our decisions.



We select suppliers who **share our vision of a sustainable future** and who operate according to our Supplier Code of Conduct.



We contribute to **slowing down climate change** and creating better conditions for the next generation. This includes considering environmental perspectives in all our decisions, particularly regarding business travel, material choices, and energy use.



We use our **experience, expertise, and networks** to share ideas, resources, and insights that generate sustainable growth.

We put people first

For us, it goes without saying that all people have equal value. All our co-workers contribute with their knowledge and skills.

We work together to continuously develop ourselves and our company and to contribute to our clients' sustainable growth. We expect our approach to be respected by our business partners.

Our approach:



We have an **inclusive corporate culture where we trust and respect each other** for who we are as well as for our qualities, experiences, knowledge, competencies, values, and skills.



We care about, and actively work for, the **health, work environment, and safety** of our employees, both at our offices and at our clients' sites.



We **embrace differences** and encourage diversity, collaboration, and the sharing of ideas, knowledge, and expertise to create valuable solutions, for our clients and ourselves. We recognise individual capabilities and support personal development.



We offer modern, **flexible working methods** that promote collaboration, learning, and development, creating conditions for employee well-being and a sustainable work life.



We **respect human rights** within our own operations as well as through our business relationships.



All co-workers should be able to **participate in and influence their work situation** and contribute to the company's development. Employee influence is created through collaboration and dialogue.



We have **zero tolerance for harassment or discrimination**, whether through active or passive actions. As a company, we actively work to prevent this and address any situations of violations.



We support our customers in being **good employers** who comply with laws and regulations and offer developmental, fair, and safe working conditions.

We take responsibility in all respects

The foundation of our business is good business practice, and as an authorised audit and consultancy firm, we follow a comprehensive regulatory framework aimed at ensuring independence and quality. Responsible consulting is crucial to our trustworthiness as advisors.

We assist our clients with knowledge, insights, and sustainable, forward-looking consulting services. Through responsible actions, we create and maintain trust, relationships, and a good reputation. High trust capital also demands that we conduct ourselves appropriately outside the workplace, such as at conferences, training sessions, business trips, or when communicating on social media. All employees are part of our brand experience and should act as ambassadors to maintain and strengthen our company's trust and reputation.

Our approach:



We **comply with the laws and regulations** in the countries where we operate. We consider both external and internal requirements and expectations, as well as our ethical principles and values, in our governance and assignments. We identify changes through external monitoring, and continuous information and training initiatives ensure that employees maintain up-to-date knowledge and a high degree of awareness.



We **compete fairly and honestly**. We exchange information or enter into agreements and contracts with competitors, clients, or suppliers only if it can be done without unduly affecting the market or the outcome of a tender process.



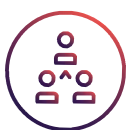
We **generate societal value**. We are engaged in community matters and share our knowledge and insights in an objective and factual manner without political bias.



We strongly **oppose all forms of illegal, unethical, and unsustainable business practices, including corruption and bribery**. Our decision-making processes are characterised by awareness and transparency to uphold our objectivity.



We provide clients with advice and expertise that help strengthen the business community's ability to **combat economic crime** and address common societal challenges.



We **protect information and personal data** of our clients, co-workers, and suppliers.

We use the following questions in our daily work:

In some situations, practical guidance is needed for us to make the right decisions. If you find yourself in such a situation or are unsure of what to do, ask yourself:



Is it legal and ethical, and does it comply with the rules of independence and business ethics in audit and consultancy services?



Would a client or other business partner, a colleague or my manager consider my behaviour appropriate?



Is my behaviour consistent with Grant Thornton's purpose, vision, values, and working methods?



Would my actions withstand media scrutiny without damaging Grant Thornton's brand?



Am I prepared to challenge something I believe is wrong, and do I welcome being challenged by others?



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