

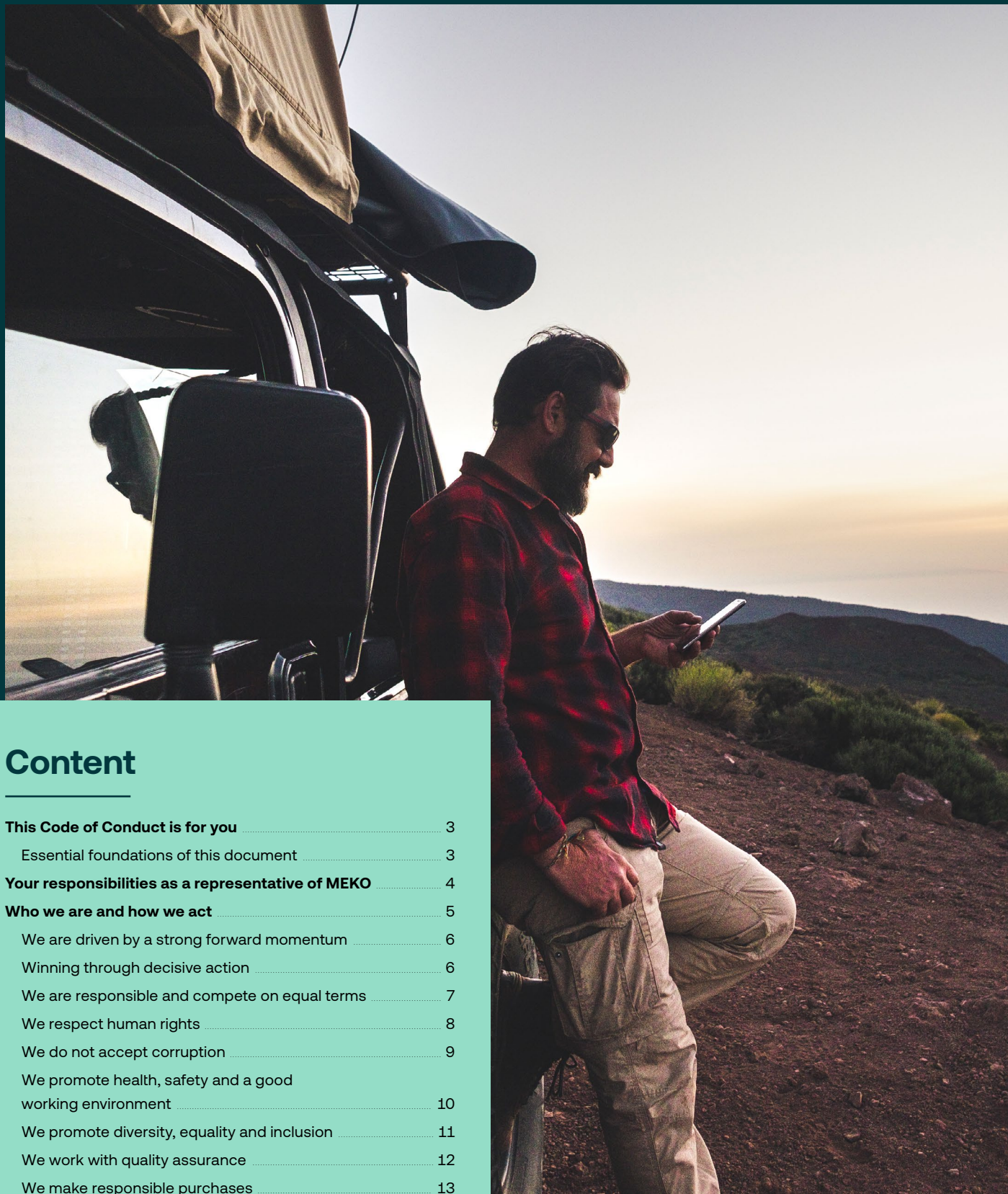
May 2025

# Code of Conduct



**MEKO**





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**“The Code of Conduct serves as a starting point for all relevant policies and guidelines of MEKO.”**

# This Code of Conduct is for you

The Code of Conduct has been adopted to emphasize the values and principles that govern our operations and relationship with employees, customers, business partners, investors and other stakeholders. It serves as a starting point for all relevant policies and guidelines of MEKO.

This is not just a document outlining compliance with laws and regulations. It also defines principles and values that drive MEKO as a company – shaping how we approach our business and our future.

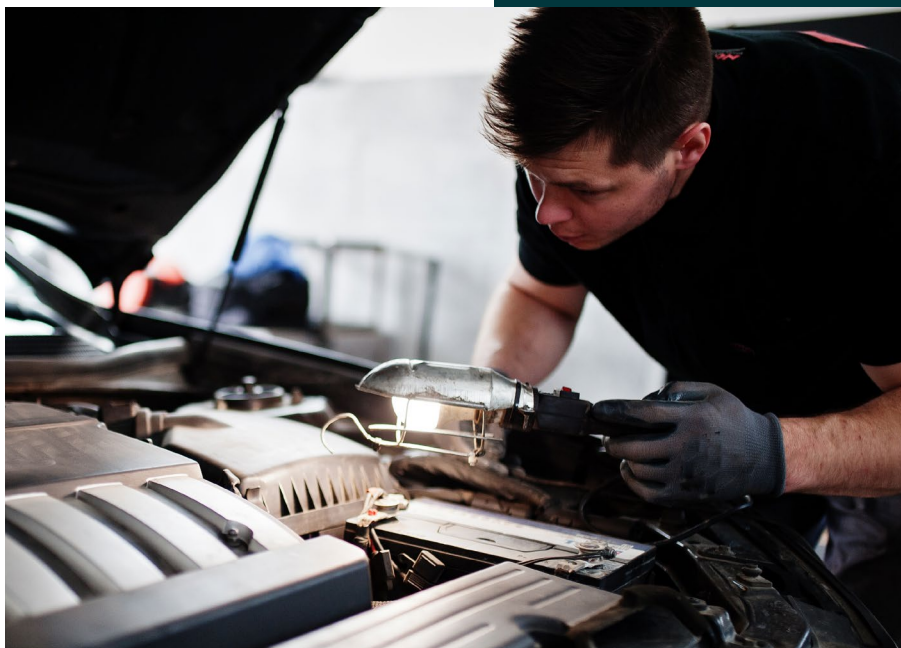
The Code of Conduct applies to all employees in all companies and countries where MEKO operates, not only employees but also the Group’s board members and employees working under one of the Group’s brands, such as affiliated workshops. We also have a separate Code of Conduct for our suppliers where our requirements and expectations are described.

## Essential foundations of this document

The Code is largely based on internationally agreed rules, primarily the ten principles of the UN Global Compact, whose principles on human rights, working conditions, environment and anti-corruption have been signed by MEKO. According to these principles, all companies must maintain basic guidelines relating to human rights, working conditions, external environment and corruption within the framework they can influence. In cases where the laws of an individual country are more far-reaching than the content of this Code, the law of the individual country must of course be followed.

The Code of Conduct shall be applied immediately and continuously. It is reviewed annually to keep it up to date. The Code has been adopted by the Board of Directors of MEKO AB and can only be repealed or amended by the Board.





**“Act in line with the principles and values that drive MEKO as a company.”**

## Your responsibilities as a representative of MEKO

**As a representative of MEKO**, you are expected to read, understand and follow the Code of Conduct and:

- Act in line with the principles and values that drive MEKO as a company.
- Stay informed and updated about the Group's governing documents (policies and other governing documents).
- Contact your manager if the Code of Conduct or other governing documents do not provide you with sufficient guidance.
- Report suspected irregularities and violations of the Code of Conduct.

**As a manager**, you have a special responsibility to always act as a good role model and to follow up on compliance with the Code. You are therefore expected, in addition to the above, to:

- Inform and present the content within your organization.
- Ensure that new employees are informed of the content of the Code of Conduct.
- Set a good example and convey how important it is to follow the Code of Conduct.
- Handle ethical dilemmas in an appropriate manner.
- Act immediately if you suspect violations of the Code. Tell your immediate manager about the problem if relevant. Failure to comply may result in disciplinary action.

The Group uses a whistleblowing system to report behavior that is not consistent with the Code of Conduct, which is accessible via MEKO's website.

# Who we are and how we act

MEKO's vision is to enable mobility – today, tomorrow, and in the future. Our mission is clear: To be the most comprehensive partner for everyone who drives, repairs, and maintains vehicles in Northern Europe. We are the market leader with many strong wholesale and workshop brands across eight markets.





## We are driven by a strong forward momentum

Among our greatest strengths are our broad geographic presence and strong brands – but our true asset is the way we work and act.

Everyone at MEKO shares an essential trait: a strong, solution-driven mindset. The same entrepreneurial spirit that defined our first spare parts delivery more than 50 years ago continues to drive us today. While we are now a publicly listed company with diverse functions and roles, our mindset remains unchanged: We seize opportunities, take responsibility, and reach or our goals.

## Winning through decisive action

Being part of MEKO means being part of a winning team that takes action.

### This is how we act:

- A drive to win. We gain new customers, secure new business, and constantly refine the way we operate – regardless of our roles.
- Decisive execution. We work with focus and determination – and we take full responsibility to reach our targets.
- Moving forward. When faced with obstacles, we don't dwell on them – we seek and find solutions without hesitation.

The automotive aftermarket is highly competitive, and at the same time, the industry is undergoing a transformation toward a greener vehicle fleet, impacting our core business. MEKO is committed to being a driving force in this transition, staying true to our mission: To be the most complete partner for our customers – now and in the future.

Our geographic presence and strong brands are key assets in this work – but it is our forward momentum and determination to win that make the real difference.



# We are responsible and compete on equal terms

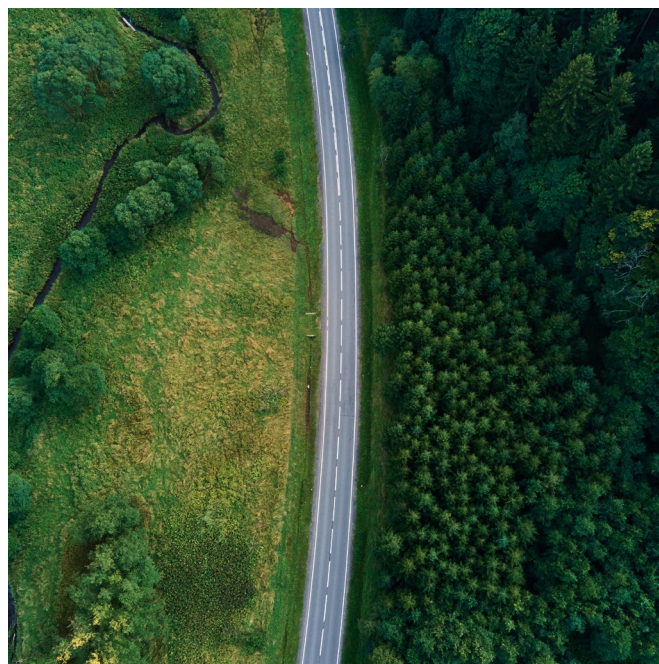
Free and fair competition benefits our customers, society at large and our business. MEKO shall act reliable and honest, and only engage in business activities that comply with national laws, international conventions and concluded agreements that are in accordance with the Code of Conduct.

All financial transactions shall be recorded in accordance with the Group's accounting principles and comply with applicable laws, rules and standards. The accounting shall show all types of transactions in a correct and non-misleading manner. External financial reporting shall be reliable and complete.

MEKO shall not cooperate, directly or indirectly, with any person, company or organization listed as prohibited on sanctions lists and we do not do business, directly or indirectly, with countries or regions subject to sanctions. We are vigilant when external parties may be on a sanctions list or may have a related company in a country subject to sanctions. We have zero tolerance for business relationships with persons, entities, countries or regions subject to sanctions.

We respect and comply with competition rules, environmental legislation, labor market laws, contracts and safety requirements as well as other regulations that set the framework for our operations. We believe in long-term business relationships where, together with our business partners, we create the basis for good financial results.

We do not accept any agreements or other arrangements with competitors that restrict or distort competition, for example through price agreements, market sharing or sales restrictions. We do not exchange sensitive and confidential information with competitors that could reveal how we intend to trade. We consider our position in the market and ensure that we do not act in a way that could constitute an abuse of a dominant position.



## This is how it affects you:

- Do not discuss prices or sensitive business information with competitors.
- Never enter into agreements with competitors that restrict or distort competition.
- Consult Legal if you are unsure whether an agreement you are about to enter could be restrictive of competition or whether we have a dominant position and how this affects our scope of action.
- All employees have a responsibility to maintain accurate accounting and documentation, so that our business can be conducted efficiently. The Group's managers are responsible for ensuring that they and their employees have relevant knowledge and information about the content of MEKO's Financial Handbook.



## We respect human rights

MEKO is committed to respecting and complying with international human rights and labor rights. Our commitment extends throughout the value chain. If we cause, contribute to, or are in any way associated with serious human rights violations, we will take appropriate measures.

Fundamental human rights must be known, respected and applied equally to all employees regardless of their employment status. All employees have the right to join associations and organizations of their own choosing and to bargain collectively through the trade unions with which MEKO has agreements.

No forms of forced, involuntary or child labor are accepted in any part of MEKO's value chain.

### This is how it affects you:

- You have the right to receive support and guidance from recognized trade unions and employee representation bodies.
- You have the right to receive written confirmation of your employment conditions.
- Your salary must meet or exceed the statutory or agreed national minimum standards in the industry.
- As a manager, you must not interfere in employees' decisions regarding union representation or membership.
- You must never purchase sexual services, visit pornography or strip clubs, on duty or off duty in connection with a business trip.
- Follow the supplier assessment processes that the group has in place to detect and address any human rights risks.
- If you suspect serious negative human rights impacts, such as forced labor or child labor at a business partner, you should always report it to your manager or Legal for further assessment. Reporting is also possible via the whistleblowing channel.

→ Read more:  
**MEKO's Human Rights Policy,**  
**MEKO's Supplier Code of Conduct,**  
**MEKO's whistleblowing channel**  
 (available on [MEKO's website](#))



# We do not accept corruption

At MEKO we do not tolerate any form of corruption. Corruption distorts the market, disrupts free competition and is against the law. It damages the brand and destroys the reputation of the company and individuals. No employee may, through their position or role in the business, demand, accept or receive personal benefits in the form of gifts, offers or goods from a supplier.

**i** Corruption is behavior that results in decisions and actions being influenced in an inappropriate way. Examples include conflicts of interest, theft, bribery, extortion, fraud, nepotism or friendly services. Corruption includes, for example, money laundering, offers of or receipt of kickbacks, bribes, gifts or entertainment that are considered luxurious or so-called “grease money”.



## This is how it affects you:

- Do not give or receive anything that could be perceived as a bribe. Bribery means cash, gift cards or other things that can be equivalent to cash. Services, travel and promises of debt payment are also considered bribes, as are gifts and entertainment that are contrary to the law or MEKO's anti-corruption policy.
- It is not permitted to request benefits/gifts from partners or suppliers.
- Never accept anything from a supplier, business partner or anyone else if it could affect, or could be perceived to affect, your ability to be objective when making business decisions.
- Gifts and participation in events that have more than a symbolic value may not be received or given without the approval of your immediate manager.
- Lunches or dinners with a relevant and clearly stated business purpose are accepted. The scope must be reasonable and appropriate – both in terms of value and frequency.
- If you are unsure, contact your immediate manager or the company's legal counsel.

→ Read more:  
**MEKO's Anti-corruption policy,**  
**MEKO's Supplier Code of Conduct,**  
**MEKO's whistleblowing channel**  
(available on [MEKO's website](#))



## We promote health, safety and a good working environment

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A good and safe working environment is a strategically important part of MEKO's development and for our employees. The goal is to create a physically, mentally and socially healthy workplace that offers development opportunities for all employees and where risks of work-related injuries and illness are prevented.

### This is how it affects you:

- As an employee, you must participate in the work environment work by pointing out risks and shortages in the work environment to your immediate manager and reporting incidents and accidents.
- You must follow safety regulations and use protective equipment.
- You must actively participate in your rehabilitation and work adaptation
- You must not be under the influence of alcohol or drugs during working hours.
- If you see that someone is under the influence of alcohol or other drugs, you must immediately report it to your immediate manager who is responsible for taking the necessary measures.



# We promote diversity, equality and inclusion

MEKO's view of diversity and equality is based on the belief that people's differences contribute to an attractive, dynamic workplace and a stronger MEKO. We will strive to reflect the diversity of our customers and society at large, and both our employees and customers should feel included.

Everyone is of equal value, and we shall offer a workplace where differences are respected and appreciated and where everyone can reach their full potential. Recruitment, development efforts and promotions shall be based on competence, qualification, merit and performance.

All current and potential employees shall be treated fairly and without prejudice regardless of gender, transgender identity or expression, sexual orientation, religion or other belief, ethnicity, disability or age. We do not accept discrimination, offensive treatment such as bullying, corporal punishment or physical, sexual, psychological or verbal harassment or abuse.



## This is how it affects you:

- Treat colleagues, customers and other external stakeholders with respect and consideration. This means, among other things, not acting with an attitude, language or behavior that can be perceived as offensive, sexist or exclusionary.
- If you find out that another employee is offending, harassing or discriminating against a colleague or external contact, you have a responsibility to act. If necessary, you should inform your immediate manager or seek support from HR or Management. You can always use the whistleblower system and then remain anonymous.
- We make it easier for each other to combine work, leisure and family and respect each other's right to time off after the end of the working day.
- We adapt working conditions based on religious and ethnic reasons as far as the business allows.
- As a manager, you should be a role model and work actively with diversity, equality and inclusion.
- If you as a manager receive a report of offensive discrimination, you are responsible for ensuring that the matter is investigated impartially and confidentially.

→ Read more:  
**MEKO's Group-wide HR policy**  
**MEKO's Diversity and inclusion policy**  
**MEKO's Diversity policy Board of Directors**



## We work with quality assurance

Maintaining good quality of our products and good service to our customers is a success factor for the continued positive development of the Group. We keep our promises and are an exemplary partner that develops together with our customers and partners.

We shall comply with applicable laws, agreements and internal rules and processes. Products and services shall be delivered at the right time, at the right place and to the promised quality, to maximize the value and benefit for our customers. We continuously engage in dialogue with customers about their needs and we listen to their views. We are flexible and responsive to what they require and want from us.

We shall have effective procedures for handling complaints. This is to ensure correct treatment of end customers and feedback of the correct information to the supplier. By continuously measuring customer satisfaction and working systematically, we identify and address deficiencies in the operations.

### This is how it affects you:

- Everyone should consider quality and customer satisfaction as interacting factors.
- Based on your role, you should contribute to fulfilling customer promises.
- You have a responsibility to react to errors and shortcomings.
- If you are a manager, you should set goals, follow up on the goals and lead by example.



# We make responsible purchases

Purchases within MEKO must always be carried out responsibly. This way we can ensure reliable and long-term business relationships. We have a risk-based approach and set requirements from a sustainability perspective on our suppliers, purchased services and products. We expect our suppliers to comply with national laws and regulations and respect international conventions. Our requirements for suppliers are clarified in MEKO's Supplier Code of Conduct.

We must always have written agreements and follow up on the requirements set and act in the event of deviations. We have a clearly communicated purchasing process that can be found in our Purchasing Handbook, where our purchasing strategy, process and relevant policies and guidelines can be found. Since MEKO mainly sells products within the automotive industry, quality and safety of the product are a prerequisite for being relevant as a supplier. It must be clear that the supplier takes full product responsibility. We should conduct our own independent quality tests on relevant products.



## This is how it affects you:

- You have an obligation to inform if there are deficiencies in suppliers, products or if product information is lacking.
- Central agreements must be used.
- You must use the Group's supplier evaluation process for new suppliers.
- You must ensure that the supplier accepts MEKO's Code of Conduct for Suppliers.
- The best interests of the Group must always be prioritized.
- Orders must be placed according to internal rules and approved by the authorized decision-maker.
- If you are unsure about how a particular purchase should be carried out, contact your immediate manager.

➔ Read more:  
**MEKO's Supplier Code of Conduct**  
**MEKO's Purchasing Handbook**

# We reduce our environmental and climate impact

MEKO's greatest positive impact is that we contribute to a circular economy where cars are repaired instead of being replaced with new ones. Our primary negative impact is in the areas of transportation, energy use in premises, and chemical and waste management.

Environmental and climate issues shall be an integrated part of business operations and contribute to creating value for our stakeholders. We shall work actively to reduce energy use and limit waste, emissions of pollutants and greenhouse gases. We shall work systematically by continuously measuring, monitoring, auditing and improving operations from an environmental and energy perspective and reporting our impact.

Each business area shall ensure that there are available and communicated procedures that ensure that applicable laws and regulations for the operations are complied with.

Through information and training, we shall increase knowledge of environmental and climate issues among our employees. We must handle chemical products and goods safely and, to the extent possible, market and sell chemical products and goods that have a lower impact on the environment.



## This is how it affects you:

- Do what you can to reduce the environmental and climate impact you have in your work.
- Everyone must know and follow relevant legislation and internal rules.
- Use chemical products with caution and follow the safety regulations in the associated safety data sheets.
- When purchasing a chemical product, an environmental assessment must always be carried out.
- As a manager, you must ensure that you and your employees receive relevant environmental training.
- Make climate-smart choices when traveling; do not make unnecessary trips and choose train over plane whenever possible.



# We secure our digital systems and information

Information security should be an integral part of business operations and contribute to creating value for customers, owners and other stakeholders.

## Information security means that:

- Information and systems are available when needed.
- Information is kept up-to-date, correct and complete.
- Information and systems are only accessible to authorized persons.
- Access and changes to information & systems are traceable. This means that it can be determined who has accessed the information, what changes have been made and who carried them out.

We shall comply with applicable legislation such as GDPR, as well as other requirements of customers and suppliers. We respect people's fundamental right to privacy. Personal data must be collected correctly and legally, be relevant to the purpose for which it has been collected and processed with the greatest care. The risks we are exposed to in information management must be well balanced and accepted by the person or persons who suffer harm if the risk occurs. We will coordinate group-wide work by using the same terminology, standards and methods in the area to the greatest extent possible.

We will design information security in processes, services and systems based on the risks we are exposed to. We are prepared and have the readiness to handle unplanned events in IT support. We will therefore have plans to return to normal as quickly as possible. We will continuously follow up, revise and improve operations from an information security perspective.



## This is how it affects you:

- Everyone must know and follow internal rules.
- As a manager, you must ensure that you and your employees receive the necessary training.
- Every decision that has a major impact on information management must be preceded by a documented risk assessment.

→ Read more:  
**MEKO's Privacy policy**  
**MEKO's Information security policy**



## We collaborate with others and are socially engaged

We shall actively contribute to the development of society, the industry and the Group through collaborations with other companies, foundations, organizations and other businesses. The Group's collaborations shall always contribute to creating business and/or customer benefit.

A collaborating business shall act in accordance with applicable law and this Code of Conduct. A manager or employee who has a direct or indirect connection to a collaborating business may not participate in or influence a decision on collaboration or financial transaction. Nor may they certify a financial transaction.

### This is how it affects you:

- Evaluate whether a collaboration benefits the Group in terms of customer or business benefit.
- Evaluate any risks in a collaborating business, e.g. ensure that the collaborating business acts in accordance with laws, regulations, standards and the Code of Conduct.
- Ensure that you are not in a conflict of interest when deciding on a collaboration or transaction.



## We communicate responsibly

Communication within the Group shall aim to support the company's visions, business concept and strategies. As a public and listed company, it is our obligation to provide the capital market with relevant, reliable, accurate and up-to-date information in accordance with the stock exchange's listing agreement, as well as other applicable laws and regulations.

We shall strive for clear and honest communication and comply with marketing laws and regulations in the countries in which we operate. Our information and communication are therefore based on openness, clarity, relevance, accessibility and being active. All communication and marketing regarding sustainability benefits of MEKO's own products shall be credible and evidence-based.

We act with respect towards our colleagues and stakeholders in all channels, such as social media, journalistic media and when we engage in dialogue with other stakeholders.

### This is how it affects you:

- Read and comply with the content of the communication policy.
- As a manager, you are responsible for ensuring that your employees are well informed about the Group's communication policy, operations, vision, goals, strategies and core values.
- Spokespersons in the group are regulated in the communication policy. Do not speak in an external context on behalf of MEKO before speaking to your manager or the communications manager.
- Do not spread insider information or other information that is not intended to be communicated to the market, other external parties or internally in the group.
- Develop a communication strategy before communication takes place, with a defined purpose, target group, and adapted message.
- As employees in the group, we are ambassadors for our brands.



# How to report irregularities

If you notice behavior or actions that you believe may violate MEKO's Code of Conduct, laws and regulations, you can use one of the following options to report your suspicions:

## 1.

Contact your manager or HR or Management team.

## 2.

If you do not feel comfortable talking to your manager, HR or Management team, or if you believe that they have not addressed your concerns appropriately, you can contact the Group's General Counsel or Chief Audit Executive.

## 3.

If you cannot or do not want to reveal your identity, you can anonymously use the Group's confidential whistleblower system. The whistleblower system is available on MEKO's website and is a channel for employees in the Group, customers, suppliers and other stakeholders to report serious irregularities or violations of the law. The whistleblower system provides the reported person with privacy protection, which means that the information provided is treated confidentially.



MEKO AB  
Code of Conduct 2025

This policy was adopted by  
the Board of Directors at the  
Board meeting in MEKO AB (publ)  
on May 15, 2025

[meko.com](https://meko.com)

**MEKO**