

CODE OF CONDUCT

Word from the CEO

The employees at Midsummer share fundamental values around business conduct and ethics.

The *Code of Conduct* is important to our business because it reflects our values and embodies our commitment to high ethical standards. The *Code of Conduct* provides direction as we negotiate challenges in our work. It also helps us make the best decisions when clear and easy answers may not be readily available. In other words, *the Code of Conduct* enables us to uphold the highest ethical standards in all situations.

For me, the easiest way to think about the meaning of 'ethical standards' is to view them simply as a commitment to make decisions that are in the best interest of our stakeholders. Through this commitment to working hard and doing right, we will continue to satisfy our customers, win new business, and grow as a sustainable, profitable Midsummer AB.

Our commitment to act with uncompromising ethics and integrity at all times, in all situations, has been critical to the success of our business. It has helped us earn and keep the trust and confidence of all of our stakeholders, including our employees, customers, suppliers, investors and the communities in which we all live and work.

Thank you for your commitment in understanding this *Code of Conduct* and integrating its principles into your work for Midsummer AB.

Sven Lindström CEO,

Midsummer AB

Making Ethical Decisions

Following the Code helps to ensure that we do the right thing at all times.

At Midsummer AB, you are not alone, and there are many resources that can assist you in making ethical decisions every day.

Take action by asking yourself the following questions:

1. Does the action or behavior seem like the “right thing to do?”
2. Would you be comfortable if your Manager knew about the activity or behavior?
3. Would the activity or behavior improve Midsummer AB’s’ reputation with our customers, shareholders or colleagues?
4. Would you be comfortable if the activity or behavior was reported in a newspaper?
5. Is the activity or behavior consistent with the Code and relevant Midsummer AB policies?

Speaking Up: Asking Questions and Reporting Concerns

Asking a question or reporting a concern requires courage, and as Midsummer AB’s employees we are expected to speak up. When we do, we protect Midsummer AB, our brand, and our sites, and we help to improve our operations and prevent potential misconduct.

We Do Not Tolerate Retaliation

Midsummer AB does not tolerate retaliation against anyone who in good faith asks a question, speaks up about possible misconduct, or participates in an audit or investigation.

Integrity in the Workplace

Treating each other with respect in the workplace means appreciating our colleagues for the diversity of their ideas, experiences, knowledge and backgrounds and recognizing the creativity and culture of Midsummer AB.

We Do the Right Thing

- We make ethical decisions
- We follow our Code, Midsummer AB policies, and the law.
- We immediately report any concern we may have about possible misconduct.
- We ask questions about Midsummer AB policies or procedures when we have them.
- We cooperate fully and honestly with any internal audit or investigation.

Additionally, our managers must lead by example and model ethical behavior, and create an environment where employees feel comfortable asking questions, raising concerns, and reporting matters without fear of retaliation.

We Treat Others with Respect and Comply with Fair Labor and Employment Practices

- We are open and honest with one another and treat each other with integrity and respect.
- We do not discriminate against anyone on the basis of color, gender, age, national origin, religion, or any other legally protected characteristic.

- We strive to maintain a workplace where individuals are free from all forms of harassment or abuse.
- We follow applicable wage and hour laws.
- We provide employees with, at a minimum, all legally required benefits.
- We do not use child, forced, indentured, or bonded labor, and maintain a minimum age requirement for employment.
- We recognize the rights of our workers to associate freely, and believe that open communication and direct engagement between workers and management is the most effective way to resolve workplace issues.
- We do not allow retaliation against anyone who raises a concern about discrimination, harassment, or any labor and employment practice.
- We expect our business partners to also meet these same standards.

We Recognize the Importance of Data Privacy

- We respect the privacy of all individuals and are committed to taking appropriate measures to protect personal data against unauthorized access.
- We collect and use personal data responsibly and in accordance with applicable data privacy laws

We Provide a Safe Work Environment for Our Employees

- The health and safety of our employees is the Midsummer AB's' highest priority.
- We invest in the facilities, tools, equipment, processes, and people to provide a safe work environment for our employees.
- We adopt and enforce safe work practices and comply with all health and safety laws and regulations and Midsummer AB policies to ensure that protective measures are effective and that we maintain a safe work environment.
- We train our employees on safe work practices.

If you have any questions related to workplace safety or your responsibilities, contact HR.

Integrity for our Midsummer AB and our Shareholders

We compete fairly, we protect our assets and information and that of our customers, and we avoid situations that can reflect poorly upon our Company.

We Avoid Conflicts of Interest

Family and Personal Relationships

You or one of your family members has a managerial or financial interest (for example, has material stock holdings) in a company that competes, does business, or wants to do business with Midsummer AB. If so, immediately tell your manager so the conflict can be addressed.

You have a family member or close friend who is, or wants to become, a Midsummer AB vendor, supplier, or employee. If so, you must tell your manager about your relationship and must not be involved in selecting or managing the potential vendor or employee.

Financial, Investment, or Business Opportunities

You want to take advantage of a business or investment opportunity available to the Midsummer AB. If so, immediately let your manager and the management know and make sure that the opportunity is first offered to the Midsummer AB. If the Midsummer AB declines the opportunity and no other conflict exists, then you may pursue it.

Service on Outside Boards

You want to serve as a director of another for-profit Midsummer AB. If so, you must get a prior written approval from the management.

Secondary Employment

You would like to have a second job or want to consult for another for-profit Company that competes, does business with, or may become a customer of the Midsummer AB. If so, tell your manager immediately so the potential conflict can be addressed.

You own a business or have shareholdings in an entity outside of your work for Midsummer AB, and that business competes, does business with, or may become a customer of the Midsummer AB. If so, tell your manager immediately so the potential conflict can be addressed.

If you find yourself in any of these or other actual or possible conflict of interest situations, immediately tell your manager, so it can be evaluated and resolved. Managers will ensure that matters concerning Conflicts of Interest are escalated to a Director within their organization.

We Safeguard the Midsummer AB's Information

Confidential Information

This information might be useful to a competitor or harmful to our Midsummer AB if it gets into the wrong hands. Common examples include:

- Customer or supplier lists
- Terms, discount rates, pricing data, financial information
- Designs, drawings, formulas, strategic plans, trade secrets, inventions, patent applications Q&A
- Manufacturing processes
- Employee records

As the Company's employees, we protect, safeguard, and only disclose confidential information about the Midsummer AB to:

- Coworkers who have a business need to have the information
- People outside the Midsummer AB who have a business need to have the information, a clear duty to keep the information confidential, and have signed a Non-Disclosure Agreement; or
- Those who have a legal and contractual right to have the information

The Midsummer AB's Intellectual Property

- We follow the restrictions on the use of intellectual property, including those in our contracts with third parties. "Intellectual property" includes patents, trademarks, copyrights, trade secrets,

and any other intangible personal property that is created through the intellectual efforts of its creator.

- We do not steal, misappropriate, or unlawfully use the intellectual property, or proprietary, or confidential information of anyone, including that of Midsummer AB, our suppliers, customers, business partners or competitors.
- Even if we no longer work for a former employer, we protect and maintain its confidential information from disclosure and do not share or use any trade secrets belonging to that former employer.

We Accept Gifts and Business Entertainment Only When Appropriate

- If you are offered or given something of value (for example, a special discount on an appliance, free tickets to a sporting event, a discounted apartment, or other gift items) from the Midsummer AB customer or vendor that is lavish, not within our Midsummer AB's guidelines, or questionable, inform your manager immediately so the potential conflict can be addressed.

We Use the Midsummer AB's Assets Wisely

Physical Assets and Technology

- We are trusted with Midsummer AB assets, including workspaces, facilities, computers, mobile and desk phones, other equipment, and any Midsummer AB funds that we control or manage.
- We respect, care for, and properly use our Midsummer AB assets, and work hard to prevent their theft, destruction, or misuse.
- We dispose of Midsummer AB equipment, or other assets, legally and appropriately, and do not steal or misuse our property or technology.
- We understand that while certain company assets may be used for personal purposes (such as Midsummer AB-assigned mobile phones), and to the extent allowed by law, the Midsummer AB may access, search, and review any communications, data, or equipment maintained in any of these places, with or without our consent.
- We use Midsummer AB assets in a safe, lawful, and appropriate manner and do not use Midsummer AB assets to download, store, or send sexually explicit, offensive, or discriminatory material.
- We do not share personal user identification numbers or passwords.

Communications and Social Media

Only our official spokespersons are authorized to communicate with the public on behalf of our Midsummer AB. This means that if approached by a reporter or when using social media, including any blogs, social networking site, photo/video sharing, and chat rooms, we should:

- Not share information about Midsummer AB or customers with any reporter or research firm.
- Get approval from the Head of Communications before posting any official information about Midsummer AB in a public place.
- Protect our Midsummer AB's assets and confidential information, remembering the Internet is a public place.
- Not allow reporters to visit our facilities without prior approval of the CEO, CFO or Head of Communications.

- Protect confidential information by not sharing it with anyone who does not have a legal, contractual, or legitimate business need to know it.

We Maintain Accurate Books and Records

- We are responsible for ensuring that our books and records are free from false or misleading entries and employing independent auditors so that our books and records are maintained according to legal requirements and applicable accounting standards.
- We do not keep undisclosed or unrecorded corporate funds for any purpose.
- We issue payment only where there are appropriate, complete, and accurate supporting records

Integrity for Our Customers and Our Business Partners

We Engage in Responsible Sales and Marketing Practices

We are responsible and ensure that our promotional, sales, and marketing materials contain truthful statements about Midsummer AB, our services, and the products we manufacture.

We Compete Fairly in the Marketplace

- Competition and antitrust laws are intended to encourage and protect free and fair competition. We support strong competition, not unfair business practices.
- While we may join trade associations or participate in benchmarking or other activities with competitors and after securing non-disclosure agreements where appropriate, we do not cooperate with competitors and do not discuss the following without getting legal consent:
 - Pricing or pricing policy, terms of sale, costs, marketing or strategic plans
 - Proprietary or confidential information
 - Potential mergers and acquisitions, joint ventures, or other partnerships
 - Boycotts and allocations of customers, products, or territories
 - Exclusive dealing arrangements
 - Certain restrictions on, or tying arrangements with, suppliers or customers

We Protect Third-Party Information and Property

- We protect the confidential information that our customers and business partners share with us, and do not share this information with anyone inside or outside Midsummer AB who does not have a legal or contractual right or legitimate business need to have it.
- We use software made by other companies but do not make copies, resell, or transfer without permission under applicable license agreements. We understand that Midsummer AB may inspect our computers to verify that only approved and licensed software is installed.

Integrity in Our Global Supply Chain

We Do Business with Responsible Suppliers and Business Partners

- We select suppliers based on their qualifications and merit.
- We develop strong working relationships with suppliers who deliver superior quality, excellent service, competitive pricing, and follow the contractual, legal, and ethical business standards of our company.
- We are committed to purchasing and using materials only from appropriate and properly authorized sources.

We Maintain Fair Procurement Practices

- Midsummer AB creates value for customers through competent and swift product development, high productivity, high quality, agility, and cost competitiveness.
- Midsummer AB's dealings with our customers, suppliers, and business partners are based on good business judgment and fair dealing.
- While conducting procurement activities, we do not offer or give bribes, kickbacks, or anything of value, including a gift or entertainment, to a supplier, customer, or business partner to improperly control the recipient's actions or decisions.

Integrity in Our Global Communities

We are Committed to Protecting the Environment

- Midsummer AB uses an environmental policy to ensure that we are focused on producing environmentally compliant products using environmentally compliant manufacturing processes and suppliers.
- We follow all applicable environmental laws and regulations, and protect the environment, conserve energy and natural resources, and prevent pollution by applying appropriate management practices and technology.
- We comply with global and local regulatory requirements relating to the use, storage, discharge, and disposal of hazardous chemicals used during our manufacturing processes.

You can find Midsummer AB' Corporate Social and Environmental Responsibility (CSR) on our intranet.

We Do Not Offer or Give Bribes or Kickbacks to Anyone

- We prohibit bribery and kickbacks in any form and to anyone.
- We do not offer, promise, or give anything of value (such as cash or cash equivalents, gifts, non-business travel, or entertainment) to anyone, including to any government official, to improperly secure or keep business, or to improperly influence any decision regarding Midsummer AB; and we do not use any third-party (such as a consultant, agent, or business partner) to do so on our behalf.
- We do not make business decisions with any supplier, vendor, customer, or other business partner based on any personal benefit that is either offered or given to us, directly or indirectly.
- We do not ask for, demand, or accept bribes or kickbacks.

We Do Not Engage in Money Laundering or Terrorist-Related Activities

- We are committed to avoiding the use of Midsummer ABs' resources for the purpose of money laundering, which is the attempt to hide the proceeds of a crime to make the proceeds appear appropriate or lawful. To this end, we do not accept payment from any entity that is not a party to the transaction legally allowed to make a payment.
- We do not use Midsummer ABs' assets to aid terrorism or terrorist-related activities.
- We do not use Midsummer AB's funds for political contributions of any kind to any political candidate or person who holds any government office

We Comply with Laws Governing International Trade

Imports and Exports

- As an exporter, we comply with the laws of the countries from which we ship our finished products, components or technology as well as the export laws regardless of the shipping country.

Boycotts and Restricted Countries

- We do not do business with embargoed or sanctioned countries or individuals.

Consequences of Non compliance

Violating our Code or Midsummer AB policies can lead to consequences including: loss of business and competitive advantage, loss of jobs, as well as:

- Disciplinary action, up to and including termination of employment, consistent with local disciplinary laws and Midsummer AB policies.
- Referral to law enforcement and any other appropriate corrective action.

Adaption and compliance

Midsummer's Code of Conduct is adapted by the Board of Midsummer AB once a year. The date and version of the policy is shown on the first page of the document.

Conclusion

At the Midsummer AB, everything we do is based on a culture of ethics, integrity, and superior performance, and we all play a critical role in supporting that culture. Our Code of Business Conduct and Ethics is our guide to help us do the right thing, all the time, and everywhere we operate.

The Code sets out The Midsummer AB' expectations of us, but it does not cover every instance or circumstance that we may come across. Remember, if you ever have a question or concern, you should feel free to contact your Manager, your Site HR Manager,

Thank you for supporting The Midsummer AB' legacy of excellence and integrity.