



ERICSSON

ERICSSON CODE OF CONDUCT



PURPOSE

This Code of Conduct has been developed for the purpose of protecting human rights, and promoting fair employment conditions, safe working conditions, responsible management of environmental issues, and high ethical standards.

In addition to compliance with all relevant laws, regulations, and standards in all the countries in which Ericsson operates, all Ericsson units, companies and employees shall comply with the Code of Conduct even if it stipulates a higher standard than required by national laws or regulations.

Ericsson also requires suppliers and their subcontractors to comply with the Code of Conduct, or similar standards, and to verify compliance by providing information and allowing access for Ericsson to their premises. Ericsson is committed to engaging with its suppliers to ensure continuous and measurable improvements over time.

Ericsson is a signatory to the United Nations Global Compact initiative. In order to make this commitment clear to employees, suppliers, customers and other

stakeholders, the Code of Conduct is based on the Global Compact's ten principles and shall be publicly available. We are also committed to implementing the United Nations Guiding Principles on Business and Human Rights throughout our business operations.

We are aware of the specific challenges to certain human rights issues in the Networked Society, such as the right of freedom of expression and the right to privacy, as well as the impacts on other rights arising from potential misuse of technology, and we work actively to minimize any such risks and challenges.

Privacy and security are important elements in products and services delivered by Ericsson, and we align our product and business processes to ensure that human rights aspects of privacy and freedom of expression are respected throughout the operations of our products and services.

We firmly believe that information and communication technology promotes greater transparency and enables many fundamental human rights, such as the right to health, education, freedom of assembly, and freedom of expression.

Application

The Code of Conduct shall be applied throughout the company's operations, including in the management, development, production, supply, sales and support of Ericsson solutions, products, and services worldwide. The Code of Conduct shall also be valid for all Ericsson suppliers and applied through contractual terms and conditions.



CODE OF CONDUCT¹

Human Rights ●

We respect all internationally recognized human rights including the International Bill of Human Rights² and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We strive to avoid infringing on the human rights of others and address adverse human rights impacts with which Ericsson is involved.

We shall, in all contexts, seek ways to honor the principles of internationally recognized human rights, even when faced with conflicting requirements.

We are committed to implementing the United Nations Guiding Principles on Business and Human Rights throughout our business operations.

Labor Standards ●

Freedom of Association – All employees shall be free to form and to join, or not to join, trade unions or similar external representative organizations and to bargain collectively. Information and consultation with employees can be done through formal arrangements or, if such do not exist, other mechanisms may be used.

Prohibition of Forced Labor – Modern day slavery, including forced, bonded or compulsory labor and human trafficking are strictly prohibited. Employees shall be free to leave their employment after reasonable notice as required by applicable law or contract. Employees shall not be required to lodge deposits of money or identity papers with their employer.

Fair Employment Conditions – Employees shall understand their employment conditions. All employees must be provided with a written document that outlines the basic terms and conditions of employment in a language understandable to them.

Pay and terms shall be fair and reasonable, and comply at a minimum with applicable laws or industry standards, whichever is higher.

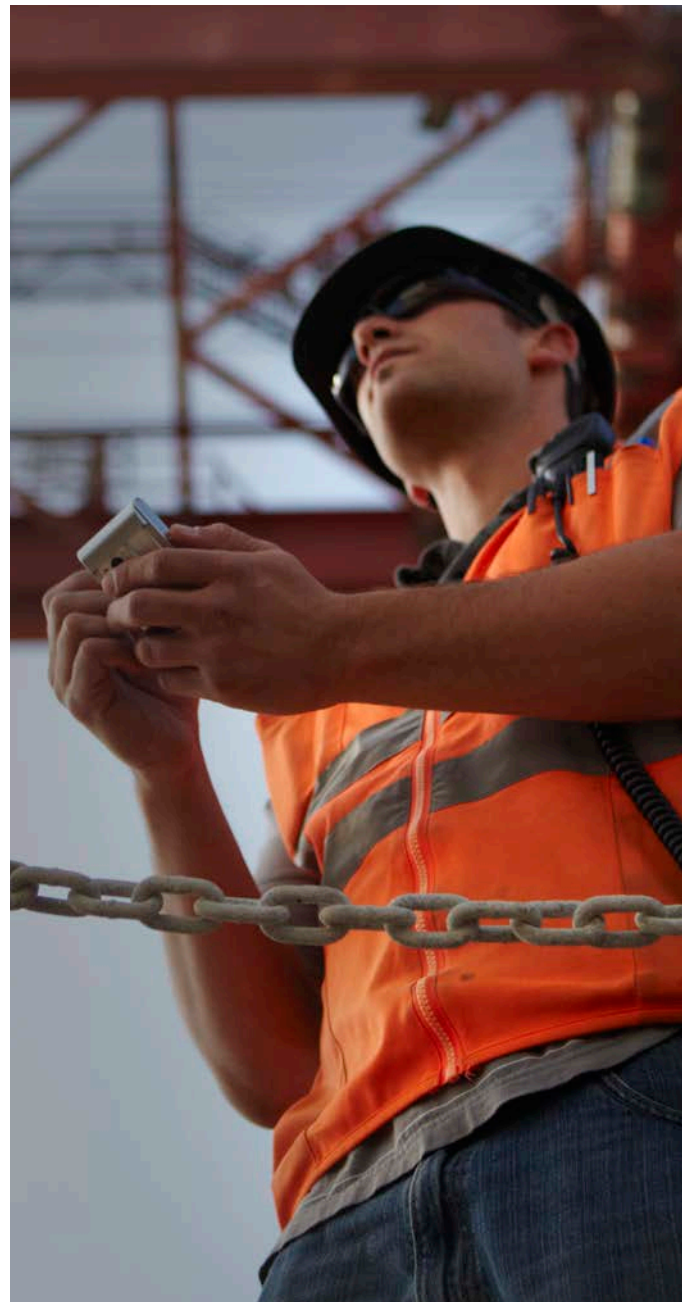
Working hours shall comply with applicable laws. The normal work week shall not exceed 48 hours.

Hours worked beyond the normal work week shall be voluntary, unless a collective bargaining agreement allows for required time under certain conditions and/or, if legal, in exceptional circumstances. Other than in such circumstances, a workweek shall not exceed 60 hours. Exceptional circumstances include short-term business demands and natural disaster.

Absent exceptional circumstances, personnel shall be provided with at least one day off in every seven-day period. One day off shall be interpreted as at least twenty-four consecutive hours.

Deduction from wages as a disciplinary measure shall not be permitted.

Corporal punishment, physical or verbal abuse, bullying or other unlawful harassment and any threats or other forms of intimidation shall be prohibited.



¹ The Ericsson Code of Conduct is based on the United Nations Guiding Principles on Business and Human Rights as well as the United Nations Global Compact's ten principles derived from: the Universal Declaration of Human Rights, the International Labour Organization's Declaration of Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention Against Corruption <https://www.unglobalcompact.org/>

² The International Bill of Human Rights consists of the Universal Declaration on Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights

Child Labor Avoidance³ – No person shall be employed who is below the minimum legal age for employment. Minimum age is the age of completion of compulsory schooling, or not less than 15 years or not less than 14 years, in countries where educational facilities are insufficiently developed.

Children shall not be employed for any hazardous work, or work that is inconsistent with the child’s personal development. A child means a person below the age of 18 years. Personal development includes a child’s health or physical, mental, spiritual, moral, or social development.

Elimination of Discrimination – All employees shall be treated with respect and dignity.

All kinds of discrimination based on partiality or prejudice is prohibited such as discrimination based on race, colour, gender, sexual orientation, gender identity, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic background, social origin, social status, indigenous status, disability, age, union membership or employee representation and any other characteristic protected by local law, as applicable.

Employees with the same qualifications, experience and performance shall receive equal pay for equal work with respect to those performing the same jobs under similar working conditions.

³ ILO Convention No. 138 on Minimum Age, United Nations Convention on the Rights of the Child

⁴ OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

Fair, Safe and Healthy Working Conditions – The health and safety of our employees shall be prioritized. A healthy and safe working environment, including psychosocial considerations and, if applicable, housing facilities shall be provided for employees, in accordance with international standards and national laws.

Appropriate health and safety information and training shall be provided to employees including, but not limited to: risks they are exposed to, arrangements for safe evacuations of buildings and correct handling and marking of chemicals and machinery.

Our Zero Tolerance Safety Rules apply to all employees, and are intended to help us achieve our vision of zero major incidents.

We shall provide support to employees to maintain a balance between work and personal life.

Responsible Sourcing of Raw Materials - Due diligence shall be exercised with respect to the sourcing and extraction of raw materials, including e.g. tin, tantalum, tungsten, and gold used in products. The due diligence shall be consistent with relevant parts of the OECD Due Diligence Guidance⁴ or equivalent processes.



Environment ●

We shall develop, produce, and offer products and services with excellent sustainability performance and contribute to the sustainable development of society.

We shall continuously improve, with a life cycle perspective, the environmental performance of our products. We shall work to continuously reduce the negative impact of our own operations and take a precautionary approach to environmental challenges.

We shall use appropriate methodologies to determine significant issues and aspects, for setting and reviewing objectives and targets securing that statements and communication regarding the sustainability performance of our operations, products and services are fact based.



Anti-Corruption ●

Zero-Tolerance - Ericsson has a zero-tolerance policy towards any form of corruption and financial irregularity, for example bribery, kickbacks, facilitation payments, fraud, embezzlement, and money laundering. With respect thereto, the following apply:

Bribes and Kickbacks - No one representing Ericsson may, directly or indirectly, demand or accept from, or offer or give to, employees or other representatives of business partners or any other third parties (e.g. authorities), any kind of bribe, kickback or any other unlawful or unethical benefit.

Gifts and Entertainment - We may not offer to, or accept from, business partners, or other third parties, gifts, benefits, reimbursements, or entertainment that would constitute a violation of laws or that could suggest a conflict of interest, divided loyalty, or be perceived as an improper attempt to influence business decisions or otherwise affect the recipient's performance or work duties.

Certain gifts or benefits are never allowed to be either offered or accepted; money, loans, gift vouchers,

kick-backs, work for private purpose, unethical benefits, vacations, or similar benefits addressed to individuals.

Public Officials - Stricter rules apply when we interact with government entities and their employees or representatives. Normally nothing of value should be promised, offered, or provided to a public official, either directly or indirectly.

Facilitation Payments - Unofficial payments demanded by public officials intended to speed up or secure the performance of routine government actions (e.g. issuance of visas, permits or licenses) are not allowed by Ericsson.

Fraud and Embezzlement - Ericsson does not accept any type of fraudulent behavior or embezzlement.

Money Laundering - Ericsson supports international efforts to combat money laundering and the funding of terrorist and criminal activities. It is therefore vital that employees are familiar with, and comply with all applicable laws related to such matters.



ERICSSON CODE OF CONDUCT – SUPPLIER SUPPLEMENT

The Code of Conduct is applicable to all Ericsson operations and to any party that contributes to Ericsson products, services, and other business activities (“Supplier”).

Compliance ●

Ericsson requires the Supplier and its subcontractors to comply with the Code of Conduct, or equivalent standards, which may request higher standards than required by applicable laws.

Upon request, a Supplier must, by way of providing information and/or allowing access to premises to Ericsson or its representative, verify to Ericsson’s reasonable satisfaction, that the Supplier and its subcontractors comply with the Code of Conduct.

The Responsible Sourcing Program ensures high standards in the supply chain in terms of Ericsson requirements in the areas of labor, environment, human rights, and anticorruption, which are valid for all suppliers. The program uses a risk based approach to ensure effective management of the environmental and social impacts by implementing supplier risk analysis, regular supplier audits, assessments, performance benchmarking and other activities which ensure compliance with Ericsson Code of Conduct and Code of Business Ethics.

Obligation to Inform ●

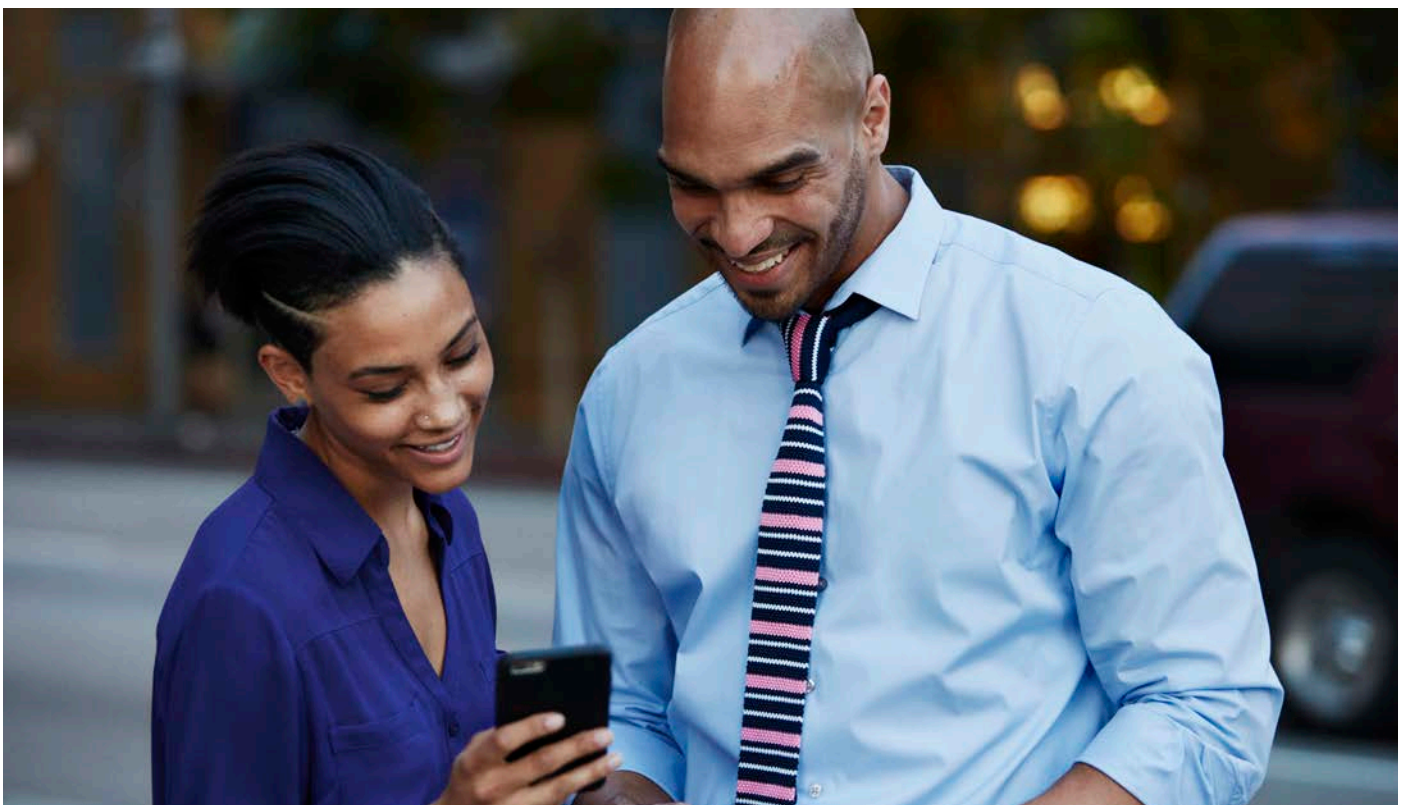
It is the responsibility of the Supplier to ensure that its employees and subcontractors are informed about and comply with the Code of Conduct.

The supplier shall inform Ericsson if they discover a breach of the Code of Conduct in their own operations.

The Code of Conduct includes, as applicable, specific requirements for Suppliers related to Occupational Health and Safety, and Environment.

These requirements are detailed in the accompanying documents “The Ericsson General Supplier Occupational Health and Safety Requirements”, “The Ericsson Specific Supplier Occupational Health and Safety Requirements”, “The Ericsson Supplier Environmental Requirements”, “The Ericsson Lists of Banned and Restricted Substances” as well as the operating instructions referenced in these documents.

All documents are available at www.ericsson.com/responsible-sourcing



REPORTING COMPLIANCE CONCERNS

Employees, suppliers, customers, and other partners involved with Ericsson may report suspected violations of laws or the Code of Conduct to the local operations manager or in accordance with locally established procedure.

If the above channels for reporting are not available or appropriate, and if the alleged violation

- A. Is conducted by group or local management, and
- B. Relates to corruption, questionable accounting, or deficiencies in the internal control of accounting or

auditing matters or otherwise seriously affects vital interests of Ericsson or personal health and safety, the violation may be reported through the Group's external whistle-blower process: **The Ericsson Compliance Line.**

Reports can be handled via this process if in accordance with local legislation applicable to persons involved. Ericsson will not accept any discrimination or retaliation against the individual reporting the violation for having, in good faith, reported alleged violations.

Information about the Ericsson Compliance Line is available on the Ericsson website:

<http://www.ericsson.com/reporting-compliance-concerns>



