

CODE OF CONDUCT

Uno-X Mobility



A MESSAGE FROM THE MANAGING DIRECTOR



Vegar Kulset
Managing director
Uno-X Mobility AS

Dear Colleagues,

In Uno-X Mobility our mission is to develop and promote solutions for sustainable mobility.

Our culture is based on the REITAN mindset as outlined in Our Philosophy Conduct. With an aligned set of values throughout all our companies in Norway and Denmark we work better together and achieve our goals faster.

Our eight values guide us in how we work:

1. We focus on our business idea
2. We keep a high business moral
3. We are committed to be debt-free
4. We encourage a winning culture
5. We have a positive and proactive mindset
6. We talk with each other, not about each other
7. The customer is our ultimate boss
8. We want our work to be enjoyable and profitable

This Code of Conduct is aligned with our values, and mandatory for everyone who works on behalf of Uno-X Mobility and our subsidiaries.

On our mission to develop and promote solutions for sustainable mobility, trust is essential.

We are dependent on trusting each other throughout our organisations, and we are dependent on trust from our customers, suppliers, partners, owners, authorities and from society at large.

Conducting business in an ethical and transparent manner aligned with our values is essential for us - to inspire trust.

Each one of our subsidiaries focus on target market segment, all contributing to sustainable mobility. As our operations and value chains leave a footprint in many countries, all our companies have a great responsible to adhere to our values and requirements for sustainability and ethics.

Integrity starts with each one of us, and we are all responsible for complying with the ethical business practises outlined in this Code of Conduct – in the way we work every day.

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1. About Uno-X Mobility

Uno-X Mobility is one of four business areas in Reitan Retail, alongside REMA 1000 in Norway, REMA 1000 in Denmark and Reitan Convenience. Our business consists of ten companies, six in Norway and four in Denmark.

In our business activity, Uno-X Mobility will comply with applicable laws, act in a sustainable, social and ethically responsible manner. Uno-X Mobility will conduct its business consistently with the Ten Principles of the United Nations' (UN) Global Compact, the International Labour Organisation (ILO) and the OECD Guidelines for Multinational Enterprises. Further, Uno-X Mobility supports the UN Sustainability Development Goals.

This Code of Conduct (the "Code") applies, regardless of location, to all employees as well as to all temporary personnel, consultants and others who act on behalf of or represent Uno-X Mobility or its subsidiaries, and to the members of the Board of Directors of Uno-X Mobility. All the above mentioned are expected to conduct business with integrity and transparency and to demonstrate commitment to the highest ethical standards in their dealings with customers, business partners, colleagues, and society at large, securing continued trust to our businesses from all stakeholders.

2. Upholding this Code of Conduct

This Code of Conduct is approved by the Board of Directors of Uno-X Mobility. The Board of Directors and general manager of each subsidiary is responsible for the implementation and compliance of this Code, or a corresponding CoC. Managers at all levels have a particular responsibility to ensure that employees and relevant third parties are informed and have understood the contents of the Code, internal policies and guidelines. In addition, managers at all levels have the responsibility to

ensure that activities in their area of responsibility are carried out in accordance with the foregoing and applicable law.

All subsidiaries, as employers, are responsible for providing their employees with information which is necessary to carry out their tasks and responsibilities. At the same time, all employees have a responsibility to ensure their understanding of and compliance with applicable laws and regulations, as well as this Code and the subsidiaries' internal policies and guidelines.

Potential misconduct may be investigated by internal or external experts, and we will pursue remedial measures in the event an employee breaches the law or this Code.

3. Caring for People

3.1. Human Rights

Uno-X Mobility respects and actively protects workers' right to fundamental human rights and decent working conditions. We follow the UN Guiding Principles on Business and Human Rights which sets forth the global standard for preventing and addressing the risk of adverse impacts on human rights linked to business activity.

3.2. Safety and Security

Protecting the health and safety of our employees is a top priority, and Uno-X Mobility has a zero-harm ambition with respect to both people and the environment. We are committed to providing a safe, healthy, and secure environment for all workers at our job sites, preventing accidents and incidents from affecting people, the environment, and our assets. Therefore, our subsidiaries have internal EHS policies and exercise sound judgement in their work.

3.3. Drugs and Alcohol

It is prohibited to consume alcohol and other intoxicating substances during working hours at Uno-X Mobility. However, consumption of limited amounts of alcohol served as part of corporate hospitality or company

events may be approved on an exceptional basis, provided that the consumption is not combined with operating machinery, driving or any other work-related tasks that is incompatible with the consumption of alcohol.

3.4. Equality, Diversity, and Inclusion

Uno-X Mobility strives for an inclusive working environment, characterised by diversity and equality. Therefore, Uno-X Mobility's personnel are expected to treat colleagues, customers, business partners and others with respect, particularly regarding cultural differences. Employees shall not engage in any form of harassment or other behaviour which could be perceived as offensive, threatening or degrading, including any form of unwanted attention of a sexual nature. Uno-X Mobility has a zero-tolerance policy for discrimination. This includes but is not limited to any unequal treatment, preference or exclusion based on age, gender identity or expression, disability, sexual orientation, ethnicity, political or religious belief or any other individual characteristics.

Uno-X Mobility respect every employee's right to freedom of association. We respect the rights of employees to

join, form or not to join an association of their choice without fear of reprisal, interference, intimidation or harassment.

4. Legal Compliance and Business Ethics

Uno-X Mobility and our subsidiaries are obliged and committed to conduct our business within the framework of applicable laws in the countries in which we operate, as well as this Code and internal policies and guidelines. In areas where this Code sets standards higher than national legislation, the Codes shall apply, provided that the Code does not conflict with national laws. Local customs or practices may never take precedence over Uno-X Mobility's standards, and Uno-X Mobility's operations shall never be conducted in an illegal or unethical way.

4.1. Anti-Corruption and Anti-Money Laundering

Uno-X Mobility do not tolerate any form of bribery, corruption, or money laundering in any form. Corruption and money laundering undermine legitimate business activities, distorts competition, could entail imprisonment and other civil and criminal liability, and prevents the realisation of human rights. Therefore, Uno-X Mobility shall always be compliant with applicable anti-corruption and anti-money laundering laws, and must not offer, nor accept anything that could call into question the company's professionalism and ethical way of conducting business. Gifts

and hospitality are only offered or accepted when they are of a modest value and serve a clear professional purpose. Gifts and hospitality of high value shall be declined. These standards apply to the Uno-X Mobility companies, as well as to all employees and persons representing our companies.

4.2. Privacy, Competition and Confidentiality

We are committed to protecting the right to privacy of our employees, customers, and others with whom we do business, as well as the confidential nature of many of our business relationships.

Personal data protection: Uno-X Mobility recognise the responsibility to protect and safeguard the personal data of our customers, employees and other relevant third parties. Uno-X Mobility and our subsidiaries shall process personal data with respect, confidentiality, ethically, honestly, with integrity and always with applicable laws and regulations, including the GDPR.

Fair competition and honest marketing: Uno-X Mobility shall always respect and be compliant with laws regarding antitrust, competition and marketing. We will not

enter into agreements or arrangements with competitors which would violate applicable competition law, or otherwise behave in a manner that undermines fair competition. All marketing shall be honest and accountable.

Confidentiality: Uno-X Mobility's business and operational information are valuable assets in our highly business markets, which is exposed to strong competition. It is of utmost importance to protect this information. Uno-X Mobility personnel with access to confidential information regarding Uno-X Mobility or third parties (e.g. contracting parties) shall safeguard the information in accordance with our internal confidential information policies, in line with our suppliers and business partners interests, and always in compliance with contractual obligations, applicable laws and regulations. Such information may be financial information, business plans, supplier classification, benchmarks, information about employees, customers, partners (and other contracting parties) and other types of sensitive information.

No Uno-X Mobility employee or representative shall make decisions or engage in activities related to Uno-X Mobility, based on personal interests.

4.3. Financial Reporting and Documentation

Uno-X Mobility is committed to correct and accurate accounting and reporting in accordance with applicable legislation and standards in each country. This is essential for the company's credibility and reputation. All transactions are fully and accurately documented and recorded in accordance with applicable laws and generally accepted accounting principles. False or misleading entries can be treated as fraud and are never acceptable.

4.4. Transfer Pricing

Transactions within Uno-X Mobility or between a Uno-X Mobility company and a shareholder shall be agreed and completed at arm's length terms (transfer pricing). Consequently, the same standards shall in this respect apply between Uno-X Mobility companies, as between a Uno-X Mobility company and a third party not affiliated with Uno-X Mobility.

4.5. Political Neutrality

Uno-X Mobility observes neutrality with regards to political parties and candidates. Company names, company owned trademarks or assets related to companies within Uno-X Mobility shall not be used to promote nor discredit the interests of political parties or candidates

5. Our Suppliers and Business Partners

Uno-X Mobility expect all our business partners to comply with applicable laws and our Supplier Code of Conduct (or if applicable the Supplier Code of Conduct of the Uno-X Mobility company entering into an agreement with the business partner), and to respect internationally recognised human rights and ethical standards. Our business partners include suppliers, distributors, agents, consultants, contractors, joint venture partners and others Uno-X Mobility conducts business with.

Managers at every level is responsible for ensuring that Uno-X Mobility's business partners are informed of and understand our Supplier Code of Conduct. Uno-X Mobility is committed to only working with parties that fulfil these requirements. Uno-X Mobility reserves the right to terminate the business relationship if the company in question fails to comply with these requirements.

6. Sustainability

The needs of the planet and customers are rapidly evolving. Uno-X Mobility is committed to responsible business practices and to contributing to solve global climate- and sustainability challenges through developing and promoting solutions for sustainable mobility. At Uno-X Mobility we can and should make a difference. Our ambition is to spearhead the green transition in our markets, and we have outlined these material topics in our ESG approach: Sustainable Mobility, People and Culture, Health and Safety and Sustainable Value Chain.

We will help our customers make responsible choices and contribute to the establishment of a more sustainable value chain that helps to protect and preserve nature.

We must maintain a high level of business ethics and commit ourselves to work with suppliers to prevent and limit negative impacts on people, the environment and society.

We seek to maintain transparency and accountability, by disclosing our progress on these topics by reporting our work in our annual ESG reporting in accordance with the Global Reporting Initiative (GRI).

7. Reporting Concerns

Uno-X Mobility is a value-based business, where openness is central. We have an open communication policy, and welcome being notified by anyone of conduct they perceive as unethical.

If you are an employee of Uno-X Mobility and suspect a possible violation of the Code or other unethical conduct, it is your duty to report this immediately. Any possible

violations or other unethical conduct can be reported to your manager, their manager's manager, or the company's whistleblowing channel through a third party as it is outlined in the personnel handbook. The whistleblower can choose to be anonymous.

Uno-X Mobility prohibits any form of retaliation against an employee for making a good faith report of misconduct.

