



Code of Conduct

2024-11-14

1. Purpose and Scope

Trapets must observe high ethical principles in all our activities. The purpose of this Code of Conduct is to communicate Trapets’ business principles and policies to our employees and stakeholders and to give internal guidance in our daily operations. Every individual has a critical role in defining and protecting our most valuable asset - trust.

Trapets shall abide by the laws and regulations of each country where we operate. In case of conflict between mandatory legal requirements and the principles in this Code of Conduct, the legal requirements shall prevail. It is the responsibility of each employee to be aware of relevant laws or to seek legal advice to ensure compliance.

This Code of Conduct applies to everyone at Trapets, including each individual employee and manager, and to the extent relevant, each consultant or contractor (all referred to as “employee” below).

Each individual employee is responsible to read and understand the content of this Code of Conduct.

Questions related to this Code of Conduct can be directed to the CEO or the Chief Legal Officer.

2. Owner and Version control

Owner:	Chief Legal Officer (CLO)		
Version	Date approved	Approved by	Major changes
1.0	2023-01-12	Trapets Management Team	This Code of Conduct replaces the previous Corporate Governance Policy, Social Media Policy and Conflicts of Interest Policy
2.0	2024-01-25	Trapets Management Team	Annual review and update
2.0	2024-11-14	Trapets Management Team	Annual review and approval, no change

3. Vision, Mission and Core Values

Trapets’ vision is a future free from financial crime and our mission is to help businesses with the technology and knowledge needed to fight financial crime.

The guiding principles in our daily operations are our core values – Engagement, Trust, Together and Growth.

 Engagement We are engaged and driven by creating a better today and tomorrow	 Trust We do what we promise and commit to do – to each other and to customers	 Together We act as one team – always supportive and helpful	 Growth We strive to continuously learn, progress and grow to reach our goals
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4. Business principles and policies

(in alphabetical order)

Anti-Corruption

Trapets takes corruption and bribery very seriously and does not tolerate corruption in any form. Trapets employees, contractors or partners are not allowed to offer any undue gifts, services or other advantages (undue benefits) to any employee of any customer, potential customer, authority or similar in order to achieve any benefits. Nor is any Trapets employee, contractor or partner allowed to request or receive any undue gifts, services or other advantages.

All payments and transactions must be accounted for in a correct manner.

Any suspicion of bribery may lead to costly enforcement investigations against both Trapets and its employees and may have a detrimental effect on Trapets’ good reputation, brand and the trust placed in us. It may also result in criminal sanctions for the company and the individuals concerned, as well as damages, dismissal and trade prohibition (*Sw. Näringsförbud*) for persons found guilty of bribery offences.

Confidentiality

All information regarding Trapets, Trapets’ customers and their customers and data, which is not openly communicated to the market or otherwise commonly known, is considered confidential information. It is the obligation of each employee to keep confidential all confidential information

that have or will come to his/her knowledge during his/her employment with Trapets. This obligation will remain in force also after the termination of the employment relationship.

Conflicts of Interest

No employee may engage in any activities, engagements or employments which may interfere with his or her judgment or ability to perform his or her responsibilities and obligations to Trapets, other employees, customers, suppliers or other business partners. Before accepting any engagement that could potentially risk having, or be perceived to have, such effect, the employee must always consult with his/her immediate manager.

Trapets is responsible for ensuring that Trapets systems, controls and procedures are adequate to identify and manage conflicts of Interest.

Corporate Assets

Safeguarding Trapets' assets – both tangible (such as office equipment and hardware) and intangible (such as intellectual property rights, trade secrets and confidential information) – is vital to Trapets' business success. Employees and contractors have a duty to use Trapets' assets only for legitimate business purposes within the framework of their employment or engagement at Trapets, and to protect them from loss, disclosure, or unauthorized use.

Trapets provides its employees with all work tools necessary to carry out their tasks, including e.g. computers and phones. These tools are provided for work related use in compliance with internal information security policies.

Diversity

Trapets hires and treats its employees in a manner that does not discriminate based on gender, nationality, religion, race, age, disability, sexual orientation, political opinion, union membership, or social or ethnic origin. All employees shall be treated with equal respect and dignity. Trapets is an equal opportunity employer where appointments to jobs, rewards and personal success depend on individual ability and performance. It is the responsibility of every manager to apply a principle of non-discrimination, and the responsibility of every manager and employee to treat colleagues and business contacts with respect, dignity and without discrimination.

External Communication

The long-term aim of all communication is to build a strong Trapets brand, internally and externally. PR and media activities and general coordination of communication activities are managed centrally through the Marketing unit. All media enquiries shall be directed to the CEO or the CMO. The Trapets CEO is the official spokesperson of the company.

Trapets encourages our specialists to pro-actively participate in public discussions in their field of expertise, provided all obligations of confidentiality towards Trapets and our customers or third parties are always respected. It is also in the interest of Trapets that our professionals are recognized publicly as leaders in their fields. (see also section on Social Media below)

Fair Competition

All contacts between Trapets and our competitors and other business practices shall be in compliance with applicable competition laws and may not include any anti-competitive cooperation between competitors to fix prices, share markets or similar practices, any abuse of a dominant position in the market, or unlawful use or exploitation of trade secrets.

Human Rights and Labour relations

Trapets supports and respects the principles set out in the Universal Declaration of Human Rights and the ten principles of the UN Global Compact. Trapets does not accept any form of child labour or other forms of compulsory and forced labour. Trapets supports the freedom of association and all employees have the right to be a member of a trade union and to bargain collectively.

Information Security

Trapets shall ensure that information security is of a high standard and in accordance with the expected requirements within the business area that Trapets operates. It is the obligation of each employee to comply with all internal information security policies and instructions.

Protection of personal data

Trapets has legal and contractual obligations as a processor of the data for our customers and will only process personal data for the purpose of fulfilling our obligations under the agreement with each customer. Personal data regarding Trapets employees, customers and business partners shall only be handled, processed or stored for legitimate business purposes, and always in compliance with the GDPR and any other applicable legal requirements, contractual obligations and internal instructions and policies.

Quality

Trapets aims for its products and services to meet or exceed our customers' needs and expectations and to create added value for our customers. Trapets ensures, through competence development, business intelligence and our unique professional knowledge, that our systems and services are continuously improved and developed.

Trapets commits to continual improvement of quality, objective target setting and measurement of processes and operational quality.

Social media

Trapets has a positive and open attitude to our employees expressing their opinions on social media platforms. Our employees are our best ambassadors, and we are grateful if our employees want to spread information and knowledge about us in a positive way, or to otherwise be an active voice within their area of expertise.

However, internal or confidential information about Trapets, about our solutions, technical environments, our customers or their customers or the personal or financial conditions of any individual must never be disclosed or communicated.

We strive for a sound and healthy physical and psycho-social work environment where slander, insults or bullying of co-workers/managers or other internal or external stakeholders must not occur, including on social media.

Sustainability

Trapets is committed to conducting its business in a sustainable and environmentally responsible manner. We recognize the importance of environmental protection, social responsibility, and ethical business practices.

- We are committed to minimizing our environmental impact and continually improving our environmental performance. We recognize the importance of protecting the environment for present and future generations, and we are dedicated to complying with all applicable environmental laws and regulations.
- Trapets' mission is to help businesses with the technology and knowledge needed to fight financial crime and our vision is a future free from financial crime. This means in our everyday operations we support the overall local and global fight to reduce financial crime, for a more sustainable future.
- We are committed to ethical business practices, including as described under the sections on anti-corruption, conflicts of interests and fair competition. We prioritize the protection of customer and employee data, adhering to high standards of data privacy and security. We also aim to select suppliers that adhere to ethical and sustainable practices.

Trapets is dedicated to making continuous improvements in our sustainability efforts

Whistleblowing

Trapets is committed to a high standard of openness, honesty, and accountability. We expect our employees and business partners who are concerned about our conduct to raise this with us. Trapets has a Whistleblowing policy that encourages employees and other stakeholders to report suspected misconduct without any risk of retaliation and to ensure an appropriate investigation process. We also provide a tool to enable anonymous incident reporting by our employees.

Work Environment

A safe and healthy working environment free of coercion, harassment or risks of accidents and injuries shall be provided for all employees. It is the responsibility of every individual manager and employee to refrain from any acts of harassment in the workplace and to follow environmental, safety and health rules and practices and report accidents, injuries and unsafe equipment, practices or conditions.

5. Non-Compliance

Explicit or implicit approval of questionable actions will not be tolerated. Reports of violations of this Code of Conduct may be made anonymously and/or in confidence to any member of the management team or to the Chief Legal Officer or Head of HR (see also under Whistleblowing).

Persons reporting violations in good faith will not be subject to retaliation in any form. Failure to act in compliance with the Code of Conduct can result in appropriate disciplinary actions in accordance with local law. Trapets seeks continuous improvement in the way we conduct our business and encourages all managers and employees to take part in this process.



Trapets is a software company that provides products and solutions for financial crime prevention, including Anti-Money Laundering (AML), Know Your Customer (KYC), and Market Surveillance.

Founded in 2000, Trapets has helped organizations meet regulatory needs for business success and fight financial crime for decades. We are trusted by over 500 companies ranging from small financial institutions to regulatory entities and earned recognition as one of the top 100 RegTech companies globally.

Trapets has more than 80 employees based in Stockholm, Hanoi, and London.

For more information, please visit www.trapets.com.