

Code of Conduct

Document ID: Revision: Rev01
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Created date: 2025-12-16
Approved by: Board of Directors
Date adopted: 2026-02-05

| | |
|--|----|
| 1. Pricer's Code of Conduct..... | 03 |
| 1.1 The foundation of our actions..... | 03 |
| 1.2 Introduction | 03 |
| 2. Our values | 04 |
| 2.1 Business ethics & anti-corruption..... | 04 |
| 3. Diversity, inclusion and equality..... | 05 |
| 4. Sustainability | 05 |
| 5. Information and communication..... | 06 |
| 6. Data Protection and Cybersecurity..... | 07 |
| 7. Trade Compliance & Sanctions Compliance..... | 07 |
| 8. Guidance, Compliance, Implementation and Reporting..... | 08 |

Pricer's Code of Conduct

At Pricer, our vision is to be the preferred partner for in-store communication and digitalization. We aim to create a meaningful impact by continuously pioneering our industry with confidence, energy, and commitment. Our expertise and innovation build trust, empower our customers' digital journeys, and make us a global leader in in-store automation. We achieve this by moving forward with clear goals, pushing boundaries, and ensuring human connections are at the heart of everything we do.

1.1.1 The foundation of our actions

This Code of Conduct is the backbone of how we act. It is the essential foundation that makes our progress possible, turns our ambition into reality, and guides us in making the right decisions every day.

It outlines the principles for:

- Our behavior and mutual respect: Fostering a safe, inclusive working environment for all colleagues.
- Our business integrity: Conducting all interactions with customers, partners, and stakeholders with integrity and responsibility.
- Our sustainability commitment: Advancing sustainable retail to benefit both people and the planet.

By embedding these principles into every interaction, we ensure consistency in our actions, build unwavering trust, and remain a successful partner to our customers and stakeholders.

We expect all third parties to be qualified according to Pricer standards, share the values set out in this Code of Conduct, and follow all applicable laws and regulations.

Introduction

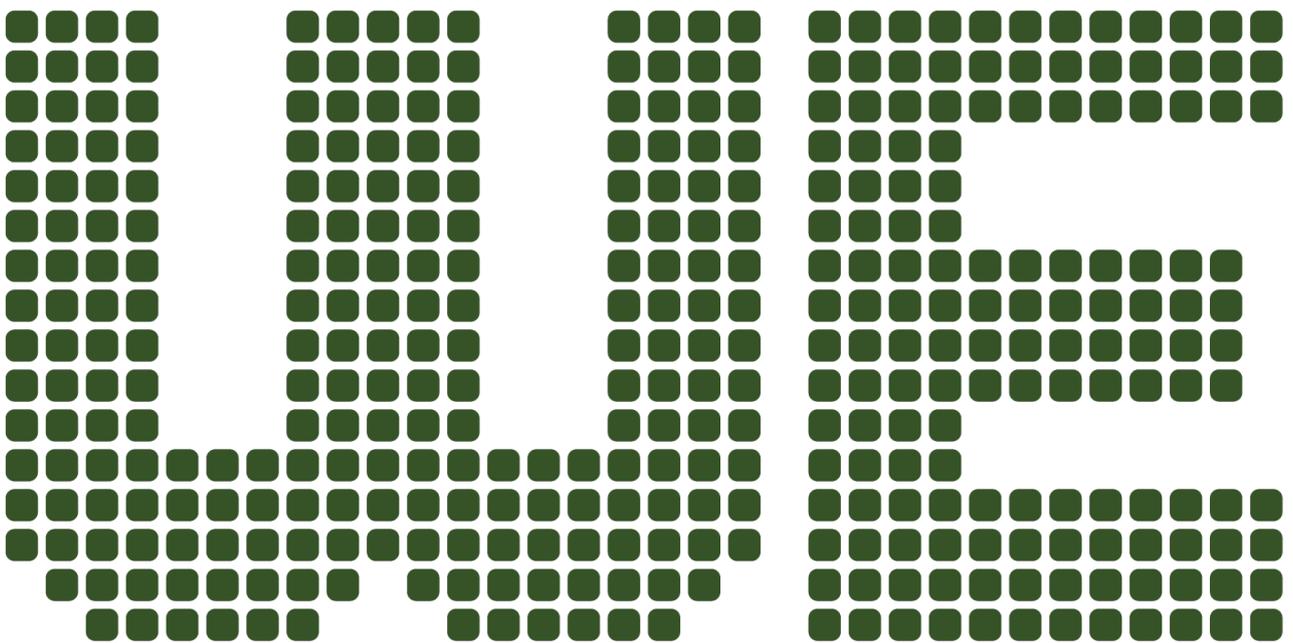
The Code of Conduct covers all Pricer employees, contractors, and re-sellers in all countries where we operate. Pricer shall always abide by local laws and regulations. If local, national, or international laws provide stricter requirements, those will be observed.

The Code of Conduct has been set up to guide us in how we:

- Conduct business ethically and responsibly.
- Treat each other with respect and contribute to safeguarding and building our culture.
- Engage with external stakeholders in a transparent and principled manner.
- Integrate sustainability into our business operations.

2. Our values

Making our values—to dare, care, and win together—real in how we operate.



DARE ■ CARE ■ WIN TOGETHER

3 Business ethics & anti-corruption

Pricer is committed to high standards of integrity and ethical conduct. We have zero tolerance for corruption, bribery, fraud, and other illegal activities.

Our core business principles:

- Zero tolerance for corruption: We strictly prohibit all forms of fraud, bribery, and theft. This includes the misuse of company assets and providing misleading information to customers.
- Compliance with laws: We shall comply with all relevant laws, EU laws, including anti-corruption regulations, the UK Bribery Act and the US Foreign Corrupt Practices Act (FCPA).
- Ethical conduct: Employees must use company resources solely for business purposes. Gifts and hospitality must be within generally accepted business practices and comply with all laws and any internal policies.
- Reporting violations: We encourage anyone who suspects wrongdoing to promptly report it to their supervisor, a member of Pricer's executive management team or through the whistleblower channel.
- Conflict of interest: Employees must avoid any personal relationships, financial interests, or external activities that could compromise, or appear to compromise, their ability to make impartial and objective decisions on behalf of the organization.
- Our commitment to ethical business practices is a cornerstone of our operations, and we expect everyone associated with Pricer to share this commitment.

4 Diversity, inclusion and equality

Pricer is committed to an inclusive environment where equal opportunity is a reality for everyone. To remain competitive, we recruit the best employees by accessing the full extent of the talent pool, ensuring that merit and fit come before bias or discrimination.

We define diversity broadly, including differences in:

- Gender and gender identity
- Ethnicity
- Sexual orientation
- Religion and belief
- Age
- Disability
- Socioeconomic background

We strive for inclusion and equal opportunities. Our goal is to continuously develop a culture of inclusion and respect for differences.

We are committed to a fair, inclusive, and bias-resistant recruitment process that attracts top talent. We use structured, transparent methods and diverse interview panels to ensure decisions are based solely on competence, potential, and values. We continuously review and improve our practices to strengthen representation and support a workplace where everyone can thrive.

We have a strict zero-tolerance policy for all forms of discrimination and harassment.

We are legally and morally committed to protecting our employees from prejudice or unfair treatment based on protected characteristics. Violations will result in disciplinary action, up to termination.

We continuously foster an inclusive culture: We integrate diversity and inclusion into regular discussions. We conduct annual employee surveys to measure attitudes and belonging.

We work proactively to create a good organizational and social work environment and prevent accidents, injuries, and discrimination. We systematically manage the work environment, identify risks, and constantly strive to prevent and remedy issues. We also address alcohol and drug abuse, reacting immediately to signs of ill health.

5 Sustainability

Our vision is to be a partner that contributes to sustainable retail for people and the planet. We put sustainability into action by leading with innovative, efficient, and sustainable products and solutions that reduce climate impact and enable resource efficiency. Our sustainability work focuses on People & Society, Climate and Circularity.

We respect human and labor rights, following the Universal Declaration on Human Rights and the International Labour Organization's core conventions. We prohibit child labor, bonded workers, or forced labor. We respect employees' right to form a union for collective bargaining and do not discriminate against those who exercise this right. All employees must know the basic terms and conditions of their employment. We promote social equality throughout our value chain.

We are committed to environmental sustainability: Pricer views a sustainable model as crucial for profitability and proactively minimizes its environmental footprint. Our ambition is to reduce our impact by minimizing emissions and waste, preventing pollution, and continuously improving performance.

We integrate sustainability throughout the entire product lifecycle (development, use, disposal) by focusing on energy efficiency, sustainable materials, and reduced resource consumption. We optimize distribution to cut transport emissions and partner only with suppliers who share our environmental ambitions. We strategically measure and understand our emissions to inform product design and material choices.

We collaborate, choose, and buy only from suppliers that adhere to sustainability practices and principles ensured through initial and continuous assessments. We select suppliers who uphold fundamental labor and human rights, strictly prohibiting forced and child labor. Our suppliers are guided by our Supplier Code of Conduct.

Our suppliers must provide a safe and healthy working environment free from harassment, abuse, and discrimination. Workers must be treated fairly, paid legally compliant wages (including overtime), and have their right to form unions and bargain collectively respected. Employment terms must be clear, and workers must not pay recruitment fees. Suppliers must also have a confidential whistleblowing process.

6 Information and communication

We communicate transparently and correctly: Pricer's communication is strictly governed by this policy and must adhere to all applicable laws and regulations, including the EU Market Abuse Regulation and the Nasdaq Nordic Rule Book for Issuers.

Communication should be:

- Timely: Provided promptly and proactively.
- Open: Open and relevant.
- Reliable: Factual, accurate, and not misleading.

Internal processes require managers to ensure all strategic information reaches the CEO as required, our Board of Directors if needed, in a timely, open, relevant, and reliable manner to ensure external compliance.

We do not share or make use of inside information: Everyone at Pricer must comply with all applicable laws and the company's internal Insider Policy regarding market abuse and handling non-public information.

We focus on integrity and action: Pricer's intellectual property and non-public information are among our most valuable assets. All employees are responsible for safeguarding confidential data and must not disclose it to any unauthorized party. Disclosure is only permitted with explicit authorization and in accordance with legal requirements.

We use company communication and technology responsibly: Pricer's electronic systems, equipment, and data are the company's property and must be used primarily for business-related purposes. Prohibited uses include accessing or transmitting discriminatory, harassing, obscene, defamatory, or copyrighted material, or any communication that violates policy or law.

7 Data Protection and Cybersecurity

At Pricer, we believe privacy and security are shared responsibilities among all employees and partners. They are cornerstones for establishing trust in our products, services, operations, and business practices. Protecting privacy matters to each of us, and we are committed to upholding the highest standards when safeguarding personal information.

Pricer manages data in a responsible and lawful manner, with strong ethical principles, adhering to all data protection regulations. Our products and services integrate privacy and security into the core design, applying robust measures to prevent unauthorized access or disclosure.

We require all employees, consultants, and business partners to maintain a strong security posture. You must adhere to our cybersecurity policies and best practices, which include using strong authentication (Multi Factor Authentication, or MFA), securing physical and digital devices, and remaining vigilant against threats such as phishing. Everyone is responsible for immediately reporting any suspected security incidents or vulnerabilities.

8 Trade Compliance & Sanctions Compliance

The transfer of hardware, software, documentation, technical data, or other technology across international borders, whether physically or electronically, is governed by national and international trade control laws and sanctions regulations. These rules may affect Pricer's operations and business relationships across jurisdictions.

Pricer is committed to strict compliance with all applicable trade regulations, including but not limited to export control laws, customs compliance requirements, and international sanctions.

This commitment applies to all transactions, shipments, and transfers, regardless of their form or means.

As Pricer employees, we are responsible for adhering to trade regulations when managing cross-border shipments, financial transactions, exports, imports, hand-carried items, samples, or materials transported for international trade business, shows, exhibitions, and demonstrations. Compliance activities include appropriate due diligence, sanctions, end user screening, and license assessment prior to the transfer of items.

Each Pricer legal entity is obligated to adhere to the trade and sanctions regulations applicable in its jurisdiction of operations, including but not limited to compliance with Export Administration Regulations (EAR), Department of the Treasury's Office of Foreign Assets Control (OFAC), EU Regulation 2021/821 along with applicable EU sanctions regulations and guidelines, Export Control Amendment No.2 Regulation 2025 of the United Kingdom and regulation of the Office of Financial Sanctions Implementation (OFSI) and Export Control Unit (ECJU) amending Export Control Order 2008, and the United Nations Sanctions Regime of the UN Security Council (UNSC).

Any suspected violation should be immediately reported through the whistleblowing channel or to the Compliance unit.

9 Guidance, Compliance, Implementation and Reporting

The Code of Conduct is communicated and publicly available on our website. Implementation is continuously executed through training and is part of the onboarding process for all new employees.

Breaches of our Code of Conduct undermine the trust we have established with investors, customers, and key stakeholders. Ignoring the Code of Conduct can be harmful to Pricer's reputation and exposes the business to unnecessary risk. Every employee must promptly report any suspected violation to help prevent issues from escalating into serious financial, legal, or reputational harm for Pricer.

Employees must also raise concerns related to third parties when those concerns could affect Pricer's business, people, or operations. Proactive reporting is essential.

Pricer maintains a dedicated whistleblower channel. All reports of suspected violations must be submitted through this channel and will be treated as confidential. All concerns reported through the whistleblower channel are managed by an independent third party. The channel can be accessed directly via the Pricer website.

Any Pricer employee is also encouraged to report suspected violations to the Chief Executive Officer via email.

When an employee reports a suspected violation through any means, Pricer commits to confidentiality and follows up on the concern until the investigation is complete and corrective action is taken.

All concerns, irrespective of the reporting channel, will be handled impartially, and results will be notified to those who raised concern for investigation. Pricer acknowledges that reporting violations is sensitive and commits to maintaining a non-retaliation policy. Pricer strictly prohibits any form of retaliation against employees who raise concern in good faith and contribute information to support such reporting.