

Owner: President & CEO
Approver: Executive Management and the Board of Directors

Policy¹

Sustainability is a key element of Elekta's values and forms an integral part of our business strategy. At Elekta we view our Suppliers as partners in our success as a company. This Code of Conduct is developed to clearly outline our expectations of our suppliers regarding sustainability and business ethics.

Elekta pursues a responsible procurement policy consistent with internationally proclaimed human rights, business ethics, respect for fundamental worker rights, and environmental standards, all of which are key conditions for doing business with Elekta. The Supplier Code of Conduct (hereinafter referred to as "the Code") sets out the Elekta requirements and expectations with respect to key areas of sustainable sourcing, and ensures that Elekta upholds the values and sustained excellence for its customers and stakeholders.

The Code applies to all Elekta Suppliers. Elekta requires its Suppliers to comply with the Code in all markets and jurisdictions where the Supplier is carrying out its business activities.

In addition to compliance with all relevant laws, regulations and standards in all of the countries in which they operate, all Elekta Suppliers and sub-suppliers shall comply with the Code even if it stipulates a higher standard than required by national laws or regulations. The Code shall be applied by our Suppliers through contractual agreement.

¹ The Code is based on the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, UN Guiding Principles on Business and Human Rights, The OECD Guidelines for Multinational Enterprises, the Children's Rights and Business Principles, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the United Nations Convention Against Corruption. Elekta has undertaken to act in accordance with the UN Global Compact's 10 principles for human rights, labor law, the environment and anti-corruption.

1. General Requirements

1.1 Legal compliance

Suppliers shall comply with all applicable laws, rules and regulations in the countries where they carry out business activities and comply the Code even if it stipulates a higher standard than required by national laws or regulations.

In case of contradictions between the Code and applicable laws and regulations, the Supplier shall inform Elekta.

1.2 Management systems

Suppliers should have adequate management systems and controls in place to ensure compliance with the Code or agreed equivalent standards. The functioning and quality of the supplier's management system should be in proportion to the size, complexity and risk environment of its business. Suppliers shall secure and monitor that their Suppliers and sub-suppliers comply with the Code or, where applicable, their own equivalent code of conduct. On request, the Supplier shall be able to inform Elekta which sub-suppliers they use, and demonstrate that these have received and understood the provisions in the Code.

1.3 Commitment to continuous improvement

Elekta recognizes that Suppliers will be at different stages of maturity and commits to working with Suppliers to achieve continuous improvement.

If Elekta finds that a Supplier is not meeting the requirements and expectations set out in the Code, Elekta may offer guidance specifying which issues need to be corrected or improved. The Supplier shall then take corrective actions promptly and commit to showing progress.

2. Human Rights and Labor Rights

Elekta Suppliers shall respect internationally proclaimed human rights both in the workplace and more broadly in all their business activities.

Requirements related to Supplier's personnel in the Code shall apply to all the Suppliers' workers including temporary, migrant, student and contract workers as well as direct employees. All workers shall have the right to enter into and to terminate their employment freely.

Suppliers shall take measures to avoid causing, contributing or being linked to negative human rights impacts.

2.1 Child labor and authorized minors

Suppliers shall work against all forms of child labor. Unless local law stipulates a higher age limit, no person younger than the age for completing compulsory education or younger than 15 shall be employed. For authorized minors, management is responsible for providing age-appropriate working conditions, hours of work and wage, in compliance with applicable local law.

Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations.

If a child is found working at a site where Elekta products or components are produced, all actions taken must be in the best interest of the child, and all remediating actions must be taken to maintain or improve the child's social situation.

2.2 Forced Labor and human trafficking

Suppliers shall not participate in, or benefit from any form of forced labor, including bonded labor, involuntary prison labor, slavery, servitude, trafficking or work performed under the menace of a penalty or coercion. All work, including overtime work, shall be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice.

Suppliers shall not require that workers hand over government-issued identification, passports or work permits to be kept by the Supplier as a condition of employment.

2.3 Health and safety of employees

Suppliers shall provide a safe and healthy working environment and, when applicable, safe and healthy residential facilities, with applicable local law as a minimum. The Supplier should take appropriate action to prevent, and manage, potential workplace accidents and illnesses.

2.4 Non-discrimination

Elekta recognizes and respects diversity and cultural differences. All our Suppliers' employees shall be treated strictly according to his or her abilities and qualifications in any employment decisions, including but not limited to hiring, advancement, compensation, benefits, training, layoffs and termination.

Illegitimate grounds for discrimination include but are not limited to: race, color, gender, age, language, property, nationality or national origin, religion, ethnic or social origin, caste, economic grounds, disability, pregnancy, belonging to an indigenous people, trade union affiliation, political opinion, sexual orientation.

2.5 Harassment, harsh or inhumane treatment

Suppliers shall ensure that no employee is subject physical, sexual, psychological or verbal harassment, intimidation or abuse.

2.6 Disciplinary practices

Disciplinary actions at our Suppliers shall be conducted in a manner to ensure the fair and humane treatment of employees. No employee shall be subject to corporal punishment. Progressive disciplinary action shall be applied.

2.7 Working hours

Elekta recognizes the need for a healthy balance between work and free time. Our Suppliers' employees shall not, on a regularly scheduled basis, be required to work a standard workweek of more than 48 hours per week or a total workweek of more than 60 hours (including overtime). Except in extraordinary business

circumstances. All workers shall be entitled to at least one day off in every seven-day period.

2.8 Compensation and benefits

Suppliers shall ensure that, wages, including overtime compensation and benefits, equal or exceed the level required by applicable law. Elekta encourages consideration of the cost for meeting basic needs of the workers and their families, as part of defining wage levels.

2.9 Freedom of association and collective bargaining

All our Suppliers' employees shall be free to exercise their legal rights to form, join, or refrain from joining organizations representing their interests as employees. No employee shall be subject to intimidation or harassment in his or her peaceful exercise of these rights. The employees' right to collectively bargain shall be respected.

In situations where the right to freedom of association and collective bargaining is restricted by applicable laws and regulations, Elekta expects Suppliers to allow alternate forms of worker representations.

3. Material Compliance and Conflict Minerals

Suppliers shall make reliable determination of the origin and source of materials in products, parts or components supplied to Elekta and ensure that the sourcing does not directly or indirectly contribute to human right abuses and/or environmental damage in conflict-affected and high-risk areas.

Minerals and metals of special concern are tin, tantalum, tungsten, gold and cobalt, but other minerals and metals may also be applicable. Elekta refers to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas for the definition of conflict-affected and high-risk-areas.

4. Business Ethics

Suppliers shall conduct business in compliance with all applicable national and international laws and regulations and adhere to internationally agreed standards of business ethics.

4.1 Anti-corruption

Suppliers must not engage in or tolerate any form of corruption, bribery, extortion or embezzlement. Suppliers must not offer or accept any benefits or other means to obtain any undue or improper advantage. Such improper benefits may comprise cash, non-monetary gifts, pleasure trips or services and amenities of any other nature.

4.2 Conflict of interest

Suppliers shall avoid conflicts of interest that may compromise the Supplier's credibility or other exterior parties' confidence in Elekta. Suppliers shall disclose to whenever a situation arises in which there appears to be a conflict of interest involving or affecting Elekta.

4.3 Fair competition

Suppliers shall respect and comply with all applicable competition laws and regulations and not enter into discussions or agreements with competitors concerning pricing, market sharing or other similar activities.

4.4 Protection of third party rights and information

Suppliers must respect Elekta's intellectual property rights and protect Elekta's information by safeguarding it against misuse, theft, fraud or improper disclosure.

4.5 Compliance with export controls

Suppliers shall comply with applicable export control laws and regulations and ensure that goods are not exported in contradiction with the same, including but

not limited to applicable national, European or U.S laws and regulations. Further, the Suppliers shall comply with applicable sanctions laws and economic sanctions programs administered by the EU, U.S. or other applicable sanction regime. Suppliers may not undertake any activity, or cause or require Elekta to undertake any activity that could result in Elekta violating any of the abovementioned export control and/or sanction laws and regulations.

4.6 Standards when conducting clinical trials

Suppliers are required to conduct clinical trials in accordance with international guidelines, the current national and local laws and regulations and the strictest medical, scientific and ethical principles, in particular the Declaration of Helsinki.

4.7 Animal welfare

If applicable to the industry of the supplier, animal testing will not be acceptable and scientifically valid and acceptable alternatives shall be used.

5. Environmental protection

Suppliers shall operate in full compliance with applicable environmental legislation. A management system shall be in place, aimed to continuously improve the Supplier's environmental standards and performance. Suppliers shall identify all relevant environmental aspects and take appropriate actions to address these, including resource consumption, emissions, chemicals and waste. Resources such as water and energy should be used efficiently and impacts on biodiversity as well as services provided by our ecosystems should be minimized.

6. Monitoring and compliance

The Supplier is responsible for regular and documented monitoring and review of the compliance with the Code by all their units. The Supplier is also responsible for maintaining adequate documentation to demonstrate compliance by its suppliers (Elekta sub-suppliers).

As a condition of doing business with Elekta, Suppliers must permit Elekta and its designated agents (including third parties) to perform audits, including confidential employee interviews.

In case deviations from the Code and/or applicable laws are found, the Supplier shall take corrective actions in accordance with an, in cooperation with Elekta, agreed upon corrective action plan. Lack of cooperation, repeated and severe violations of the Code and/or applicable laws may result in a reduction in business with that Supplier and, ultimately, an end to the business relationship with Elekta.

In the context of our business relationship, if you or your employees believe that the terms of this Code are not adhered to, please inform your point of contact at Elekta. In case you believe that Elekta is not acting in accordance with its own Code of Conduct, then we encourage you to raise your concerns directly to the Elekta stakeholder reporting channels, compliance@elekta.com.