

Coffee Stain Group - Code of Conduct

Adopted by the Board of Directors 2025-11-27

Document type: Policy

Version: 1

This Code sets out the basic principles for how we work at Coffee Stain Group AB ("**Coffee Stain**"). It applies to all employees, consultants, and contractors.

Document owner: Coffee Stain Group CFO

If you have any questions about this policy, please contact:

Coffee Stain Group CFO

Revision history

Date	Version	Description	Author
2025-11-27	1.0	Adopted by the board of directors.	

2. GENERAL PRINCIPLES AND OBLIGATIONS

Coffee Stain expects all employees to act responsibly, ethically and in compliance with laws. We treat colleagues, players, partners and investors with respect, protect the company's reputation, assets and confidential information, and have zero tolerance for corruption, harassment or discrimination.

Employees must always comply with applicable laws and regulations. Bribery or corruption in any form is prohibited. Business must be conducted fairly and competitively, without collusion or anti-competitive behavior. Conflicts of interest must be avoided or disclosed, and company assets and information must be handled responsibly and only for legitimate business purposes.

3. CONDUCT IN BUSINESS

3.1 ASSETS AND RESOURCES

Coffee Stain's assets and resources include IT equipment, systems, software, intellectual property such as brands, trademarks and game IPs, as well as confidential business information. These are vital to our operations and must not be misused, damaged or disclosed without authorization. Employees must handle them responsibly and protect them from loss, damage or misuse. Use is allowed only for legitimate business purposes, with limited personal use permitted where it does not conflict with this Code or the law. The same obligations apply to assets and intellectual property belonging to partners or other third parties.

3.2 TAX POLICY

Coffee Stain complies with tax law and practice in all of the territories in which we operate. Compliance for us means paying the right amount of tax in the right place at the right time. In structuring our commercial activities Coffee Stain will consider — among other factors — the tax laws of the countries within which we operate with a view to maximizing value on a sustainable basis for our shareholders. Any tax planning undertaken will have commercial and economic substance and will have regard to the potential impact on our reputation and broader goals. We will not undertake planning that is contrived or artificial.

3.3 FAIR COMPETITION

Coffee Stain observes the principles of free and fair competition. Coffee Stain competes vigorously and ethically while complying with all antitrust and competition laws. Antitrust and competition laws are designed to protect consumers and competitors against unfair business practices and to promote and preserve competition. These laws, among other things, prohibit or restrict activities related to fixing, coordinating or controlling prices and allocating or dividing customers, territories or markets.

Any violations of antitrust laws by its management or employees are prohibited. Coffee Stain will always fully cooperate with authorities.

All employees are required to strictly observe antitrust law and the corresponding internal regulations.

Anti-competitive agreements with competitors are forbidden, irrespective of the market position of those involved. Moreover, it is forbidden to bring about any understanding with competitors on such matters. Employees should take care in any communications with competitors about any aspect of Coffee Stain's business (e.g., at industry events, trade associations, etc.) and refrain from and prevent illegal anti-competitive agreements with competitors. We avoid patterns of conduct coordinated with other companies that have as their purpose an illegal restraint of competition or which results in harm to third parties.

In general, there is a ban on issuing instructions to distributors on the resale prices they may charge. Exceptions are only permitted in rare cases and must be compliant with local law. A legal assessment and the prior consent of the management of your company must always be obtained before any such instruction can be given or agreement entered into.

3.4 INSIDER TRADING

Employees must not use or share insider information when trading Coffee Stain shares or other securities. Insider information means non-public information that, if disclosed, could significantly influence the share price. This includes financial results, major contracts, acquisitions, new products, or changes in senior management. Any trading or tipping of others based on such information is strictly prohibited. Employees who have access to insider information must exercise caution and, in case of doubt, consult the Legal function before trading.

3.5 CONFLICTS OF INTEREST

All decisions taken within Coffee Stain must always be taken against a background of what is best for the Group. Conflicts of interest arise when an employee's outside private interests (for example, financial, personal or family interests) impair or interfere with the employee's job duties or with the interests of Coffee Stain in any way.

Conflicts of interest may arise through business activity or by exercising mandates outside of Coffee Stain such as membership in a board of directors, in clubs, in political or public offices, from secondary employment (as a supplier, adviser) as well as from gifts, donations and invitations or wrong incentive systems.

Your personal relationships or interests must not influence your work for Coffee Stain. Therefore, both actual conflicts of interest and the mere appearance of a conflict of interest must be avoided.

All employees are required to report actual or possible conflicts of interest to avoid potential consequences for themselves under employment law or criminal law and to avoid harming Coffee Stain.

3.6 CONFIDENTIAL INFORMATION

Confidential information refers to non-public information intended only for authorized recipients. It may include business records, contracts, financial or employee data, creative work, intellectual property and new business plans or products. Sharing such information without authorization, including with media, competitors or in public settings, is prohibited and may breach the law. Employees with access to sensitive information must maintain strict confidentiality and may disclose it externally only with proper authorization and, where appropriate, under a confidentiality agreement. Confidential information must also never be shared on social media.

4. CONDUCT TOWARDS COLLEAGUES AND EMPLOYEES

Coffee Stain is committed to equal opportunities, mutual respect and a workplace free from discrimination and harassment. All employees, applicants and business partners must be treated regardless of gender, age, ethnicity, religion, disability, sexual orientation or other protected grounds. Recruitment and promotion are based on competence and suitability. We value diversity and believe that different backgrounds strengthen our company. Any form of harassment or conduct that undermines human rights is strictly prohibited.

4.1 HUMAN AND LABOR RIGHTS

Coffee Stain is committed, in particular, to moral and ethical principles and of the International Charter of Human Rights, the ten principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the labor and social standards of the International Labor Organization (ILO), and the principle of social partnership.

In addition to the equality of all human rights, the following principles are especially important to Coffee Stain:

- the right to equal opportunity and freedom from discrimination
- the avoidance of all forms of child labor and forced labor
- fair remuneration and additional benefits based on local market conditions
- observance of the applicable rules on working hours
- observance of all anti-slavery laws
- freedom of association

Our position is always to show mutual respect for one another's dignity, and we do not tolerate any form of abusive behavior, harassment, threat or violence. Every employee is welcome and encouraged to report any irregularities, concerns, abuses or violations to his or her supervisor, the management or HR Department. As an employee, you are also welcome to report any issues, also anonymously by using the whistleblowing channel which can be found on [Coffee Stain Whistleblowing](#).

5. CONDUCT WITHIN THE SOCIETY

5.1 BEHAVIOR IN PUBLIC AND COMMUNICATIONS

Employees have the right to free speech but must remember that their actions in public or online can reflect on Coffee Stain. Personal opinions may be expressed, but they must not be presented in a way that suggests they represent the company. Only authorized persons may make statements on behalf of Coffee Stain, including via social media. Inquiries from media or authorities must be referred to the designated company contact.

5.2 SOCIAL MEDIA

Employees must use social media responsibly. Online activity must never breach this Code, disclose confidential information, infringe intellectual property, violate laws, or involve harassment, discrimination or offensive behavior. When posting about Coffee Stain or the gaming industry, employees must make clear that views expressed are personal and not official statements of the company. Employees are personally responsible for what they publish, and misuse that harms Coffee Stain or breaches this Code may result in consequences.

5.3 DATA PROTECTION AND AI USE

The protection of personal data concerning employees, customers, suppliers, and all other stakeholders is of particular importance to Coffee Stain. We collect and process personal data only when this is absolutely necessary to perform work-related tasks. Personal data may be collected or processed only with a clear purpose and if permitted by law.

Since Coffee Stain is regulated by the EU General Data Protection Regulation and national laws particular care must be taken when transferring personal data outside the EU (whether within the Coffee Stain Group or otherwise).

The Company supports the responsible and secure use of artificial intelligence (“AI”) to enhance its operations and decision-making. AI shall only be used through trusted and approved platforms that meet the Company’s standards for data protection, confidentiality, and ethical compliance.

5.4 DATA SECURITY

It is important that Coffee Stain restrict access to confidential and sensitive data to protect it from being lost or compromised in order to avoid adversely impacting our customers, incurring penalties for non-compliance and suffering damage to our reputation. At the same time, we must ensure users can access data as required for them to work effectively. We all have a responsibility to try to eliminate malicious data theft. We need to continue to increase awareness of data security risks and avoid accidental loss scenarios in our daily operation for instance by restricting access to data classified as ‘Confidential’ or ‘Restricted’ to authorized persons whose job responsibilities require it and by reporting incidents to the Coffee Stain response team.

6. REPORTING CONCERNS

If you see or suspect a violation of this Code, raise it with your manager, HR, or through the whistleblowing channel which can be found on [Coffee Stain Whistleblowing](#). Reports made in good faith will not result in retaliation.

7. RESPONSIBILITY AND IMPLEMENTATION

All employees must know and follow this Code. Managers must lead by example and ensure their teams comply. Breaches of this Code may result in disciplinary action, including termination of employment.

8. VIOLATIONS AND PENALTIES

Coffee Stain wishes to avoid illegal and unethical conduct. Any incident or risk of non-compliance should be identified and disclosed as early as possible to avoid serious damage for Coffee Stain.

9. CONTACTS

Questions or concerns regarding this Code can be raised with your immediate manager, HR, or relevant functions such as Legal or Finance. You may also use the whistleblowing channel which can be found on [Coffee Stain Whistleblowing](#).