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"Our Code of Conduct is our way of ensuring that everyone at Diab is aware of and understand our way of doing business to drive results in a responsible and ethical way"



CEO Words

In a world shared by over 8 billion people, sustainability is not optional – it is essential. Each one of us has a responsibility to our planet and the future generations who will inhabit it. Our core values show us how we want to be, how we want to work and how we want to treat ourselves, but also our customers, partners and all other stakeholders.

Our Code of Conduct provides our corporate values into guidelines and gives us directions for how to act appropriately in every situation and make the right decisions in line with our high standards of business integrity and ethical corporate governance. I strongly believe that earning and maintaining the respect and trust of our employees, customers, business partners, and society are crucial for our sustained business success. We understand that, like all companies and organisations today, we must take tangible steps to ensure a sustainable future. This relies on each of us making the right decisions, every day.

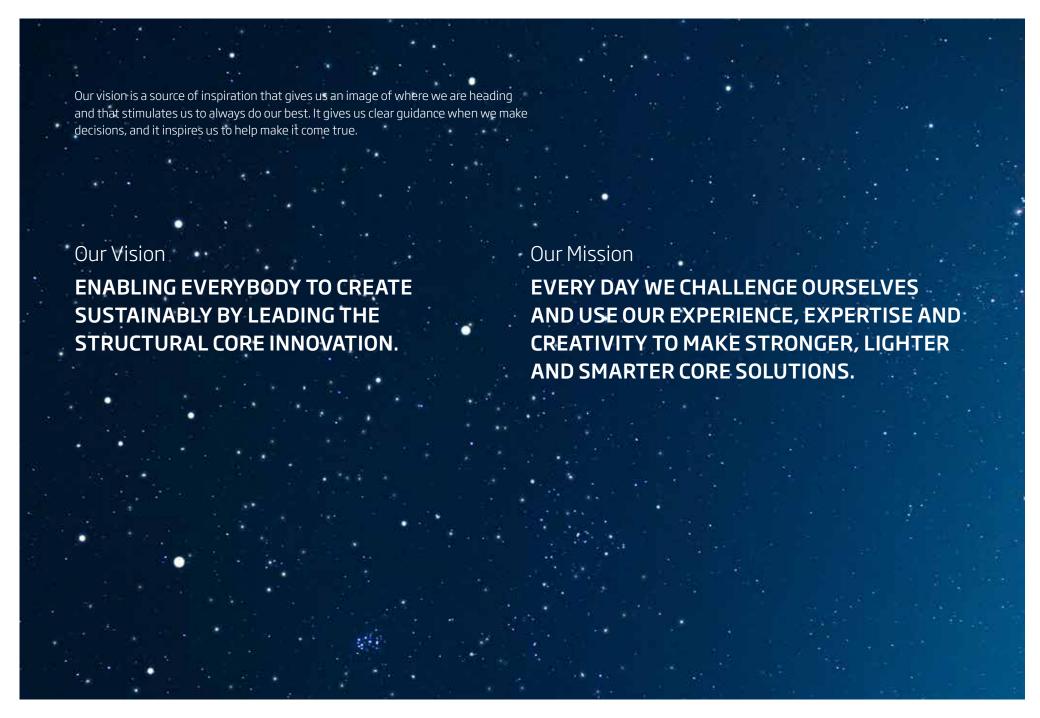
Together, we cultivate and maintain a respectful and ethical workplace – that is at the heart of Diab. We need to know how to work and act to reach our vision to create a sustainable solution by leading the structural core innovation – let us do this as One Diab.

Yours,

Johan Arvidsson Group CEO







Our Values

Success is all about teamwork. Teamwork where every individual contribution has the same value. Because it is with commitment, involvement, dialogue and feedback that we can reach our common goals. But to achieve that, we must all share the same values, work together, respect each other and use our knowledge. It's when we are all moving in the same direction as One Diab that we create a force strong enough to create an impact. That's why we have four core values. They are the soul of our company and describe how we relate to our customers and each other.



Safety

Safety for people always comes first. Simply put, no one should get hurt while working at Diab. Together, we all take responsibility for each other's safety.



Can-Do

Each one of us is responsible for driving improvement.

With a positive, productive approach to work, we take personal initiative -empowering ourselves, our coworkers and our company.



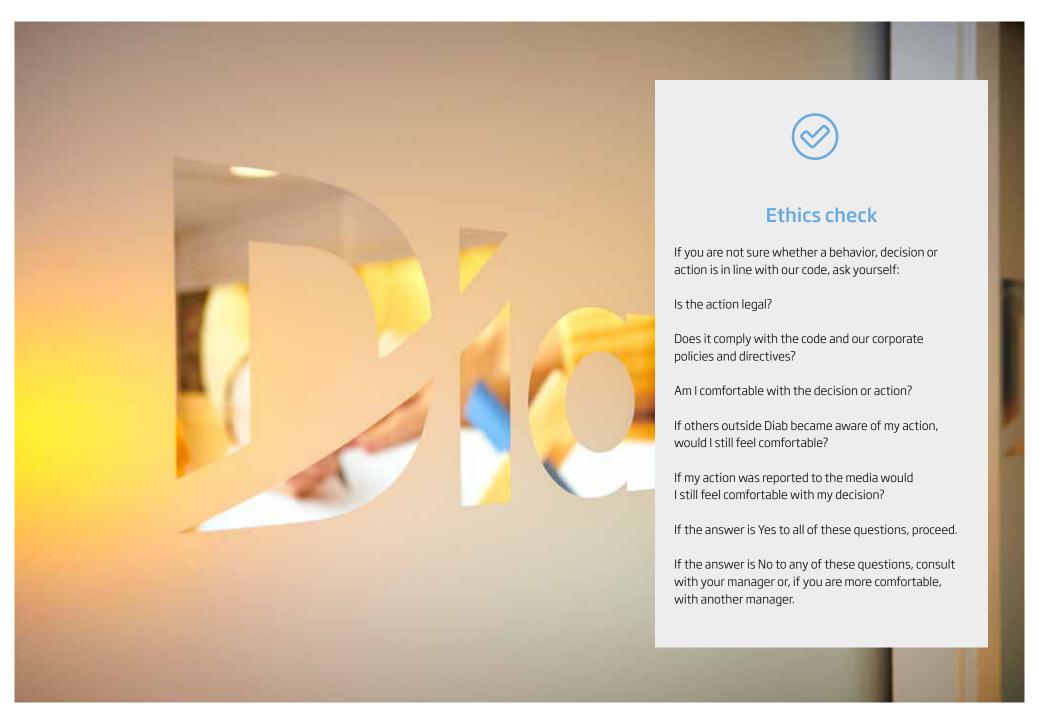
Reliability

We keep our promises, both to each other internally and to our customers, partners and others externally. We work for a sustainable society, our work ethic is strong and we prove it every day.



Efficiency

Efficiency and high performance are distinctions of our culture. With clear organization, we make sure that we do the right things at the right time with the right speed.



7 | Diab Group Code of Conduct

Purpose, Definitions and Scope

The Code of Conduct establishes a framework for sustainable business practices in Diab, setting clear expectations for integrating sustainability into business operations in terms of governance, risk management, and daily operations. It reflects the interests of key stakeholders and defines the minimum standards that apply to Diab Group AB and its subsidiaries. The policy is available on Diab Group AB's external website and distributed to stakeholders.

The Code of Conduct was adopted by Diab Group AB's Board of Directors on March 28th, 2025.

Diab Group AB continuously monitor and review our internal processes and documents. The Code of Conduct is developed annually by Sustainability & EHSQ Manager prior to Board meeting for approval.

Diab Management Team (DMT) is responsible for reviewing the Code of Conduct and proposing annual objectives to the board of directors. Any changes to this Code of Conduct is subject to approval by the members of the Board of Diab Group AB. It must also identify best practices and tools that the company can use to help achieve its commitments and targets.

Diab commits to allocating appropriate financial, human, and technological resources to implement its sustainable strategy and manage material impacts, risks, and opportunities across the group.

Throughout the policy, the following definitions apply: "Diab Group AB" refers to the parent company of Diab. "Diab" refers to subsidiaries within the group, including the parent company Diab Group AB. "Group companies" refers to companies in Diab, excluding the parent company Diab Group AB and associates. "Employees" refers to all employees in Diab. "Representatives" refers to non-employed individuals authorized to act on behalf of Diab, including but not limited to board members, agents, and external contractors.

The Code of Conduct applies to the entire Diab and all its legal entities both domestic and foreign. It covers all employees, managers, contractors and business partners. All Diab Group AB subsidiaries are obliged to adopt this policy or to create and adopt equivalent policies of their own complying with the minimum level set by the framework in the Code of Conduct. The Board of directors and management in each group company are responsible for implementing the policy as well as for ensuring adherence to and compliance with the policy. When applying the policy, entity-specific circumstances are to be considered. It is each manager's duty to ensure that employees understand the Code of Conduct. Each employee or representative is responsible for understanding the requirements that are directly applicable to their position, role and employment. In situations where the Code of Conduct does not provide a clear answer or when in doubt, ask for further advice.

Our Diab Code of Conduct - our way of doing sustainable business

Diab Group AB is a Swedish owned company with production facilities and sales offices globally for sandwich core materials. By developing technological solutions for our customers, as well as offering a wide range of services and products, laying ground for a sustainable future, Diab creates value both for shareholders and society at large.

Sustainability has long been an integrated part of Diab's business strategy. Rooted in the conviction that sustainable companies are profitable and create long-term value, Diab focuses on sustainable strategies rather than sustainability strategies. In addition, Diab does not differentiate between sustainability risks and business risks but rather regards them as interconnected.

Diab has divided the Code of Conduct into four focus areas, which reflect our strong commitment to sustainable business. These focus areas contain the minimum requirements that apply all of us in our daily work and are summarized in the following pages.





Why do we need a Code of Conduct?

The Code of Conduct shows Diab's values in action, particularly in areas with key ethical or legal considerations. The Code of Conduct is what Diab stands for and what is expected from everyone it applies to.

Who does our Code of Conduct apply to?

The Code of Conduct applies to everyone. The Code of Conduct applies to the entire Diab and all its legal entities both domestic and foreign. It covers all employees, managers, contractors and business partners. All employees have a responsibility to inform themselves about the rules and policies relevant to their work. Diab's code of conduct should also be used as the basis for setting expectations with business partners, consultants and third parties. Diab wants to work with those whose actions align with the Code of Conduct.

What if something is not covered in our Code of Conduct?

The Code of Conduct contains rules and principles for how to do business. It can't, however, describe every real situation that might arise and sometimes the right answer is not obvious. If you're ever in doubt about a course of action, consult your manager who can help you find a way to handle the situation. Diab can provide legal advice and guidance if the requirements of the Code of Conduct are unclear in any respect.

Roles and Responsibilities

Role	Responsibilities
Board of Directors, Diab Group AB	Overall responsible for the organization and management of Diab.
	Oversee compliance with, including but not limited to, external laws and regulations, governance model, policies and adequate sustainability programs.
	Oversee that the Code of Conduct aligns with material sustainability impacts, risks, and opportunities across relevant areas.
	Responsible for the preparation of the annual and consolidated accounts, including the sustainability statement.
	Adopt strategies and targets.
	Adopt policies and frameworks.
Board of Directors, Diab subsidiaries	Overall responsible for the organization and management of each group company.
	Oversee compliance with, including but not limited to, external laws and regulations, governance model, policies and adequate sustainability programs.
	Adopt strategies and targets for each group company.
	Adopt policies and frameworks for each group company.
	Comply with Diab's policies and frameworks.
CEO, Diab Group AB	Prepare and implement the business strategies adopted by the Board of Directors.
	Overall responsibility for daily operations together with the management team including execution of sustainability programs.
	Report to Board of Directors of Diab Group AB.
VP, Diab Subsidiaries	Prepare and implement the business strategies adopted by the Diab Group AB.
	Overall responsibility for daily operations together with the management team including execution of sustainability programs. Report to Board of Directors of each group company.

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Third-party Standards

Diab Group AB is committed to the principles of the UN Global Compact and the UN Principles for Responsible Investments (PRI). The Code of Conduct is aligned with these commitments, as well as the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the Declaration on Fundamental Principles and Rights at Work of the ILO, the ten fundamental conventions of the ILO, the International Bill of Human Rights, the ILO's conventions on human rights at work, the Rio Declaration on Environment and Development, and the UN Convention against Corruption.

Governance and Ownership Structure

Diab Group AB is Ratos AB owned by 96%. Diab Group AB (holding company) own 100% of Diab International AB. Diab International AB owns 100% of all Diab subsidiaries.

Ratos AB's governance model establishes clear roles and responsibilities for Diab Group AB. Diab Group AB, operates with a high degree of independence and is responsible for developing strategies and business plans that include targets and actions to enhance competitiveness and financial strength, while adhering to laws, values, and sustainability standards. Ratos AB exercises ownership through board representation in Diab Group AB. Diab International AB is the entity that enforces the roles and responsibilities of Diab Group AB to all Diab subsidiaries.

Ratos AB provides resources, expertise, and knowledge to support value creation in Diab Group AB, leveraging its network to identify opportunities, share insights, and facilitate knowledge exchange. Diab International AB share the same role but within Diab.

Whistleblowing

Employees of Diab must be aware of the laws, guidelines, and regulations relevant to their duties. Suspected violations must be reported immediately to the nearest supervisor. Employees and external parties have the option to report such incidents anonymously through Diab Group AB's whistleblowing system. The system is managed by an external organization, WhistleB, the Whistleblowing Centre which operates independently of Diab Group AB's IT systems and online services. A link to the system is available on www.diabgroup.com.

Demonstrating compliance

Diab Group AB's yearly Sustainability Report is used to demonstrate compliance and monitoring regarding the Diab's performance in relation to this Code of Conduct. When Diab's stakeholders, customers and other parties ask Diab to demonstrate compliance with laws, international initiatives and other requirements, this Code of Conduct should be sent to the party concerned.



What does this mean in practice? What behavior is unacceptable?

Here are a few examples:

- Racially offensive or xenophobic material is placed on a employee's desk;
- Innuendo or comments hostile to the disabled;
- Gender-specific harassment or violence, including assaults, unwanted advances, or improper remarks or jokes; or
- Displaying improper images or objects, including those with sexual content

Diab aims to ensure that each individual feels valued and fully supported in achieving their personal best.



Social Responsibility

Legal Compliance and Commitment to Human Right

Diab respects the UN human rights conventions, national laws and regulations of countries where Diab operates as well as collective agreements and relevant ILO conventions. In cases international law is stricter than national regulatory requirements, Diab will comply with and follow international law.

Employee Rights, Equality, and Workplace Safety

Diab has zero tolerance for harassment and discrimination, and actively promotes a corporate culture free from discrimination and harassment. Furthermore, Diab has zero tolerance for child labor and forced labor and does not employ individuals under the age of 15 or below the applicable local minimum age. Diab does not accept forced labor, modern slavery, or any other form of involuntary labor, including in its value chain.

Purchase of sexual services, sexual exploitation of children, and child pornography are prohibited. Additionally, such actions are illegal in most countries where Diab operates. Diab employees and representatives must never engage in or support these activities. This applies both during and after working hours, regardless of the country.

The Board of Directors in Diab Group AB, together with the Board of Directors in each group company, are responsible for compliance with the ethical requirements in the Code of Conduct and for working actively towards equal treatment and opportunities in employment. The responsibility is then shared with the management of Diab Group AB, the management of group companies, as well as all employees and representatives.

Diab believes that the employees are a key resource, and the relationship between Diab and its employees is built on mutual respect and trust. Employees are treated equally, regardless of – but not limited to – gender, gender identity or expression, religion or other beliefs, ethnicity, disability, sexual orientation, and age.

Diab makes active efforts to ensure equal treatment, equality, and diversity in all aspects of employment, including working conditions, salaries, recruitment, promotions, and skills development. Diab is committed to pay adequate wages according to local laws and regulations.

Employees are provided with a safe and healthy work environment, which Diab continuously strive to improve. Diab aims for zero work accidents.

All employees are required to follow safety instructions and Diab offer appropriate training to ensure safe work.

For health and safety reason, Diab do not accept employees being intoxicated or under influence of drugs at work. It is everyone's responsibility to report any suspicion of abuse.

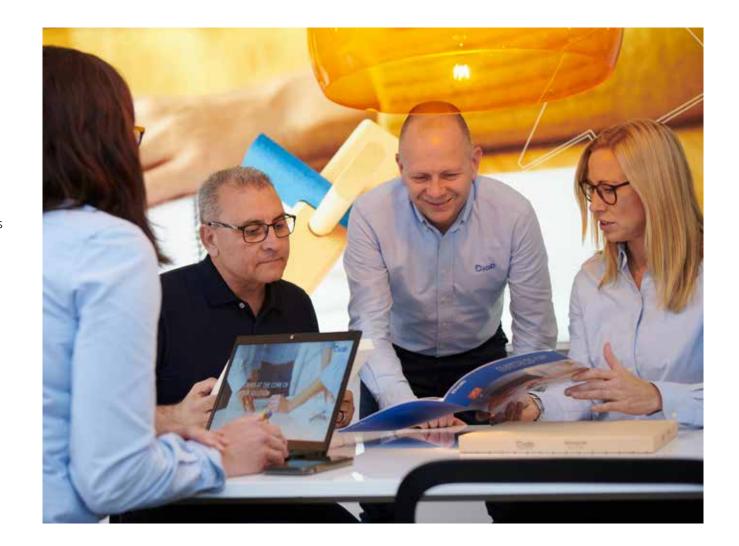
Social Responsibility

Diab aims to attract, develop, and retain qualified and motivated employees in a professional environment. Recruitment is based solely on merit and competence.

Diab is dedicated to fostering a culture of continuous learning and professional development and to provide regular training sessions and educational opportunities to ensure our employees have the skills and knowledge needed to excel in their roles.

All employees have equal access to training and development programs. Diab offer mandatory training on compliance, ethics, and company policies to ensure all employees understand and adhere to the standards of conduct. This includes training on anti-discrimination, harassment prevention, and workplace safety. Diab supports employees in their career development goals and encourage participation in workshops, seminars, and courses that align with both individual career aspirations and organizational needs.

Employees in Diab have the right to family-related leaves, including parental leave, in accordance with local laws, social policies, and collective bargaining agreements. Diab employees are covered by social protection, either through public programs or company-offered benefits, to guard against loss of income due to retirement. Employees have the right to form or join unions. Furthermore, Diab respects the rights of employees and trade unions to negotiate collective agreements.





What are the biggest environmental challenges our industry faces?

What responsibility do I, as an individual employee, have to follow Diab's environmental policy?

How can I reduce my own environmental impact in my daily work?

How can we as a team work together to achieve our environmental goals?

What examples of successful environmental initiatives have we already implemented?

How can I provide feedback or suggestions for improving our environmental policy?



Environmental Responsibility

Integrating Environmental Sustainability

Diab complies with relevant environmental laws and international standards. Diab assesses and manages sustainability impacts, risks, and opportunities throughout its material value chain, including both upstream and downstream activities.

Diab prioritizes the efficient use of resources, including the responsible management of energy and water. All employees and other stakeholders have the possibility but also responsibility to see to that Diab apply to this in every action.

Climate action efforts focus on both reducing greenhouse gas (GHG) emissions and adapting to the challenges of climate change. Additionally, protecting biodiversity, preventing pollution, and careful managing of hazardous substances are key priorities. Group companies shall promote businesses that enable the transition to environmental sustainability.

Diab strives for zero air pollution and continuously implements new techniques and routines to achieve this goal.

All Diab production sites shall strive to be certified in accordance with ISO 14001.

Diab's products and lightweight solutions are all part of the future society, in which lightweight delivers performance and enables reduced GHG emissions.

Recycling materials wherever is feasible, including in productions areas and offices is of utmost importance to continously improve our performance and meet our targets.

Diab received approval for its new science-based targets (SBTi) in 2024, which are clear goals to be achieved over the next five years across all three GHG scopes, as well as long-term Net-Zero targets to be met by 2050. These goals are detailed under Climate Commitment.

For Scopes 1 and 2, Diab will transition to 100% green electricity and replace primarily fossil-based heat sources with renewable ones within the next few years. This effort will be implemented through all production units down to the smallest sales office and is a shared responsibility. Scope 3 is more challenging to achieve, which is not unique to Diab. Our largest GHG emissions derives from our purchased raw materials, so focusing on this area is a natural priority. One step in this direction is to decouple

our dependence on fossil-based feedstock and instead use mass balanced (for Diab, this means bio-circulated) raw materials. The goal for 2025 is to transition to 100% non-fossil PVC in our PVC foam for all our Advanced kits in Europe.

Waste management

Diab continuously strives primarily to reduce the amount of waste generated in production. Where waste still occurs, the material should be evaluated for reuse; otherwise, recycling should be considered. If the chemical structure of the material does not allow for recycling, it should be incinerated for energy recovery as a last resort. Diab strive towards continuously collaborate with external parties to evaluate the possibilities of upgrading the not recyclable waste that still occur, in order to fully adopt to the circular product life cycles. The goal is that no core material from Diab should end up in landfill.



Commitment to Climate

We are committed to climate protection and to develop sustainable solutions for both near and long-term targets.



Approved Near-Term Science-based Targets

Diab commits to reduce absolute scope 1 GHG emissions 33.6% by 2028 from a 2022 base year. Diab also commits to increase active annual sourcing of renewable electricity from 51% in 2022 to 100% by 2030.

Diab further commits to reduce scope 3 GHG emissions 44% per metric tonne of sold product by 2028 from a 2022 base year.



Approved Net-Zero and Long-Term Science-based Targets

Overall Net-Zero Target

Diab commits to reach net-zero greenhouse gas emissions across the value chain by 2050.

Long-Term Targets

Diab commits to reduce absolute scope 1 GHG emissions 90% by 2050 from a 2022 base year.

Diab also commits to continue active annually sourcing 100% renewable electricity from 2030 through 2050 from a 2022 base year.

Diab further commits to reduce scope 3 GHG emissions 97% per metric tonne of sold product by 2050 from a 2022 base year.



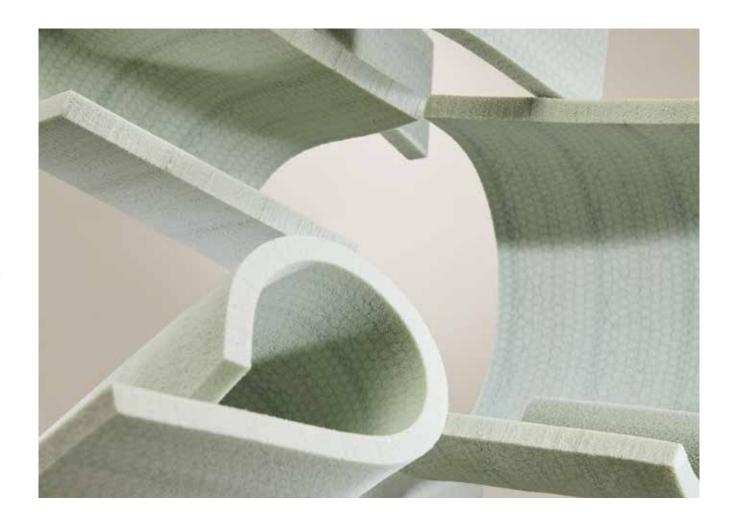


Continual improvements

Diab's activities are driven by continual improvements in all aspects of the operations, with the aim of exceeding customer expectations and meeting business needs. Continual development and improvements are also the key drivers for meeting the sustainability targets. Systematic activities, together with preventive work and the application of the preventive principle, are also key concepts for Diab's efforts to continually improve and develop the sustainability work.

Commitment to quality

Diab is dedicated to delivering quality work in every aspect, ensuring that products and services consistently meet and exceed customer expectations. Diab's operations are continuously improved and developed with sustainability in mind. A systematic approach to quality management is taken, ensuring all production units are certified according to the ISO 9001 quality management system and relevant sector-specific certifications.





Why would a potential business partner offer me this gift or invitation?

Could others perceive my business decision as being influenced due to my relationship with the other person?

What is commercially sensitive information? It includes: prices, surcharges, costs, margins or discounts / terms of sale or profitability / distribution, business plans, aftermarket strategies, market forecasts or product development plans.

Sharing, receiving or exchanging this type of information could be prohibited even when it is informal, such as in conversation with a former colleague or friend who now works for a competitor.



Responsible Business

Business Fthics

Our core values guide our daily decision-making and provide a framework for acting correctly and to conduct our business in a fair and responsible manner.

Customers, Companies in the Value Chain and Business Ethics

Diab assesses new customers and companies in the value chain for risks, opportunities, and maturity in terms of sustainability. Diab refrains from customers in the value chain that cause severe environmental harm, impact ecosystems or human health, or violate human or labor rights. Additionally, the group excludes sales to companies involved in the development, production, or sale of weapons that violate international conventions. This exclusion also applies to products or components specifically designed for these weapons.

Our procedures and policies are built to make sure that we follow applicable international legislation, sanctions and embargos, set by the UN and EU, on products and components for military or dual-purpose use.

Anti-Corruption, Risk Management and Compliance

Diab has zero tolerance for all forms of corruption, including bribery and money laundering.

Corruption refers to the abuse of a position of trust for personal or corporate gain, such as offering, requesting, or accepting bribes. A bribe is defined as a gift, service, entertainment, or other benefit that might improperly influence another person's actions in favor of the giver.

The management of Diab Group AB and group companies shall regularly analyze corruption and money laundering risks and maintain anti-corruption and anti-money laundering programs. This includes the analysis of operations in exposed industries or high-risk countries.

Diab employs a comprehensive risk management process for environmental, social, and governance risks, including climate change, human rights, and supply chain impacts. These risks are regularly updated in response to regulatory changes and stakeholder expectations.

The Board of Directors of Diab Group AB and each group company are responsible for carrying out risk management processes where all employees have a responsibility to report any detected risks.

The results on effectiveness of risk management measures are reported to the Board of Directors on an annual basis.

Diab prohibits actions that conflict with ethical business practices or laws, including offering, promising, giving, requesting, or accepting bribes, undue advantages, or monetary gifts, as well as involvement in money laundering or financing illegal activities.

Employees, representatives, and partners of Diab are expected to demonstrate honesty, integrity, and transparency in all interactions with colleagues, customers, suppliers, business partners, organizations, and authorities. Failure to comply with these principles may result in disciplinary actions, including dismissal. Stakeholders must adhere to anti-corruption and anti-money laundering measures.

Employees and representatives of Diab shall comply with competition laws and avoid illegal agreements or sharing of market information. Additionally, employees, representatives, and partners are required to disclose potential conflicts of interest, such as contracts involving close family members or friends.

Diab complies with export control regulations, ensuring that no transactions violate economic sanctions or involve sensitive goods without proper licenses.

Diab does not use company funds to support political campaigns or causes. Employees and representatives are expected to keep personal political activities separate from their roles at Diab.

Diab employees and representatives must not misuse or disclose confidential information. Confidential information includes non-public details about Diab's operations, results, strategies, transactions, and plans. Confidentiality agreements are required for relevant employees and contractors, continuing post-employment.

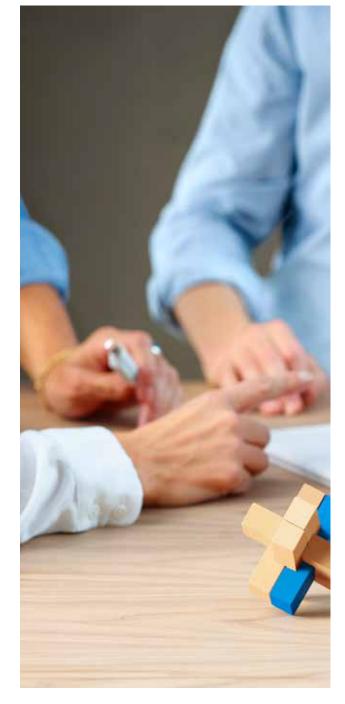
Both physical and intellectual property of Diab must be used for legitimate business purposes only. Employees must protect company assets from damage, theft, and misuse, complying with IT and security policies.

Supplier and Partner Compliance including Business Ethics

Diab is committed to maintaining strong, fair, and ethical business relationships with suppliers. Diab places a strong emphasis on supplier engagement to ensure compliance with sustainable business practices throughout the value chain. Suppliers are required to maintain transparency regarding their sourcing and production processes, as well as provide necessary documentation upon request to align with environmental, social, and governance standards of Diab.

Suppliers, agents, and partners are required to adhere to this policy as well as to the Supplier Code of Conduct. Diab Supplier Code of Conduct sets expectations for environmental, social, and governance practices across the material value chain.

Diab strives to have minimum all strategic supplier signed the Supplier Code of Conduct during 2025. Further, we also aim to assess a minimum of four strategic suppliers per year.





Key suppliers are expected to participate in audits and assessments to verify adherence to these requirements. We expect suppliers to provide access to their production facilities on demand, enabling direct verification of compliance. It applies to suppliers, regardless of industry or location. Failure to comply with the Code of Conduct and the Supplier Code of Conduct may be considered a breach of contract, and Diab reserves the right to terminate the agreement.

Suppliers are encouraged to introduce certifiable management systems on quality management, the environment and work environment, and to support the Paris Agreement to limit global warming.

Training is offered to internal strategic stakeholders yearly, for example R&D and local procurement according to ethical business and Code of Conduct.

Diab collaborates with a limited number of selected organizations, projects, memberships, and contributions. The criteria for selecting and collaborating with partners stipulate non-political organizations, transparent organizations with audited accounts, activities that are not offensive, time-limited commitments with the possibility of extensions, ongoing dialogue with partners and ensuring that funds are used as agreed.

An annual evaluation of Diab Group AB's community engagement is presented to the board of Diab Group AB. The Board of Directors decides on the budget for the following

year. Additionally, management can request additional funds for specific projects during the year.

Diab is committed to managing the material impacts, risks, and opportunities related to value chain workers. This includes fair labor practices, safe working conditions, and respect for human rights. Diab also implements grievance mechanisms to address issues and provides educational programs on health, safety, and labor rights. Additionally, Diab may offer financial resources, volunteer efforts, and support to selected organizations and projects aligned with its values.

Financial and Data Transparency

Diab aims to provide transparent, accurate, continuous and timely information of the highest quality. Group companies shall have accurate accounting that comply with applicable laws, regulations, accounting standards and norms. Diab respects and handles personal data as well as data regarding customers, business partners and suppliers carefully. Furthermore, personal data is processed in accordance with GDPR and other relevant data protection policies. The CEO and management at Diab Group AB are together with the VP and management of each subsidiary responsible for that data and sensitive data handling comply with relevant laws and regulations.

Company assets

Diab handles its company's assets responsibly and protect them from damage, misuse, criminal acts and loss. Diab's facilities, production lines, processes, and materials are highly valuable assets for which all share responsibility and handle them with care.

Diab insure its company's assests adequately and also see to that everything is compliant with all applicable internal controls to protect and safeguard the same.

Assets should only be used for business purposes, unless other use has been approved by the relevant manager. Diab do not tolerate any use of assets for illegal activities or personal gain.

Efficient and accurate tax management

Diab conduct business and support tax processes with a high level of ethics and integrity, with the overall aim of producing correct tax outcomes at an accurate cost. Diab is committed to paying taxes as required by legislation in each jurisdiction.

Tax-related issues are addressed promptly and Diab works proactively to mitigate tax risks.

Diab strictly comply with all applicable tax laws, regulations and company procedures in our business.



Personal data

Personal data relating to individuals, such as employees, customers and business partners are collected within Diab's everyday business activities.

Personal information (or data) is handled responsibly, and Diab ensure that information related to identified persons are handled in compliance with applicable regulations and laws in the countries where Diab operate.

Diab respect and apply the protection of rights and privacy according to the EU General Data Protection Regulation (GDPR) and other applicable data privacy laws in North America and Asia.

Information security and confidentiality

Company information is handled with due care and good information management is applied.

All confidential and sensitive information is handled in compliance with applicable regulations, group policies and directives. Diab regard information protection as part of the everyday work. Further, employees handling confidential information, including trade secrets, must comply with non-disclosure agreements, applicable laws and regulations, group policies and directives.

IT and IT Security

Diab ensure the proper usage and effective protection of information, networks, and systems within Diab. This includes maintaining confidentiality, integrity, and availability of data and resources through established IT security processes and procedures. All employees, contractors and partners are required to adhere to group IT and IT Security policy, which provides a framework for protecting data, users, computer systems and networks.

Employees will receive regular training on IT security best practices to stay informed about the latest threats and protective measures.





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