



WORLD'S NO 1. SLEEP APP

2025-04-08

# Code of Conduct

# CODE OF CONDUCT

## 1. DOCUMENT CONTROL

TITEL:  
Code of Conduct

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APPROVAL DATE:  
2025-04-08

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APPROVED BY:  
The Board of Directors

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## 2. INTRODUCTION

### 2.1. CEO'S WORDS ABOUT SLEEP CYCLE

Sleep Cycle is dedicated to conducting business with the highest possible standards. The Code of Conducts is one of the ways we put these standards into practice.

Being an employee at Sleep Cycle comes with many good things as well as responsibility. Responsibility to uphold high standards in how we, every day, communicate, behave, and act. It is not possible for our Code of Conduct to address every situation that you may face but it is set out the higher principle that should help anyone working at Sleep Cycle to "do the right thing".

### 2.2. PURPOSE, SCOPE AND IMPLEMENTATION

Sleep Cycles code of conduct is based on our values and desired behaviours. It should contribute to strengthen our culture, serve as a tool in our daily work and simplify decision making.

The code of conduct should serve as a general guideline to how we interact as colleagues as well as to external parties. The code of conduct sets the principles on how Sleep Cycle as a company as well as its employees act in relation to customers, suppliers, and the public.

The code of conduct applies to all employees within Sleep Cycle and to all companies owned or controlled by Sleep Cycle.

The code of conduct has been approved and adopted by the board of directors and should be updated when needed and reviewed periodically, at least annually.

### 2.3. SLEEP CYCLE'S RESPONSIBILITIES

Sleep Cycle will ensure that its employees will be provided the instructions and tools needed to ensure that we as a company will not only apply to the laws relevant in our daily work but also that we act according to our company values.

Sleep Cycle will ensure that steering documents and competence is available for its employees in order for them to be compliant with the code of conduct.

Sleep Cycle will ensure that reporting channels for violations of the code of conduct exists, are safe, and are handled professionally.

Sleep Cycle will ensure a safe, secure, and open workplace.

### 2.4. EMPLOYEE'S RESPONSIBILITIES

All employees are responsible for applying the code of conduct, as well as additional steering documents that Sleep Cycle has implemented.

Employees are expected to report any potential violations and keeping up to date with changes in the code of conduct as well as other steering documents. If the employee feel uncertainty in how to apply the code of conduct in any given event, it's his/her responsibility to raise questions to relevant party.

Mangers in Sleep Cycle should lead by example and thus foster a culture that is compliant with our code of conduct.

Mangers are responsible to ensure that new employees are introduced to the code of conduct and other relevant steering documents.

## 3. HUMAN RIGHTS

Sleep Cycle respects and adopt the UN recognized human rights as a natural part of our culture and business decisions.

### 3.1. DIVERSITY, EQUALITY, AND NON-DISCRIMINATION

At Sleep Cycle we respect each other and our differences. We support and help each other ensuring that respect is a natural part of daily work and that every individual have the same opportunity for personal development and employment. We believe that our diverse thinking, different experiences and backgrounds is what strengthens us as a team and help us contribute to the overall goals.

Sleep Cycle have zero tolerance for discrimination, sexism or racism and we encourage all our employees to report any violations. We are committed to comply with all laws and regulations applicable to harassment, equal employment, and affirmative action.

### 3.2. SAFE AND COMFORTABLE WORKING ENVIRONMENT

Sleep Cycles working environment should be free from violent and abusive behavior. Any threatening, aggressive, or abusive behavior will not be tolerated and dealt with accordingly.

Sleep Cycle works continuously on ensuring a safe and comfortable physical working environment for all our employees. Sleep Cycle encourage all employees to take care of their health and take part in social activities. We understand the importance of sleep and we strive to ensure that all employees have a good balance between work and private life.

## 4. PRIVACY

Sleep Cycle consider data as a key asset. All the data we collect, and process are handled with respect and in accordance with applicable legislation. It is of utmost importance to protect our user's private information, for our credibility and continuous product development. See our Information security policy and privacy policy for more detailed information.

### 4.1. COMMUNICATION

Sleep Cycle believes in transparent and honest communication. It is not only important for increasing engagement, brand awareness and reputation for our company but also to achieve our strategy and goals.

Communication can come in many forms. No matter which forms it comes, it is important for every employee to act with common sense and in compliance with applicable law, respect, and integrity. How we act reflects who we are as a company and can help us build trust and thus strengthen our business.

We always keep confidential information to ourselves, but with information that is not confidential, we share in a transparent manner and encourage colleagues and business partners to learn and thus promoting feedback and engagement through the organization as well with business partners.

### 4.2. COMPANY ASSETS

#### Intellectual Property

Sleep Cycle's intellectual property rights (our trademarks, logos, copyrights, trade secrets, "know-how", and patents) are among our most valuable assets. Unauthorized use can lead to their loss or serious loss of

value. All employees, partners and regulators must respect all copyright and other intellectual property laws, including laws governing the fair use of copyrights, trademarks, and brands. Sleep Cycle's (or its affiliated entities') logos, marks, or other protected information or property must never be used for any business or commercial venture without pre-clearance from the Marketing Team. We strongly encourage all employees to report any suspected misuse of trademarks, logos, or other Sleep Cycle intellectual property to Management.

## 5. SOCIAL RESPONSIBILITY

### 5.1. ENVIRONMENT

We support efforts to drive sustainable development, and we respect human rights standards. We recognize that our business operations and our provision of services may at times impact the environment and we work to reduce harmful effects they might have.

### 5.2. BRIBERY, FRAUD AND ANTI-CORRUPTION

Sleep Cycle conducts all its business in an honest and ethical manner. It is critical that any process, subject of corruption in any form, are correctly executed and that clear guidelines exist on how to determine what is incorrect.

Sleep Cycle does not take part in any form of bribery or corruption. Corruption can occur in different forms and every possible scenario cannot be in detail described in a guideline which means that every employee has the responsibility of determining if they are in a situation of a potential fraud, and act accordingly. Failure to comply with prevailing laws can lead to serious consequences not only for Sleep Cycle but also for the employee. Therefore, it is of utmost importance that employees should never place themselves in a position where a potential breach of Sleep Cycles internal policies is likely. In general, a gift and/or benefit offered by someone outside of the company, that have impact on the employee's objectivity and thus can impact a business decision, is inappropriate.

Sleep Cycle define a bribe as; an act involving the exchange of something of value, such as money, with the purpose of improperly influencing the behavior of another, e.g., a business decision. Whether or not the purpose is improper or not, must be assessed by its circumstances. Those circumstances could include value of the gift, the business relationship, occurrences, and transparency.

With above guidelines in mind, Sleep Cycle understands that creating and maintaining customer relationships includes activities such as gifts, representation, and customer events. However, those activities should always be done with clear consideration regarding value and timing, and if there are any uncertainties, always contact your manager.

### 5.3. ANTI-MONEY-LAUNDERING

Sleep Cycle is committed to comply with all applicable anti-money laundering laws, only accept funds from legitimate sources and conduct business with reputable customers and suppliers.

### 5.4. CONFLICT OF INTEREST

A conflict of interest is defined as when you are in a situation in which competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of Sleep Cycle or our users. All of us should avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict.

Sleep Cycle expect employee's to be open about potential conflict of interests and notify their closest manager about them.

## 6. INFORMATION SECURITY

For Sleep Cycles business success our protection of confidential company information is key, as well as non-public information entrusted to us by employees, customers, and business partners.

Confidential information includes pricing, financial data, customer information or non-public information about other companies, including

current or potential supplier and vendors. Sleep Cycle will not disclose confidential or non-public information without a valid business purpose and proper authorization.

All Employees are trusted to behave responsibly and use their good judgment to conserve the company's confidential information, mitigate risks that such information is shared, and never discuss such information publicly nor privately with friends.

If an employee quits his/her employment they are still obligated by above principles.

## 7. VIOLATIONS

Sleep Cycle values openness and transparency and expects all employees to act in the event of a violation, or a potential future violation of the code of conduct or applicable law.

We expect the employee to act by addressing the issue with the person concerned if possible. If that is not suitable, he/she should raise it to their manager or in next instance, the CEO. An employee that reports a potential violation should not have to worry about any reprisal and identity of involved parties should be kept confidential if possible.

What Sleep Cycle expect all employees to report:

- Violations of code of conduct
- Violations in applicable law
- Violation of any policy, guideline or instructions stated in the company's governing documents
- An event of potential fraud or bribery
- Any discrimination, sexism, racism, or other unethical behaviour

### 7.1. WHISTLEBLOWING

In event of serious violation, it can be reported anonymously to Sleep Cycles whistleblowing service WhistleB [www.report.whistleb.com/en/sleepcycle](http://www.report.whistleb.com/en/sleepcycle).