

Qt Group Code of Conduct



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01 Introduction

- Our values lay the foundation for ethical conduct
- Doing the right thing starts with all of us
- Manager's responsibility



Conducting business ethically and responsibly is at the core of trust. Our success is not measured only by *what* we achieve, but also by *how* we achieve it. We create the culture of trust everyday by keeping our promises and acting with integrity towards our employees, customers, suppliers, partners, and the communities we serve.

This Code of Conduct outlines our ethical commitments that guide our everyday work and decisions. Every decision we make reflects our values and contributes to the trust placed in us by our employees, customers and other stakeholders.

We strive for excellence in everything we do and consistently deliver the best possible service to our customers, while upholding integrity and fairness in all our activities. Let this Code inspire you to lead and work with integrity, take responsibility, and uphold the ethical standards that define who we are.

Our Values

Our values create the basis for our ethical commitments that define how we behave as Qt employees and representatives.

01 Collaboration

Our best work happens when we connect, share, and build on each other’s ideas. Collaboration isn’t just how we work – it’s who we are. We support, challenge, and inspire one another to go further, together.

02 Transparency

We believe trust is earned through transparency within our teams and with our users. That means speaking up, listening actively, and making decisions with clarity and integrity.

03 Innovation

Ingenuity is in our DNA. It drives how we think, how we build, and how we push boundaries – boldly, creatively, and always with purpose. Our people and technology are redefining how the world experiences the digital realm.

Doing the right thing starts with all of us

Working ethically is not just about following the rules – it is about doing the right thing honestly and genuinely. Every action matters and has the power to make a difference. We recognize that ethical business conduct is a continuous journey, and are committed to proactively seek opportunities to learn, grow, and improve the ways we work.

We expect all Qt Group employees, board members, and our suppliers and partners to comply with the ethical standards set in this Code of Conduct whenever representing and working for, with or on behalf of Qt Group.

Manager’s responsibility

Doing the right thing is everyone’s responsibility, but managers have a special responsibility in bringing our ethical commitments alive and showing ethical example. Managers have a key role by demonstrating responsible business conduct in everyday interactions, supporting their teams in acting with integrity, and taking action and address issues appropriately and proactively when ethical concerns arise, including escalating issues when necessary.

02 Speaking up

- We speak up and act on concerns
- How to raise concerns
- What happens after reporting



We speak up and act on concerns

By speaking up, we can prevent and address issues and create a transparent and accountable working environment. Speaking up and raising concerns is not about pointing fingers – it is about keeping ourselves and others accountable and doing the right thing.

Our commitment to integrity depends on the responsibility of every one of us. It is everyone's responsibility to speak up – not just when directly affected, but whenever we encounter behaviour that compromises our commitment to ethical and responsible business conduct.

How to raise concerns

You are encouraged to report all your concerns related to breaching the law, our internal policies or this Code of Conduct. There are many safe and accessible ways to do so:

- Your manager
- People & Culture or Legal functions
- Qt Anonymous Speak-up Channel

The channel is provided by an external service provider to ensure its confidentiality. Reporting via the channel is available to all stakeholders, internal and external. The reports sent in the service are only accessible for the Chief Financial Officer; Senior Vice President, People & Culture; and General Counsel at the Qt Group.

What happens after reporting

We take all reports seriously and address them to understand the situation, assess potential risks and impacts, and determine the appropriate actions. We will investigate any suspicion of misconduct and have defined a process for taking active measures in response to misconduct depending on the severity of the case. All reports are reviewed thoroughly to ensure fair and consistent handling, including recusal of anyone who may have a conflict of interest. All reports are treated with confidentiality to the extent possible.

Qt Group does not take countermeasures against the person, even if the reporter's concerns or allegations were later found to be without merit. However, making a complaint that one knows to be false is a misuse of these reporting channels and may also carry consequences.

03 Our commitments

- We comply with laws and regulations
- We create a workplace based on kindness and respect
- We care about safe and healthy working environment
- We respect human rights
- We collaborate and communicate responsibly
- We fight corruption and bribery
- We avoid conflicts of interest
- We comply with trade and anti-money laundering requirements
- We compete fairly
- We safeguard financial integrity
- We protect data, assets and privacy
- We protect the environment



We comply with laws and regulations

We conduct our business with sincere professionalism, honesty and integrity, and to the highest moral, ethical, and legal standards. We follow all the applicable international and national laws, regulations and conventions in our daily business operations in addition to following our internal policies and procedures. This includes, but is not limited to, laws and regulations concerning safety, data protection and privacy, anti-corruption, money laundering, insider regulations, environmental responsibility, fair competition and trade compliance.

The contents of this Code of Conduct may address issues, which are also stipulated in local or regional legislation, in which case the contents of this Code of Conduct as well as any possible discrepancies are to be interpreted according to the applicable legislation. If Qt Group’s Code of Conduct sets a higher standard than the applicable law, then the Code takes precedence.

We create a workplace based on kindness and respect

We are committed to having an open, inspiring, and equal work environment where employees have the opportunity to reach their fullest potential and contribute to our company’s vision and targets.

We are all responsible for making Qt Group a workplace where we treat each other with kindness and respect. We treat everyone equally regardless of their ethnicity, religion, age, nationality, gender identity, disability, sexual orientation, political affiliation or any other personal characteristics. We give equal opportunities for personal growth and career development.

We do not tolerate sexual, physical or psychological violence, harassment or any form of discrimination, abuse, intimidation and bullying.

We are committed to providing a safe and healthy workplace for all employees. We identify and manage health and safety related risks and prevent injuries. We promote a culture where everyone takes responsibility for their own safety and the safety of others.

In addition to physical safety, we foster psychological safety and an environment, where everyone can feel appreciated as individuals and as part of the wider working community. We take our employees' mental well-being seriously and encourage a healthy balance between work and personal life.

We care about **safe** and
healthy working environment

We respect human rights

We are committed to treating all people with dignity and to upholding human and employee rights. Our business is conducted in alignment with internationally recognized human rights standards, including the UN Guiding Principles on Business and Human Rights. We promote equality, non-discrimination, and fair employment practices, ensuring safe and healthy working conditions, responsible recruitment, fair wages, and reasonable working hours.

We do not allow child labour, all forms of modern slavery, including human trafficking, forced, or indentured labour, or any form of labour exploitation in our operations and supply chains. We respect the right of employees to freely join organizations of their choice, including trade unions, and to engage in collective bargaining.

We collaborate and communicate **responsibly**

We foster an environment of cooperation and openness. We develop working partnerships that are fair, responsible and mutually beneficial. We act ethically in all interactions with our stakeholders and base our relationships on trust, respect, and integrity.

We act professionally in all communication and collaboration we have internally and externally. We communicate accurately, transparently, and respectfully, while respecting our commitment to safeguarding non-public information.

We fight corruption and bribery

We prohibit all forms of bribery or corruption. We are committed to conduct business professionally, transparently, and with integrity in all business dealings and relationships, wherever in the world we operate.

We do not accept, offer or authorise any improper payments, gifts, entertainment or any other business courtesies that are or may be intended to influence decision-making or to gain unfair business advantages. Accepting minimal and customary business gifts and hospitality (such as business lunch) according to acceptable local practices is allowed. When providing or receiving hospitality or giving or receiving gifts we always consider whether it is appropriate, reasonable and justified. Receiving or offering monetary gifts, including gifts of cash or securities, is always prohibited.

We avoid conflicts of interest

We avoid situations that may create a conflict of interest and do not allow personal considerations or relationships improperly influence our business decisions. Conflicts of interest may occur when an employees’ or board members’ personal interests are or appear to be in conflict with the interests of Qt, for example, during recruitment, tendering or sales processes.

As employees, we follow our employment contracts and do not engage in any unapproved outside business or perform any commercially related activities that compete with the Qt Group. For clarification, the simple purchase, holding, trade, or sale of publicly traded stock does not, in and of itself, constitute a competitive activity so long as employment contracts are abided by. We do not use our position at the company to advance personal interests, or those of a friend or relative, at the expense of the company’s interests. To ensure responsible business decisions, we openly address situations where personal and company interests may interfere and recuse ourselves from decision making when conflicts of interest occur.

As a company, we are committed to political neutrality, do not promote political stands and do not give financial or other support to politicians, political parties or institutions.

We comply with trade and anti-money laundering requirements

We are committed to prevent money laundering, terrorist financing, and other illegal financial activities. We comply with export control laws and regulations, and never do business with customers, suppliers, or partners that are subject to trade sanctions or restrictions. We conduct due diligence to prevent illegal transactions, and maintain accurate records to support lawful and transparent business operations.

We compete fairly

We believe in competing honestly and fairly and are committed to fair competition. We do not engage in unfair business practices or make agreements or arrangements with competitors to fix prices, divide markets or manipulate bids. We are careful whenever interacting with competitors and do not share sensitive or confidential business information (such as pricing, costs, or strategies).

We safeguard financial integrity

We are committed to maintaining and providing truthful information that satisfies applicable legal requirements. We follow applicable accounting principles and standards to have appropriate internal processes to ensure that accounting and financial reporting is accurate, complete and reliable. As a publicly listed company, we follow all applicable rules and regulations concerning the publishing of information related to the Qt Group.

We are committed to safeguarding our digital infrastructure and protecting all assets and information, which our company may hold or handle. All Qt Group’s assets and resources should be used for our business objectives only. We have clear processes and systems in place to ensure information security and protect confidential data. We respect everyone’s right to privacy and process personal data carefully and securely, following all applicable laws and company policies. Access to information is granted only to those who need it, and any loss, breach, or misuse must be reported immediately. We protect our digital systems, networks, and information from cyber threats by following company cybersecurity policies and best practices.

We protect data, assets and privacy

We respect the physical and intellectual property of third parties, including that of our business partners and competitors. We never attempt to maliciously obtain this intellectual property and unlawfully use it in our business operations.

We use AI technology responsibly, ensuring transparency, fairness, and accountability in its development and application, and avoiding harm or bias.

We do not use non-public, material information for personal gain or to benefit others. Using information that is not known to the public, and which might significantly impact the price of Qt Group’s shares or other financial instruments, is prohibited.

We protect the environment

We recognize the impact of our industry and own operations on the environment and promote sustainable practices. We are committed to reduce our environmental footprint by identifying, managing and minimizing our environmental impacts, using resources efficiently and reducing waste and emissions.

We take environmental issues into account in managing our operations, as part of decision-making process and developing and monitoring our processes. We cooperate with our stakeholders to provide the services that help to reduce environmental impacts.

Thank you.

Learn more about Qt

→ qt.io

