



# Code of Conduct

Document Owner	CEO
Document Holder	General Counsel
Approval	Board of Directors of Olink Holding AB (publ) (the “Company” and together with its subsidiaries the “Group”)
Date of Approval	16 February 2021
Effective as of	The Effective Date of the Company’s Registration Statement on Form F-1



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## Introduction

A warm welcome to Olink Proteomics AB. We are very excited to have you onboard our great team!

Olink is a rapidly growing biotechnology company with a unique, world-leading technology and product portfolio for protein biomarker discovery and development. Our broad customer base includes both clinical and academic researchers, as well as scientists in the pharmaceutical and medical biotechnology industries. Olink's mission is to accelerate proteomics together with the scientific community, putting proteins firmly at the center of biomedical research and therapeutic development. Our vision is that this will enable understanding of real-time human biology, driving the development and implementation of precision medicine.

Olink was founded as a Swedish company and now has a strong global presence, with well-established organizations in the US and across Europe, and a rapidly expanding operation in Asia.

We are a high-tech, innovative company with the ambition to lead and drive our field based on our proprietary cutting-edge technology, supported by the exceptional knowledge and expertise of our employees. Olink is truly customer-centric and we try our best to excel and deliver above expectations, developing meaningful collaborative relationships and establishing ourselves as much more than a product/service provider in the minds of our customers. We operate in a very exciting, important and rapidly developing field. We are proud of who we are and think it is great to work in a small, dynamic, and fast-growing company. We look forward to working alongside you to reach our ambitious goals.

## Our purpose, our vision

### A new era for global healthcare

Many of the best-selling drugs in the world today are only effective in around 30 percent of the patients treated with them, largely due to our lack of understanding of the biology of diseases. It is therefore essential that healthcare moves on from our current "one size fits all" approach, towards the better-informed promise of "precision medicine".

Precision medicine is defined by National Institutes of Health as "an emerging approach for disease treatment and prevention that takes into account individual variability in genes, environment, and lifestyle for each person". Healthcare today, however, still largely adheres to a one-size-fits-all approach, based on strategies that have been developed for the "average" person, with less consideration of individual differences. So, what is needed for it to happen?



## Accelerating proteomics together, to understand real-time human biology

To achieve precision medicine, we need to study proteins to gain a much deeper understanding of human biology, particularly the real-time changes that occur during the development and progression of disease and during the response to treatment. This is widely understood, but the complexity of proteins and the limitations in available technology have held back progress in the field of “proteomics”. A fast, reliable method for high-resolution analysis of large numbers of the crucially important dynamic, low-abundant proteins has long been needed. Olink has now solved this problem with its unique protein biomarker technology and aims to accelerate proteomics together with the scientific community to contribute towards a healthier future.

## Our values

**Our Core Values:** We are **innovative, customer focused, keep our promises**, and we **do it together** – this is the simplest statement of who we are. Our values govern everything we do.

## The Code

**Our Code provides the ethical guidelines and expectations for conducting business on behalf of Olink. It applies to all employees of Olink and should be considered as a valuable resource for everyone.**

The Code cannot address every possible issue, but provides guidance and resources to help make the right choices. Our external partners are expected to adhere to the spirit of the Code when working on Olink’s behalf, and we may terminate our relationship with them if they violate our standards.

Employees must never ask or encourage external partners to take actions prohibited by laws, regulations and our Code, and must ensure that they are familiar with, and trained on, the relevant requirements of the Code, which are mirrored in more detail in Olink’s policies and guidelines.

Any violation of this Code is deemed a serious violation of Olink policy and entitles Olink to unilaterally terminate the relevant employee forthwith, if permissible under national legislation.

## How to use the Code

Each of us is responsible to act in a manner that reflects our Core Values along with business principles and internal policies. The Code is meant to help us conduct business in a legal, ethical manner that is consistent with our core values, and to guide our understanding of Olink’s key policies and procedures and certain applicable laws and regulations. The standards described in the Code apply in all countries where we conduct business. Simply stated, the Code helps Olink employees make the right choices. When in doubt, please ensure to talk to your manager or a member of human resources.



## Compliance with laws, regulations and internal rules

### We comply with the law at all times

Olink is committed to full compliance with the laws and regulations in all jurisdictions in which it operates. Olink employees must comply with all applicable laws and regulations, as well as internal standards. These internal rules are specific to our company and may go beyond what is required by law.

## Our commitment to employees

### Diversity and respect

Olink is committed to providing a supportive and respectful work environment where everyone has the opportunity to reach their full potential.

We are committed to providing a workplace that is diverse and free from all types of discrimination and harassment. Our interactions with one another should always be fair, objective and professional.

### We embrace diversity and respect the rights of our fellow employees

Olink respects the dignity, privacy and personal rights of every employee and is committed to maintaining a workplace free from discrimination, harassment and victimization. Employees must not discriminate on any grounds, including but not limited to, on the basis of national origin, gender, transgender, identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age, or engage in any kind of verbal or physical harassment or victimization. Discrimination or unfavorable treatment for reasons related to pregnancy or parental leave will not be accepted.

Employees who feel that their workplace does not comply with the above principles are encouraged to raise their concerns with their manager or HR.

## Health and safety

### We are committed to the safety of our employees

The health and safety of our employees is of great importance for Olink and a key priority. A healthy and safe work environment, taking into consideration both physical, organizational and social factors, shall be provided to all employees.

We follow the health and safety policies and procedures that are designed to ensure we meet all applicable occupational health and safety laws and regulations as they apply to our workplace. All employees shall receive appropriate health and safety information and training in order to prevent occupational illness and accidents.



Each of us needs to do our best to keep Olink workplaces safe and well-functioning. It is important that we immediately advise our managers of any workplace injury, accident, dangerous or unhealthy situation so immediate action may be taken to resolve the issue.

We all must:

- ensure we are not putting ourselves or others at risk by our actions;
- comply with the applicable rules on health and safety at work, and take every reasonable precaution to maintain a safe and healthy working environment;
- ensure that we know what to do if an emergency occurs at our workplace;
- report any behavior, installations or items likely to compromise the safety of our working environment, as well as all accidents, however minor to management; and
- discuss any health or safety issue we encounter with HR or your nearest manager.

## Employment conditions

### We provide fair, reasonable and competitive employment conditions

Olink is committed to providing fair, reasonable and competitive employment conditions to all its employees. The employment conditions shall always at a minimum comply with applicable laws, regulations and collective bargaining agreements, if applicable.

All employees must be provided with a written employment contract or document outlining the material terms and conditions of employment.

## Human rights and labor standards

### Olink is committed to complying with international conventions on human rights and labor standards

Olink respects the rights of its employees to organize and to bargain collectively. Olink will not tolerate any anti-union discrimination.

Forced or compulsory labor in all its forms is strictly prohibited. All employees shall be free to terminate the employment relationship after reasonable notice pursuant to applicable law or employment contract.

Olink does not accept child labor. No individual shall be employed who is under the minimum legal age of employment according to applicable law.



## Raise any concerns

### We encourage employees to raise any concerns

Olink encourages all employees to express their views and opinions, and to raise any concerns relating to any practices or actions believed to be non-compliant with the Code or that are illegal or unethical. Further information on this topic can be found at the end of this document.

## Our commitment to the Company

### Confidential information

#### We value and protect our confidential information and respect the confidential information of others

Confidential information consists of any information that is not currently public. It includes trade secrets, scientific data, business, marketing and service plans, consumer insights, engineering and manufacturing ideas, databases, records, employee personal information, salary information or any other non-published financial details or data.

During the employment term and thereafter, Olink employees must keep all confidential information of Olink strictly confidential and may only use such information to carry out Olink work assignments.

In relation to external partners, information provided by or related to such external partners shall always be deemed confidential information. Employees must additionally ensure that competitively sensitive information received or originating from one of the partners is not shared with any other partner. Where feasible, such information should be marked to clearly indicate its competitively sensitive nature (i.e. “confidential”) and the partner of origin. Not to disclose confidential information in relation to competitors is essential as follows from the below section regarding antitrust. Nor may such information be exchanged via a third party. As a publicly listed company we are required to keep all information deemed “material” as confidential. Material information is any type of information that could reasonably be expected to affect the market price of the company’s securities. Either positive or negative information may be material.

Material information often relate to earnings results or expectations and other financial information, but it can also be non-financial information such as for example joint ventures, clinical trial results, developments with the FDA or other regulatory agencies. It can relate to the introduction of major new product lines or discoveries, changes in relationships with major customers, the gain or loss of important contracts, disputes with major suppliers or customers, major personnel changes or government investigations, litigation or patent issuances and other information that is likely to affect the price of the shares. Material



information must be made public via a press release. Until then, the information is confidential.

Being a public listed company makes it possible for everyone to invest in Olink. If you know of material information which is not yet made public through a press release you are not allowed to buy or sell shares and you are not allowed to recommend or induce anyone to buy or sell shares in Olink. This is called Insider Trading and can lead to hefty fines for the individual and the company and imprisonment for the individual. Information will be considered public after the close of trading on the first full trading day following the Company's public release of the information. As an example, if Olink announces material information that you are aware of before the markets open on Tuesday, the first time you may buy or sell Olink stock is the opening of the market on Wednesday. If announcement is made after trading begins on Tuesday, the first time you can buy or sell Company stock is the opening of the market on Thursday.

## Use of Company resources

Employees shall safeguard and only make proper and efficient use of Olink's assets. All employees must seek to protect Olink's assets from loss, damage, misuse, theft, fraud, embezzlement and destruction. Software and other materials licensed to Olink may only be used for the purpose permitted in the license agreement and must not be copied, distributed or used except in accordance with the license agreement. Employees should protect their username/login code and password and other access information or devices at all times and not divulge such information or devices to any other person. These obligations cover both tangible and intangible assets, including trademarks, know-how, confidential or proprietary information, software and information systems.

Use of the Olink assets is intended for Olink business use. Personal use is permitted where such use does not affect the individual's business performance, is not detrimental to Olink in any way, not in breach of any term and condition of employment and does not place the individual or Olink in breach of any obligations. To the extent permitted under applicable law, Olink reserves the right to monitor and inspect how its assets are used by employees, including inspection of e-mails, and any other data stored or processed in the Olink environment.

## Intellectual property

### We safeguard our intellectual property

Olink is built on the intellectual property that supports our business, including patents, trademarks, copyrights, design patents and trade secrets. Intellectual property is considered confidential information. Employees have a duty to protect Olink's intellectual property, just as they have an obligation to respect the intellectual property rights of third parties.



Employees must never allow Olink's or its partners' intellectual property to be used or shared with people outside Olink without authorisation by the relevant Head of function, and with the appropriate protections put in place.

## Data privacy

### We respect personal data

Olink respects the privacy of individuals, such as employees, business partners and any other individuals, and will protect their personal data.

Employees and consultants involved in the processing of personal data must comply with all applicable laws and regulations as well as Olink's internal data policies and Olink's instructions. All processing of personal data must be lawful, justified and used for specified, explicit and legitimate business purposes only.

Appropriate technical and organizational measures must be taken to ensure that the personal data is protected against unauthorized access, processing and damage. If a data breach occurs, this must be reported to the relevant third party.

Olink and its employees must also make sure that data subjects' rights under the general data protection regulation (the "GDPR") are fulfilled. This includes an obligation for Olink to provide individuals with information about the personal data that Olink processes about them upon request and, if necessary, correct and remove the data.

Personal data must not be transferred to third parties or outside the EU/EEA without ensuring that such transfer is compliant with Olink's contractual and legal obligations.

## Social media

Official Olink social media sites and services can only be set up, populated and branded by authorized Olink staff. Any questions or comments directed to any official site can only be responded to or commented on by Olink authorized staff. If employees or consultants make reference to Olink, its staff, products or the like on social media, they should identify themselves as Olink employees or consultants and only disclose and discuss Olink information that is authorized to be released publicly by Olink. Employees should also ensure that none of the references, postings or content cause the employee or consultant to breach any other obligations of Olink or create any liability for Olink. If employees are uncertain about what they can do on social media and what is permitted in the context of the employment relationship, the employee or consultant should ask their immediate manager. Employees shall also consider that they generally are ambassadors of Olink and shall use due care when using social media privately.



## Our commitment to customers and business partners

Our interactions with customers and business partners are ethical, appropriate and professional.

### Antitrust and fair dealing

#### We believe in the importance of free competition

Olink is prepared to compete in today's business environment and will always do so in full compliance with all applicable antitrust, competition and fair-trading laws. Employees must at all times therefore comply with the following rules:

- commercial policy and prices will be set independently and will never be agreed, formally or informally, with competitors, customers or other non-related parties, whether directly or indirectly;
- customers, territories or product markets will never be allocated between Olink and its competitors but will be the result of fair competition;
- customers and suppliers will be dealt with fairly;
- furthermore, employees shall ensure **to not** disclose, discuss or exchange information with any competitor, directly or indirectly, regarding other business sensitive issues which are internal to Olink (e.g., business or strategic plans, marketing, advertising, promotion plans, unannounced investments or development plans, proposed research and development, marketing strategies, future market entry, bids and tenders, market shares and volumes) without the prior approval of legal counsel; and
- before initiating any contact with competitors regarding business projects ensure to consult with the Legal Department.

All employees, especially those who are involved in marketing, sales and purchasing, or who are in regular contact with competitors, have a responsibility to ensure that they are familiar with applicable competition laws. When in doubt, contact the Olink Legal Department for guidance.

### Bribery and corruption

#### We condemn any form of bribery and corruption

Employees must never, directly or through intermediaries, offer or promise any personal or improper financial or other advantage, in order to obtain or retain a business or other



advantage from a third party, whether public or private. Nor must they accept any such advantage in return for any preferential treatment of a third party.

Moreover, employees must refrain from any activity or behavior that could give rise to the appearance or suspicion of such conduct or any such attempt. Employees should be aware that the offering or giving of improper benefits in order to influence the decision of the recipient, even if he or she is not a government official, may not only entail disciplinary actions, but may also result in criminal charges and fines. The concept of bribes is very wide and includes anything of value for the recipient, including employment or consultancy contracts for closely related parties as well as money, gifts, hospitality which is not moderate, exclusive memberships, etc.

Caution is required in relation to government officials but the prohibition on giving and taking bribes also applies to business to business relationships.

A guiding principle is that there shall always be a business value and that Olink shall compete based on its innovative products and services and not based on providing personal advantages to customers, suppliers, government officials or any third parties. In addition, it shall choose its suppliers based on quality and price and not due to benefits. When in doubt whether an employee may offer or accept hospitality or any other kind of benefit always disclose it to your Manager and/or to Human Resources or the Legal Department to help determine the best solution and, if necessary, resolve the situation in a fair and transparent manner.

## Gifts, entertainment and other items of value

### We compete and do business based only on quality and competence

Offering or accepting gifts, entertainment or other items are often part of human interactions or cultural practices. However, they can be misunderstood and perceived as an improper advantage to create influence in the business context.

Employees may only offer or accept gifts and entertainment which are appropriate under the circumstances, and they shall not accept or offer gifts or entertainment if such behavior could create the impression of improperly influencing the respective business relationship. Gifts must be modest and entertainment must not go beyond what is reasonable.

Employees are expected to follow strictly the US FCPA Resource Guide<sup>1</sup> and the Code to prevent corruption in business<sup>2</sup> administered by the Swedish Anti-Corruption Institute and other local policy applicable in their market.

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<sup>1</sup> See <https://www.justice.gov/criminal-fraud/file/1292051/download>.

<sup>2</sup> See <http://3afvm642sqoq9muh73hsqhtz-wpengine.netdna-ssl.com/wp-content/uploads/2020/10/IMM-Code-to-prevent-corruption-in-business.pdf>.



No employee shall offer to or accept from any third-party gifts taking the form of any of the following, whatever the value involved:

- money;
- loans;
- kickbacks; or
- equivalent monetary advantages.

When in doubt whether you may offer or accept hospitality or any other kind of benefit always disclose it to your Manager, Human Resources, or the Legal Department to help determine the best solution and, if necessary, resolve the situation in a fair and transparent manner.

## Third party compliance

Olink takes care in its dealings with third parties and will never use them to engage in corrupt practices. Our Company requires its suppliers, service providers, distributors and third parties acting on its behalf to act with integrity, and to comply with applicable anti-bribery laws and the anti-bribery provisions of the Code. They should be carefully selected and monitored.

## Conflict of interest

### We will always act in the best interests of Olink

Relationships with family members and close personal friends can influence our decisions. It is important to be careful about Company business decisions that involve close personal relationships.

A conflict of interest might occur when you find yourself in a position that might influence or appear to influence your judgment and actions, for example, where a family member is employed by a supplier. In such situations, it can be difficult for the employee to act fully in the best interests of Olink.

A conflict of interest, or even a potential conflict, can damage your reputation or that of the Company.

You are responsible for avoiding situations that present or create a potential conflict between your interests and those of our Company.

To prevent conflicts of interest:

- avoid supervising or taking part in the hiring or promotion of someone with whom you share a close personal relationship; and



- avoid taking part in the decision-making process around the appointment of a third party (i.e. distributor, supplier etc.) and management of a project where such third party is someone with whom you share a close personal relationship.

If you face a situation that you think might involve or lead to a conflict of interest or if a conflict of interest situation has occurred, you must disclose it to your Manager, Human Resources, or the Legal Department to help determine the best solution and, if necessary, resolve the situation in a fair and transparent manner.

## Our Commitment to Society

### Accuracy of Records

The integrity, reliability and accuracy in all material respects of Olink's books, records and financial statements are fundamental to Olink's continued and future business success.

No director, manager, employee or third party may cause Olink to enter into a transaction with the intent to document or record it in a deceptive or unlawful manner. In addition, no director, manager, employee or third party may create any false or artificial documentation or book entry for any transaction entered into by Olink. Similarly, those who have responsibility for accounting and financial reporting matters have a responsibility to accurately record all funds, assets and transactions on Olink's books and records.

### Bioethics

Olink is strongly committed to ensuring ethical conduct in all our activities and specifically in matters of bioethics. Our business is guided by the fundamental principles of bioethics: beneficence, non-maleficence, autonomy and justice.

Olink is committed to:

- always conducting business in accordance with applicable rules and regulations as well as international declarations on ethical principles for medical research involving human subjects, including research on identifiable human material and data; and
- always acting in accordance with fundamental bioethics principles.

We are actively contributing to the dialogue on current bioethical issues, such as clinical trial data transparency.

Any bioethical matter arising in any part of our business should be reported internally to any of the following: Line Manager, Human Resources, or any member of the Legal Department.



## Creating shared value

Being a global company not only brings a duty to operate responsibly, but also an opportunity to create long-term positive value for society.

We call this “creating shared value”, and we embrace it uniformly across all parts of our business.

We strive to help shape the future of biomedical science, building and sustaining a strong and long-lasting community that brings together industry, academics, healthcare professionals, consumers, and in the long run, patients.

At Olink we have a long-standing commitment to working ethically. We pool the knowledge, skills and integrity of our people to contribute positively to the world we live in. We aim to gain the trust of all our stakeholders and to encourage the right conditions for the growth of our business and communities.

## Innovation

We stand among those capable of inventing, developing and bringing to the market new solutions that are truly innovative. Our model is based on using research and development and evidence-based solutions to promote and accelerate a better understanding of human biology and actionable knowledge that will drive the future of global healthcare. Our innovation goes beyond the development and improvement of core technology and also extends to biostatistical and bioinformatic tools and services that help scientists through the journey from research to understanding and discovery.

The extent of our commitment to biomedical science is reflected in the huge number of protein data points generated by the scientific community using Olink technology, and by the large and accelerating body of scientific literature published from studies using Olink.

## Stakeholders

Given the nature of our commitment, we engage globally with multiple and varied stakeholders every day in an ethical, transparent and professional manner. Each of our interactions should be a concrete expression of the values we stand for, so that Olink will be recognized as a trusted and long-term partner by all its stakeholders.

## Sustainability

We are environmentally conscientious and are an active contributor to the communities we interact with, shareholders, and society at large. We invest in the development of our people, technologies, products and services.

We carefully consider the health and safety of our employees and customers. We are all responsible for maintaining a safe workplace and complying with not only our corporate



policies, but also all applicable laws and regulations, through working in an environmentally conscious fashion and socially responsible management. We strive to conduct our business in an environmentally sustainable manner and the technologies, products and services shall be environmentally friendly. The environmental work shall always extend to making requirements of suppliers.

## Quality of Public Disclosures

Olink is committed to providing its shareholders with complete and accurate information about its financial condition and results of operations as required by the securities laws of the United States and the Swedish Companies Act (2005:551). It is Olink's policy that the reports and documents it files with or submits to the Securities and Exchange Commission and the Swedish Financial Supervisory Authority and any earnings releases and similar public communications made by the Company, include fair, timely and understandable disclosure. Those who are responsible for these filings and disclosures, including Olink's principal executive, financial and accounting officers, must use reasonable judgment and perform their responsibilities honestly, ethically and objectively in order to ensure that this disclosure policy is fulfilled.

## How to report illegal or non-compliant conduct

We encourage our employees to speak up and report potential misconduct to Olink. Misconduct is categorized as any conduct that violates this Code, company policies or law. The employee should report potential misconduct to any of the following: Line Manager, Human Resources, or any member of the Legal Department.

In addition, Olink has implemented a Whistleblowing Policy which encourages employees, members of Olink management and the board of directors as well as vendors and customers, to disclose all suspicion of, or actual or potential, wrongdoing within Olink. Reporting of wrongdoings shall be made to persons using the processes described in the Olink Whistleblowing Policy.

Olink will review and investigate all reports, regardless of the method of reporting. It is our policy that all complaints shall be thoroughly investigated and that appropriate actions will be taken to address the outcome of the investigation, including taking disciplinary action up to and including termination of employment. Employees who report potential misconduct, provide information, or otherwise assist in any inquiry or investigation of potential misconduct will be protected against retaliatory action.

## Waivers

No waiver of any provisions of the Code for the benefit of a director or an executive officer (which includes, without limitation, for purposes of this Code, the Company's principal executive, financial and accounting officers) shall be effective unless (i) approved by the board of directors or, if permitted, a committee thereof, and (ii) if applicable, such waiver is



promptly disclosed to the Company's shareholders in accordance with applicable U.S. securities laws and/or the rules and regulations of the exchange or system on which the Company's shares are traded or quoted, as the case may be.

Any waivers of the Code for other employees may be made by the CEO, the CFO, or the General Counsel, the Board of Directors or, if permitted, a committee thereof.

**Olink Management Team**

Uppsala, February 16, 2021