

HR Policy

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1. Purpose

Stillfront Group AB (publ) (“**Stillfront**” and together with its subsidiaries “**Stillfront Group**” or the “**Group**”) operates in different jurisdictions and are thereby subject to a number of human resources related legislations. This policy (this “**Policy**”) aims to establish the overarching principles for the relationship between Stillfront and its professionals. Should this Policy or any local HR policy conflict with local legislation, local legislation will prevail.

Stillfront Group is, for its future success, dependent on attracting, developing and maintaining talented professionals. Hence, it is crucial to safeguard that we offer an attractive, competitive and healthy workplace. This document aims to clarify responsibilities and commitments and to provide guidance to leaders and professionals throughout the organization.

Stillfront’s talent management program includes employee development talks, clear career paths, strong corporate values, policies trainings and quarterly employee satisfaction surveys (Stillpoll). Stillfront has a unique organizational model. All studios have their own identity and culture with its own organization, working methods and processes as well as segmented local market knowledge. Our key to success and creating a leading powerhouse of gaming studios lies in allowing each of our studios to work autonomously, while simultaneously deriving benefits from collaborations with other parts of the business.

2. Scope

The scope of this Policy covers all companies and all professionals of the Stillfront Group. This Policy is to be implemented and monitored by the local Studio Heads and management team. Additional guidelines to ensure compliance with local laws are to be developed as required. All professionals must comply with this Policy. Managers have a special responsibility to be role models in demonstrating the desired behaviours as outlined in the policy and to proactively enforce this Policy on a day-to-day basis.

3. Work environment – Health and Safety

Stillfront Group strives to be an attractive employer by creating a work environment based on collaboration, responsibility and openness. The well-being of professionals is a high priority, and Stillfront Group is committed to providing safe and healthy working conditions.

Stillfront Group is working actively and systematically to minimizing risks of injuries, accidents and other incidents. The systematic work environment management shall be a part of all decisions being made and activities carried out within Stillfront Group. Health- and safety issues should be treated with openness and care. Risks must be identified and analysed, and when necessary, measures shall be taken immediately. Stillfront Group shall fulfil all applicable work environment requirements and endeavour to at all times improve the work environment organisationally as well as socially and physically. This means that:

- work environment management is a natural part of the daily work;
- work environment management is carried out in cooperation between Stillfront Group and the professionals;
- managers shall have the right skills, knowledge, resources and authority to facilitate a safe work environment;
- all professionals shall receive proper training and information in relation to obtain a safe work environment;

- in case of changes that affects the professionals, Stillfront Group shall investigate and make risk assessments of the work environment in order to be able to take necessary measures to ensure that the work environment is safe;
- all incidents and accidents shall be reported and investigated according to procedures in local laws;
- the responsibility for the work environment shall be distributed to relevant persons within Stillfront Group to ensure that the systematic work environment measures is being implemented; and
- Stillfront shall once a year evaluate and follow up the systematic work environment management.

It is expected that Stillfront Group's professionals participate in tasks related to the work environment and take part in the implementation of the measures needed in order to improve the work environment. Managers are expected to encourage such work, to monitor for areas of improvement and to be open for constructive input from professionals.

4. Equality, diversity and inclusion

At Stillfront Group, employment and development opportunities must always be based on qualifications, experience and ability to perform according to our high standards and the expectations of our customers, regardless of race, ethnic or national origin, ancestry, citizenship, religion or other beliefs, age, gender, sexual orientation, transgender identity or expression, political opinion, union membership, civil status or disability unrelated to the task in question. Stillfront Group promotes and supports diversity at all levels within the business. As an essential part of ensuring equal rights, Stillfront Group expect all professionals to actively support and continuously enhance an equal and supporting work environment, free from all discrimination and harassment. This means that Stillfront Group:

- believes that all professionals shall be treated the same and with courtesy and respect;
- has a zero tolerance for any discrimination, sexual harassment or any other kind of harassments or reprisals;
- urges all professionals to be alert and take responsibility for ensuring compliance with this Policy; and
- will handle all notifications, reports or other concerns with utmost confidentiality.

Stillfront Group does not tolerate any form of harassment or violence in the workplace, and the use of forced labour and child labour is strictly prohibited in all company operations. Stillfront Group considers that it is not enough to avoid discrimination or harassment. It is an important responsibility for all professionals within Stillfront Group to actively contribute to a work environment that is based upon respect and trust at all levels, and it is the responsibility of all managers to also monitor for signs of problems or areas of potential improvements in this context.

Due to the above, Stillfront Group will take active measures aimed at preventing discrimination and serving in other ways to promote equal rights and opportunities. Stillfront Group aims to undertake active measures if a discrimination and/or harassment case occur. The action shall also ensure that discrimination and/or harassment, to the best of Stillfront Group's ability, will be prevented in the future. This means that Stillfront Group shall:

- examine the workplace in order to identify any areas entailing risk of discrimination or reprisals, or any other obstacles to professionals' equal rights and opportunities;
- analyse the causes of any risks and obstacles discovered. This involves reflecting, analyzing and drawing conclusions about why they are present, if they exist;

- take the prevention and promotion measures that reasonably can be demanded, given the outcome of the investigation and analysis; and
- evaluate the investigation and analysis and measures taken.

5. Recruitment and onboarding



Recruiting and selecting the right professionals is critical to the continued success of Stillfront Group. All recruitments in subsidiaries must be preapproved by the relevant Studio Head, all recruitments of Studio Heads as well as Group Management must be preapproved by the Group CEO. Furthermore, the Group CEO or Group CFO shall be involved in matters relating to hiring, firing, significant changes to remuneration and the like in relation to Studio Financial Directors positions.

For positions at Studio Head level and all central position in the Stillfront Group, all managers wishing to make decisions regarding hiring, firing, significant changes to remuneration and the like for professionals reporting directly to her/him, need to seek approval from their superior level before such changes are made. Corresponding decisions within Studios from level two and downwards shall be handled similarly or are to be covered within the budgeting process.

Appointments must be based on merit. Principles include fairness, credibility and equal employment opportunity free from any discrimination.

This section shall also apply in relation to promotions for the positions mentioned herein.

Each Studio Head is responsible for proper onboarding of new staff, including introduction to Stillfront Group's Group Policies.

6. Remuneration

Stillfront Group strives to uphold competitive, stimulating and fair remuneration structures offering an overall competitive and attractive compensation package. Remuneration includes salary, any variable part of remuneration as well as social, pension and other benefits.

Each professional shall be rewarded in a correct and fair manner in accordance with his or her individual performance and contribution to the success of Stillfront Group. The wages paid for a standard working week shall at least meet the legal or industry minimum standards in the relevant local market and be sufficient to meet the basic needs of our professionals. Labour hire agreements and apprenticeships shall not be undertaken to evade Stillfront Group's obligations to personnel under applicable laws, social security legislation and regulations.

It is the responsibility of each manager to propose, within the framework of the company policy, budget and guidelines, the remuneration of her/his professionals, taking into account the local market, individual performance, skills and potential for development.

It is also the responsibility of each manager to communicate properly, clearly and with sufficient transparency, the individual remuneration of each staff member taking into account her/his professional performance and her/his specific responsibilities.

7. Professional Development

Learning is part of the company culture and a necessity for Stillfront Group and its professionals ability to remain successful. The willingness to learn is therefore a fundamental condition to be employed by Stillfront Group.

First and foremost, training is done on-the-job. Guiding and coaching is part of the responsibility of each manager and it is crucial to make each one progress in her/his position.

When formal training programs are organised, they should be purpose oriented and designed to improve relevant skills and competencies. Therefore, they are proposed in the framework of individual development programs. As a consequence, attending a program should never be considered as a reward nor as a promise of promotion.

Each professional is in charge of her/his own professional development. However, Stillfront Group endeavours to offer the opportunity to progress for those having the determination and the potential to develop their capabilities. It is the role of each manager to act as a mentor for her/his staff and to assess progress achieved as a result of training programs.

Promotions will exclusively be based on competence, insight, performance and potential with the exclusion of any consideration for race, religion or other beliefs, age, ethnic or national origin, gender, sexual orientation, transgender identity or expression, political opinion, union membership, marital status or disability.

8. Parental leave

Stillfront Group is committed to ensure a workplace, which promotes equal opportunities and flexible working arrangements for all, in accordance with applicable legislation. It shall be possible to combine parenting with working for Stillfront Group. We are positive to, and encourage, our employees in taking parental leave in accordance with local legislation. Parental leave may never be a source of discrimination in employment including access to employment or promotions.

9. Alcohol and Drugs

Stillfront Group has a zero-tolerance alcohol and drug policy. Stillfront Group professionals are under no circumstance allowed to use or be under the influence of alcohol or other kinds of intoxication when in duty.

When participating in Stillfront Group social events where alcohol is served, it is the responsibility of the individual to observe moderation. All professionals are expected to behave in a business like, courteous and sober manner. If a professional's behaviour is not acceptable or suggests the influence of drugs or alcohol, Stillfront Group reserves the right to take appropriate action and if applicable to instigate employment action including dismissal.

10. Data Privacy

Stillfront Group values the privacy of individuals, clients and professionals; respects their data protection rights and recognizes the importance of protecting personal data. Each

individual is entitled to protection of their personal integrity, which includes a number of rights and freedoms determined in various legalisations. The right to protect the integrity of personal information is generally referred to as the right to data privacy. Each individual's right to data privacy is secured through a rigorous legal framework of rules and principles applicable throughout the entire lifecycle of the personal information - from collection of personal information to erasure of the personal information. Moreover, the legal framework protects and ensures certain rights granted to individuals so that the individual is in control of his or her personal information and that any measures taken with personal information is conducted in a transparent manner.

All professionals have the right to request access to any of their personal data that Stillfront may hold, and to request correction of any inaccurate data relating to you. Stillfront's ability to maintain records also depends on professional notification of inaccurate information.

Additionally, all professionals have the right – to the extent applicable data protection regulations provide – to request the deletion of your personal data, the right to request that the processing of your personal data is restricted, the right to data portability and the right to object to processing justified on legitimate interest grounds as provided for under the applicable law, including the General Data Protection Regulation (2016/679/EU).

For further details on how Stillfront processes your personal data and your rights, please see the Data Protection and Privacy Policy and other relevant policies as referred to within it.

11. Freedom of association and Collective Bargaining

Stillfront Group recognizes and respects its employees' right to freedom of association and to collective bargaining, in particular we:

- respect the right of all workers to form and join a trade union of their choice in accordance with national law, without fear of intimidation or reprisals;
- ensure that policies, procedures, and practices do not discriminate against individuals because of their views on trade unions or for their trade union activities; and
- do not interfere with the activities of workers' representatives while they carry out their functions in ways that are not disruptive to regular company operations or applicable law.

12. Monitoring

Each Studio Head and management team is responsible for implementing this Policy within their studio and monitoring its compliance.

Stillfront conducts a quarterly employee satisfaction survey (Stillpoll) and evaluates its result.

13. Document properties

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Document owner
Group CEO

13.1 Revision history

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1.2	10.12.2020	Updated with sections covering parental leave and freedom of association and collective bargaining	Johanna Bergsten, GC
1.3	2021-09-02	Annual revision	Johanna Bergsten, GC