

CODE OF CONDUCT AND ETHICS

FOR SENIOR OFFICERS OF VEONEER HOLDCO, LLC

Adopted as of April 2022

Introduction

Veoneer HoldCo, LLC (“Veoneer” or, the “Company”) is committed to complying with applicable laws and regulations and to operating with the highest standards of business conduct and views this as an integral part to the basic operation of the Company. The board of directors of Veoneer (the “Board of Directors” or the “Board”) adopts this Code of Conduct (this “Senior Officers’ Code”) to assist the Company’s Senior Officers in fulfilling their duties to the Company in accordance with this commitment. For the purpose of this Code of Conduct and Ethics, “Senior Officers” includes the Chief Executive Officer and President of the Company (the “CEO”) and all executives that report directly to the CEO, together with the Senior Treasury Officer and Principal Accounting Officer. As Senior Officers, you manage the business and affairs of Veoneer and set a tone of integrity and compliance for all employees to follow. This Senior Officers’ Code is designed to assist you in that task.

Veoneer’s Standards of Business Conduct and Ethics, which this Senior Officers’ Code is intended to supplement, sets forth the fundamental principles and key policies and procedures that govern the conduct of all of us in our business. In many instances, the guidelines and standards of this Senior Officers’ Code go beyond the requirements of applicable law. You are bound by the requirements set forth in the Standards of Business Conduct and Ethics, as well as those set forth in this Senior Officers’ Code and other applicable policies and procedures.

Since no code or policy can anticipate every situation that may arise, this Senior Officers’ Code is intended to provide guidance for handling unforeseen situations that may arise. Senior Officers are encouraged to bring questions about particular situations to the attention of the General Counsel, who, if necessary and appropriate, may discuss such issues with the Chairman of the Board, Chief Executive Officer, lead independent director (if any), or consult with outside legal counsel.

Compliance with Rules and Regulations

As a Senior Officer, your responsibility for upholding the highest standards of business conduct and ethics does not end with your own compliance. Senior Officers also have leadership responsibilities that include creating a culture of high ethical standards; performance with integrity; commitment to compliance with laws, rules, and standards applicable to our business; maintaining a work environment that encourages employees to

raise concerns without fear of retaliation; and promptly addressing employee compliance concerns. Therefore, it is your responsibility to promote the ethical standards of the Company and maintain a culture of integrity by ensuring that the Company's policies and its executives:

- encourage employees to talk to supervisors, managers, and other appropriate personnel when in doubt about the best course of action in a particular situation;
- encourage employees to report violations of laws, rules, regulations, or applicable codes of conduct to appropriate personnel; and
- inform employees that the Company will not allow retaliation for reports made in good faith.

Pre-Notification of Outside Positions

Acceptance of a position with another company. Senior Officers shall disclose using the [Conflict of Interest Disclosure Form](#) as per company Conflict of Interest policy, prior to accepting a position, such as a directorship, with any entity outside the Company. This notification will allow the Company to evaluate the appropriateness of such appointment and determine whether there is a potential conflict of interest.

Acceptance of a position with a charitable or non-profit organization. Senior Officers shall disclose using the [Conflict of Interest Disclosure Form](#), as per company Conflict of Interest policy, prior to accepting an official position with a charitable organization. This notification will allow the Company to monitor the level of contributions, if any, that the Company makes to the charitable organization.

Acceptance of other positions. Senior Officers shall disclose using the [Conflict of Interest Disclosure Form](#), as per company Conflict of Interest policy, prior to affiliating with a law firm or audit firm that provides services to the Company. Senior Officers should also contact the General Counsel of the Company when any members of their immediate family accept such positions.

Conflicts of Interest and Related Person Transactions

You are expected to avoid any activity or personal interest that creates or appears to create a conflict between your interests and the interests of the Company in order to maintain integrity in the conduct of the Company's business and your independent judgment. A conflict of interest occurs when your private interests interfere or appear to interfere with the interests of the Company. Although we cannot list every conceivable conflict, the following are some examples that illustrate actual or apparent conflicts of interest:

- You or a member of your immediate family¹ has an ownership interest in, is employed by or serves as a director of an entity that competes with the Company, does business with the Company (such as a Veoneer customer, supplier, or business partner), or is a recipient of charitable contributions made by the Company.
- You or a member of your immediate family participates in a joint venture,

¹ Members of your "immediate family" include your spouse/partner, parents, children, siblings, mothers and fathers-in-law, sons and daughters-in-law, brothers and sisters-in-law, and anyone (other than domestic employees) who shares your home.

- partnership or other business arrangement or investment with Veoneer.
- You or a member of your immediate family participates in a joint venture, partnership or other business arrangement or investment that you learned of through the use of corporate property, corporate information, or your position at the Company.
- You or a member of your immediate family receives improper personal benefits as a result of your position in the Company.

Before making any investment, accepting any position or benefits, or participating in any transaction or business arrangement that creates or appears to create a conflict of interest, you must fully disclose the details and circumstances of such possible conflict to the Audit Committee of the Board of Directors (the "Audit Committee") and the General Counsel and obtain the approval of the Audit Committee. This includes, but is not limited to, preempting, or seizing a corporate business opportunity. A corporate business opportunity is (1) an opportunity in the Company's line of business or proposed expansion or diversification, (2) which the Company is financially able to undertake and (3) which may be of interest to the Company. Only after the Audit Committee determines that the Company does not have an actual or expected interest in the opportunity may a Senior Officer participate in it, provided that the Senior Officer has not wrongfully utilized the Company's resources in order to acquire the opportunity.

Veoneer recognizes that transactions with parties related to the Company's employees, executives, senior officers, or directors present potential or actual conflicts of interest and create the appearance that Company decisions are based on considerations other than the best interest of the Company. Accordingly, as a general matter, Veoneer prefers to avoid such transactions. The Company recognizes, however, that certain situations may arise where certain "related person transactions" may not be inconsistent with the best interest of the Company. Therefore, the Company has adopted a Related Person Transactions Policy, which requires all related person transactions to be reviewed and approved or ratified by the Audit Committee.

Loans

Senior Officers may not obtain a loan from the Company or any of its subsidiaries.

Confidential Information

You shall maintain the confidentiality of confidential information entrusted to you as an officer of the Company. You may not inappropriately disclose the Company's confidential and proprietary information or use that information for your own personal gain or advantage, or the personal gain or advantage of anyone other than the Company. The term "confidential information" includes, but is not limited to, non-public information that might be of use to competitors of the Company, or harmful to the Company or its customers if disclosed.

You must consult the General Counsel if you believe you have a legal obligation to disclose confidential information.

Gifts and Entertainment

When acting on behalf of the Company, you should never request gifts, entertainment or any other business courtesies from people doing business with the Company (including suppliers, customers, competitors, contractors, and consultants). Unsolicited gifts are permissible if they are customary and commonly accepted business courtesies, not excessive in value, and given and accepted without an express or implied understanding that you are in any way obligated to return a business benefit or favor by acceptance of the gift. Gifts with a value of over \$100 should only be accepted with the approval of the Chief Executive Officer or General Counsel. Gifts with a value of over \$250 are prohibited. Meals in the ordinary course of business and infrequent meals and entertainment, such as cultural or sporting events, that are attended by both the Senior Officer and the person providing the meal or entertainment are not considered gifts.

Gifts of cash or cash equivalents (including gift certificates, securities, below-market loans, etc.) in any amount are prohibited. For additional information regarding gifts, see our Anti-corruption and Anti-Bribery Policy.

Reporting of Significant Deficiencies

The Chief Executive Officer, Chief Financial Officer, Senior Accounting Officer and Senior Treasury Officer shall promptly bring to the attention of the General Counsel or Chief Executive Officer any information he or she may have concerning: (a) significant deficiencies in the design or operation of internal controls which could adversely affect the Company's ability to record, process, summarize and report financial data or (b) any fraud, whether or not material, that involves management or other employees who have a significant role in the Company's financial reporting, disclosures or internal controls.

Compliance with the Senior Officers' Code

You must provide a written acknowledgement annually of your understanding and compliance with this Senior Officers' Code.

If you have questions about this Senior Officers' Code, you should seek guidance from the General Counsel. If you know of or suspect a violation of applicable laws or regulations or this Senior Officers' Code, you must immediately report that information to the Chief Executive Officer, the General Counsel, or the Audit Committee. No one will be subject to retaliation because of a good-faith report of a suspected violation.

Violations of this Senior Officers' Code may result in disciplinary action, up to and including discharge. The Audit Committee shall determine or designate appropriate persons to determine appropriate action in response to violations of this Senior Officers' Code.

Waivers of the Code

The Company will waive application of the policies set forth in this Senior Officers' Code only when circumstances warrant granting a waiver, and then only in conjunction with any appropriate monitoring of the particular situation. Changes in and waivers of this Senior Officers' Code may be made only by the Board of Directors or the Audit Committee and will be publicly disclosed as required by applicable law or regulation.

No Rights Created

This Senior Officers' Code is not intended to and does not constitute an employment contract or assurance of continued employment, and does not create any rights in any director, officer, employee, client, supplier, competitor, stockholder or any other person or entity.