



CODE OF CONDUCT  
COMPANY

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# Code of Conduct

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# Our commitment

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At *Company*, we are committed to comply with laws and regulations that apply in countries where we operate at all times. In addition to following the legal requirements, we believe in doing business ethically and responsibly. We recognise and actively promote the United Nations Sustainable Development Goals, which guide our work in sustainable development and the continuous improvement of our operations. We respect the international Labour Organization's Declaration on Fundamental Principles and Rights at Work and United Nations Global Compact ten principles relating to human rights, labour, environment and anti-corruption. This Code of Conduct has been guided by these important principles.

This Code of Conduct is approved by the highest decision-making authority of *Company*, Board of Directors. All employees working for *Company* and its joint ventures, whether permanently or temporarily employed, subcontracted or volunteering, are subject to our Code of Conduct, including the Board of Directors and the Leadership Team.

The ultimate responsibility for adhering to the following principles and for sustaining *Company's* ethical business conduct rests with each employee individually.

We collaborate with our business partners in good faith and expect them to commit to the principles of our Code of Conduct or ensure their adoption of similar ethical principles in their business activities.

## As Company's **employees** we are expected to:

- Read, understand and comply with our Code of Conduct
- Speak up and voice our concerns if we suspect any misconduct
- Ask for advice from our managers or Legal when uncertain about the right thing to do

## As Company's **team leaders** we are expected to:

- Lead by example
- Take the time to discuss and reflect on the areas of our Code that are specifically relevant to your team
- Promote an atmosphere in which your team members feel they can voice their concerns
- Listen to the concerns of your team members and escalate any suspected misconduct
- Supervise and support your team in meeting the expectations of our Code

“Integrity is  
doing the right  
thing, even  
when no one  
is watching.”

# Our Code of Conduct principles in a nutshell

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## COMMITMENTS TO OUR WORKPLACE

1. We put health and safety first
2. We value diversity and aim for an inclusive, equal workplace
3. We respect one another, promoting positive behavior and disapproving of all forms of harassment and discrimination

## COMMITMENTS TO THE MARKETPLACE

4. We promote fair competition
5. We respect the rights, assets and privacy of others
6. We help to combat money laundering
7. We are politically neutral
8. We respect all international trade laws

## COMMITMENTS TO OUR BUSINESS PARTNERS

9. We promise integrity and quality to our customers
10. We expect our business partners to share the same ethical standards with us
11. We avoid situations where personal and business interests could conflict
12. We do our part in the fight against corruption and bribery

## COMMITMENTS TO OUR SHAREHOLDERS

13. We strive to strengthen Company's brand and reputation
14. We keep meticulous financial records and accounts that impartially reflect Company's transactions and assets
15. We respect our company assets and have measures to prevent fraud

## COMMITMENTS TO THE SOCIETY

16. We are committed to sustainable development and environmental values
17. We are committed to do business in ways that protect the society and the environment in all the countries where we operate

## COMMITMENT TO SPEAK UP

18. We promise to speak up and act when this Code is violated

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## Ethics in business activities

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Company does not exist without our customers. Keeping this in mind, we treat our customers as we treat our colleagues: with respect and dignity. Integrity shall lead our conduct throughout designing, manufacturing, marketing and delivering our solutions and services.

Our ambition is to seek ethical and transparent relationships with our customers, suppliers, agents, and contractors. We expect our partners to share the same ethical principles as we do.

All of our decisions and business transactions must promote the best interests of Company and cannot be based on someone's personal interests. Personal relationships with our partners shall not influence our decision-making. We all need to recognize and avoid conflicts of interest and restrain ourselves from decision-making if it includes or may include a conflict of interest. We must immediately report any circumstances that may be interpreted as conflicts of interest to our decision-makers and consider the solutions together.

At Company, we do our part in the fight against corruption and bribery. We regard gestures of appreciation such as meals and invitations to social gatherings as part of building sound business relationships. However, we must make sure that the gifts and hospitality we give and receive always support a clear business objective and are properly recorded, reasonably valued, and appropriated to the nature of the business relationship. We refrain from receiving and giving any gifts that may affect decisions related to business operations or that have considerable personal or financial value.



# How to do the right thing?

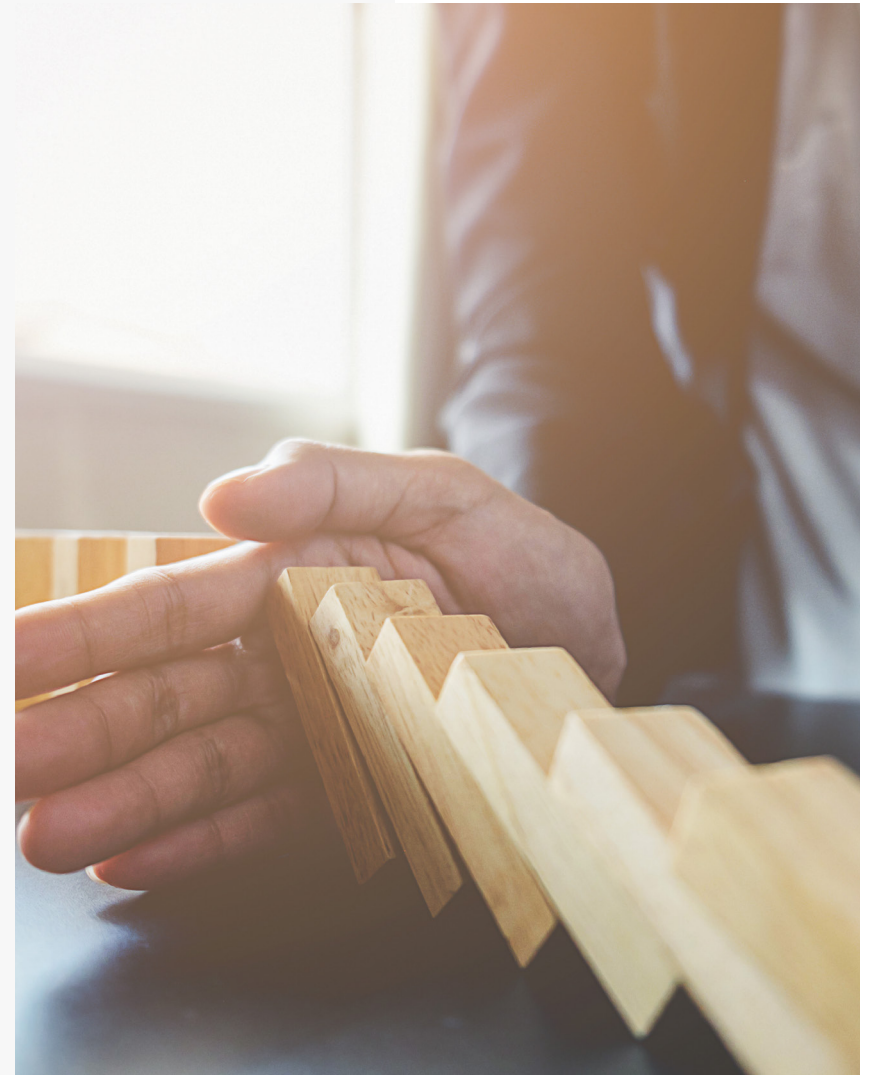
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## How to promote a diverse, inclusive and equal company culture?

- Be conscious of the language you use
- Don't physically or verbally bully, intimidate or humiliate others
- Humor is not the same for everyone – don't tell stories or jokes that could be seen as inappropriate, offensive or sexually explicit
- Don't distribute or display offensive material
- Avoid making remarks about a person's appearance – body or clothing
- Become aware of your own biases and work on them
- Promptly report any inappropriate or unacceptable behavior you observe in the workplace

## A healthy and safe work environment is everybody's responsibility.

1. Take personal responsibility for your own health, safety and well-being
2. Understand your role in contributing to creating a safe working environment for your colleagues
3. Halt and report unsafe situations, without putting yourself or others in danger



**“Be a role model  
for health and safety  
and lead by example.”**