

# The Silduksfabriken Code of Business Conduct

## Introduction

The Silduksfabriken Code of Business Conduct prescribe certain values and principles which Silduksfabriken has committed to.

This Code of Business Conduct specifies and helps the continued implementation of the Corporate Business Principles by establishing certain nonnegotiable minimum standards of behaviour in key areas.

The nature of this Code is not meant to cover all possible situations that may occur. It is designed to provide a frame of reference.

Employees should seek guidance when they are in doubt about the proper course of action in a given situation, as it is the ultimate responsibility of each employee to “do the right thing”, a responsibility that cannot be delegated.

Employees should always be guided by the following basic principles:

- avoid any conduct that could damage or risk Silduksfabriken or its reputation;
- act legally and honestly;
- put the Company’s interests ahead of personal or other interests.

## Compliance with laws, rules and regulations

### Conflicts of Interest

**We respect the law at all times.**

Silduksfabriken and its employees are bound by the law.

Compliance with all applicable laws and regulations must never be compromised.

Additionally, employees shall adhere to internal rules and regulations as they apply in a given situation. Those internal rules are specific to the Company and may go beyond what is required by the law.

**We will always act in the best interests of Silduksfabriken**

A Conflict of Interest occurs when personal interests of an employee or the interests of a third party compete with the interests of Silduksfabriken.

In such a situation, it can be difficult for the employee to act fully in the best interests of Silduksfabriken.

Employees shall avoid Conflicts of Interest whenever possible.

If a Conflict of Interest situation has occurred or if an employee faces a situation that may involve or lead to a Conflict of Interest, the employee shall disclose it to his or her Manager to resolve the situation in a fair and transparent manner.

## Antitrust and fair dealing

### Confidential information

All employees, but 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.

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

Silduksfabriken is prepared to compete successfully in today's business environment and will always do so in full compliance with all applicable antitrust, competition and fair dealing laws.

Therefore, employees must at all times adhere to the following rules:

- Commercial policy and prices will be set independently and will never be agreed, formally or informally, with competitors or other non-related parties, whether directly or indirectly;
- Customers, territories or product markets will never be allocated between Silduksfabriken and its competitors but will always be the result of fair competition;
- Customers and suppliers will be dealt with fairly.

**We value and protect our confidential information and we respect the confidential information of others.**

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

Silduksfabriken continued success depends on the use of its confidential information and its nondisclosure to third parties.

Unless required by law or authorized by their management, employees shall not disclose confidential information or allow such disclosure.

This obligation continues beyond the termination of employment. Furthermore, employees must use best efforts to avoid unintentional disclosure by applying special care when storing or transmitting confidential information.

Silduksfabriken respects that third parties have a similar interest in protecting their confidential information. In case that third parties, such as joint venture partners, suppliers or customers, share with Silduksfabriken confidential information, such information shall be treated with the same care as if it was Silduksfabriken's confidential information.

In that same spirit, employees shall protect confidential information that they have obtained in the course of their prior employment.

Employees shall safeguard and make only proper and efficient use of Silduksfabriken property. All employees shall seek to protect Silduksfabriken's property from loss, damage, misuse, theft, fraud, embezzlement and destruction.

These obligations cover both tangible and intangible assets, including trademarks, know-how, confidential or proprietary information and information systems. To the extent permitted under applicable law, the Company reserves the right to monitor and inspect how its assets are used by employees, including inspection of all e-mail, data and files kept on Company network terminals.

## **Bribery and corruption**

**We insist on honesty and we respect the Company's assets and property.**

Employees must never engage in fraudulent or any other dishonest conduct involving the property or assets of Silduksfabriken.

This may not only entail disciplinary sanctions but also result in criminal charges.

**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.

Nor must they accept any such advantage in return for any preferential treatment of a third party.

## Discrimination and harassment

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

**We embrace diversity and respect the personal dignity of our fellow employees**

Silduksfabriken respects the personal dignity, privacy and personal rights of every employee and is committed to maintaining a workplace free from discrimination and harassment.

Therefore, employees must not discriminate on the basis of origin, nationality, religion, race, gender, age or sexual orientation, or engage in any kind of verbal or physical harassment based on any of the above or any other reason.

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

## Reporting illegal or non-compliant conduct

**We will consult the Code, comply with its provisions and seek guidance where needed.**

It is each employee's responsibility to ensure full compliance with all provisions of this Code and to seek guidance where necessary from their Manager.

To "do the right thing" and to ensure the highest standards of integrity is each employee's personal responsibility that cannot be delegated.

**We take responsibility for ensuring that we all act with integrity in all situations.**

Employees shall report any practices or actions believed to be inappropriate under this Code or even illegal to their Manager.

Where appropriate, complaints may be made on a confidential basis.

All complaints shall be properly investigated.

## Human and labour rights

Silduksfabriken believes that the acceptance of and compliance with internationally acknowledged human rights are fundamental to all its business relations.

Silduksfabriken demands suppliers to apply to the United Nations rules of human rights and ILO's conventions about child labour, discrimination, the right to join trade and work environment.

Silduksfabriken's supplier should also follow applicable laws of work hours and minimum wages within the industrial standard.

**Follow Through:**

Any new supplier or similar partner should be informed about Silduksfabriken's Code of Conduct and be given notice to confirm this Code of Conduct before entering into the business relation.

On behalf of Silduksfabriken i Jönköping AB, Sweden  
Peter Lindmark / Managing Director