



GRÖNSKÄR

CODE OF CONDUCT

**CODE OF CONDUCT – GRÖNSKÄR GRUPPEN AB**

## 1 BACKGROUND AND PURPOSE

Grönskär Gruppen AB, reg. no 556894-6163 (“**Grönskär Gruppen AB**”) has resolved on a number of governing documents, amongst other things this document called Code of Conduct (the “**Code of Conduct**”) as well as certain processes to ensure that Grönskär Gruppen AB is complying with applicable laws and regulations and that Grönskär Gruppen AB’s values and desired ways of conducting business are communicated and followed throughout the entire organization.

The object of the Code of Conduct is to describe the fundamental values that apply within Grönskär Gruppen AB. The Code of Conduct constitutes a minimum level – not a maximum level – when it comes to regulatory compliance and business ethics and is supplemented by governing documents within specific areas.

## 2 TO WHOM IN APPLIES

This Code of Conduct applies to Grönskär Gruppen AB and all legal entities owned or controlled by Grönskär Gruppen AB. Accordingly, the Code of Conduct applies to all employees within Grönskär Gruppen AB, and it is everyone’s responsibility to adhere to, and act according to, the principles set out in the Code of Conduct. In addition, the Code of Conduct are to be applied not only to employees but also in relation to customers, suppliers, shareholders and other stakeholders.

Matters relating to business ethics may be complex. If guidance is needed, please contact the CEO or Head of Legal of Grönskär Gruppen AB.

## 3 BUSINESS ETHICS

### **ANTI-CORRUPTION**

Within Grönskär Gruppen AB, all business activities shall be conducted with high integrity. All forms of bribery, corruption, and financial irregularity are strictly forbidden. All benefits and business entertainment shall be used with sound judgment and there must be no doubt about its business legitimacy. Employees shall not request, accept or offer any gift, loan, discount or other item of substantial monetary value from any person or company that could influence the business decisions.

### **ANTI-MONEY LAUNDERING (“AML”) AND COUNTER-TERRORIST FINANCING (“CTF”)**

Within Grönskär Gruppen AB, measures shall be taken to prevent Grönskär Gruppen AB from being used to facilitate the movement of criminal proceeds or transfer of funds destined to finance terrorism. Employees are prohibited from engaging in transactions that may violate AML and CTF regulations.

### **SANCTIONS**

Within Grönskär Gruppen AB, all business activities shall be conducted in accordance with international sanctions and Grönskär Gruppen AB is committed to fully comply with sanctions adopted by inter alia the United Nations (UN), the United States of America (U.S.), United Kingdom (UK) and the European Union (EU). Employees are prohibited from engaging in transactions that may violate sanctions.

### **COMPETITION**

Within Grönskär Gruppen AB, all business activities shall be conducted in a manner that supports fair and open competition. All business activities shall adhere to applicable competition laws that prohibit agreements and arrangements between competitors that restrict fair and open competition.

### **INFORMATION PROVISION**

Within Grönskär Gruppen AB, everyone shall strive to ensure that information is open, correct and of the best quality, and that it is provided in accordance with applicable laws, regulations, accounting standards and norms. Confidential information shall be protected and must not be disclosed to any unauthorized parties.

### **HAZARDOUS SUBSTANCES**

Within Grönskär Gruppen AB, potentially hazardous substances in chemical products and articles used in production are to be handled, transported, stored, recycled and disposed of safely. Safety information shall be available to educate, train, and protect employees from hazardous materials and employees shall have access to adequate personal protective equipment.

### **RESPONSIBLE SOURCING**

Within Grönskär Gruppen AB everyone shall conduct responsible supply chain management of materials och products and in particular of those from conflict affected and high-risk areas. Grönskär Gruppen AB does not accept that minerals contained in the products sold or manufactured by Grönskär Gruppen AB directly or indirectly finance or benefit armed groups that are perpetrators of human rights abuses or in any other way directly or indirectly contribute to human rights violations.

### **CONFLICTS OF INTEREST**

Within Grönskär Gruppen AB, conflicts of interest shall be avoided to the best extent possible.

Everyone within Grönskär Gruppen AB is expected to use their judgment to act in the best interest of the Grönskär Gruppen AB and shall not use their position to request personal benefits for themselves or family members. A conflict of interest may also arise from a personal relationship with a customer, vendor, competitor, or business partner, if that relationship impairs or may be perceived to impair the objective business judgment.

## 4 EMPLOYEE RIGHTS

### **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

Within Grönskär Gruppen AB, the employees fundamental right to freely associate and be represented by labor unions shall be respected, including the right of employees and their unions to conduct collective bargaining. Salaries and benefits shall be paid in accordance with applicable laws and collective agreements.

### **DIVERSITY AND EQUAL OPPORTUNITIES**

Within Grönskär Gruppen AB, everyone – regardless of gender, age, ethnicity, religion, sexual orientation or disability – shall have the same opportunities, rights and obligations. All forms of discrimination and abusive behavior are unacceptable.

### **HEALTH AND SAFETY**

Within Grönskär Gruppen AB, all employees shall be offered a safe working environment which considers health, safety and environmental issues. All employees shall be aware of, and equipped to follow, applicable rules and processes for health and safety in their area of operation.

## 5 INFORMATION MANAGEMENT

### **DATA PRIVACY, INFORMATION SECURITY AND IT-SECURITY**

Within Grönskär Gruppen AB, everyone shall respect personal and confidential information handled within the business. All personal data shall be handled with respect to everyone's right to the protection of their personal data, and according to current legislation. Data shall be protected and handled responsibly and only used for the purpose for which it is provided. Each employee shall maintain a high level of information management, information security, and IT-security.

### **COMMUNICATION**

Within Grönskär Gruppen AB, all communication, both internally and with external stakeholders, such as shareholders and media, shall be clear and truthful. Social media shall be used with responsibility and in accordance with internal guidelines.

## 6 ENVIRONMENT

Within Grönskär Gruppen AB, it is an overall objective that the business shall be conducted in a sustainable way to ensure that the impact on the environment is limited. All decisions within the business shall be made with consideration for the environment.

## 7 DEVIATIONS FROM THE CODE OF CONDUCT

Any violations of our Code of Conduct may be reported to managers or relevant functional group (for instance Legal or Finance).

In addition Grönskär Gruppen AB has established a group-wide whistleblower service, which can be reached at our webpage or at our parent company's webpage, [www.gronskar.se](http://www.gronskar.se). The whistle blower service is hosted by a third party. Access to information contained therein is limited to a dedicated team and handled on a strictly confidential basis. Retaliation against a person for making complaints in good faith is not tolerated.