

# Alsiano

## Code of Conduct

It is our ambition to constantly develop our company - without compromising the principle of being a responsible company. Our Code of Conduct describes how to act to run the business in an ethical, social and environmental way.

### GENERAL PRINCIPLES

Alsiano's business is based on close and long-term relationships with customers and suppliers. We strive to be considered a credible, long-term and reliable partner. Therefore, it is important for us to have high standards of integrity and ethics. Alsiano complies with the laws and regulations in force and chooses to partner with suppliers who share our principles. Our principles are based on the guidelines of the UN Global Compact.

### HUMAN RIGHTS

Anyone who works directly or indirectly for Alsiano is entitled to have his or her basic human rights fulfilled in accordance with the UN Universal Declaration of Human Rights.

### Terms of employment

The terms of employment, including wages and working hours offered to our employees, must at least meet the minimum requirements of national law and agreements. All employees must have written employment contracts and be informed of the terms of employment. Wages, working hours and terms must be fair and reasonable.

### Work environment

We strive to be a respected employer continuously improving health and safety at work. We ensure a good working environment from a physical, mental and social point of view and do our utmost to be an attractive employer. The necessary safety instructions must be provided, including relevant information. The relationship with and between employees must be based on mutual respect. We must, as a minimum, comply with national health and safety laws and the health and safety regulations that result from agreements including union agreements.

### Child labour

The UN convention on the rights of the child, the ILO convention on minimum age for access to employment, and the ILO convention on prohibition and immediate action to abolish the worst forms of child labour form part of the guidelines for our activities.

### Disciplinary measures

Employees must be treated with respect and dignity. No employee shall under any circumstances be subjected to corporal punishment or any other form of physical, sexual or psychological punishment, harassment or coercion. Wages must not be cut as a disciplinary penalty unless provided for in a collective bargaining agreement or regulated by law.

### Freedom of association

Employees must have the freedom to be a member of, establish or work for organizations representing their interests as workers.

### Equality, diversity and discrimination

We do not allow discrimination or harassment of any kind. Employees must have equal development opportunities regardless of gender, age, ethnic origin, religion, political views, sexual orientation, disability or other distinctive characteristics. In case of e.g. wage differences between men and women performing the same functions, we must actively work to equalize them.

### Forced labour

We do not accept forced or involuntary or unpaid work of any kind. This also applies to agreements under forced conditions and the use of illegal labour. Nor do we accept methods that restrict the free movement of employees. No one must be held to work against his or her will.

### Political commitment

We are politically neutral. The name Alsiano must not be used to promote the interests of political parties or candidates.

### BUSINESS ETHICS

#### Anti-corruption

We do not accept corruption, bribery or unfair anti-competitive measures. The procurement, sale and marketing of our products must be carried out professionally and in accordance with relevant laws and regulations. We comply with anti-corruption

laws and regulations in force. Conditions for discounts, commissions and bonuses must be reasonable and agreed in writing. We must not offer or provide payment or other remuneration to persons or organizations for the purpose of having the person or organization enter into or maintain a business relationship with our company. We must not directly or indirectly demand or accept any form of payment or other remuneration for the purpose of initiating or maintaining a business relationship.

#### **Conflict areas**

We must ensure that in no way our business activities support war, conflicts, drugs or slave trade. This includes the use of conflict minerals.

#### **Alsiano's property and resources**

We respect the assets of other companies and protect our tangible and intangible assets from loss, theft, unauthorized access and abuse. The property and resources of Alsiano may not be used for personal gain, fraudulent or otherwise improper purposes.

#### **Customers and suppliers**

We strive to offer products that meet or exceed our customers' expectations. We base the relationship with our business partners on sound business and market practices, high ethical standards and fair and clear agreements.

#### **Impartiality and conflicts of interest**

Alsiano's business relationships must be impartial, and all business decisions must be made based on Alsiano's interests without regard to personal relationships or benefits. Conflicts of interest between employees and group companies must be avoided. Employees must not participate in activities that conflict with the interests of Alsiano or the Group.

#### **Healthy competition**

We support fair and free competition in all parts of our business. Price cooperation and market splits between competitors, price control of dealers, innovation restriction, exchange of trade secrets or other anti-competitive measures are not allowed. With respect to competitors, Alsiano employees do not discuss the division of markets, prices or other terms or costs that may affect prices. If a competition authority makes an unannounced inspection visit, the employees must cooperate with the authorities' representatives and must not in any way impede the inspection.

#### **Accounting and reporting**

All financial transactions must be accounted for and reported in accordance with generally accepted accounting principles.

## **COMMUNITY**

### **Communication**

We have an open dialogue with all partners. We respond to inquiries from outsiders and communicate with stakeholders in a concrete and effective manner. Business related questions can be directed to Alsiano at [alsiano@alsiano.com](mailto:alsiano@alsiano.com).

### **Environmental responsibility**

Alsiano works actively to continuously reduce the direct and indirect environmental impact. All important decisions must take environmental considerations into account with the aim of creating long-term value for Alsiano's customers, employees, shareholders and society in general.

### **Taxes**

Alsiano must comply with tax laws and tax regulations in all the countries where the company operates.

## **APPLICATION AND COMPLIANCE**

### **Application of the Code of Conduct**

We require all employees to comply with the Code of Conduct. The CEO of Alsiano is responsible for implementing the Code of Conduct, informing the employees of their rights and obligations and ensuring that employees comply with the Code of Conduct. Alsiano requires suppliers to adhere to this Code of Conduct or to document a possible Code of Conduct of their own having similar intentions.

### **Compliance with the Code of Conduct**

Each employee in Alsiano is responsible for reporting any cases of fraud or other criminal behavior. Detected violations of our Code of Conduct promptly lead to disciplinary action - including dismissal and/or legal action in case of serious violations. We encourage employees to report any matter that may be in violation of Alsiano's Code of Conduct to the Managing director or Board members.

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