



CODE OF CONDUCT

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Code of Conduct

Kulleborn Group enjoys invaluable reputation of credibility based on a history of always acting reliable, with integrity and in compliance with applicable laws and regulations. The company's values and commitment to sustainable development are, and will always be, reflected, promoted and implemented in policies, decisions and actions.

1. Scope of Application

Kulleborn's Code of Conduct has been established to underline the principles by which the company conducts its relations with employees, business partners and other stakeholders. It applies to all members of the organization. Further, Kulleborn Group expects all business partners (suppliers, dealers, consultants, etc.) to implement the same principles.

2. Business Principle

2.1 Legal Compliance

In every country in which we operate, Kulleborn Group shall accept the laws and regulations of that country. In situations where the law does not give guidance, Kulleborn Group applies its own standards based on its documented corporate "Core values" and culture. In cases of conflict between mandatory law and the principles contained in this code, the law shall prevail.

2.2 Relations with Business Partners

Kulleborn's dealings with its business partners are characterized by fairness.

Kulleborn Group shall not offer customers, potential customers, governments, agencies of governments, or any representatives of such entities, any rewards or benefits in violation of either applicable laws or reasonable and generally accepted business practices.

Kulleborn Group employees must not accept payments, gifts, or other kinds of reimbursement from a third party that could affect or appear to affect their objectivity in their business decisions.

2.3 Accounting and Reporting

All financial transactions by Kulleborn Group must be reported in accordance with generally accepted accounting practices, and accounting records must show the nature of all transactions in a correct and non-misleading manner. Kulleborn Group will provide disclosure that is open, truthful, relevant, comprehensible and timely.

Employees and managers at all levels in Kulleborn Group shall conduct their private and other external activities and financial interests in a manner that does not conflict or appear to conflict with the interests of Kulleborn. Should a conflict of interest arise, it must be reported immediately by the person subject to the conflict to his/her immediate supervisor.

2.4 Political Involvement

Kulleborn Group observes neutrality with regard to political parties and candidates. Neither the names nor the assets of the Kulleborn Group Company shall be used to promote the interests of political parties or candidates.

3. Environmental Principles

3.1 Resource Efficiency

Kulleborn Group processes are designed in such a way that energy and raw materials are used efficiently, and waste and residual products are minimized over the products' life cycles.

3.2 Precautionary Principle

Kulleborn Group supports the precautionary principle by avoiding materials and methods posing environmental and health risks when suitable alternatives are available.

4. Human Rights and Workplace Practices

4.1 Human Rights

Within its sphere of influence, Kulleborn Group supports and respects the protection of internationally proclaimed human rights and ensures that it is not complicit in human rights abuses.

4.2 Non-Discrimination

Kulleborn Group hires and treats its employees in a manner that does not discriminate with regard to sex, race, religion, age, disability, sexual orientation, nationality, political opinion, union-affiliation, social or ethnic origin.

4.3 Labor

No form of forced, compulsory or child labor is tolerated in Kulleborn Group. The minimum employment age is the age of completion of compulsory school or according to the Swedish law. Freedom of association and the right to collective bargaining and agreements shall be respected in all Kulleborn Group operations.

4.4 Work Environment

The necessary conditions for a safe and healthy work environment shall be provided for all Kulleborn Group employees.

5. Responsibility of Managers and Employees

It is the responsibility of managers at Kulleborn Group to communicate and demonstrate the content as well as the spirit of this document within their organizations, and to encourage employees to reveal behavior that may be noncompliant with these principles. Explicit or implicit approval of questionable actions will not be tolerated.

Reports of violations of this code may be done anonymously and confidentially to the H/R Manager at Kulleborn Group. Persons reporting violations in good faith will not be subject to reprisal.

This Code of Conduct will be promptly and consistently enforced. Failure to comply with its provisions can result in disciplinary action.

This Code of Conduct has been approved by the management team at Kulleborn Group and can only be amended or waved by the same team.