



# CoC Employees

## INTRODUCTION

The Code of Conduct clarifies how Allgon is to conduct itself as a business partner, employer and societal stakeholder. The Code applies to the individual responsibilities of employees and the Group's responsibilities in respect of employees and the surrounding community. Our Code of Conduct is based on the Ten Principles of the UN Global Compact.

Allgon is of the view that it is important to conduct oneself in an appropriate manner both socially and ethically. It is our firm conviction that we must ensure our employees, and other individuals who contribute to our success, are not deprived of their human rights or subjected to physical or mental suffering in the course of their work.

Allgon's Code of Conduct is determined by the Board of Directors. The CEO and Board of each subsidiary bear ultimate responsibility for ensuring compliance with the Code of Conduct. Companies may exercise their own code, provided they comply with Allgon's. The managers must set a good example, and are expected to discuss the content of the Code in their teams and create a work environment where the employees feel comfortable raising issues or challenges which relate to it. The managers are also responsible for ensuring all employees receive regular training on the Code of Conduct. It is the responsibility of all managers to act in accordance with the Code of Conduct and seek support on its application with their line managers. The Code of Conduct is supplemented by policies ([the Equal Opportunity Policy](#)).

### Laws and ordinances

All those acting in Allgon's name shall comply with the laws and regulations that apply to its operations. This is a minimum requirement in all sections of the Code of Conduct.

### 1. THE OBLIGATION TO INFORM AND SIGN

All our employees must sign this document in order to acknowledge they are aware of our Code of Conduct, as well as forthcoming revisions. The management shall inform the employees with regard to changes in the contents of the document.

The Code of Conduct is an open document, and shall be accessible via our website and on our premises in such a way that everyone who works with us and contributes to our products and services is aware of and complies with it.



The Code of Conduct should also be provided to our suppliers as well as distributed to their subcontractors. We will achieve great success when everyone complies with the guidelines stated in the Code. We are prepared to clarify the content and associated requirements in this document if so required.

## 2. LEGAL REQUIREMENTS

We will, in all instances, comply with national and regional statutory requirements in the countries in which we operate. Should any of the requirements in this Code run counter to the laws of a nation or territory, the local laws in effect shall take precedence. However, it is important to understand that our requirements are not restricted to the requirements of national laws.

## 3. GENERAL COMMITMENTS REGARDING ETHICAL AND HUMAN RIGHTS

- We shall set an outstanding example in relation to ethical issues. Honesty and integrity are of the highest priority within our operations, and involvement in bribery, blackmail or corruption with the aim of disrupting the free market will not be tolerated in any form.
- Employees must ask themselves the following questions when encountering questionable conduct:
  - Is the conduct legal?
  - Does the conduct comply with our agreed policies and codes?
  - Does the conduct reflect our values and culture?
  - Could the conduct pose a serious threat to the company's interests?
  - Would you be concerned personally if the conduct ended up in the news?
  - We support and respect the protection of internationally declared humanitarian rights. Our managers shall exercise an open-door policy, welcome suggestions and listen to the concerns of employees. This will enable our employees to feel comfortable raising any issue and alert managers to difficulties existing within the working group.
- Any conflicts of interest must be addressed and handled so as to ensure everyone is treated fairly, shows mutual respect, encourages team spirit and avoids the intention of carrying out, or awareness of unethical or compromising activities.
- We call for a climate of trust and honesty in order to reinforce our vision of appropriate ethical conduct within the company. Unauthorised use of confidential information or business secrets, including marketing or customer information, operative, personnel-related or financial information, source code or technical information, as well as intellectual property rights or expertise, is strictly forbidden. Employees shall not utilise the company's property or business relationships for their own personal gain.



#### 4. CHILD LABOUR

We comply with and base our approach to child labour on the UN Convention on the Rights of the Child. We do not accept child labour in our own supplier chain. We will cease cooperation with partners who do not share our policy in relation to child labour.

We are aware that it exists, and acknowledge that it cannot be eliminated by adopting rules and carrying out inspections. Nevertheless, in our view, even if child labour is permitted under the local laws of a nation, a child has the right not to be exploited for the purposes of financial gain. Nor should children perform work which may entail risk or interfere with their education, or pose a risk to their mental or physical health or their spiritual, moral or social development.

#### 5. THE RIGHTS OF EMPLOYEES

##### Basic human rights

All those who work for us, either directly or indirectly, shall enjoy the following human rights:

- We do not accept the use of debt bondage, forced employment or prison- or illegal labour.
- Where non-Swedish workers are employed on a temporary basis, they shall never be forced to work under conditions contrary to their wishes.
- We will not tolerate that employees are subjected to corporal punishment or any other type of mental or physical disciplinary measure, or to sexual harassment.
- We recommend that all employees who so wish shall be affiliated to a trade union and have the right to collective bargaining. We will not accept disciplinary measures from employers against employees who choose to organise or apply for trade union membership.
- No employee shall be discriminated against on the grounds of his/her skin colour, ethnic background, nationality, gender, religion, disability, sexual orientation, age, political opinion or interests.
- We recommend that all employees with the same experience and qualifications are to be paid an equal salary for the same work.
- All employees are entitled to have a contract of employment.

##### Salary and working hours

- Salaries are to be paid regularly, on time and at an appropriate rate in relation to working input. The application of statutory minimum wages shall be avoided, rather than recommended.
- Weekly working hours shall not exceed legal limitations, and overtime shall be voluntary and compensated accordingly. Mandatory overtime may only be requested in accordance with the existing contract of employment.
- Employees shall be permitted to take annual leave, while parental leave and sick leave may be taken without any repercussions.
- Dismissal on the grounds of pregnancy is not tolerated.

 6. SAFETY IN THE WORKPLACE**Fire safety**

It is a requirement that safety in the workplace shall always be top priority. Buildings must have clearly designated evacuation routes, with emergency exits preferably located on all floors. All employees shall be informed about safety regulations in the building, such as emergency exits, fire extinguishers, first aid kits, etc. There must be an evacuation plan on each floor, and the fire alarm must be tested regularly. It is requested that evacuation drills are carried out on a regular basis.

**First aid**

We recommend that first aid equipment is provided in every office or building in use, and that at least one person in each department has undergone basic first aid training.

**Work environment**

Along with our suppliers, we shall maintain a clean, safe, healthy and productive environment, including clean toilets.

## 7. ENVIRONMENTAL FACTORS

As the environment has assumed greater global significance, we expect all our suppliers to act responsibly in this respect.

We believe in protecting the environment, and do so by calling for reduced usage, recycling and re-use of surplus material and waste. We also encourage the reduction of non-essential packaging materials and the greater use of recycled and non-toxic materials whenever possible. Emissions shall be reduced in order to minimise the harmful effects to the surroundings and environment. Along with our suppliers, we shall also comply with all applicable environmental laws and regulations.

## 8. INSPECTIONS AND APPLICATION

**The principle of trust and cooperation**

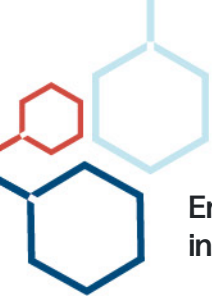
We assume that all employees, suppliers and their subcontractors will respect this Code of Conduct and do their utmost to live up to the standards set. We are prepared to cooperate with our suppliers in order to achieve satisfactory solutions in individual cases. We are also prepared to take cultural differences and other factors into account; however, we will not compromise on the basic details outlined in this document.

**Inspections**

We reserve the right to carry out unannounced visits to workplaces where people work for us either directly or indirectly. We reserve the right to allow an independent party (e.g., a non-governmental organisation) to carry out inspections in order to ensure compliance with our Code of Conduct.

## 9. BUSINESS ETHICS





Employees shall conduct themselves with honour, consideration, dedication and integrity in respect of partners and other employees.

- We shall live up to our words and actions. Contracts entered into shall be complied with and applied appropriately.
- We do not abuse our position for the sake of personal benefit.
- The provision or receipt of bribes may never take place in the course of Allgon's business relationships.
- Corporate entertainment and the provision and receipt of gifts shall take place openly and in moderation, and a logical connection to a business relationship must always exist.
- Competitive tendering shall always be applied when deemed to be justified on commercial grounds in accordance with the purchasing process.
- The price and quality of all orders and deliveries shall be determined in accordance with the company's internal directives/guidelines.
- We make business decisions in the best interests of the Group, and not based on individual considerations or relationships.
- Employees may not pursue supplementary activities which may give rise to a conflict of interest.
- We will not tolerate employee engagement in activities relating to sexual exploitation in conjunction with corporate entertainment or business travel.

### **Information security and privacy**

We value open communication, within the scope of maintaining business secrecy. Information relating to our activities, or those of our partners, may only be used for the purposes intended. Employees who may gain access to personal data in the course of their work must comply with legal and contractual requirements.

## **10. REPORTING OF INFRINGEMENTS**

Allgon encourages an open and honest corporate climate. Employees are encouraged to report non-compliance with the Code of Conduct to their line manager or, where this is not applicable, to the CEO or legal counsel of the subsidiary in question. Employees who choose to remain anonymous may report cases through [Allgon's whistle-blower system](#). Allgon will not accept negative consequences for employees who, in good faith, reported suspected infringements.