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Code of Conduct

1 Introduction

The Business area Tools, Supplies, Workwear and PPE (hereinafter “the Business Area”) mission is to keep companies working. Our business is managed on a commercial basis to a high ethical standard. We take responsibility for our environment impact and strive to be a genuinely sustainable company.

Our values should be reflected in everything we do as a business. It is our firm conviction that showing responsibility to employees, customers, suppliers and everyone else who interfaces with the Business Area creates long-term value for our shareholders and other stakeholders. All employees should act in accordance with the Business Area values and in line with the responsibilities and powers invested in them.

We support the UN Global Compact and our sustainability work is based on its 10 Principles. Our strategic goal and structured sustainability work also aims to contribute to the global goals for sustainable development. In terms of our impact, we have an especially big responsibility to achieve the following Global goals by 2030:



GLOBALA MÅLEN
för hållbar utveckling



3 HÄLSA OCH
VÄLBEFINNANDE



5 JÄMSTÄLLET



6 RENT VATTEN
OCH SANITET



8 ANSTÄNDIGA
ARBETSVILLKOR
OCH EKONOMISK
TILLVÄXT



12 HÅLLBAR
KONSUMTION
OCH PRODUKTION



16 FREDLIGA OCH
INKLUDERANDE
SAMHÄLLEN

2 Who does the code apply to?

The code of conduct applies to all employees, members of the board and contracted personnel. Each business unit, support function and subsidiary company is responsible for implementing the code of conduct in their business operations. All managers are responsible for ensuring their employees are aware of the code of conduct, understand it and work in accordance with it. The Business Area code of conduct for suppliers has been developed by amfori BSCI. The code of conduct is one of the Business Area’s governance documents and the policy is to be approved by the board.

3 Contents

The code of conduct is based on the ten UN Global Compact principles, that are categorized into the following areas:

- Human rights
- Working conditions
- Environment
- Business ethics
- Customers and suppliers
- Communication and Information Security
- Compliance
- Reporting of deviations

In addition to this code of conduct, we also have a number of policies and guidelines in our business that all employees and contracted personnel are required to adhere to.

4 Rules and Regulatory Framework

The Business Area complies with all laws, regulations, agreements and industry standards that apply on the markets where we do business. We work in accordance with our ISO 9001 certified management system for quality and ISO 14001 for the environment. The Business Area complies with the Swedish Anti-Corruption Institute code on bribes. The Business Area code of conduct for suppliers has been developed by amfori BSCI. The code of conduct also observes the ILO 8 core conventions.

5 Human Rights

Global Compact Principles 1 and 2

We respect and promote human rights within both our own organization and in our supplier chain. We should take steps to assure we have no part, directly or indirectly, in abuses of human rights.

We should have a strong and enduring relationship with our employees that is based on mutual respect between individuals. The working climate should be healthy and encourage involvement. All employees have the same rights and opportunities.

The Business Area is a member of amfori BSCI, an initiative that seeks to promote transparency, human rights, improved working conditions and environmental concern in our supplier chains. We only work with suppliers and business partners that accept our code of conduct for suppliers developed by amfori BSCI or that have their own code of conduct that includes the requirements we specify.

6 Working Conditions

Global Compact Principles 3, 4 and 6

We respect and promote human rights within both our own organization and in our supplier chain.

6.1 The Work Environment

The Business Area strives to ensure a safe, healthy and inclusive work environment with high job satisfaction that encourages commitment, good cooperation, efficiency and that facilitates the development of our organization and employees. We work systematically to promote health and prevent ill-health, accidents and the risk of harmful consumption of alcohol or other drugs.

All employees have a responsibility to actively contribute to a good work environment, a good company climate and to follow the guidelines for health and safety in the workplace. Managers have an expanded responsibility for health and safety in the workplace.

Our organization should be free from all forms of harmful consumption (e.g. alcohol or drugs abuse). All employees are obliged to notify their manager if they discover or suspect any risk of harmful consumption of alcohol or drugs.

6.2 Equal Treatment

We accept no form of discrimination, based on any of the seven discrimination grounds: gender, transgender expression or identity, ethnic origin, disability, sexual orientation, age, religion or other religious belief.

We accept no bullying or abusive treatment that is perceived as harassment in our organization or in our business relationships, such as customer contacts.

All employees have a responsibility to treat each other with respect and to create an environment that is perceived to be safe. No forms of xenophobia, sexual harassment, violation of personal integrity or similar behavior are accepted.

6.3 Equality and Diversity

We should pursue conscious and deliberate equal opportunity and diversity initiatives as a natural and integrated part of our organization as a whole. We view diversity as an idea generating and positive asset.

Working terms and conditions, rights and development opportunities are not to be dependent on gender, origin or other discriminatory grounds. Salary levels should be fair and based on criteria for each respective post.

Employees are employed solely on the basis of skills set and suitability for the post. In the case of both internal and external recruitment, the Business Area is to encourage both men and women to apply for vacant posts. Other types of diversity should also be taken into consideration.

7 Environment

Global Compact Principles 7, 8 and 9

We work systematically to continuously improve our environment work as a business and comply with applicable legislation. We have developed a Quality Assurance and Environment Policy that is relevant for our business activities. We have established strategic measurable targets for our environment work that are annually reviewed.

We apply the precautionary principle when designing products and perform regular product testing to ensure exacting demands are met on function, quality, safety and chemical content. This means that products and substances can be gradually replaced if necessary. We promote more sustainable consumption by selling products of high quality and provide information to customers on the best way to care for each product. We also seek to influence supplier environment work and persuade them to reduce their environment impact.

All business travel within the Business Area should always be subject to taking environmental impact into account and minimizing this. All employees are to be aware of and adhere to the Business Area travel guidelines.

8 Business Ethics

Global Compact Principle 10

We do not accept bribes, irregularities, disloyal or competition-limiting actions. We abstain from business that risks having a negative impact on confidence in the company, and put corresponding demands on our business partners and suppliers.

8.1 Anti-Corruption

The Business Area complies with the Swedish Anti-Corruption Institute code on bribes. Corruption means abuse of confidence, power or position to benefit the individual, an organization or another person. We do not accept any form of corruption. The giving or accepting of inappropriate benefits is accordingly not permitted, nor is any other way of influencing or seeking to influence an external party for the purpose of personal gain, or for the benefit of the organization or some other party.

A permitted benefit should be transparent and modest, and be work-related and oriented to a department rather than an individual person. Permitted benefits can include, for example, a working meal of an everyday nature, smaller product samples and profile material of no great market value. Before any individual case that can entail a deviation from the code of conduct or other policies, your immediate manager is to be consulted.

8.2 Unauthorized Appropriation and Sabotage

We do not accept any form of unauthorized appropriation or sabotage. Unauthorized appropriation means, for example, theft, pilfering or willful behavior. Nor is it permitted to appropriate advantages for yourself or another party at the expense of the Business Area. Deliberate sabotage against the company or its employees is similarly not acceptable. All employees are to adhere to procedures developed to prevent and detect unauthorized appropriation and sabotage. In the event of theft of private property in the workplace, the employees are encouraged to report this to the police.

8.3 Fair Competition

Fair and effective competition is necessary if the market where we are active is to work well. Collusion on pricing, marketshares or output restrictions, so-called cartel formation, in all forms is not permitted. We accordingly avoid all unnecessary contact with competitors. The Business Area must never prevent, restrict or eliminate fair competition.

8.4 Conflicts of Interest

Employees and directors of the Business Area are to manage their private or other external activities and financial interests or sideline occupations in such a way that they are not in conflict with or can be perceived to be in conflict with, the interests of the company. To minimize the risk of unpermitted sideline occupations arising within the Business Area, every employee is obliged to seek the approval in writing of their immediate manager for any sideline occupation of a more extensive kind.

8.5 Sales Promoting Actions

We permit sales promoting actions such as discounts, specific offers, targeted campaigns and sales competitions that are in line with applicable marketing rules and International Chamber of Commerce rules for advertising and market communication. Sales promoting actions are always to be regulated in writing and must never prevent salespersons from offering correct advice to customers.

9 Customers and Suppliers

9.1 Customer in focus

The Business Area should be the partner that best meets the needs and preferences of professional users. We apply sound business and marketing methods and have the best interests of customers in mind in our internal decision-making processes. Our commitment to customers is genuine and based on the needs and preferences of customers. Customers should be given a warm welcome and the feeling that we are prepared to go the extra mile for them. The products we sell should be safe and of the right quality for the customer's needs and comply with all statutory and other requirements. Customers should be given clear and simple information such that any products they buy can be used safely.

9.2 Suppliers and business partners

The Business Area should always honor agreements entered into with suppliers and business partners. It is our belief that quality, responsibility and profitability go hand in hand with long-term and close cooperation with prioritized suppliers. Product procurement is to be based on agreements with suppliers of such ranges and the purchasing department is to be used. The Business Area purchasing policy and purchasing procedures are to be adhered to during procurement and supplier contact.

10 Communication and Information Security

All employees are representatives of the Business Area and are to communicate with external parties in a responsible way and in accordance with our values. Employment is based on mutual trust where loyalty and duty of confidentiality reside. Duty of confidentiality covers business secrets, business matters, pricing and similar where disclosure could harm the Business Area, another employee or a business partner. The employee who is best suited for a certain issue is to act as spokesperson with the media, after consultation with their immediate manager and communications officer. Commenting on financial information is the domain of the CEO and CFO.

Social media are not to be used in a way that can damage the reputation of the Business Area. Misleading content about our employees, competitors or other stakeholders may not be published.

All information, and sensitive information about the company in particular, is to be managed securely and via structured document management. Such sensitive information includes, for example, business plans, management systems, legal documents and information about our customers. The same secure management of confidential information also applies to communication by email or phone.

We process employee personal data in a responsible way and meet statutory data processing requirements. During recruitment, applicants and their documentation are processed with the utmost respect.

All employees are liable for the secure management of log in details, data and work material. This means, for example, not disclosing or sharing log in details with anyone else and not leaving sensitive or confidential information unattended.

11 Compliance

The code of conduct does not provide specific answers to all issues that can arise, and should be viewed as the core of the Business Area's approach. If questions or a lack of clarity were to arise concerning interpretation of the code of conduct or other guidelines, please consult your immediate manager. Managers in the Business Area are to provide a good example and create an atmosphere in which employees feel they are safe to ask questions and report any deviations. All employees have a responsibility to be aware of and understand the code of conduct.

12 Reporting of Deviations

In the event of becoming aware of, or suspecting something that can be in breach of this code or the law, this should be reported to your immediate manager. You can also contact the HR Manager or CEO directly, or in serious cases use the Business Area whistleblower service. Suspected cases of criminal activities should be reported to the police.

The whistleblower service is used to report irregularities that are occurring, have occurred or are planned, and that concern our business, and that can damage use or our employees. Reporting can be done totally anonymous with no risk of disciplinary actions or reprisals. All employees, customers, suppliers, business partners and other stakeholders can contact our whistleblower service.

To protect your anonymity, the service is managed by an external partner, WhistleB, Whistleblowing Centre, <https://report.whistleb.com/en/momentumgroup>. The communication channel is encrypted and password-protected.

All communication is treated as strictly confidential.

How can I know I am doing things right?

If you have any doubts as to whether you are acting in accordance with the code of conduct: Ask yourself the following questions:

- Is it ethically correct?
- Am I providing a good example?
- Am I aware of the consequences my actions will have?
- Can I support the decision if I am asked about it by the media?
- Is it legal?
- Does my gut feeling say yes?

If your answer is **YES** to all these questions, everything is probably exactly as it should be. If you have any lingering doubts, however, do not hesitate to consult your manager.