

## Business Ethics Policy for the Löfbergs Group

### Aim

Within the Löfbergs Group we believe in transparency and honesty. We work in many parts of the world, but always strive to be a responsible employer and business partner. The business ethics policy is based on our core values and is designed to provide guidance in issues that can arise in our daily work. Its aim is to guarantee an ethical attitude, and that laws and regulations are followed.

### Application

The policy applies for every company in the Löfbergs Group. The management of each company has the responsibility of ensuring that the policy is followed and that all employees are informed in the respective country's language.

Every company in the Löfbergs Group shall follow both the business ethics policy and the national laws and regulations. Should the business ethics policy differ from the national laws and regulations, the more stringent requirements apply.

### Scope

The policy applies for every employee, including stand-ins and those working via a contract with a third party. We even encourage our project and business partners to follow the policy. All suppliers and licensees (including agents and other third parties) must follow our code of conduct where our social, environmental and ethical norms are defined.

### Observance

Each employee has the responsibility of reporting when the policy is not followed. Reporting is done via the immediate manager, another representative in company management or via the system for confidential reporting on the Löfbergs Group's Intranet. In the latter case, the system is designed so that confidentiality and anonymity is guaranteed in all cases. Each report is followed up within 5-6 days by the HR Manager, Chief Financial Officer and Sustainability Manager.

Failure of observation will result in the appropriate measures being taken.

### The policy's 10 core areas

- Bribery and corruption
- Gifts, meals and entertainment
- Donations
- Conflicts of interest
- Confidential information
- Competition law
- Financial irregularities
- Facilitation payments
- Cash flow
- Material and immaterial assets

### **Bribery and corruption**

Companies and employees in the Löfbergs Group shall not accept nor offer bribes in any form.

### **Gifts, meals and entertainment**

Gifts, meals and entertainment that are offered or received from companies and employees within the Löfbergs Group shall be reasonable and acceptable. We neither offer nor receive gifts, meals or entertainment which can influence the receiver in an inappropriate way.

For study tours, trade fairs and such like arranged by external contacts, the invitation is to be forwarded to the immediate manager who then takes the decision about actual participation. Written confirmation of the decision shall be given.

### **Donations**

The Löfbergs Group and its companies do not give political contributions or donations.

### **Conflicts of interest**

Employees within the Löfbergs Group shall not involve themselves in activities that can lead to a conflict between the company's and the employee's own interests. Each employee shall inform their manager of any business activities and/or spare-time jobs that are in addition to their employment within the Löfbergs Group.

### **Confidential information**

Employees within the Löfbergs Group shall protect confidential information about the company's activities. Confidential information from external third parties is to be treated and protected in the same way as internal confidential information.

### **Competition laws**

The Löfbergs Group and its employees ensure that the business always follows applicable competition regulations.

### **Financial irregularities**

Employees within the Löfbergs Group shall not use the company's resources or assets for other than the company's business and its interests.

### **Facilitation payments**

Companies in the Löfbergs Group do not make payments in order to speed up services from authorities and such like.

### **Cash flow**

Provided that transparent agreements do not state otherwise, all discounts, marketing support, compensations for claims and other types of payments from us are always sent to the same legal entity that received the original invoice.

### **Material and immaterial assets**

The Löfbergs Group's employees do not use the company's property, information or position for their own gains. In addition, they protect the company's property and reputation.



02.05.2014 Lars Appelqvist, CEO