



Valid from Jan 2021

Code of Conduct

Eugen Wiberger AB is one of Sweden's leading subcontractors in the machine parts sector with the aim to deliver high quality products to the Swedish industry. The foundation of our business is the ability to build and maintain mutually beneficial long-term relationships with our customers and suppliers and to offer sustainable solutions.

We aim to guard this foundation by being committed to conducting our business in a legally, ethically, socially and environmentally responsible manner.

Our vision and core values help us define our short- and long-term goals and give guidance on how we should act to reach our goals.

Core values

We are a company with core values that define our common culture:

- We are open and innovative
- We bring knowledge and improvement
- We strive towards a more sustainable tomorrow
- We act with a sense of urgency

While our vision and core values describe who we are, our actions make these values meaningful. What we do is important, but how we do it is just as important. Every action we take shapes the character of Eugen Wiberger AB and ultimately differentiates and strengthens us in the marketplace.

This Code of Conduct helps us put our core values into action in everyday work situations and provides guidance for how we act.

Suppliers

We want to further develop the sustainability performance in our supply chain. We expect our suppliers to fully comply with applicable laws and to adhere to internationally recognised environmental, social and corporate governance standards (ESG standards). We also expect our suppliers to use their best efforts to implement these standards with their suppliers and subcontractors.

Scope and target group

Our Code of Conduct addresses ethical behaviour in our work environment and business practices. We shall behave appropriately towards existing and potential customers, suppliers, employees, investors and other business partners, as well as towards the communities in which we act.

The Code of Conduct shall provide guidance to aspects relating to:

- How we respect human rights both inside and outside our company

- How we ensure that we operate in an environmentally responsible way
- How we maintain sound business ethics

The Code is applicable to all employees within Eugen Wiberger AB. Moreover, we expect our business partners, including suppliers, consultants and independent contractors, to adhere to standards similar to those reflected in our Code. Our suppliers, as well as others with whom they do business, including employees, subcontractors and other third parties, are expected to establish and maintain appropriate management systems and actively review, monitor and modify their management processes and business operations to ensure they align with the principles set forth in this Code of Conduct.

The Code is split into the key areas Introduction, Business ethics and integrity, Social ethics, Environmental responsibilities, Governance and how to report a violation of the Code.

Business ethics and integrity

Legal compliance

Eugen Wiberger AB complies with the applicable laws, standards and other legal provisions in Sweden. We are aware of the continuous development of International Regulations and social standards and adopt those that are relevant to our business.

Competition

Eugen Wiberger AB is committed to fair competition. Laws protecting competition, especially anti-trust laws and other regulations that regulate competition, shall be observed. Companies and employees must never engage in any anti-competitive activity such as illegal fixing of prices or the sharing of markets.

Anti-corruption and bribery

Eugen Wiberger AB is committed to working against corruption in all its forms, including extortion and bribery. No such illegal activity is tolerated either in action or as negligence by any of our employees, suppliers and business partners. We use suitable means to promote transparency, trading with integrity, responsible leadership and company accountability. The company shall comply with the applicable criminal law on corruption.

Gifts and entertainment

Neither Eugen Wiberger AB's employees nor anyone acting on our behalf may solicit, give or receive, directly or indirectly, gifts, gratuities, special allowances or a benefit which could influence the judgement of the recipient or is deemed unreasonable in the context. However, Eugen Wiberger AB also recognises and accepts that occasional modest – and in the context of business – reasonable, gifts or hospitality can make a valuable contribution to our business relationships.

Confidentiality

Confidentiality is maintained by Eugen Wiberger AB and its employees with regard to its business partners' commercial secrets. The communication of confidential information to third parties or the public is prohibited. The obligation to observe secrecy continues to apply after the end of employment for all employees in line with applicable legislation.

Company assets

Eugen Wiberger AB employees are expected to be loyal and share the responsibility of

protecting the company's assets from loss, damage, misuse and destruction. Company assets shall not be used for personal purposes or in support of activities outside of Eugen Wiberger AB.

Social

Human rights

Eugen Wiberger AB supports and respects the protection of internationally proclaimed human rights and ensures that company activities are not complicit in human rights abuses, for example, in our relationships with our suppliers. In practice this means that:

- We comply with applicable legal requirements relating to human rights.
- We identify, prevent and address actual or potential human rights infringements.

Discrimination and harassment

Eugen Wiberger AB condemns discrimination in hiring and employment. No existing or potential employee should be discriminated against because of, for example, race, colour, gender, sexual orientation, marital status, pregnancy, parental status, religion, political views, nationality, ethnic background, social origin, social status, disability, age or union membership. The company disapproves of psychological, physical or sexual abuse and verbal harassment or abuse. Integrity, privacy and freedom of expression are guaranteed.

Freedom of association

Eugen Wiberger AB respects the right of employees to establish or join trade unions and representative organisations of their own choosing in line with applicable local legislation.

Forced labour

Eugen Wiberger AB will not use any form of forced or compulsory labour.

Child labour

Child labour and any form of exploitation of children and adolescents will not be tolerated. The corresponding laws must be observed.

Labour practices

Eugen Wiberger AB is committed to providing fair compensation and working conditions for all its employees. Working hours shall be set according to the domestic laws in force or

industrial standards. All employees are informed and have the right to know the basic terms and conditions of their employment.

Health and occupational safety

Domestic and international regulations to ensure occupational health and safety in the workplace are to be observed. By supporting risk analyses, training programmes and other precautionary measures, we ensure that our employees can perform their work in a safe and healthy manner.

Environment responsibilities

At Eugen Wiberger AB we recognise that environmental responsibility is a precondition for the survival and prosperity of all living beings. Eugen Wiberger AB promotes sustainability across all aspects of the business, fulfils the requirements and standards for environmental protection and acts in an environmentally conscious way.

Eugen Wiberger AB is certified according to ISO 14001.

Operations

We operate our business and provide products in a way that minimises environmental impact. The overall aim is to minimise environmental impact that relates to our activities, products and services. We therefore support a precautionary and careful approach to environmental challenges.

Governance and monitoring of the Code

All employees should be familiar with our Code of Conduct and other policies relevant to their jobs and apply them in their work.

Non-compliance with the Code

Violations of this Code of Conduct will always be taken seriously and may lead to disciplinary action up to and including termination of employment.

Practical guidance

In our daily work we may face situations from time to time which are not explicitly covered by our Code of Conduct or other policies and guiding documents. Often it is a question of common sense or prior experiences. If we are unsure about the correct behaviour in a specific situation, we should ask ourselves, or discuss with a colleague, the following questions:

- Is the behaviour legal?
- Am I a good role model?
- Have I made a decision that would stand close examination by newspapers or on TV?
- Do I become dependent on my behaviour/acceptance of amenities?

Karl Lagerwall
President & CEO