

		Dokumentnamn			
		Code of Conduct			
		Dokumentnummer 90 093	Ansvarig för dokumentet/ uppdaterings intervall VD/Vid behov		
Utarbetad av: Jim Broman	Granskad av: Jim Broman	Godkänd av: Lisa Schyttberg	Datum 2019-08-12	Utgåva: R1	Sida 1 (3)

Corporate Social Responsibility

Foreword

Holje is committed to a Code of Conduct which describes our intention on how to behave when we do business and how we interact with our stakeholders. We seek to ensure that all our suppliers operate in compliance with our requirements. Holje's Code of Conduct is the corporate policy and general reference document on ethical issues and for appropriate business practices.

Holje Code of Conduct

Holje enjoys a reputation for corporate trustworthiness among its stakeholders, based on consistently conducting business with integrity and in compliance with the laws and regulations governing its activities.

General principles- Holje shall:

- comply with the laws and regulations of each country in which we operate
- demonstrate and promote its commitment to responsible business practice in policies, decisions and activities
- Integrate the principles of this policy into critical processes
- be positive to develop in this area

Requirements on business partners: Holje prefers to work with component suppliers, consultants, distributors and other business partners that share the principles expressed in this Code of Conduct. Holje encourages its business partners to apply standards of business conduct consistent with the principles of this Code of Conduct.

Business principles Accounting and reporting: All financial transactions shall be reported in accordance with generally accepted accounting practices, and the accounting records must show the nature of all transactions in a correct and non-misleading manner. Holje shall report in a transparent, truthful and timely manner with the aim of conveying a true view of the Holje's performance.

Anti-corruption: Holje shall not participate in or endorse any corrupt practices. Representatives of the Holje shall not offer customers, potential customers, suppliers, consultants, governments or others, any rewards or benefits in violation of applicable laws or established business practices stricter than applicable laws, in order to obtain or retain business or to gain any other improper advantage. Holje employees shall 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. All representatives of the Holje 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 Holje. Employees' private interests shall not influence, or appear to influence, their judgement or actions in performing their duties as representatives of Holje.

Company property and resources: Holje's property and resources shall be used for business objectives. The property and resources shall not be used for personal gain, fraudulent purposes, or in any other inappropriate manner.

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Taxation: Holje shall comply with the tax laws and regulations of each country in which it operates.

Customer offering: Holje shall ensure that its products meet all applicable regulatory requirements. Holje shall design its products with a focus on our core values of quality, innovation and environmental care.

Marketing and sales: Holje shall present its products and services accurately and shall comply with applicable regulatory and legal requirements. Holje shall not make false statements or provide misleading information regarding its products or their performance, including the safety and environmental attributes of the products.

Fair competition practices: Holje shall compete in a fair manner and with integrity. Holje shall not exchange information or enter into agreements or understandings with competitors, customers or suppliers in a way that improperly influences the market place or the outcome of a bidding process.

Principles of human rights and social justice Human rights: Holje shall support and respect the protection of internationally proclaimed human rights and make sure the Holje is not complicit in human rights abuses.

Non-discrimination: All employees shall have equal opportunities based on competencies, experience and performance regardless of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social background or ethnic origin. All employees shall be treated with respect. Discrimination, physical or verbal harassment, or any illegal threats are not tolerated.

Workplace practice: The necessary conditions for a safe and healthy work environment shall be provided for all Holje employees.

Forced labour: Holje shall not engage in or support forced, bonded or compulsory labour, nor shall Holje require any form of deposit or confiscate identification papers from employees. Employees are free to leave their employment after reasonable notice as required by law and contract.

Child labour: Child labour is not tolerated. The minimum employment age is the age of completion of compulsory school and needs to comply with the laws and regulations of each applicable country.

Freedom of association: Holje respects the right of all employees to join an association to represent their interests as employees, to organize and to bargain collectively or individually. Holje shall respect the recognized unions. An employee's right to refrain from joining a union is equally respected. Holje shall notify employees' representatives and relevant government authorities of major changes in our operations as required by law.

Working hours and compensation: Holje shall comply with applicable laws, agreements and industry standards on working hours and compensation.

Environmental principles & Resource efficiency: Holje products and processes shall be designed in such a way that energy, natural resources and raw materials are used efficiently, and waste and residual products are minimized.

Precautionary principle: Holje shall avoid materials and methods posing environmental and health risks when suitable alternatives are available. Particular emphasis shall be put on evaluating the potential risks of present and future substances and operations in order to minimize the negative impact on the environment.

Responsibility of Managers and Employees: It is the responsibility of Holje managers to communicate and demonstrate the content as well as the spirit of this document within their organizations, and to encourage

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employees to reveal behaviour that may be non-compliant with these principles.

Corporate Social Responsibility requirements for suppliers

Holje has a reputation for corporate trustworthiness, based on consistently conducting business with integrity and in compliance with the laws and regulations governing its activities. In the same spirit, we want our suppliers to adopt the principles in our Code of Conduct or similar principles. Suppliers of materials and services play a vital part in the development and manufacturing of Holje's products. All suppliers and contractors should have knowledge of Holje Code of Conduct, coupled with internal working procedures including the following aspects;

- Comply with laws and regulations of the countries where the supplier operates; when the local laws and regulations are lacking, the principles in the Code shall guide
- The principles described in the Code of Conduct should be the minimum level to be used in relations to their employees, business partners and other stakeholders
- Take responsibility for their sub-suppliers for deploying these requirements through their supply chain
- Maintain an open dialogue with Holje concerning achievements, trends and possibilities for Corporate Social Responsibility improvements
- Have a system in place to ensure compliance with the principles outlined in the Code of Conduct

Each Business Area of Holje is responsible for evaluation of the requirements to its suppliers as well as clarifying the contact persons and channels of information to its suppliers.