

# Swedrive Code of Conduct

Swedrive adheres to a high standard of ethics and our philosophy of decentralized leadership puts high demand on every employee's professionalism and integrity.

**Our Code of Conduct reflects who we want to be and how we want to be perceived.**

## "We act with integrity in all business relationships"

- We act with integrity and high ethics in all our business relationships and we expect the same from our partners.
- We shall follow applicable laws and regulations in all countries in which we operate.
- All our activities shall be built upon a sound business culture and fair competition. We adhere to applicable competition laws which prohibit any agreements or arrangements between competitors that restrict competition.
- We shall always act in the best interest of the company and avoid any conflict of interest.
- We shall not engage in corruption, extortion, embezzlement or bribery and we will not tolerate improper or corrupt payments, made directly or indirectly, to a customer, government official or any other third party.
- No employee may offer, receive or promote payments, gifts or other benefits that could influence or may be perceived to influence our objectivity in a business decision.
- Our employees may only offer or receive gifts, meals etc that are clearly compatible with applicable laws and generally accepted local business practice.

## "Our Safety Vision is ZERO accidents and our priority is safe working environment"

- We shall:
- Prevent accidents by an organized and documented safety work.
  - Register and follow-up all incidents, near misses and accidents.
  - Report any Lost Time Accident (LTA) to the CEO within 48 hours and investigate as well as follow up a root cause analysis and actions to eliminate further risks.
  - On a monthly basis report LTA's, other accidents and near misses.

## "We strive to offer our employees opportunities to develop and grow"

- We encourage an open, communicative and informal culture within the company.
- All employees, as well as applicants for vacant positions, must be treated equally, fairly and strictly on objective grounds, regardless of personal situation like gender, ethics, politics, age, sexual orientation and functional disability.
- We don't use or tolerate the use of child labour or forced labour.
- Harassment, threats or other unsuitable conduct are not permitted.
- We respect all employees right to form and join a trade union.
- We shall ensure that salaries and benefits meet or exceed the minimum statutory or industry levels in the country of operation.
- We strive to offer employees good opportunities to develop their skills, to perform a wider variety of tasks and to take on greater responsibility.
- We shall ensure that registration, archiving and use of data about employees are treated in strict confidentiality and in compliance with local laws.

## "We shall promote an ecologically sustainable development"

- Our communication policy is to be open and accessible, providing factual and continuous information of our products, services and development.
- We shall protect our IP rights and business secrets at all times.
- We shall work intensely to promote an ecologically sustainable development for our products, our operations and during our business trips.
- We shall always operate in a socially responsible manner and within the framework of national legislation in all countries where we are established.
- We shall always include the sustainability aspects in a new investment.
- We shall interact positively with the local community and are open to support local schools, universities and non-profit organizations.
- We do not engage or comment on political issues in the countries where we operate.