

# GA Lindberg ChemTech AB

## Code of Conduct

### 1. General

#### 1.1 Objective and goal

We live in a complicated and changeable world and there is an increasing need for ethical rules. GA Lindberg ChemTech AB is a company that interacts with many interested parties, and for us it is important to clarify to ourselves and to them, which values and rules we have. Our trading partners should be comfortable with us doing our business by following legal obligations and high ethical standards to keep a good reputation. Our company has a long history of responsible business, which poses obligations for the future. At the same time we want to cooperate with interested parties in the value chain who share our values; like suppliers, resellers, customers and other business partners.

GA Lindberg ChemTech AB wants to work for a sustainable development in a long perspective regarding environmental, social and economical aspects.

The Code of Conduct is based upon the basic values expressed in the UN:s sustainability initiative Global Compacts (UNGC) 10 principles for a sustainable entrepreneurship:

<https://www.unglobalcompact.org/>

#### 1.2 Responsibility

The Code of Conduct is produced by GA Lindberg ChemTech ABs management, but it is the personal responsibility of all staff who work in the company to together create the culture and operations that we want to represent. The Code also explains what You as a co-worker can expect from Your employer. It is the responsibility of the management to update it when needed and to distribute it to all affected.

#### 1.3 Scope

The Code of Conduct includes all staff in the company, and managers have a specific responsibility to be a role-model, to be available for ethical questions and to receive reports of violation. The CEO has the top responsibility for the availability of the Code of Conduct and that the staff undergoes relevant education and understands its content. We communicate our values and demands on our working sites and to our business partners. We expect our business partners to also comply with this Code of Conduct, or an own version.

#### 1.4 Violation

Staff is encouraged to report violation of this Code. These cases are taken seriously and will be handled confidentially, promptly and professionally. Such a report should be seen being for the best for the colleagues and the company, and the person making a justified report should never be exposed to any kind of reprisals. To report, there is a whistleblower portal at Indutrade: <https://report.whistleb.com/sv/indutrade>

## 2. Compliance Obligations and Human Rights

### 2.1. National law

We are to follow national laws and regulations in all countries where we are active. If this Code of Conduct demands higher standard than the national law, then it is the Code that is to be followed.

### 2.2. Human rights

We work for the respect and protection of basic human rights. GA Lindberg ChemTech AB is a Swedish company with a market predominantly in Sweden but with business partners around the world. Regardless of where we are, and within our own operations and contexts where we have possibility to impact, we aim to respect and protect human rights and freedom.

We should make sure to identify potential and real negative effects on human rights with connection to our operations and we should react responsibly and powerfully when we see such a risk.

## 3. Labour Standards

### 3.1 Freedom of association and right to collective bargaining

We acknowledge all staffs fundamental right to freely associate with and be represented by trade unions, and their right to refrain from participation in a trade union. Also, we respect coworkers and their trade unions right to negotiate collective agreements. Where the law of the country restricts these rights, we need to take action to promote them.

### 3.2 Child Labour/ Forced Labour

Child labour and forced labour is not tolerated in any form in our own operations or in our value chain. We strictly follow national and international laws regarding minimal age at all places where we operate. Employees should not be controlled or prevented from terminating their employment by requirements to deposit identity papers or money, or any other action during their employment. They should enter employment agreements voluntarily. We protect personal integrity and handle personal information according to current laws and rules.

### 3.3 Discrimination

Discrimination when recruiting, based on race, skin colour, sex, handicap, age, language, religion, political view or other; national or social, origin, economical status, birth place or other status is not tolerated. We value diversity and equality among all our staff and this is established in our Discrimination Policy.

### 3.4 Employment Conditions

The company should have an open and honest dialogue with the coworkers and their representatives. Everyone should be treated with dignity and respect and be given opportunity of development and learning. We should be responsive for both criticism and good ideas. Harassment, threat and other inappropriate behaviour is not tolerated.

Wages and social benefits, including maternity leave, shall meet at a minimum national legal standards and are paid according to current law and collective agreements. In case of no agreements, we follow existing industrial standards. Employees must have a legitimate contract of employment, regulated working hours as well as the right to paid holidays and sick leave, without any form of negative sanctions.

### 3.5 Health and Safety

GA Lindberg ChemTech AB wants to offer all coworkers a safe and healthy working place. We have a common responsibility to pay attention to each other with respect to health and safety risks, and to counteract stress and psychosocial issues, to create a space where people can thrive.

It is every person's responsibility to be aware of and follow current rules, policies and processes for health and safety; as well as to prevent or report risky conditions, accidents, incidents, damages or illnesses. Managers should make sure that coworkers and entrepreneurs receive the training and protective equipment that is relevant.

These rules are established in our Work Environment Policy.

## 4. Business Ethics

### 4.1 Corruption and other prohibited business practices

Corruption is defined as "the abuse of given powers for private gain" and includes economical and other gain. All forms of corrupt behaviour are prohibited, i.e. bribery, reception of inappropriate gifts, bribe money and protection, blackmail, money laundering and nepotism.

The risk for corruption is to be evaluated for each new business relation regarding factors like business partners identity, risk environments such as geographical regions, as well as type of operations that we do. This should be documented if necessary.

### 4.2 Business Courtesies

No one working at GA Lindberg ChemTech AB is allowed to grant, offer, receive, demand or promise payments, gifts or other advantages that could be perceived as affecting objectivity in a company or authority decision. Gifts, meals, entertainment or hospitality that is received must be compatible with current law and business practices. When in doubt, advise with your manager.

No coworker may give political or charity contributions, or offer sponsoring with expectations to win advantage.

### 4.3 Competition

We always follow current competition laws that forbid agreements and deals between competing parties that inhibit competition. This includes price fixing, division of customers and geographical markets, cartels and dominating position. All success should be based upon fair competition.

### 4.4 Conflict of interest

Conflict of interest arises when private interests, personal relations or external activities affect how you execute your work tasks. This should be avoided, and you should always act in the company's interest.

### 4.5 Information sharing and Confidentiality

We should always aim for GA Lindberg ChemTech ABs information to be open, correct, swift and of highest quality, as well as it should conform with current legislation. In cases when information needs to be protected, agreements of confidentiality are written with customers or within specific projects, this is done through the CEO.

### 4.6 IT security

GA Lindberg ChemTech ABs IT system is part of the mother company Indutrade. We follow thus the common safety rules and polices. Safety precautions are in place, but all staff take part in the responsibility for the safety in information handling. Everything that is stored on the company's servers is regarded as belonging to the company.

### 4.7 Trade Sanctions and export control

Trade Sanctions are used by the UN, EU and US to promote peace, national security and other foreign policy interests. They can target individuals, companies, organizations, countries/ regions or industry sectors. Sanctions restrict or prohibit trade with certain goods or services and make international trade more complex.

GA Lindberg ChemTech AB aims to follow all relevant legislation in the countries where we act, including trade restrictions and sanctions. This means that we even want to make sure that eventual trade partners don't act on behalf of a sanctioned person, or that no indirect sale is made to a sanctioned customer.

This is manifested in the mother company Indutrades Trade Sanctions and Export Control Policy.

### 4.8 Good neighbours

It is important for us in the company to have a strong local presence. We try to contribute with local support within sports and education, partly through sponsoring, partly through support for specific activities. We take part for example as lecturers in related courses and aid in research programs at the Royal Institute of Technology (KTH) and other universities.

We create conditions for local growth through a constructive dialogue with authorities, decision makers, the education system and civil society, and contribute to strengthening the communities we operate within by running a viable and long-term business.

We follow the tax requirements that apply in each municipality that we operate in, strive to recruit new employees locally and offer jobs and internships to the younger generation.

## 5. Environment

### 5.1 Permits and reporting

GA Lindberg ChemTech AB is a trade company with no manufacturing of our own. We have a high level of technical knowledge and market-leading portfolio, products and product standards; but even in the field of environment and occupational health.

We work systematically to increase our environmental awareness and competence; and cooperate with our customers and suppliers so that we can offer the most environmentally friendly option for both products and methods.

We have all required environmental permits, approvals and registrations, and follow their operational and reporting requirements to relevant regulations.

### 5.2 Resources and origin

We work systematically to improve our own operations in terms of resource consumption, resource efficiency, waste minimization; including energy, emissions, waste generation, transportation, clean energy sources. We strive to perform due diligence regarding the origin of conflict minerals (3TG) and other raw materials in our products.

### 5.3 Hazardous substances

We work systematically with identifying and managing hazardous chemicals in their use, storage and disposal. Employees handling hazardous chemicals are trained, equipped, instructed and informed about the risks, to be able to maintain safety at all times and respond to accidents/ incidents and emergencies.

Our environmental guidelines are established in the Environmental and Quality Policy. Our sustainability work is summarized in a sustainability report.