

SEPTEMBER 2019

ELANDERS SUPPLIERS CODE OF CONDUCT & DECLARATION

As reflected in the Elanders Code of Conduct, Elanders is committed to high standards of integrity and sustainability.

INTRODUCTION

This Supplier Code of Conduct (Supplier Code), defines the basic requirements placed on Elanders' suppliers, of goods and services, concerning their responsibilities towards their stakeholders and the economic, environmental and social impact of our activities. We reserve the right to reasonably amend the requirements of the Supplier Code due to changes of the Compliance program of Elanders Group. In such event we expect the suppliers to accept those reasonable amendments.

Fundamentally, all current and future suppliers, in all of their respective operations, must follow the national laws and regulations in the countries where they operate. If any local, national or international laws and, regulations take a more demanding position on matters contained in this Supplier Code, those shall prevail and be complied with.

In the unlikely event of a conflict between the law and this Supplier Code the law shall be followed and the conflict must be reported to your local contact point or Elanders Group.

The supplier declares herewith:

LEGAL COMPLIANCE

- to update on and comply with applicable international laws and regulations as well as regional and national legislation.

PROHIBITION OF CORRUPTION AND BRIBERY

- to tolerate no form of and not to engage in any form of corruption or bribery, including any payment or other form of benefit conferred on any government official for the purpose of influencing decision making in violation of law.
- to have the highest standard of integrity, transparency, openness and compliance in all business interactions.

ANTITRUST AND FAIR COMPETITION

- to conduct business operation in line with fair market practices and in full compliance with all applicable antitrust, competition and fair dealing laws.

DISCLOSURE OF INFORMATION

- to disclose information regarding business activities, health and safety, environmental practices, structure, financial situation and performance in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

INTELLECTUAL PROPERTY

- to respect intellectual property rights and transfer of technology and know-how should to be done in a manner that protects intellectual property rights.

DATA PRIVACY

- to commit to protecting the reasonable privacy expectations of personal information of everyone we do business with, including suppliers, customers, consumers and employees.
- to comply with privacy and information security laws and regulatory requirements especially with the EU GDPR when personal information is collected, stored, processed, transmitted, and shared.

RESPONSIBLE SOURCING OF MINERALS

- to have a policy to reasonably assure that conflict minerals, such as tantalum, tin, tungsten and gold does not directly or indirectly finance or benefits armed groups that are perpetrators of serious human right abuses.
- to commit to work proactively to ensure that minerals in its products and its supply chain are responsibly sourced and avoid unsustainably mined minerals. The due diligence on the source and chain of custody of these minerals should be traceable.

RESPECT FOR HUMAN RIGHTS

- to align with the UN Guiding Principles on Business and Human Rights, including the ILO Declaration on Fundamental Principles and Rights at work and the UN Universal Declaration of Human Rights.
- to respect the personal dignity, privacy and rights of all individuals.
- to ensure no use of any form of slave, forced labor or human trafficking in any phase of business operations.
- to refuse to employ or make anyone work against his or her will.
- to provide fair remuneration and to guarantee the applicable national statutory minimum wage.
- to comply with the maximum number of working hours laid down in the applicable laws.

NON-DISCRIMINATION

- to promote equal opportunities for and treatment of employees irrespective of skin color, race, ethnicity or nationality, social background, disabilities, pregnancy, political or religious conviction, gender, sexual orientation, gender identity or expression, age, marital or family status, or any other characteristic protected by applicable laws and regulations.

WORKPLACE HARASSMENT

- to refuse to tolerate or support any unacceptable treatment of employees, such as psychological or physical cruelty, sexual harassment or discrimination.
- to prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

PROHIBITION OF CHILD LABOUR

- to employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14.
- to protect young workers from performing any work that is likely to be hazardous or to interfere with the child's education or to be harmful for child's physical, spiritual, moral, social and mental development.

HEALTH AND SAFETY OF EMPLOYEES

- to control worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards)

- through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment. Workers shall not be disciplined for raising safety concerns.
- to take responsibility for the health and safety of its employees; potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.
 - to control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases; procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide accessible first aid equipment and necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.
 - to identify, evaluate and control worker exposure to chemical, biological and physical agents; engineering or administrative controls must be used to control overexposures. When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs.
 - to identify, evaluate and control worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks.
 - to evaluate building construction and production and other machinery for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where buildings or machinery presents an injury hazard to workers.

ENVIRONMENTAL PROTECTION

- to act in accordance with the applicable statutory and international standards regarding environmental protection. Proper registrations are to be obtained, maintained and kept current and the operational and reporting requirements are to be followed.
- to minimize environmental pollution and make continuous improvements in environmental protection.
- to reduce or eliminate waste of all types, including water and energy at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.
- to identify and manage chemicals and other materials posing a hazard if released to the environment to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.
- to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.

SUPPLY CHAIN

- to use best efforts to promote, among its suppliers, compliance with this Supplier Code.
- to comply with the principles of non-discrimination with regards to supplier selection and treatment.

COMMUNICATION OF SUPPLIER RESPONSIBILITY

- to implement a process to communicate this Supplier Code requirements to subcontractors and to monitor their compliance to the Code.

AUDIT RIGHT

- to entitle Elanders the right to perform audit at Supplier's premises or sites regarding Supplier's compliance with this Supplier Code.

During the audit Elanders shall have the right to talk to Supplier's employees without presence of supplier's representatives.

DECLARATION OF COMMITMENT

- to have received a copy of Elanders' Supplier Code and to undertake to comply with the principles and requirements laid down therein in addition to its obligations in the corresponding framework or individual agreement with Elanders' entities.
- to agree with Elanders that any breach of the principles in this Supplier Code would be considered as a serious breach of contract which may result in suspending or terminating your activities as one of our suppliers.

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Place and date

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Company stamp and legally binding signature