

**HEDSON TECHNOLOGIES AB  
CODE OF CONDUCT  
2016**



## **CODE OF CONDUCT**

The Hedson Code of Conduct shall guide all Hedson Group employees in their daily work. The Code of Conduct is a set of policies and rules, which forms the basis for the continuous improvement of financial, environmental and social performance.

## **RECORDS AND FINANCE**

Hedson shall have accurate record-keeping consistent with all applicable standards. This applies to each and every detail of the business. All employees are responsible for maintaining accurate books and records to efficiently manage our business.

## **BUSINESS OPERATIONS**

Hedson products and services shall be marketed and sold fairly and honestly on the basis of their quality, capabilities, price, service level and other legitimate attributes.

### **Business Courtesies**

Hedson employees may not give or accept gifts, favors, entertainment or other inducements unless they:

- are consistent with common business practices
- are not excessive in value and cannot reasonably be construed as a bribe or payoff
- do not violate applicable law
- will not embarrass the Company or the employee if publicly disclosed.

### **Bribery**

Hedson employees shall not, directly or indirectly, offer, promise, give request, demand or accept a bribe or other improper benefit to obtain or retain business.

### **Antitrust and Competition Law**

Hedson shall comply fully and in good faith with the applicable antitrust and competition laws and regulations in countries where we operate.

### **Supplier/subcontractor relations**

Hedson shall establish and maintain appropriate procedures to evaluate and select major suppliers and subcontractors on their ability to meet the requirements of Hedson's Code of Conduct.

## **LABOR**

### **Health & Safety**

Hedson shall provide a safe and healthy working environment and shall take reasonable steps to prevent accidents and injuries.

Workplace violence, including threats, threatening behavior, harassment, intimidation, assaults and similar conduct, will not be tolerated. Firearms are not permitted at any Hedson facility.

### **Equal Opportunity**

Hedson shall ensure equal employment opportunities for all qualified individuals, without distinction or discrimination because of age, race, color, national origin, religion, sex, disability or other characteristics protected by applicable law.

### **Drugs and Alcohol**

Hedson employees are not allowed to distribute, possess, use or work under the influence of drugs or alcohol on any Hedson premises, or in connection with Hedson business without authorization.

### **Unlawful Harassment**

All employees shall treat one another with courtesy, dignity and respect, regardless of gender. Hedson shall not tolerate sexual or other unlawful harassment involving the solicitation of sexual favors, the initiation of sexual advances by one employee toward another or other unwelcome conduct that creates an offensive or intimidating work environment.

Hedson managers, supervisors and executives shall be alert to the possible presence of unlawful harassment in the workplace and shall take appropriate steps to prevent any form of such harassment.

### **Compensation**

Hedson shall ensure that:

- wages paid for a standard working week at least meet the legal or industry minimum standards and are sufficient to meet the basic needs of our employees
- information on wages and benefits is communicated clearly and regularly for each employee
- wages and benefits are rendered in full compliance with all applicable laws
- labor hire arrangements and apprenticeships are not undertaken to evade Hedson's obligations to personnel under applicable laws, social security legislation and regulations.

### **Working Hours**

Hedson shall comply with applicable laws and industry standards on working hours. In any event, personnel shall not, on a regular basis, be required to work in excess of 48 hours per week and shall be provided with at least one day off for every seven-day period.



Hedson shall ensure that overtime work (more than 48 hours per week) does not exceed 12 hours per employee per week and is not demanded other than in exceptional business circumstances.

#### **Forced Labor**

Hedson shall:

- Guarantee that working hours and working conditions will comply with all statutory requirements. All employees will be treated with respect and no employee will be subject to corporal punishment or coercion of any type.
- Not engage in or support the use of forced labor, nor shall any employee be required to deposit identity papers when commencing employment with Hedson.

#### **Freedom of Association**

All Hedson employees shall have the right of free association. Hedson shall respect the right of all unionized employees to bargain collectively.

Hedson shall, in those situations in which the right to freedom of association and collective bargaining are restricted under law, facilitate means of independent and free association and bargaining for all such personnel.

#### **Child Labor**

Hedson shall neither tolerate the use of child labor when conducting business, nor accept products from suppliers and subcontractors that utilize child labor in their contracting, subcontracting or other relationships for the manufacture of their products.

#### **ENVIRONMENT**

Matters pertaining to the environment, health and safety are an integral part of Hedson's total operations. Continuous improvements are achieved in these areas through management by objectives. We consider that the greatest effect is achieved through preventive action.

We adhere to an approach that results in long-term sustainable development. Consequently, we strive for high efficiency in the use of energy and natural resources, promote systems for recovery and recycling of materials and work to prevent and minimize contamination.

We strive to offer working conditions that stimulate employees to perform effectively, assume responsibility and continue to develop in their personal and professional pursuits.

We shall comply with or exceed environmental requirements set by applicable laws, ordinances and international agreements. We consider that common and environmentally effective requirements and standards should be established at an international level.

#### **COMMUNITY INVOLVEMENT**

##### **Community Contribution**

Wherever Hedson operates, good relations shall be regarded as fundamental to long-term success. Knowing that each local community is different, the policy of Hedson is that every Hedson company shall strive to understand and interact constructively with its local communities and to assist in their development. To meet this policy Hedson encourages its employees to participate in community programs and initiatives that benefit the people in the community where Hedson operates.

##### **Political Contributions**

Hedson will not contribute financially to political parties or politicians.

Hedson will not make any contribution, directly or indirectly, to any candidate for public office, political parties, or other political organizations except through industry organizations after approval by Hedson's CEO. Employees may not be given time off with pay for political activity, although time off without pay may be possible if consistent with local policies and laws.

##### **Sponsoring and Endowments**

Hedson perceives that its most important contribution to the communities where it operates is to perform its basic business activities as effectively as possible following the principles of the Code of Conduct. Hedson's sponsoring and endowment initiatives shall be delivered through local business units, focusing on programs supporting culture, education, sports or other proactive social and humanitarian programs.

#### **NON-COMPLIANCE**

Complaints about non-compliant behavior can be made to the nearest supervisor, or if there is reason to believe that this will be ineffective, to the CEO of Hedson. All complaints will be taken seriously and investigated where appropriate. There must be no retaliation for good-faith reporting of code violation or participating in the Company's investigation of a complaint. It is the responsibility of each Hedson manager to report any case of fraud or other wrongful conduct to a member of Group Executive Management. In the case of non-compliance with Hedson's Code of Conduct, there will be prompt disciplinary consequences ranging up to and including dismissal.