

ORDER NORDIC AB

Code of Conduct



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Code of Conduct

Order Nordic AB ("Order Nordic") is committed to conducting its business at the highest ethical, environmental and social levels. This code of conduct (the "Code of Conduct") describes the general ethical principles in Order Nordic's business and the behavior Order Nordic expects of its directors, officers, employees, contractors and temporary staff (collectively referred to as "Employees"). The purpose of this Code of Conduct is to assist the Employees in their daily work and business activities to promote the long-term positive development of Order Nordic. This Code of Conduct provides guidelines for Order Nordic's business practices which must be followed by all Employees, and is a source of governance for decision making across the company. The Code of Conduct recognizes that compliance with applicable laws, rules and regulations of the countries in which it operates is a fundamental duty and an essential part of the responsibility of each Employee.

All Employees have an individual responsibility to know and follow the rules and guidelines in this Code of Conduct. If an Employee is unsure of how these guidelines should be interpreted, or if there is uncertainty whether specific circumstances are contrary to the guidelines, this should always be discussed with management.

Violations of this Code of Conduct may result in disciplinary action. Order Nordic will not accept any discrimination or retaliation against the Employees who in good faith report suspected violations.

Order Nordic reserves the right to amend or replace this Code of Conduct, without prior notice, at any time.

1 Legal requirements

1.1 Compliance with laws

Order Nordic is strongly committed to conducting its business affairs with honesty and integrity and in full compliance with all laws, rules and regulations applicable to Order Nordic's business in the countries in which it operates. All Employees of Order Nordic must at all times comply with applicable laws, rules and

regulations, including burdens imposed by the relevant authorities in the performance of their duties for Order Nordic. All Employees shall avoid any situation that could be perceived as improper, unethical or indicate a casual attitude towards compliance with such laws, rules and regulations. Employees must not contribute to any violations that may be committed by other parties in Order Nordic's business relationships or other stakeholders.

1.2 Product Safety

Order Nordic and the Employees shall be committed to ensuring that the quality of the products Order Nordic places on the market complies with all EU safety regulations and applicable national laws. Order Nordic and the Employees shall work strictly with Order Nordic's suppliers in this regard to assure its quality controls both in China and Sweden.

2 Environment

2.1 Environmental requirements

Order Nordic is a leading distributor/manufacturer of electrical products for the Swedish market that may contain health and environmentally-hazardous substances. They may pose a risk to human health and the environment, especially during waste management. Chemicals and other materials posing a hazard if released to the environment should be identified and managed by Order Nordic and the Employees to ensure their safe handling, movement, storage, use, recycling or reuse and disposal. Order Nordic and the Employees shall act in accordance with applicable and relevant international standards and regulations on environmental protection.

2.2 Environmental policy

Order Nordic is committed to minimizing the impact of its actions on the environment. It is important for Order Nordic to be active in its environmental work and to continuously strive for improvement in order to reduce Order Nordic's environmental impact, but

also to contribute to a sustainable society, including reduced energy consumption. Both Order Nordic and its Employees share the responsibility to constantly decrease our negative impact on the environment. Order Nordic and the Employees shall continuously work towards improving knowledge and oversee the processes used in order to minimize energy consumption.

2.3 Action plan

In order to realize the above Environmental policy Order Nordic and the Employees are committed to the following action plan:

- ISO 14001: Order Nordic is a certified ISO 14001-company. The environmental management system Spineweb is used to implement the knowledge and responsibilities throughout the organization. Order Nordic and the Employees strive to view the lowering of its ecological footprint as an investment and in doing so places demands on suppliers, freight companies and other establishments.
- Transports: Order Nordic and the Employees continually search for methods to secure environmentally friendly transportations, concerning both import and out-going parcels.
- Waste: Order Nordic is a member of Recipo, whose assignment is to fulfill the manufacturer responsibility for electrical products and batteries. Order Nordic and the Employees shall fulfil the requirements of the WEEE directive (Waste Electrical and Electronic Equipment) regarding electrical waste and realize its manufacturer responsibility.
- Chemicals: Order Nordic and the Employees shall comply with all EU requirements and national laws regarding chemical use and use of other environmentally-hazardous substances.

3 Payment

3.1 Corruption and bribery

Order Nordic believes in fair competition and is firmly opposed to all forms of corruption. The Employees or third party acting on the Order Nordic's behalf shall never make a payment or provide a benefit that is intended to improperly influence, or appears to influence, a business decision. This is particularly true in the case of public officials and government employees. The Employees shall not accept, offer or pay bribes or directly or indirectly accept gifts, hospitality, fringes or compensation in any form from a third party which may be unlawful or which could in any way affect his/her professional judgment in performing any duty or service for Order Nordic or a third party.

4 Corporate responsibility

4.1 Workplace

Order Nordic is committed to being a positive workplace, free from discrimination or harassment of any kind. The Employees should never harass, degrade or discriminate against others and never behave in a violent or threatening manner and are responsible for reporting any concerns or potential violations to their immediate superior.

4.2 Human rights

Order Nordic and its Employees shall follow, respect, and support internationally proclaimed human rights, including the United Nations Declaration of Human Rights. Order Nordic does not condone or conduct business with organizations which are involved in human rights mishandlings.

4.3 Health and Safety

Order Nordic always strives to provide a safe and secure work environment where no one is subject to unnecessary risk. Health and safety considerations should be integrated into everything we do. The Employees are expected to identify and understand the risks associated with their work, to manage risks responsibly, and only perform work for which adequate training has been provided. The Employees shall promptly report all health and safety issues, including unsafe conditions, accidents, near misses, work-related injuries, and all security issues, including threatening or violent behavior, to their immediate superior. Order Nordic is devoted to:

- Working conditions shall meet or exceed legal requirements as well as the conventions of the United Nations Global Compact and International Labor Organization. Order Nordic will comply with all applicable laws relating to forced labor, child labor, minimum national salaries, working hours, leave and overtime, and the timely and accurate payment of wages.
- Take responsibility for the health and safety of the Employees.
- Control risks, and to take preventive measures against accidents and occupational diseases.
- Provide training, and to ensure that Employees are trained, in health and safety matters.
- Employees shall use appropriate equipment to protect against injuries or toxic exposure of any kind.

4.3.1 Child labor

Order Nordic shall not employ, contract or use child labor, as defined by the International Labor Organization Minimum Age Convention. Order Nordic shall comply with all applicable child labor laws, including those

related to hiring, wages, working hours, overtime and working condition.

4.3.2 Forced labor

Order Nordic shall not employ, contract or use forced labor or involuntary work. The Employees shall have the right to voluntarily terminate his/her employment, in accordance with national laws and their employment contract. Order Nordic's suppliers shall not engage in any form of forced, trafficked or non-voluntary labor.

4.3.3 Collective Bargaining

Order Nordic upholds the rights of the Employees to form, join and organize independent trade unions or other kind of worker's associations and to engage in collective bargaining in accordance with local law.

4.3.4 Discrimination

Order Nordic values diversity in its workforce and is opposed to discrimination or harassment. Order Nordic provides equal opportunities and does not discriminate. Order Nordic and the Employees shall not participate in or support any form of discrimination with regards to employment, wage, access to education, promotion, termination or retirement, on grounds of gender, gender identity or expression, age, belief, ethnic affiliation, nationality, disability, illness, membership in workers' organizations (including trade unions), political beliefs, sexual orientation or other circumstances that can result in discrimination against any Employees. The Employees shall not be subject to any form of corporal punishment or to physical, sexual, psychological or verbal harassment or abuse.

4.4 Conflict minerals

Order Nordic carries out the necessary investigative measures to ensure responsible purchasing of minerals from conflict-affected areas and high-risk areas in accordance with the OECD (Organization for Economic Cooperation and Development) guidelines.

4.5 Political activities

Order Nordic is neutral in matters of political parties and candidates. However, Order Nordic supports the right to engage in personal political activities, as long as these activities remain private, are lawful and ethical, and are conducted on personal time with personal resources. Neither Order Nordic's name nor assets should be used to promote political parties or candidates.

4.6 Conflict of interests

No Employees of Order Nordic may have personal interests - direct or indirect financial or other - in another business or company, or otherwise be engaged in activities that could result in a material conflict of interest or create doubt about or may be perceived as creating serious doubts about the Employee's loyalty to Order Nordic.

4.7 Confidential information

All confidential information regarding Order Nordic or its customers may not be disclosed to any party outside Order Nordic without necessary authorization, unless this should be required by law.

All information that is created within Order Nordic, for example information regarding research and development, production, expenses, costs, prices, profits, customers, markets and business plans and strategies, shall belong to the Company and may not be disclosed to any party outside of Order Nordic without necessary authorization, unless this should be required by law.

4.8 Data Privacy

Order Nordic may in the conduct of its business collect and use personal information. Order Nordic is committed to protecting individuals from unauthorized use and disclosure of their personal information, and providing individuals with transparency and choices regarding how their personal information is used.

Order Nordic will always comply with applicable data privacy laws and related regulations regarding collection, use, retention and disclosure of personal data gathered or entrusted to the Company. Employees shall always respect the sensitivity regarding collected or entrusted personal data, and make sure such data is secure so that the integrity of such data is not risked and that such data are not wrongfully disclosed.

4.9 Using this Code of Conduct and reporting

It is the responsibility of all Employees to understand and comply with this Code of Conduct. The board of directors is ultimately responsible for this Code of Conduct and monitoring compliance with this Code of Conduct.

If you observe or become aware of an actual or potential violation of this Code of Conduct or of any law or regulation, whether committed by the Company Employees or by others associated with Order Nordic, it is your responsibility to report the circumstances and to cooperate with any investigation by Order Nordic. This Code of Conduct is designed to provide an atmosphere of open communication for compliance issues and to ensure that Employees acting in good faith have the means to report actual or potential violations.