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## Code of Conduct for Suppliers

### INTRODUCTION

Jernbro is the leading service provider of Industrial Services in Sweden. The company specializes in leading, developing and streamlining service functions in offices, real estate, production facilities and in the public sector. Jernbro sets high standards on its own operations and assumes substantial responsibility for the impact it has on the environment, society generally and Jernbros customers' operations in a wider perspective. Business should be conducted in a professional, safe and environmentally friendly manner that satisfies all the requirements set by applicable legislation, sector standards and agreements. Jernbros business should feature high ethical and moral standards. Jernbro also endeavors to be a responsible employer with focus on development of the employees. Jernbro sets the same high standards on suppliers and their potential subcontractors. The principles Jernbros suppliers and their potential subcontractors should comply with are reviewed in this Code of Conduct. Breaches of this Code of Conduct may result in business collaborations with the relevant supplier being terminated.

### PRINCIPLES

#### Laws and ethics

One basic requirement is that Jernbros suppliers comply with environmental legislation, competition rules, labor law, tax law, safety standards and other laws and ordinances that set the framework of Jernbros operations and that are relevant to each individual employee's duties. Any breaches are completely unacceptable. In addition to complying with laws and regulations, suppliers should also assume responsibility for satisfying high standards of good ethics and business morals in all their operations and in all relationships. All employees must assume personal responsibility, not only for their own actions, but also for Jernbros activities.

#### Competition issues

Jernbro does not permit competition to be affected or distorted through gifts, bribes, price fixing, kickbacks, the formation of cartels or abuse of market dominance. Jernbros suppliers may never utilize gifts, benefits, bribes or other prohibited remuneration in any form in relation to customers, suppliers, the authorities or other decision-makers with the aim of obtaining or retaining business, for example.

#### Gifts and other benefits in Jernbros business relationships

Jernbros employees may not be offered gifts or other benefits from suppliers that would constitute a breach of legislation or that could affect the professional judgment of the employee.

#### Environment and working environment

##### *Environment*

Jernbro strives to prevent or continuously reduce any negative consequence the company's operations may have on the environment. Its operations exert their greatest environmental impact in the energy, fuels, chemicals and waste segments. Jernbros suppliers should work towards environmentally friendly delivery in their relevant segments.

### *Working environment*

Jernbros suppliers should work consciously and systematically to promote a good working environment, both physical and psychosocial. Jernbros suppliers should work actively to continuously improve the working environment, and should conduct regular updates of work.

on the working environment.

### *The supplier's responsibility as an employer*

Jernbros suppliers should respect employees' rights of free association and collective bargaining. No employee may be subject to discrimination on grounds of age, sex, religion, sexual orientation, disability, political opinion, or ethnicity. One absolute requirement is that Jernbros suppliers comply with applicable legislation regarding their responsibilities as an employer. This includes suppliers being liable for verifying tax deducted from income at source, social security contributions being paid for all employees by the supplier and that all employees hold work permits where required.

### **Ground rules regarding Jernbros customers**

When employees of a Jernbro supplier work closely with Jernbros customers, at customers' premises and on customers' IT systems, for example, it is important that they comply with Jernbros customers' codes of conduct, safety instructions and other ground rules. These instructions should be communicated by Jernbro.

### **Confidential information**

*Confidential information at Jernbro* In cases where the supplier comes in contact with confidential information on Jernbro, regarding strategies, processes, systems, agreements, services and other business operations, for example, this should be protected, and may not be disseminated outside the company by the supplier or to other party within the supplier that does not need such information to fulfill agreed delivery to Jernbro.

### *Confidential information with Jernbros customers*

In cases where employees of Jernbros suppliers come into contact with confidential information at Jernbros example, this information should be protected and should not be disclosed to any unauthorized party. Information not published by the customer should not be disclosed to any other parties apart from (i) people that work for the customer that have access to this type of information in their work and have reason for gaining access to such information, (ii) other people that are authorized by the customer to receive this type of information or (iii) people that the suppliers' employees should disclose such information to in accordance with Jernbros applicable agreements with the customer. The supplier's employees may not gain access to, copy, reproduce or utilize the customer's information other than to deliver agreed services with the customer. The customer's information may not be stored on private computers or other media that do not belong to the customer, unless otherwise specifically agreed with the customer. If, according to Jernbros applicable agreements with the customer, the supplier's employees need to take information outside the customer's premises to perform their duties, this information must be returned immediately once the duties outside the

customer's premises are complete. If there is uncertainty regarding handling confidential information, the supplier should consult with their contact at Jernbro.

## **PROTECTION OF PERSONAL DATA**

Jernbro's suppliers must value and respect the individual's right to protection for their personal data. Jernbro and its suppliers shall ensure that all processing of personal data takes place in accordance with applicable legislation, irrespective of whether the supplier acts as Jernbro's personal data assistant, if the supplier is independently responsible for personal data or if personal data responsibility is shared.

## **IMPLEMENTATION AND FOLLOW-UP**

### *Implementation*

Within their areas of responsibility, Jernbros suppliers are liable for ensuring that on Jernbros delivery, their employees, and those of potential subcontractors, have read, understood and undertaken to comply with the principles of the Code of Conduct.

### *Follow-up*

The supplier should follow up on the Code of Conduct as a regular part of its operating activities. The supplier is liable for following up compliance with its subcontractors. The supplier is urged to report breaches of applicable laws and regulations or this Code of Conduct in the event they are committed by Jernbros own employees. This should be reported to one of Jernbros company lawyers. Jernbro does not accept any discrimination or retaliation against the employees of a supplier that have reported suspected breaches. Jernbro reserves the right to verify compliance with the Code of Conduct with the supplier and its potential subcontractors through means including following up on the supplier's own inspections, audits by the supplier and through contacts with the supplier's employees on the relevant delivery.