

## Code of Conduct

Arno-Remmen AB has adopted a Code of Conduct, which applies to all our operations regardless of the country in which we do business, that guides our daily work.

Arno-Remmen AB expects all its suppliers to share our values and ensure that their organization(s), and involved sub-suppliers, are compliant to all statements mentioned in this Code of Conduct.

### **Whistleblowing and Protection Against Retaliation**

We believe in a company culture where our employees can ask questions and raise concerns without any fear of retaliation. Our employees shall also feel encouraged to report any conduct that they believe to be a violation of our Code of Conduct, corporate policy, law or regulation.

We have also adopted a whistleblowing function where employees can report serious issues which they do not want to report through normal reporting channels.

### **Organization**

To monitor and fulfill the content of the Code of Conduct, we shall allocate enough resources. We shall ensure that top management is involved in the compliance of this Code of Conduct.

## **Human Rights and Working Conditions**

### **Legal Requirements**

We are aware of, and comply with, local, national, and all other legal requirements in the countries where we do business as a minimum standard.

### **Working Conditions**

We respect human rights and all employees shall be treated in accordance with the ILO Declaration on Fundamental Principles and Rights at Work.

### **Forced Labor or Compulsory Labour**

We do not use involuntary or forced labor. This includes all forms of agreements made under duress and illegal workers. No one shall be held at the workplace against his or her will, regardless of date or time.

### **Freedom of Association and the Right to Collective Bargaining**

We shall, without retaliation or intervention, respect the right of workers to associate, organize and bargain collectively in a peaceful and legal manner.

### **Compensation/Wages**

We believe that wages are important to the basic needs of workers, and therefore comply with all applicable laws and ordinances on wages and time, including those which apply to minimum wages, overtime, maximum working hours, piecework levels and other compensation levels and offer legally agreed benefits.

### **Child Labor**

We do not use child workers. "Child" is defined here as a person under the age of 15 (or 14 if permitted by local law) or older if the local age limit for employment or compulsory school attendance is set higher. If we employ young persons who are not defined as a "child" we shall also comply with all laws and ordinances applicable to such persons.

### **Non-Discrimination and Equal Opportunities**

We strive for a diverse, equal, and inclusive working environment and do not accept any form of discrimination due to, but not limited to, religion, age, gender, sex, sexuality, association with minorities, ethnicity and functional disability.

### **Health and Safety**

We shall ensure that workers have a safe and healthy workplace in accordance with applicable laws and ordinances. The management team shall be involved in the continuously work to improve the health and safety conditions. We ensure that appropriate protective devices and safety equipment for workers are used, equipment and premises are safe and hazardous substances and waste are safely managed. Our workplace shall be free of alcohol and illegal drugs.

### **Emergency Preparedness**

We shall ensure that we are prepared for emergencies by having a contingency plan containing, but not limited to, fire, pandemics, power shortage, war, flooding, cyber-attacks and earthquakes. The contingency plan and the incident and accident management shall be reviewed and tested on a regular basis.

## **Environmental**

### **Environmental Sustainability**

We understand and comply with environmental standards in accordance with national laws, ordinances and industry standards. We promote the idea of environmental sustainability throughout the organization and strive towards contributing to a circular economy where, for example, reuse and recycling, energy efficiency, renewable energy and decarbonisation, responsible chemical management, and air, water, soil and noise quality are key factors to obtain this.

## **Business Ethics**

### **Privacy and Data Protection**

We shall have a policy regarding privacy and data protection compliant to GDPR. We shall also have a process to ensure that the policy is followed.

### **Bribery, Extortion and Corruption**

We have zero tolerance of bribery, extortion and corruption. We proactively work against bribery and corruption by prohibiting all employees to receive gifts and/or benefit from external parties where it can not be ruled out that the purpose of the gift and/or benefit is to affect the employee's behavior and decision making.

### **Financial Responsibility**

We understand and comply with legal requirements regarding financial reporting. We shall honor commercial agreements towards suppliers, customers and other parties which we conduct business with.

### **Anti-Trust and Fair Competition**

We understand and comply with legal requirements regarding fair competition and anti-trust. We shall under no circumstances be involved in price fixing or any other type of cartel operations.

### **Conflict of Interest**

We must avoid any situation that may involve a conflict of interest, or the appearance of a conflict of interest, between us and our employees and business partners.

### **Counterfeit Parts and Intellectual Property**

We do not trade with counterfeit parts and we safeguard the intellectual property of our business partners in accordance with the commercial agreement at hand. In addition, we ensure that our own intellectual property is handled with caution by all employees.

### **Export Controls and Economic Sanctions**

We comply with the trade sanctions and export control laws and regulations that apply to us by international and regional bodies, such as EU or UN. We expect all our business partners to do the same.



## Responsible Sourcing

### REACH and RoHS Conformity

We shall fulfill our obligations under the Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) regulation. We continuously review the ECHA "Candidate List" for additions and updates and act accordingly in compliance with REACH regulations. The list is available for viewing at [www.echa.europa.eu](http://www.echa.europa.eu).

We shall comply with the EU Directive RoHS, Restriction of the Use of Hazardous Substances in Electrical and Electronic Equipment Directive (2015/863/EU), by limiting the use of lead, cadmium, mercury etc.

### Conflict Minerals & Responsible Sourcing

We ensure that no sourcing of raw materials is done from conflict affected and high risk areas or extracted by uncertified practice methods. We also ensure that this restriction is enforced throughout the complete supply chain.

### PFAS

We supply no products containing PFAS substances. PFAS substances is defined according to OECD's definition.

### Asbestos

We supply no products containing asbestos.

### Sub-Suppliers

We expect our suppliers to communicate and impose the same Code of Conduct described in this document on their sub-suppliers of goods and services sold to Arno-Remmen AB. Upon Arno-Remmen's request, suppliers shall provide relevant information about their sub-suppliers.

### Audits and Monitoring

Suppliers shall permit Arno-Remmen AB and its representatives to perform audits to verify compliance with the Code of Conduct set out in this document.

Kristinehamn, 30 May 2024

Carl-Fredrik Norman

### Supplier Confirmation

*We hereby guarantee that these rules are understood and followed:*

Sign: .....

Date: .....

Company: .....