



We in Skanem compete vigorously to achieve business success, but we are concerned not only with results, but with how those results are achieved. As one of the leading manufacturers of self-adhesive labels in the world, and as a supplier to national and multinational companies, we conduct our operation with integrity, honesty and openness.

All Skanem employees shall respect the legitimate interests of those with whom the company has relationships, and to understand and respect this Code of Conduct.



CODE OF CONDUCT

Version 1.4 2013



*We add value
to our customers'
supply chain.*



skanem.com

MAIN PRINCIPLES

The main principle is to always do the right thing, and when in doubt, check with people who might know first.

Wherever we conduct our business we comply with laws and regulations valid in the country in which we operate.

Skanem’s values are Trust, Team Spirit and Continuous Improvement. We work as a team both internally and with our customers and business partners. We act with integrity so we can be trusted. And we seek continuous improvement in every part of our business.

If there are doubts as to how these principles should be interpreted or adaptations are needed, these should be agreed by the company’s CEO.

HEALTH, SECURITY & ENVIRONMENT

Skanem takes responsibility for the environment we operate in and for the people we are dependant upon, and will ensure that we conduct our business in a way that is safe and protective to people, the environment, society and properties.

We have a Disaster and Business Interruption Recovery Plan for handling emergencies.

We acknowledge our responsibility to:

- Minimise impact on health, occurrence of preventable injury, external waste levels, use of environmentally hazardous raw materials.
- Recycle waste.
- Minimise pollution, emissions and Skanem’s overall impact to the environment.
- Secure that our labels are sold with advise on how to safely use them.
- Labels are based on materials that are known to be safe and environmentally sound and print processes are inherently safe.
- Factories have individual HS&E policies that ensure safe working practices, measure and report safety.
- Our main supply partners have active HSE policies that commit to these principles and beyond.

PEOPLE AND LABOUR STANDARDS

Business is made by people, and good business is made by people who behave professionally. People are Skanem’s most important asset. We constantly seek to “Improve Business Performance by Unlocking Human Potential”. We ensure that critical positions are filled with people with the right competences.

We do not accept people who treat others badly. No-one will be discriminated due to his/her race, gender, colour, religion, national origin, age, sexual orientation, disability or other non-job-related personal characteristic. We actively seek diversity in our work force.

We respect local working environment regulations and rules regulating wages, hours and working conditions. Employees have labour contracts protecting them. Sites demonstrate a commitment to the health and safety of their employees and not use forced labour, or use raw materials or finished goods produced by forced or indentured labour. We respect the right of employees’ freedom of association and recognise employees’ rights to collective bargaining where allowable by law. We do not accept use of child labour.

FINANCIAL INTEGRITY AND COMPANY RECORDS

The integrity of Skanem’s financial records is critical to the operation of our business and is a key factor in maintaining the confidence and trust of our employees, shareholders and other stakeholders. We must ensure that all transactions are properly recorded, classified and summarized in accordance with Skanem’s accounting policies and adhere to applicable laws and regulations.

CONFIDENTIALITY

We keep confidential information confidential. Confidential information means non-public information known to us as a result of our position with Skanem that might be of use to competitors or harmful to us if disclosed; and non-public and personally identifiable information we obtain from other employees, customers or consumers. If we have a legal obligation with respect to confidential information from a former employer when we join Skanem, we are expected not to use or disclose that information in the course of our work for Skanem. Similarly, we expect that departing employees will not disclose Skanem’s confidential information after they leave us.

We should not put ourselves in situations where we could accidentally disclose confidential information, such as reading or discussing confidential information in public places or leaving important information, computers, smart phones etc. unattended.

CONFLICT OF INTEREST

All employees are obligated to act at all times solely in the best interests of Skanem. A conflict of interest arises when we have a personal relationship or financial or other interest that could interfere with this obligation, or when we use our position with Skanem for personal gain. We require that employees disclose all potential conflicts of interest and that we promptly take actions to eliminate the conflict when we are requested to.

Employees in Skanem should not have positions in other companies and not conduct compensated work that interferes with the performance of Skanem duties or can lead to conflict of interest.

BRIBERY AND CORRUPTION

Skanem does not give or receive bribes or other improper advantage for business or financial gain, directly or indirectly. None of our employees may offer, give or receive any gift or payment that may be regarded as a bribe. We do not tolerate any corruption internally or externally.

USE OF COMPANY ASSETS

Skanem’s assets and resources are dedicated to achieving our business objectives. We do not permit improper use of our assets, e.g. using Skanem property or information for personal advantage or for people outside Skanem, such as friends or family members.

All Skanem employees are required to safeguard and not misuse company assets and resources, and must never use them for any unlawful or unethical purpose.

Our IT systems, laptops and telephones should not be put at risk and users of Skanem’s information and technology resources must not share passwords.

FAIR DEALING

Skanem treats all customers equitably and does not give any customer an unfair advantage over another competing customer. We allow suppliers to compete equitably for Skanem business based on the total value offered to us by that supplier.

TRAVEL AND ENTERTAINMENT

When we travel we are Skanem’s face to the external world and should ensure that we represent the company in the best possible way. All Skanem employees are required to ensure that their business travel is intended to further our business interests. Travel and entertainment expenditures should

be reasonable, prudent and in accordance with applicable corporate or regional policies.

SUPPLY CHAIN RESPONSIBILITY

Skanem use collaborative platforms for managing ethical supply chain risks to drive improvements and convergence to responsible business practices. We expect our suppliers to adhere to the principals of responsible companies and have their own Code of Conduct or similar.

WHAT WE EXPECT FROM EACH OTHER:

- Do understand Skanem Code of Conduct as stated in this document and how to apply them in your work.
- Do comply with Skanem Code of Conduct and the implications of this document for your work.
- Do notify your manager if you believe a violation of law or Skanem Code of Conduct has occurred in the course of our business whether the violation was by a full-time employee, part-time employee, contractor, consultant or member of the senior management team.

IF YOU ARE A MANAGER:

Do inform and train those reporting to you about the Laws and Skanem’s Code of Conduct applicable to their work, follow up compliance, and take disciplinary action as required. Employees who are disciplined have the right to a fair grievance process.

Skanem is a leading producer of self-adhesive labels to some of the most recognised brand owners in the world. Skanem has 16 production sites in 10 countries and 1200 employees.

MISSION:
We add value to our customers’ supply chain.

VISION:
To be a preferred supplier of cost efficient and logistically smart labelling solutions by providing products and customer relations of high quality.

VALUES:
Trust, Team Spirit & Continuous Improvement.



Ole Rugland
President & CEO
Skanem

I confirm that I have read this:
(signature)