

Liljedahl Group

2017

Code of Conduct

Code of Conduct for the Liljedahl Group

Liljedahl Group AB is a family-owned group of companies with 7 wholly-owned holdings: Elcowire Group, LWW Group, Hörle Wire Group, LMT Group, Finnvedens Lastvagnar, Finnvedens Bil and Liljedahl Group Fastigheter. Liljedahl Group AB is also the largest owner of the listed company Bufab AB.

Liljedahl Group AB is an active owner with a long-term approach to ownership, in which knowledge and capital combine to ensure ongoing development of the holdings. At the heart of its ownership is the embedding of shared values and common principles across the group. This Code of Conduct is designed to support the day-to-day activities of all employees within the Group.

EVERYBODY'S RESPONSIBILITY

A long-term approach, business development and collaboration are the keywords that describe how the Liljedahl Group does business and how the companies in the group must work with customers, suppliers, employees and the local community.

Each and every one of our employees and board members must play their part in ensuring that the companies in the Liljedahl Group are perceived as reliable and responsible businesses.

The companies in the Liljedahl Group will operate in accordance with the following principles:

COMPLIANCE WITH LEGISLATION – We work in accordance with the laws that apply in the countries where we do business.

GOOD ETHICS – We aim to run our business in an ethical way.

CLOSE PARTNERSHIP – We aim to run our business in close consultation with our business partners and employees and with other parties that impact on or are impacted by our business.

Employees of the Liljedahl Group must not accept payment, gifts or other financial rewards from third parties which in any way influence, or could be perceived as influencing, their objectivity in business decisions.

We will not do business with customers or suppliers whom we suspect do not comply with our anti-corruption regulations.

TAXES

In all countries in which the Liljedahl Group does business, we must comply with the tax legislation and tax regulations of the country concerned. If the tax legislation fails to give clear guidance, we must be guided by the principles of good ethics, accuracy and transparency.

FAIR COMPETITION

The companies in the Liljedahl Group will compete fairly and with integrity. The companies will not exchange information, conclude contracts or enter into agreements with competitors, customers or suppliers where such action could unduly influence the market or the outcome of a tender procedure. The Liljedahl Group will use legitimate methods to gather information on its competitors.

BUSINESS PRINCIPLES



ANTI-CORRUPTION

The Liljedahl Group will not participate in or accept any form of fraudulent procedure.

Representatives of companies in the Liljedahl Group will not offer customers, potential customers, suppliers, consultants, governments, authorities, or representatives of such bodies, payment or benefits which are contrary to applicable legislation or accepted business practices which are more stringent than the legislation in order to win or retain business or obtain other undue advantages.

HUMAN RIGHTS AND SOCIAL JUSTICE



HUMAN RIGHTS

Everyone is born free and equal in value and with the same rights.

The Liljedahl Group will support and respect the protection of internationally established human rights and will ensure that the Group does not give rise to violations of human rights.

FORCED LABOUR

The Liljedahl Group will not tolerate forced labour. This includes agreements concluded under forced conditions and illegal labour. Nor will we tolerate methods that restrict the free movement of employees, and nobody may be made to work for any period of time against their will.

CHILD LABOUR

Child labour will not be tolerated. The minimum employment age is the age reached on completion of compulsory education, but will never be lower than the age of 15. The exception to this rule is short-term temporary work which does not affect a child's education, e.g. holiday work.

DISCRIMINATION

All employees must have the same opportunity based on their ability, experience and performance, irrespective of their gender, race, religion, age, disability, sexual orientation, nationality, political views, trade union membership, social background or ethnic origin. All employees must be treated with respect. Discrimination, physical or verbal harassment or unlawful threats will not be tolerated.

FREEDOM OF ASSOCIATION

The Liljedahl Group respects the rights of all employees to join a trade union to protect their interests as an employee, to organise themselves and to negotiate their wages collectively or individually. An employee's right to decide not to join a union must be respected.

WORK ENVIRONMENT

We will strive to be a respected employer. The companies in the Group will provide a good work environment, from both a physical and a social perspective, and will strive to be attractive employers in terms of employees' personal development. Relations with and between employees will be based on mutual respect and dignity and reasonable influence in areas that affect the individual's work situation.

We will strive to constantly improve health and safety in the workplace and will endeavour to offer our employees a safe work environment. All companies in the Group will, at minimum, comply in full with national legislation and/or collective agreements.

TERMS AND CONDITIONS OF EMPLOYMENT

The terms and conditions of employment, including pay and working hours, offered to our employees must, at minimum, meet the minimum requirements of national legislation, agreements and industry standards.

ENVIRONMENTAL PRINCIPLES



EFFICIENT USE OF RESOURCES

The Liljedahl Group's products, processes and services will be designed in such a way that they use energy, natural resources and raw materials efficiently and minimise waste and waste products.

PRINCIPLE OF CAUTION

The Liljedahl Group will avoid the use of materials and methods which could result in risks for the environment or health when suitable alternatives are available.

All the companies in the Group will, at minimum, comply in full with national legislation and international regulations.

COMPLIANCE



Responsibility for ensuring that business is conducted in accordance with our Code of Conduct lies with the CEO of each individual company in the Group.

Departures from this policy may only be approved by the board of directors of Liljedahl Group AB. The document will be reviewed annually by the board of directors of Liljedahl Group AB.

All Liljedahl Group employees are encouraged to report suspected breaches of this Code of Conduct to their manager or their manager's manager. If the employee's claim is not taken seriously, or if the employee does not feel comfortable reporting the suspected breach to his/her manager, the employee should report it in a letter to Whistleblower, Liljedahl Group AB, Box 420, SE-331 24 Värnamo, Sweden. Suspected breaches may be reported anonymously. Individuals who report such suspected breaches will not be subject to punishment or other sanctions. Failure to comply with the provisions of this Code of Conduct may result in disciplinary action.

This document was originally written in Swedish. The Code of Conduct will be translated into the local language of each company in the Liljedahl Group and into English.

The document was approved at a board meeting of Liljedahl Group AB held on September 19, 2017.

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