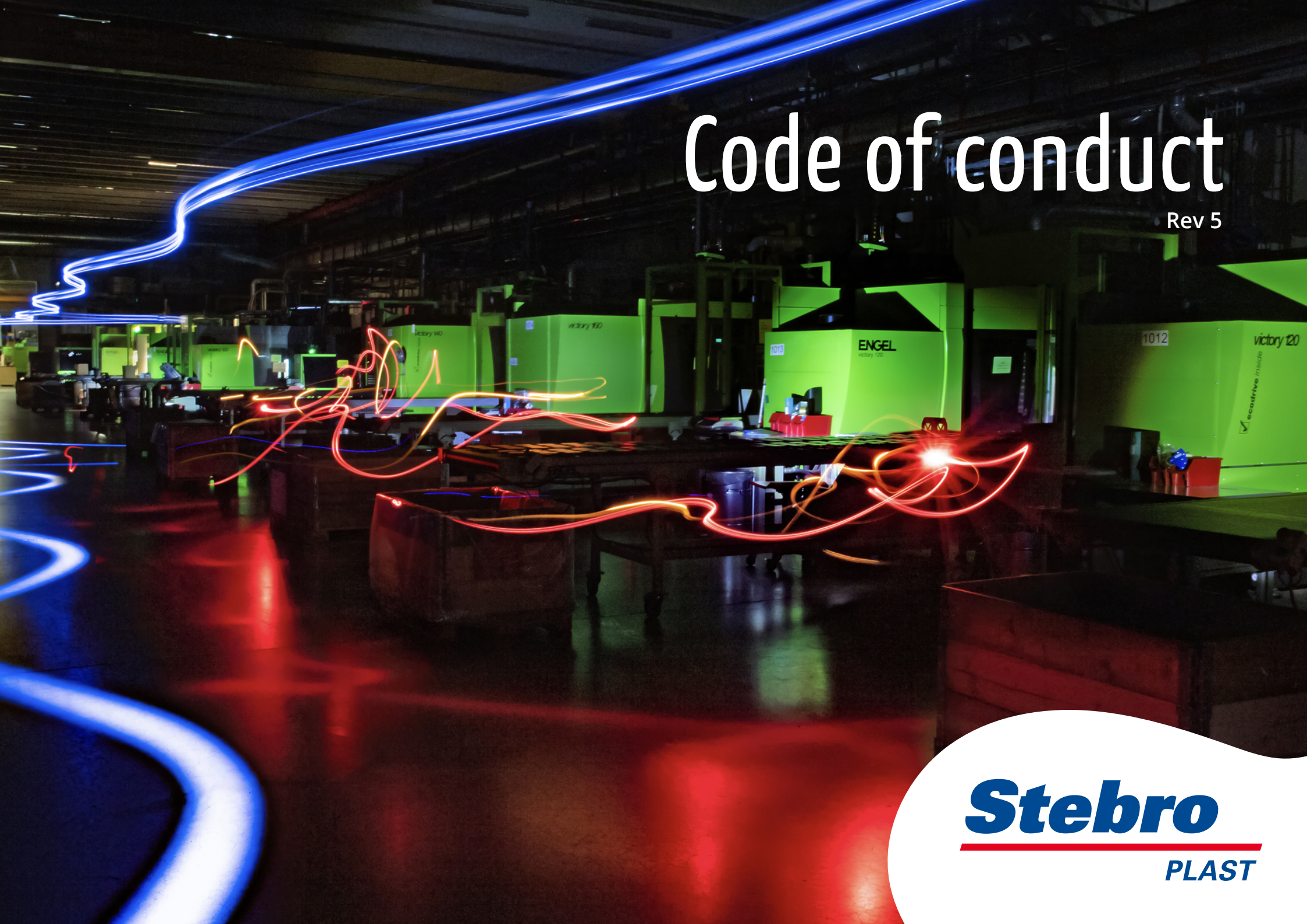

Code of conduct

Rev 5

Stebro PLAST

At Stebro Plast AB, we are committed to conducting our business with the highest standards of ethics, integrity and responsibility. This Code of Conduct is designed to guide our employees, suppliers and business partners in making decisions that are consistent with our values and principles.

We support UN Global's principles relating to human rights, labor rights, the environment and anti-corruption. By following this Code of Conduct, we contribute to a sustainable and fair future for all.

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Responsible business

Stebro Plast AB's most important goal is to create added value for customers, partners and employees. This added value is about contributing in various ways to an economic benefit, such as better profitability and competitiveness among customers and attractive returns.

We must create added value without compromising our ambitions for quality and sustainable development. Thus, environmental responsibility, social responsibility and good business ethics become natural parts of our daily operations and of Stebro Plast AB's long-term strategy.

Our view of responsible business is based on the UN Global Compact and other international agreements. The Code shows how we take responsibility for the impact that our operations and products have on both the environment and society at large.

Human rights, labor law, environment and anti-corruption

The Code of Conduct focuses on four areas: human rights, labor law, the environment and anti-corruption. It also summarizes Stebro Plast AB's positions regarding business partners, quality and product responsibility. In this way, the code describes how we work with a sustainable value chain. For each area, the code describes the approach we stand for and that all employees must contribute to fulfilling.

The code is the support, but it is through its application in every-day life that the ambitions become clear and make a difference.

This therefore becomes a responsibility that we must take together.

Through the code of conduct:

- We strive to comply with laws such as the UN Convention on the Rights of the Child and other international agreements and guidelines.
- We consider our stakeholders' financial expectations and create customer value.
- Social responsibility is integrated throughout and is practiced in relationships with employees, customers, business partners, owners and other stakeholders.
- We contribute to sustainable development, including health and welfare in society.

Applies to everyone

Together with the rules for corporate governance and Stebro Plast AB's other guidelines, the Code serves as a framework. It applies to all employees, managers and board members of Stebro Plast AB, regardless of where in the world they are.

To the extent possible, it also applies to suppliers, business partners, subcontractors and customers. The Code of Conduct defines a minimum level of what is considered appropriate behavior.

Sustainable development strategy

Stebro Plast AB is a family business that strives to create a family atmosphere in the workplace, where we collaborate, take responsibility for our tasks and respect each other. All positions are equally important throughout the chain.

Responsible business is a central part of our business strategy and a basis for our profitable growth. This responsibility is based on our Code of Conduct, our key sustainability issues, and how we identify risks and opportunities and work with our value chain.

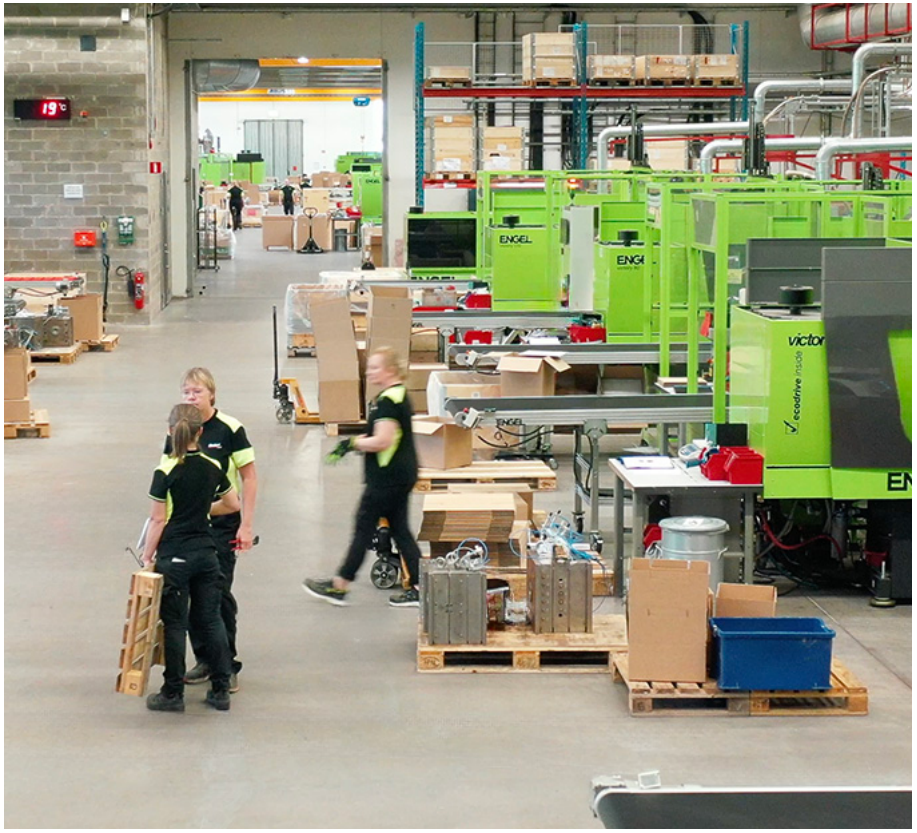
All in all, this enables sustainability work that contributes to a better world, creates business opportunities, reduces risks and enables us to meet the demands and expectations of our stakeholders. Our sustainable development strategy is based on the following elements.

The sustainable development strategy is based on the following elements:

- **Code of conduct.** It provides employees and stakeholders with guidance on how we handle issues relating to people, society, the environment and business ethics. The Code of Conduct applies to everyone at Stebro Plast AB and is based on the principles of international ethical guidelines.
- **Sustainability issues.** Focus on sustainability issues that are essential to Stebro Plast AB's business strategy and important to stakeholders.
- **Risks and opportunities.** Risks are identified, managed, and mitigated. Opportunities in sustainable development are seized and contribute to business benefits.
- **Sustainable development**. Stebro Plast AB supports the work for sustainable development.

The work in practice

- **Responsibility.** Delegated responsibility, which means that the operational sustainability work is adapted and carried out.
- **Environment.** Focus on systematic work with continuous improvements, especially within the framework of the ISO 14001 environmental management system.
- **Follow-up and communication.** We work actively with sustainability and ensure open and transparent communication with Stebro Plast AB's various stakeholders



People and society

Respect for human rights

- We treat all employees fairly, with dignity and respect.
- We do not discriminate against anyone based on religion, gender, age, disability, sexual orientation, nationality, political opinion, social background or ethnic origin.
- We support and develop diversity.
- We do not harass, threaten or discriminate.
- We respect the right of all employees to organize.
- We do not accept child labor, illegal labor or forced labor and have zero tolerance for all types of human trafficking.

Good working environment

- Our activities must be conducted in such a way that legislation in the area of the work environment is complied with.
- We have a vision of zero occupational accidents and do not compromise on health and safety in the workplace.
- We work preventively and systematically to create a good and safe work environment.
- We give our employees the opportunity to develop their professional knowledge and skills.
- It is our shared responsibility to ensure that we operate in an environment that is free from the influence of alcohol, illegal drugs and other controlled substances.
- We apply zero tolerance for threats or violence in the workplace. Workplace violence includes any behavior that creates fear of harm or discomfort, including threatening or intimidating behavior and verbal abuse.
- We have the right to work in a harassment-free environment. We do not accept any verbal or physical behavior that degrades, negatively affects someone else's work, or creates a discouraging, hostile, or offensive work environment. We do not tolerate any form of sexual harassment, in accordance with our basic respect for all individuals.

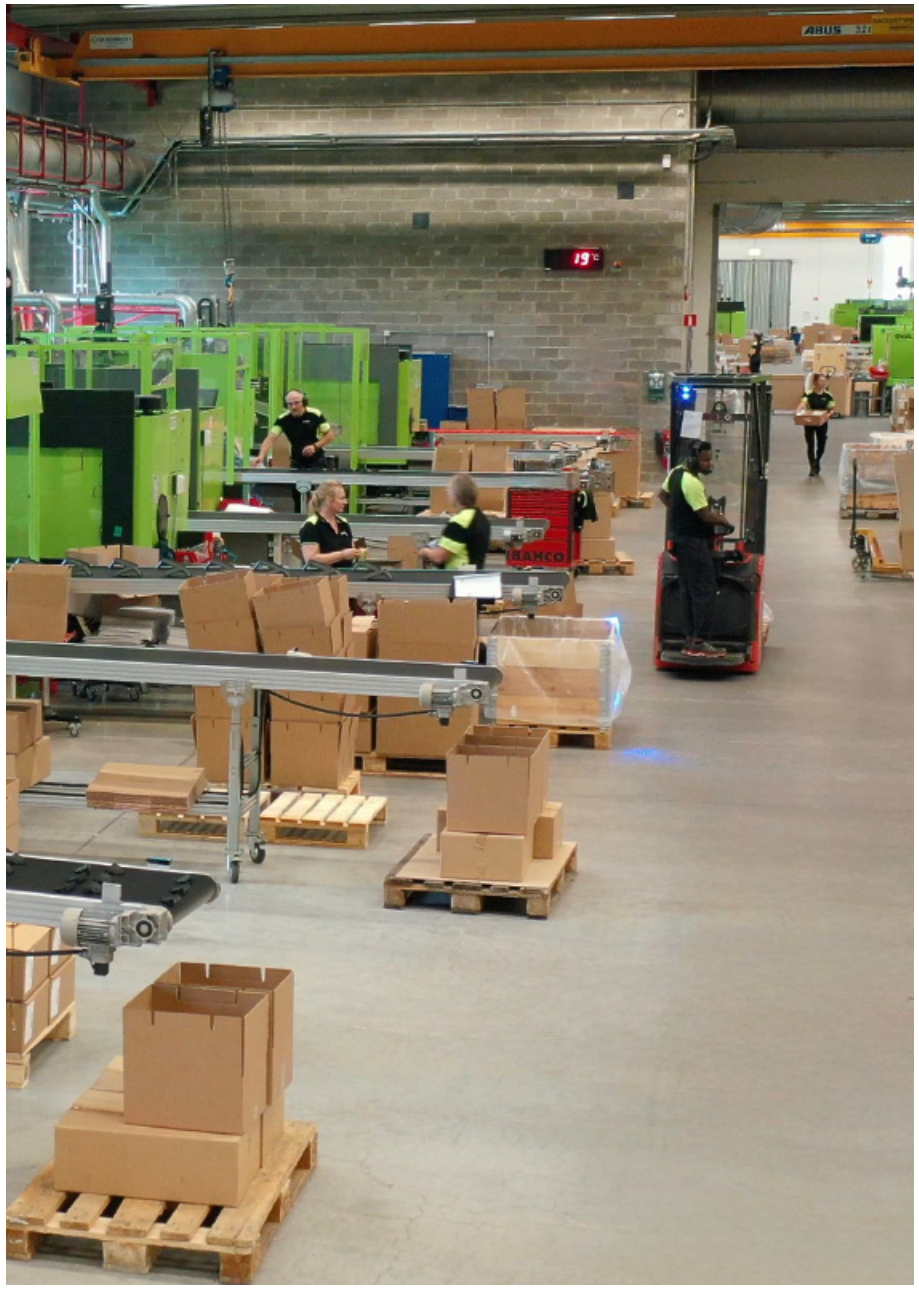
Clear commitment to society

- Where possible, we engage in the community and communities around where Stebro Plast AB operates. We strive to hire and develop local employees and managers.
- We support organizations that share our values and that benefit the communities in which we operate.
- We participate in collaborations and projects with schools and industrial networks.
- We are taking a neutral stance on political issues. The company name or Stebro Plast AB's financial resources may not be used in political contexts.

Environment

Preventive environmental work

- Our activities shall be conducted in such a way that environmental legislation is complied with.
- We must have good foresight regarding new legislation and capture requirements and wishes from customers and other stakeholders in good time.
- We work preventively, and the precautionary principle guides this work.
- We use water, energy, materials and other natural resources efficiently with good management and with a focus on sustainable development.
- We take environmental and health aspects into account when procuring raw materials, chemical products, packaging and distribution methods in cases where we can control this.
- We have good emergency preparedness by systematically identifying and evaluating risks of accidents, fires and uncontrolled releases to the environment.
- We work systematically with environmental issues and are certified according to ISO 14001.
- Information that is important to our stakeholders should always be provided as soon as circumstances allow.



Business ethics

Good business ethics

- We demand honesty and fairness in our operations and expect the same from our business partners.
- Bribery is prohibited. All forms of compensation to agents, suppliers and other business partners should only relate to actual goods or services.
- Gifts and other benefits may be part of expected hospitality, but must not go beyond local customs and must be fully in line with local law.
- All employees of Stebro Plast AB must observe and comply with competition laws.
- All employees must avoid conflicts of interest between private financial matters and the company's business operations.
- All business transactions made in the company must be clearly visible in the company's bookkeeping, which must be handled in accordance with Stebro Plast AB's rules and in line with international accounting standards.
- We must ensure that employees and our stakeholders – without risk of personal consequences – can raise the alarm about material irregularities, so-called whistleblowing.
- We shall apply sound business principles and be responsible and moderate in our advertising and marketing.
- We respect the right of ownership and the right to intellectual property.
- Information that is important to our stakeholders should always be provided as quickly as circumstances allow.

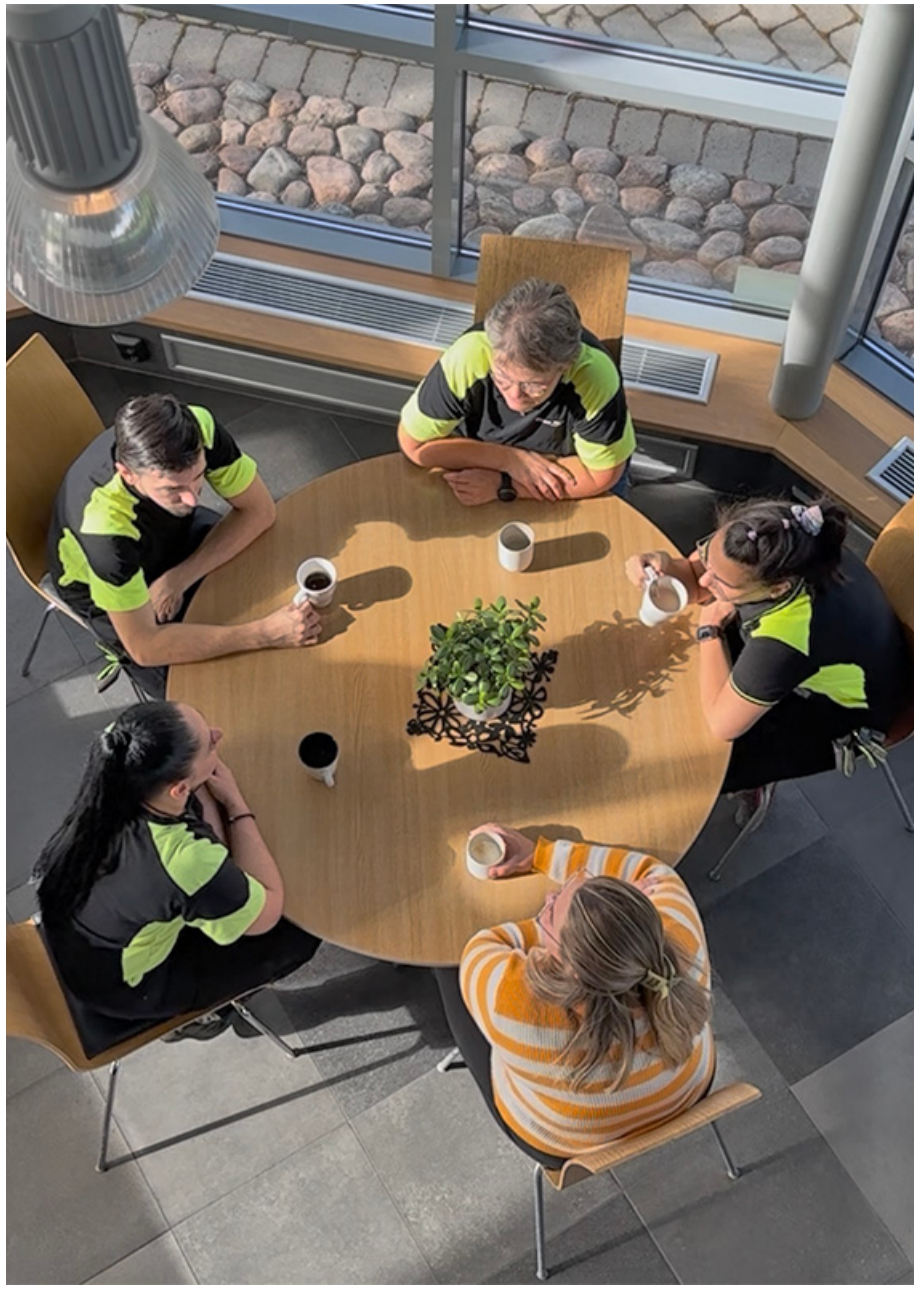
Well-thought-out communication

- Our communication must be straightforward and honest and comply with applicable legislation, rules and standards. We shall be transparent and accurate within the framework of appropriate business confidentiality.
- We maintain close relationships with our stakeholders, where communication is based on regular contacts, clarity and good business ethics.
- We respect the freedom of each employee to express an opinion on matters that concern him personally.
- Only representatives of the company's management have the right to comment on Stebro Plast AB's operations. Inquiries about the company's operations should therefore be referred to the Board of Directors or the CEO.
- If you identify yourself as an employee of Stebro Plast AB on social media, all communication should be well thought out as it can be perceived as the company's opinions. It is important not to share trade secrets or in any way degrade or slander the company, business partners or employees. The company logo must not be used in a way that could be misinterpreted by the recipient.

Sustainable value chain

Business partners, the right quality, product safety and environmental adaption

- We value cooperation with our business partners, such as suppliers, subcontractors, partners, agents and distributors.
- We expect our business partners to comply with the social, business ethics and environmental principles of our Code of Conduct and the international guidelines supported by Stebro Plast AB.
- We want our business partners to work to ensure that their operations, products and services do not have a negative impact on the environment, human health and/or society. We assume that the goods provided by our suppliers comply with the latest regulatory requirements such as REACH, RoHS, PFAS and similar.
- We encourage our business partners to implement certifiable quality and environmental management systems.
- We work with our suppliers to be able to determine with reasonable certainty that certain substances (conflict minerals) do not come from war-torn areas. As well as ensuring that other regulatory requirements such as REACH, RoHS, PFAS and similar are met.
- We will always meet our customers' requirements, needs and expectations by delivering services and products with the right quality.
- We work systematically and are certified according to ISO 9001, ISO 13485 and ISO 14001.



Responsible business in everyday life

Policies provide guidence

The Code of Conduct captures Stebro Plast AB's fundamental values. Such guidelines are developed within the framework of the company's management system. The level of ambition must correspond to what is stated in the Code of Conduct.

Oorganisation and responibility

It is the CEO who has the overall responsibility for the application of responsible business conduct. At the same time, Stebro Plast AB will distribute information that ensures that knowledge of the Code of Conduct is high. In everyday life, the responsibility for how the code is applied is delegated to the managers. The Code is included in the company's internal training programs. Managers must act in such a way that they become role models in the application of the guidelines.

Continuous improvement

The Code of Conduct is largely based on the work of continuous improvement. Through systematic work, we reduce environmental impact, improve the work environment and implement other improvement measures. Prevention and the application of the precautionary principle are important to us.

Zero tolerance

In certain areas of the Code of Conduct, we have zero tolerance for deviations. This includes compliance with the law, the application of human rights, threats or violence in the workplace, and issues related to bribery, corruption, and competition laws.

Management of operations

Effective business management, long-term ownership and responsible business conduct pave the way for value creation. We create value by delivering products and services that improve and develop the customer's business. This helps both our customers and Stebro Plast AB to increase their profitability.

Effective governance is based on responsibility, transparency, ethical conduct, respect for our stakeholders' activities and for applicable legislation.

Our decision-making tools are based on:

- Economic, natural and human resources are used efficiently.
- Safety and health are a clear priority.
- We strive for a corporate culture in which environmental and social responsibility is applied and encouraged.
- We balance our long-term strategy with the demands and views of society and other stakeholders.
- We communicate with our stakeholders on sustainable development and listen to their views.

Follow-up and reporting

The Code of Conduct is normally revised by Stebro Plast AB's management team once a year. The latest updated version of the code is available on Stebro Plast AB's internal server. All employees within the company are responsible for keeping up to date with the latest revised version. It is also published online on the website for interested parties.

Guidance in dilemmas

If you are faced with an ethical dilemma and you are unsure how to act, use this chart to get guidance on the best course of action. If you need help, turn to your manager.

Whistleblower service

At Stebro Plast AB, we strive for a transparent business climate with high business ethics. To identify any misconduct at an early stage, we have a whistleblower process where suspected irregularities can be reported. This process is used when an employee or other person discovers behavior that may be unethical or illegal.

External management

To ensure anonymity, our whistleblower channel is managed by an external company, where both the report and the subsequent dialogue are encrypted, and password protected. At the same time, we hope that employees and other stakeholders feel safe to primarily contact us directly in the event of questions or suspicions.

Via the website

The whistleblowing service is available via the following URL:

http://www.stebro.se.

A link will also be available on our computers.

The notifier fills in and submits a report. The external company then assesses whether the report is appropriate to handle within the framework of the Group's whistleblower channel and gives feedback to the whistleblower.