Ballingslöv International Group

Code of Conduct

Introduction

The Ballingslöv International AB group of companies (BI) Code of Conduct is based on the core values for corporate trustworthiness, the conducted business with integrity and in compliance with laws and regulations.

BI Code of Conduct applies to our employees and business partners, who we expect to act in line with the Code of Conduct.

We also require our business partners, e.g. suppliers, to impose these requirements with their subsuppliers etc.

We believe in co-operation and we are willing to work with our business partners to achieve sustainable solutions.

The requirements stated in this Code of Conduct are mainly based on internationally agreed conventions such as the UN Convention Universal Declaration of Human Rights and applicable ILO Conventions, the UN Convention on the Rights of the Child and the principles in the UN Global Compact.

1. General requirements

The business partner shall acknowledge, accept and sign the requirements as stated in this Code of Conduct. We expect the business partner to do the utmost to achieve our standards. We also put great emphasis on transparency and we expect communication to be open, truthful, complete, timely and not in any way misleading.

If the business partner does not comply or show unwillingness to take corrective actions as agreed upon, it will ultimately end the business relationship.

Any material breaches of BI Code of Conduct must immediately be reported to BI management Corporate Governance/HR, see point 4 below.

BI or by BI chosen third party reserve the right to make announced- or unannounced inspection visits at business partner for audit purposes and expect to get access to premises and personnel.

2. Legal requirements

BI expects our business partner, in all their activities, to follow the national laws in the countries in which they operate. Should any requirement in this Code conflict with the national law in any country or territory, the law must always be followed. BI requirements may go beyond the requirements set out in national law.

3. Ethical, environmental and social requirements

3.1 Health & safety

BI expects its business partner to follow all relevant legislations, regulations and directives in the country in which they operate to ensure a safe and healthy workplace.

The workplace shall be ordered such as the well-being and health of the employees are neither jeopardized nor compromised.

3.2 Workers' rights

Every employee shall be treated with respect and dignity. No use of humiliating or physical punishment is accepted, and no employee shall be subject to physical, sexual, psychological or verbal harassment or abuse.

No employee shall be discriminated against in employment or occupation on the grounds of sex, race, colour, age, pregnancy, sexual orientation, religion, political opinion, nationality, ethnic origin, disease or disability.

All employees have the right to form or join associations of their own choosing, and to bargain collectively.

All employees are entitled to a written employment contract, in the local language, stipulating the employment terms and conditions.

3.3 Forced & bonded labour

We do not accept any forms of forced, prisoned, bonded or involuntary labour in the production of goods or services directly or indirectly for BI.

3.4 Child labour

BI does not accept child labour in any shape or form.

The business partner shall comply with the national minimum age for employment, or the age of completion of compulsory education and shall not employ any person under the age of 15.

3.5 Environment

BI expects its business partner to guarantee that any materials used and products produced do comply with legislation and regulations regarding the protection of the environment. The business partner must have the relevant environmental permits and licenses for its operations.

On request, the business partner shall provide with applicable data for product information, safety datasheets etc.

Waste

Any waste, and in particular hazardous, must be taken care of in a responsible manner and in accordance with local law, and regulation, related to handling, storage, transportation, recycling and disposal.

Chemicals

Chemicals used must be in compliance with applicable environmental laws and regulations in the country of operation.

The business partner shall ensure that workers that purchase, store, handle and use chemicals have the right competence and are adequately trained.

The business partner shall store, handle and transport chemicals in a way that prevents emissions to air, ground and water, prevent risks of ignition/explosion and ensure workers health and safety.

Transportation

BI and its business partners shall actively minimize the logistic impact on the environment, within reasonable means.

3.6 Relation with business partners - Ethics

Corruption

BI has a zero tolerance policy on bribery and corruption. BI shall not offer any business partner, direct or indirect, any rewards or benefits in violation of either applicable laws or reasonable and generally accepted business practice.

Advantages

BI employees must not accept payments, gifts, or any other kind of reimbursement from a business partner or third party that could affect or appear to affect their objectivity in their business decisions.

Confidential information

Employees and/or business partners of BI must never disclose confidential company information to any person outside or within the Company, except with a prior permission from BI. Confidential information includes BI financial and commercial

relationships, offers, strategies, business partner information, information on business partner capacity, sensitive personnel data, information concerning BI and/or the business carried out within BI and which is not generally known outside the company; in other words, has not been published or otherwise communicated by or through BI.

Cartel

BI strongly objects to any association or cartel agreement intended to control market pricing, salary levels or other business aspects normally ruled by an open market.

4. Reporting non-compliance (whistleblowing)

BI Code of Conduct, group directives and operating procedures are intended to prevent and detect improper or illegal activities.

Any breach or suspected serious wrongdoings against BI Code of Conduct, shall by business partners or employees, be reported through our whistleblower system or to below contact persons, open or anonymous:

Whistleblower system:

https://report.whistleb.com/ballingslovinternational (write the address in your browser)

If someone for any reason would rather contact the Group CEO or Chairman of the Board, contact details are as below:

Group CEOBjörn Hauber

Chairman of the Board
Anders Wassberg

<u>bjorn.hauber@ballingslov.se</u> <u>anders.wassberg@stena.com</u> Mobile: +46 730 736 290 Mobile: +46 734 270 801

The whistleblower protection policy creates a safe and confidential environment for business partners and employees to make such reports. This policy governs the reporting and investigation of alleged improper or illegal activities at BI. In accordance with our Code of Conduct we will not tolerate retaliation against a person for making good-faith complaints of improper behaviour.

Confidentiality will be maintained to the full extent permitted by law. All reports are subject to appropriate investigation. It is a breach of the BI Code of Conduct to fail to report a violation or suspected violation that business partners or employees know about or to refuse to cooperate with the investigation of a suspected violation.

Malmö 2021-12-01	
Ballingslöv International AB	
Business partners/employees	Date