

Assemblin Code of Conduct



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Assemblin's code of conduct ("the Code of Conduct") sets out the fundamental ethical principles that guide all decisions and actions throughout the Assemblin Group. A number of other group-wide governing documents are linked to the Code of Conduct, as indicated in the text. All group-wide governing documents are available on the intranet under "Corporate governance".

” This Code of Conduct is intended to be used as a guide when we make decisions and carry out our duties.

Introduction

In order to thrive, Assemblin must have the trust and confidence of the world around us. Only through a high level of confidence can we continue to develop successfully. When we do business, we must do it in a sound and ethical manner. Our goal is to ensure that everything we do as a group is ethically sound, and it is therefore vital that all employees and other relevant parties understand the implications of our Code of Conduct.

This Code of Conduct sets out how we should act in order to gain trust and confidence. This Code of Conduct is intended to be used as a guide when we make decisions and carry out our duties. It is our shared rules which govern how we should act as a business partner, employer, colleague and stakeholder in society.

Our Code of Conduct applies to all Assemblin employees and anyone who represents or acts on behalf of Assemblin (including the management teams and boards of Assemblin Group companies, business partners, suppliers and consultants).

We shall comply with laws and regulations applicable to Assemblin's activities. All Assemblin employees are also expected to have knowledge of and comply with Assemblin's policies, instructions and other governing documents, which form part of our Code of Conduct. Assemblin's governing documents are available on the intranet under "Corporate governance".

This Code of Conduct does not provide all the answers to how you as an employee should act in different situations, so you should not hesitate to consult a colleague or manager if you are unsure.

Two questions to always bear in mind are:

- Could what I am considering doing, saying or writing influence other people's opinion of or confidence in Assemblin?
- What would I think if someone else did what I am doing?

Key starting points

Assemblin must operate in accordance with applicable legislation, in a business-like and ethically appropriate manner and in accordance with our shared values. Assemblin has also chosen to follow the principles of the United Nations Global Compact,

which also serves as an important basis for the content of our Code of Conduct.

★ **The United Nations Global Compact** was established in 1999. The aim was to create international principles concerning human rights, employment law, the environment and corruption for responsible companies. Assemblin is not formally affiliated to the Global Compact, but fully supports the ten principles that it sets out. For more information on the Global Compact, visit www.unglobalcompact.org

Our Code of Conduct sets out minimum levels, which means that it must be followed even if it extends beyond applicable legislation. In the event that any of our business areas or clients apply stricter rules than those set out in this Code of Conduct, we must comply with these rules. Assemblin imposes stringent requirements on business partners that we employ, such as manufacturers, wholesalers and subcontractors. We have a strong commitment to upholding high standards of human rights, rights linked to employment, environmental liability, zero tolerance towards bribery and corruption, etc. We demand the same of our partners.

OUR SHARED VALUES

We can

With the right skills, experience and equipment, we do our job with pride. In this way, we all contribute to satisfying our customers.

We want

Our dedication and curiosity drive us forward. The constant evolution of ourselves as people and our business enables us to create smart and sustainable solutions for our customers.

We care

Together, we do our work with the utmost respect for one another and our customers. We also take responsibility for the environment and society around us.



” Everyone at Assemblin must comply with applicable legislation and act in a business-like manner and in a way which enables us to always be both proud and honest in what we do.

OUR FUNDAMENTAL PRINCIPLES

1. Work environment and safety

Assemblin’s employees are our greatest asset. It is absolutely essential that they are guaranteed safe and secure working conditions. Through systematic work environment management, Assemblin strives to achieve our vision of zero occupational accidents. This goal imposes demands on the organisation itself and on every manager and every employee to lead by example, to think critically, to never “gamble” and to always follow the workplace’s general and safety rules. No task should be started if it cannot be done by people with the right training and the right equipment. We all have not only a personal responsibility for our own safety, but also a shared responsibility for each other. Assemblin urges all employees to speak up and/or to report inappropriate behaviour, risks, incidents and accidents (read more about our whistleblower service at the end of this Code of Conduct).

Our work environment must also be free from discrimination and violations, including violations on the grounds of gender, gender identity, ethnicity, belief, disability, age and sexual orientation. This means, for example, that we have a zero tolerance towards all forms of sexual harassment and bullying. We expect all our employees and business partners to follow these obvious rules.

One challenge facing the construction industry is to increase equality and diversity, which requires both active measures and an inclusive approach. For Assemblin, it is a matter of course that we offer equal pay for equal work and that everyone should have the same opportunities regarding employment, education, promotion and development at work. We are convinced that greater diversity is beneficial for both wellbeing and results

Assemblin aims to offer its employees the best possible work environment. Employees should look forward to going to work and have opportunities to grow, both as a person and in their professional role. Assemblin’s training programmes and structured work with apprentices are part of this.

Of course, workers have the right to join any trade union they wish and to negotiate collectively. Further guidance is available in our *HR Policy*, among other documents, which can be found under the *Corporate governance* tab on the intranet.

SUMMARY

- No task should be started unless it can be completed safely
- We strive to increase diversity and consider discrimination or bullying to be unacceptable
- We wish to be a developing employer that strives to promote wellbeing

2. Good business ethics

Everyone at Assemblin must comply with applicable legislation and act in a business-like manner and in a way which enables us to always be both proud and honest in what we do. We must follow agreements that we have entered into and we require our customers and business partners to do the same.

We must never give or accept bribes, nor do we accept others doing so. A bribe is any form of payment, service, gift or similar that may be perceived to encourage the recipient – a person, company, municipality, government agency or any other organisation – to give the donor or an associate an undue or improper advantage or benefit. You should therefore exercise particular caution regarding gifts and always check in advance what rules apply, both with us and with the recipient/donor. The same applies to travel, participation at conferences, corporate hospitality, etc.

Assemblin does not participate in anti-competitive measures or cooperation. All forms of collusion between competitors regarding prices and terms are both unethical and illegal. We observe the confidentiality of such data and of tender submissions and commercial negotiations. For more guidance, see our *Bribery and Corruption Policy*, which can be found under the *Corporate governance* tab on the intranet.

Assemblin’s physical assets, such as materials and goods, equipment and tools, premises, vehicles, computers, telephones, etc. must only be used as part of Assemblin’s operations and for commercial purposes. The same applies to intangible assets as well as anything that Assemblin leases, subscribes to or borrows. More guidance on using IT tools, such as computers, phones and mobile devices, can be found under the *Corporate governance* tab on the intranet.

Assemblin does not enter into business relationships with operators that are subject to international sanctions, nor do we become involved in money laundering. More information about this can be found in our *Treasury Policy* under the *Corporate governance* tab on the intranet.

Most requirements that apply internally also apply to our business partners. For example, our *Code of Conduct for Suppliers* must therefore always be an integral part of agreements with manufacturers, wholesalers, subcontractors and other business partners. More guidance can be found in our *Purchasing Policy and Related Party Transaction Policy*, among other documents. The Code of Conduct, including relevant policies, can be found on the intranet under the *Corporate governance* tab.

” Alla medarbetare uppmanas att anmäla misstänkta överträdelser av Assemblins Uppförandekod.

SUMMARY

- Lagstiftningen, våra styrande dokument och våra avtal ska alltid följas
- Vi accepterar inte mutor in någon form
- Vi medverkar inte till konkurrensbegränsande samarbeten

3. Communication and information

Assemblin strives to communicate transparently, openly and proactively with all stakeholders, without disclosing confidential or sensitive information that could harm the company, the company's customers or employees. Both insider information and potential insider information must always be handled in accordance with Assemblin's applicable *Policy on Insider Management* and *Communication Policy*.

Assemblin respects the freedom of opinion and expression of all its employees, and considers violations and discrimination to be unacceptable (see Work environment above). The disclosure of data that is detrimental to Assemblin or Assemblin's customers may constitute a breach of the loyalty obligation stipulated in the employment contract. The loyalty obligation means, among other things, that the employee must respect the employer's interests and cannot talk about his employer in any way.

★ **Remember that the loyalty obligation applies in all situations – not just during working hours, but also outside work. You must therefore not disclose information which could harm Assemblin or Assemblin's customers as a private individual on social media.**

Only designated spokespersons have the right to speak on behalf of Assemblin and express the company's official views externally.

For more guidance, see also Assemblin's *Communication Policy*, which can be found under the Corporate governance tab on the intranet.

SUMMARY

- Sensitive information about our business, terms and conditions and customers must be treated confidentially
- We respect every employee's private freedom of opinion and expression, but expect the loyalty obligation to be respected
- Only designated spokespersons have the right to express the company's official views externally

4. Environment

Assemblin strives to prevent and continually reduce any negative impacts that the company's operations may have on the environment. We shall carry on our business in an environmentally sustainable manner and shall comply with or exceed the requirements laid down in laws, regulations and international agreements concerning the reduction of emissions and discharges into the atmosphere, land and aquatic environment.

Assemblin's operations and services must be formulated so as to ensure that energy, natural resources and raw materials are used efficiently and so that the volume of waste and residual products is minimised. Assemblin shall avoid materials and methods that are unproven or that pose risks to the environment when other alternatives are available and appropriate. For more guidance, see Assemblin's *Sustainability Policy*, which can be found under the *Corporate governance* tab on our intranet.

SUMMARY

We will carry on our business in an environmentally sustainable manner by minimising resource consumption and avoiding environmentally hazardous materials and methods

5. Breach of the Code

All employees are encouraged to report suspected breaches of Assemblin's Code of Conduct or other governing documents within the Assemblin Group. All employees are expected to report crimes committed by an employee or representative of Assemblin.

These may be reported to a senior manager, Assemblin's general counsel or communications director or via Assemblin's whistleblower service, which can be found on the intranet under the HR & payroll tab. Your information will be processed completely anonymously.

All reports are taken very seriously and investigated. Assemblin will not accept any negative consequences for persons who have reported suspected breaches in good faith.

A verified breach may result in disciplinary measures, including termination of employment or the termination of a cooperation agreement. In view of the fact that the content of this Code of Conduct is to a certain extent regulated by law, infringements may also be subject to further sanctions, in addition to that provided for in this document.