

# Nynas Code of Conduct

## Purpose and scope

The purpose of the Code of Conduct is to set out the basic rules, fundamental standards and ethical framework which Nynas expects all its employees and partners to commit to, respect and act in accordance with. Nynas also endeavors to work with partners who already adopt similar values and ethics.

In this document “Nynas” means Nynas AB and the companies in which it directly or indirectly owns a controlling share. “Nynas partner” means a supplier, consultant, agent, contract party or distributor of the company.

This document is a summary that covers all of Nynas Code of Conduct policies. It should be noted that Nynas has detailed policies for all areas below that cover the procedures and regulations applicable for our employees.

## Responsibilities

All Nynas employees shall act in accordance with and in the spirit of this code and associated documents while carrying out company business. Any employee who fails to comply with this or is aware of conduct and fails to correct or report it will be fully investigated and appropriate action taken.

This may include re-training, disciplinary action and in the case of serious violations dismissal from the company.

If Nynas personnel are aware of any employee who is involved in acts breaching this code, they are instructed to report such conduct without delay. Nynas strictly prohibits retaliation against anyone for raising or helping to address this type of issue.

## Trade and Competition

We compete fairly and ethically within the framework of applicable competition law, and respect the right of others to compete with Nynas. We respect rules on trade such as import or export control and sanctions in the different countries where Nynas is active. International sanctions could come into force from time to time, which may conflict with local legislation. If there are any doubts about the effects of this with regard to Nynas or its partners, Nynas Legal should be consulted. Any communication of possible breaches of competition law shall be reported as set out in Policy Competition Compliance. >

## **Health, Safety, Security, Environment and Quality (HSSE&Q)**

Nynas promotes a strong and positive HSSE&Q culture in all our businesses and markets. We comply with both applicable regulatory and internal requirements as documented in our management system. We strive constantly to improve the HSSE&Q performance by optimising the efficiency of our activities and use of resources, and minimising the risk of major and minor accidents as well as harm to people's health and the environment. We have an open dialogue with employees, customers, suppliers and the rest of society about the company's environmental work.

## **Anti-Bribery and Anti-Corruption**

Nynas and its employees shall at all times operate in an independent manner with integrity both at the personal level and for the company as a whole. We will not authorise, pay, promise or offer to give anything to employees of existing or prospective customers, suppliers, other external parties or government bodies in order to improperly influence individuals to act favorably towards Nynas. Neither will we ask or authorise third parties to make any such payment, promise or offer. In the same way, Nynas employees shall not accept cash, gifts or other benefits from a supplier, customer or other external party that has a relationship with Nynas which could improperly influence their decisions. Such behaviors constitute bribery and are not only unacceptable business conduct wherever Nynas operates but are usually also illegal.

## **Conflict of Interests**

Any representative of Nynas shall protect the interests of the company and avoid putting themselves in situations where personal, family or financial interests may conflict with Nynas. Except for smaller non-controlling shareholdings in publicly listed companies, conflicts of interest include an employee or his/her family member having a financial interest in competitors, current or prospective suppliers, and other parties with which the company conducts business. Conflicts of interest also arise when an employee uses or shares confidential information obtained through his/her employment at Nynas for financial gain. If an employee has a conflict of interest this should be reported to his/her supervisor and the legal department for advice on how to mitigate the conflict of interest. The employee must not participate in any decision or preparation of a decision involving a conflict of interest.

## **People and Human Rights**

We always try to be fair and objective in our advice and actions, and we shall never be influenced in our decisions, actions or recommendations by issues of gender, race, creed, colour, age, political views or any other areas of possible discrimination. Nynas shall at all times comply with basic rules for human rights.

## **Financial and Asset Protection**

Nynas aims to provide correct and accurate information to its shareholders. Nynas shall comply both with accounting and financial reporting rules and regulations that apply in the jurisdiction in which the company operates, and with any international rules and regulations that may apply. All Nynas employees shall act within the limits of their authorization and maintain the required records and company accounts for means of audits and financial reports. Exceptions can only be made in the event of emergency measures to protect life and property.

## **Information Management**

All employees should record, keep and file information relevant for the business in a way that ensures that all business transactions are properly accounted for. Business secrets and confidential information of Nynas or others shall be kept confidential. No personal or individual information shall be assembled, disseminated or disclosed except when it is necessary and always in accordance with applicable laws.

All Nynas employees shall take special care in their written communication, including posts on social websites and comments that may bring Nynas into disrepute. All written communication shall be in line with the code of conduct and reflect the Nynas values. Communication with external audiences e.g. the media, shall be managed through the Communications Department and/or appointed company spokespersons.

