

# Code of conduct

Storskogen Group





## The Code of conduct – our guidance

Storskogen is an international group of companies that owns and develops small and medium-sized enterprises. Through our operations, we impact the lives of many people and strive to create positive value for business, society and the environment. Our **Code of conduct** is a guide to help us make responsible and ethical decisions in our daily work.

As an employee or representative of Storskogen, you are personally responsible for understanding and following this Code. By acting in accordance with our core values – **entrepreneurship, respect, long-term thinking** and **professionalism** – and fulfilling the commitments outlined in the Code, we strengthen Storskogen's reputation. This helps maintain the trust of our customers, employees, and other stakeholders.

By upholding these principles, we can continue to develop and achieve our vision, where we help our companies to grow and develop in a sustainable and long-term way.

**Christer Hansson, CEO**  
*Storskogen Group AB (publ)*

# About the Code of conduct

Our Code of conduct (the Code) describes how we, as employees and representatives of Storskogen, are expected to act and conduct our business. It clarifies what is expected from employees and business partners, and what our stakeholders can expect from us as a company. We take any breach of this Code seriously, and violations can lead to disciplinary action, including dismissal.

The Code applies to all Storskogen employees worldwide, regardless of their role, and all are responsible for reading, understanding, and adhering to it. As a Storskogen manager, you are also responsible for communicating this Code to your team and ensuring it permeates the way you do business. You must lead by example and provide necessary information and training to your team.

All Storskogen subsidiaries are bound by the Code, and our suppliers and business partners are expected to adhere to the **Code of Conduct for Suppliers**. Compliance with these principles is a key factor when selecting and evaluating our business partners.

Do you have questions about the code? Please contact Storskogen at [code@storskogen.com](mailto:code@storskogen.com)



# In society

Respect for  
human rights

The Code of conduct takes into account  
all stakeholders in the world around us

# On the market

Fair competition

# At work

Healthy and safe  
work environment



# Storskogen Code of conduct

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# Our principles



We act with **honesty, respect, and integrity** in all our business operations and working relationships. We comply with applicable laws and Storskogen's policies. Each individual takes personal responsibility for their actions and is encouraged to seek advice if uncertain.

Storskogen actively supports human rights and conducts its business in a socially responsible manner in accordance with international guidelines, including the UN Global Compact, ILO Core Conventions, and the OECD Guidelines for Multinational Enterprises. These principles are integral to our identity and are reflected in this Code.

## The Code of Conduct's relationship to laws, regulations and other policies

Storskogen must comply with applicable laws and regulations in all countries where Storskogen's companies operate, as well as existing policies within each company in Storskogen.

In some situations, for example in countries with weak legislation or control, the requirements of the Code of Conduct may be more stringent than local laws and customs.

In these cases, we should always follow this Code of Conduct and our own principles. Vice versa applies where the local legislation or regulations are stricter than our Code. Likewise, the subsidiaries are free to apply a stricter code than this Code of Conduct.

### Guiding principles:

- FN Global compact
- ILO Core conventions
- OECD Guidelines for multinational enterprises

## Your guide to making the right decisions

Our Code of Conduct does not cover every conceivable situation, law, or internal policy. However, it provides examples and guidance on how to act in specific cases. In case of uncertainty, it's important to use your common sense and ask yourself the following questions:

- 1. Is this consistent with our Code of conduct, policies, and applicable laws?**
- 2. Is this in line with our core values and our ethical guidelines?**
- 3. How would this be perceived by colleagues, customers, and other stakeholders, both inside and outside Storskogen?**
- 4. Could this damage Storskogen's reputation or trust?**

If you still feel unsure about how to act, you should consult with your manager, compliance officer or HR.

In situations where local laws or customs deviate from our principles in the Code of conduct, you should always consult Storskogen's Compliance officer for guidance. You can do this by emailing [code@storskogen.com](mailto:code@storskogen.com)



# At work

Healthy and safe  
work environment



# Healthy and safe work environment

All employees at Storskogen have the right to a safe and healthy work environment. That's why we work with a **zero vision** for work-related accidents, which means that no one should be injured at work. To achieve this goal, we prevent, minimize and address safety and health-related risks, while actively promoting employee well-being.

Every individual has a responsibility to contribute to a safe work environment by complying with current health and safety regulations. Managers are responsible for ensuring that employees and subcontractors receive the training and safety equipment required to work safely.

## Remember!

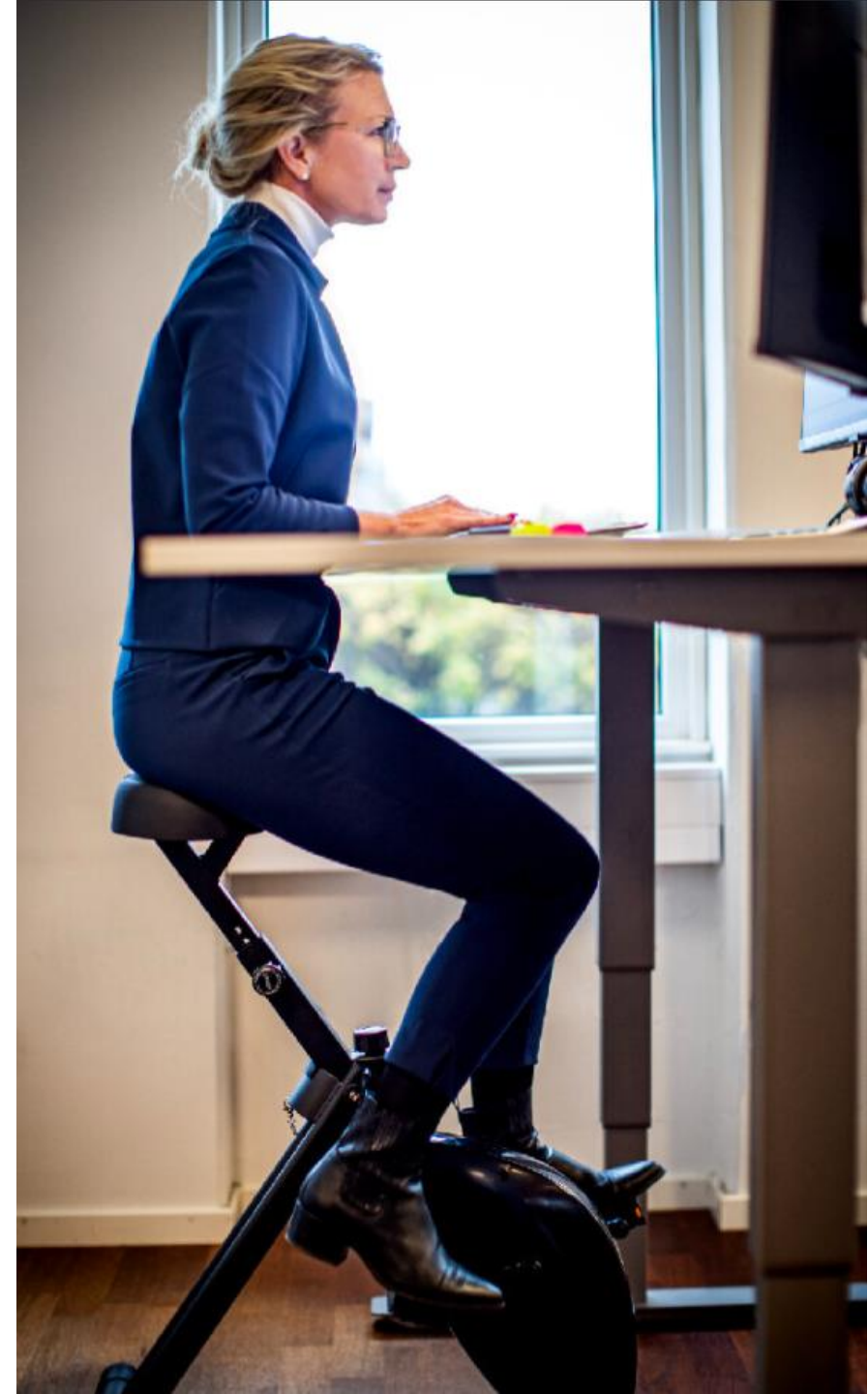
- Take personal responsibility for your health and safety.
- Immediately report risky situations, accidents, work-related injuries and illnesses.
- Consult your manager or manager responsible for work environment if you are unsure about how you should act.

## Example

- Promote a safe work culture by questioning or stopping potentially risky activities.
- Always use safety features and the right protective equipment when working.
- When employing young people (over 15 but under 18 years of age), ensure that they do not perform dangerous tasks and that the legislation for young workers is followed.
- Avoid working under the influence of alcohol, drugs, or inappropriate use of medications.
- Ensure that colleagues, subcontractors and visitors are aware of and comply with relevant safety rules.

## Read more

Storskogen's Work Environment Policy





# Employee training and development

Storskogen is committed to being an attractive employer by promoting a workplace that values continuous learning and skills development.

We support employees' professional development through focused training and development programs, designed to effectively meet industry demands and potential workforce challenges.

Our goal is to create a supportive environment where every team member has the opportunity to develop and succeed.

## Remember!

- Engage in offered educational opportunities to develop your skills and competencies.
- Share your knowledge and experience to support colleagues' learning and development.

## Example

- Participate in internal and external training programs offered by Storskogen.
- Discuss your career goals and development needs with your manager to identify relevant development opportunities.



## Open & respectful workplace

At Storskogen, we work to create a fair and inclusive workplace where all employees are treated with dignity and respect. We promote a culture where everyone is encouraged to participate and express themselves openly. We do not accept any form of harassment, threats, bullying or inappropriate behaviour in the workplace.

## Equal opportunities and non-discrimination

We value **diversity** and strive to help all our employees reach their full potential. Recruitment, selection, assessment and promotion are always based on **objective criteria**. We do not discriminate a person based on gender, marital status, family situation, ethnic or national origin, sexual orientation, religious beliefs, political affiliation, age, disability, or any other category protected by law.

Storskogen is committed to creating a work environment where everyone has the same opportunities to develop and feel included.



### Remember!

- Always show respect to those you meet at work.
- Base employment decisions on objective criteria such as education, previous experience and qualifications.
- Avoid behavior that could be perceived as offensive or discriminatory.

### Example

- Keep in mind that humor can be perceived differently by different people. Avoid jokes or sharing material that may be perceived as offensive.
- If you see inappropriate behavior, report them immediately or report it to your manager.

### Read more

Further information about Storskogen's policies and processes can be found in the Policy for Gender equality and diversity.

## Fair working conditions & compensation

Storskogen applies fair working conditions for all employees and complies with national and international labor standards. Salaries, benefits, and remuneration are competitive, fair, and in line with legal standards. We conduct regular pay surveys to identify and address any pay gaps, including those related to gender.

## Freedom of association

We respect each employee's right to decide whether to join or form a trade union. We recognize the right to collective bargaining and the freedom to renounce union membership. Storskogen strives to create an environment where all voices are heard, and rights are protected.

### Remember!

- Managers should be clear and transparent when informing about changes that affect employees' employment or working conditions.
- Fair working conditions include respect for human rights, which we develop further in the section "Human Rights."

### Example

- Respect the right of employees to form and participate in any union of their choice without fear of reprisals. Never discriminate against anyone because of their union affiliation.
- Do not prevent union representatives from carrying out their duties according to law.
- Conduct regular salary surveys to ensure fair and equal pay.





## Company assets

Storskogen's assets may only be used for the company's operations in accordance with our policies. Each of us has a responsibility to protect and manage company assets responsibly and sensibly, so that they are not lost, misused, or destroyed. This applies to both physical assets such as computers and vehicles, but also intangible assets such as patents, trademarks, copyrights, designs and domain names. We will protect our intellectual property rights and ensure that they are used correctly and lawfully.

## Bookkeeping & accounting

All accounting within Storskogen must be correct and transparent. Financial transactions must be accounted for in a manner that is not misleading, and in accordance with our internal accounting standards and applicable laws and regulations.

### Example

- Never use the company's assets or equipment, such as computers or mobile phones, for illegal or inappropriate activities that could damage Storskogen or its reputation.
- Ensure that any material, such as images or text, that you download from the internet or through a third party, is used in a legal manner and with proper licensing.
- Never share Storskogen's confidential information with any third party without proper approval and ensure that the necessary confidentiality agreements are in place.
- Record all business transactions correctly and in accordance with our accounting rules.
- Do not distort the purpose or terms of transactions with business partners.



## Information security

Information is one of our most valuable assets and must be carefully protected. Confidential information includes all information that is not publicly available, such as trade secrets, marketing plans, product development information, employee information, and financial data. We must actively protect this information from loss, misuse or disclosure. To ensure that information is protected correctly, we follow Storskogen's standards for information management and information classification.

## Privacy & personal data

We respect everyone's privacy and handle personal data responsibly, in accordance with applicable laws. Storskogen collects, processes and stores personal data from customers, employees and other third parties only for legitimate business purposes, and we protect this data against unauthorized access or dissemination.

### Example

- Use caution when discussing company business or handling confidential information in public places.
- Protect sensitive data in accordance with Storskogen's guidelines for information security.
- Be wary of emails with unusual links or attachments from unknown senders, as they may be phishing attempts.
- Never share company information on social media or other online platforms without proper permission.
- Please ensure that personal data is processed in accordance with applicable consent or agreements.

### Read more

[Storskogen's IT-policy](#)



# Cybersecurity

We are committed to protecting Storskogen's information and systems against cyber threats.

This includes ensuring that all sensitive information is handled securely and that we are following our internal cybersecurity guidelines.

Employees should be aware of and follow security procedures to protect company assets, including software, hardware, and network infrastructure.



## Remember!

- Always use strong passwords and change them regularly.
- Be careful of emails and attachments from unknown senders; Don't click on links or open attachments without verifying the sender.
- Immediately report suspicious activities or security incidents to the IT Manager.

## Example

- **Situation:** You receive an email with an attachment from a sender you don't recognize.  
**Correct action:** Do not click on the attachment. Instead, check the sender's email address and contact the IT Manager if you are unsure about the authenticity of the message.
- **Situation:** You receive a request to reset your password via an email link that seems suspicious.  
**Correct action:** Go to the company's login page directly through the browser instead of clicking the link in the email. Report the request to the IT Manager.
- **Situation:** You notice that your computer is running slowly and is getting pop-up messages about security issues.  
**Correct action:** Turn off your computer and report the problem to your cybersecurity IT Manager to help ensure that no malware has been installed.



# Travel

When we travel for work on behalf of Storskogen, we must do so in a safe, efficient and responsible manner.

During travel, we represent Storskogen and are expected to behave in a way that upholds the company's values and reputation.

It is also our responsibility to protect the company's assets and information during the journey.

## Example

- Always review travel information and notifications to stay informed about the safety situation at your destination.
- Handle corporate documents and sensitive information with care, especially in public spaces or when using public Wi-Fi.





# On the market

Fair competition

# Fair competition

Storskogen is committed to competing fairly for new business, always in compliance with competition laws.

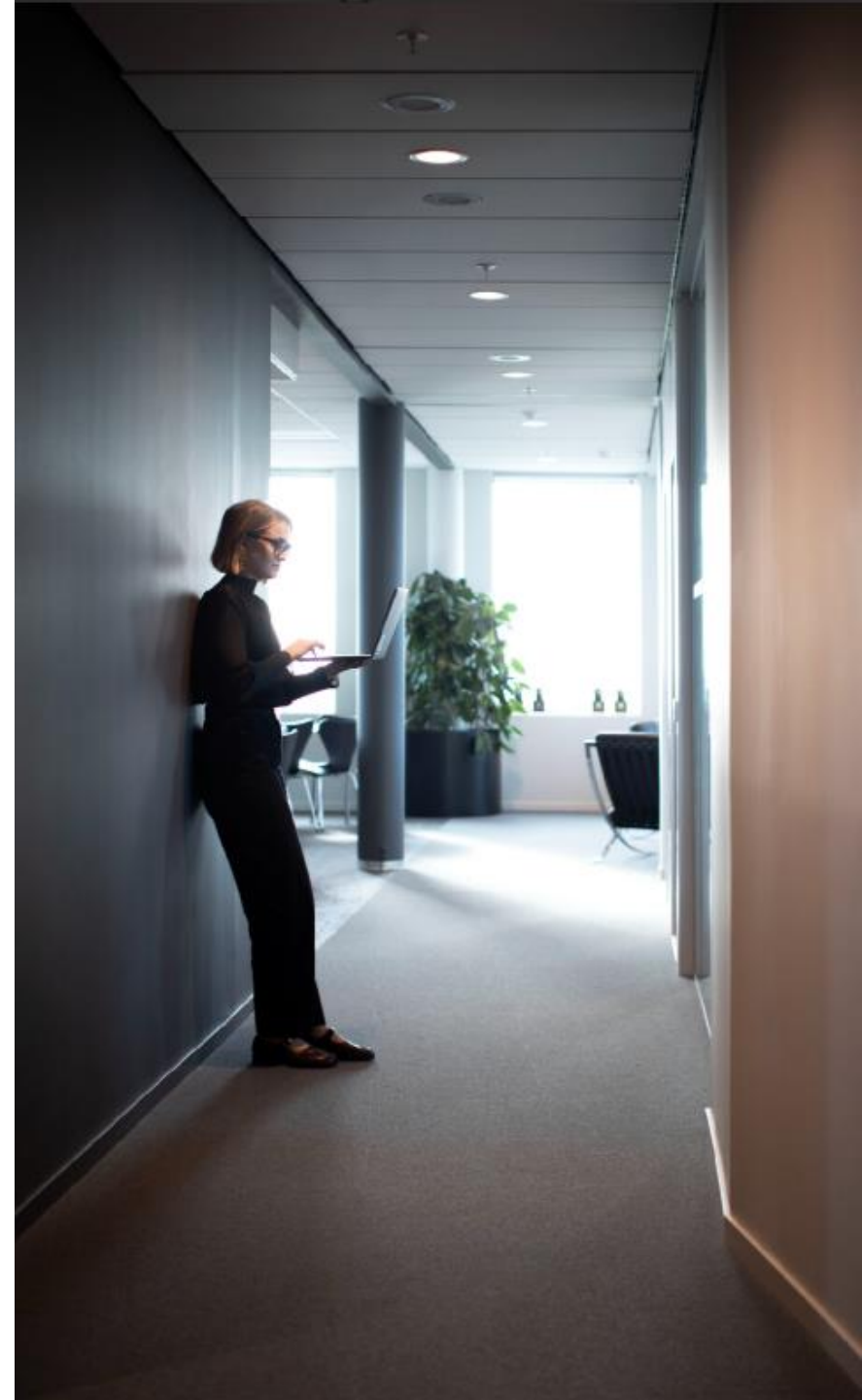
These laws, commonly known as antitrust laws, prohibit agreements or practices between competitors that restrict competition. This includes activities such as price-fixing, dividing customers or markets, bid-rigging, or abusing a dominant market position.

## Remember!

- All employees are responsible for understanding and complying with the competition laws of the countries in which we operate.
- We must never enter into illegal agreements with competitors that restrict free and fair competition.
- Violation of competition laws and regulations can seriously damage Storskogen's reputation. It can also lead to significant fines, as well as criminal and civil liability for the employees involved.

## Example

- Never share information with competitors regarding prices, customers or markets.
- Avoid entering into contracts or agreements with competitors that divide markets or customers.
- Ensure that your participation in trade associations or networks complies with competition law.





# Conflicts of interest

Our business decisions should always prioritize Storskogen's best interests. To ensure this, we must avoid situations where a conflict of interest could arise. If we become aware of an actual or potential conflict of interest, we must report it immediately.

A conflict of interest occurs when our personal interests, relationships, or activities outside Storskogen affect, or appear to affect, our ability to make objective decisions in the company's best interest.

## Remember!

- Managers have a special responsibility to ensure that employees do not participate in decisions where there is a conflict of interest.

## Example

- Avoid investments, interests, or activities that could raise doubts about your impartiality or loyalty to Storskogen.
- Always maintain professional relationships with business partners. Do not involve friends or family in business decisions and never give them preferential treatment.
- Employees with close personal relationships or family ties should not report directly or indirectly to each other.
- Inform your manager of any potential conflicts of interest as soon as you become aware of them.

## Read more

Storskogen's Anti-corruption policy

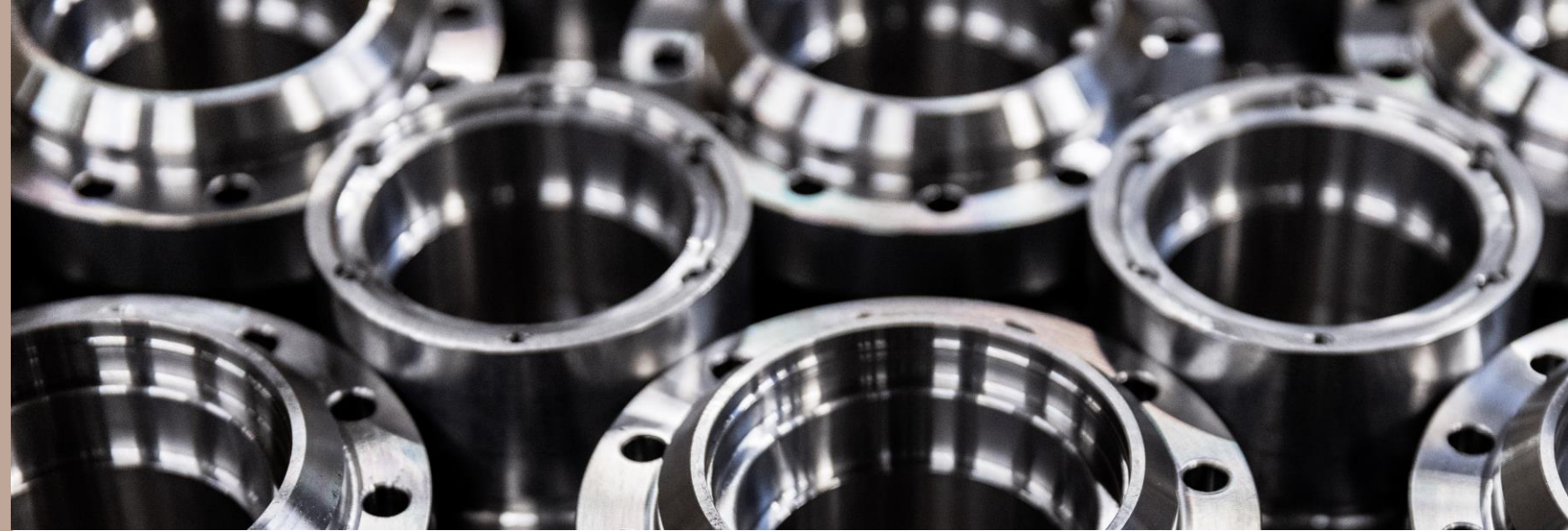


# Insider information

Insider information refers to non-public information that could influence the price of Storskogen's financial instruments, such as shares.

We are committed to complying with all applicable insider trading laws and regulations. This means that we must never share insider information with third parties, including friends or family.

Employees with access to insider information are prohibited from buying or selling Storskogen's shares, or advising others to do so, based on that information.



## Remember!

- Never share insider information with anyone, including family or friends.
- Never use insider information to buy or sell Storskogen's shares.
- Violations of insider information laws can damage Storskogen's reputation and result in criminal and civil liability.

## Example

- If you have access to sensitive financial information that has not been made public, that information may qualify as insider information. You may not trade Storskogen's shares until the information is made public.



# Products and safety

Storskogen strives to deliver high-quality products and services with the utmost focus on safety.

Our products and services must always comply with applicable safety laws and regulations.

We conduct regular safety inspections to ensure that our products meet safety standards and comply with relevant regulations.

## Remember!

- All products must meet the relevant safety requirements in accordance with applicable laws and regulations.
- Distributors and partners are responsible for ensuring that the products placed on the market comply with all safety and labelling requirements.
- We aim to offer products that not only meet safety standards but also support our sustainability goals.

## Example

- All new products must undergo testing and inspections to ensure they meet safety requirements.
- If a safety risk is identified in a product, it must be reported immediately so that necessary actions can be taken.

## Read more

Deepen your knowledge by reading our sustainability principles in the Sustainability policy.





# Responsible sourcing

Through responsible sourcing, we build sustainable relationships with our suppliers, vendors, and subcontractors.

Our purchasing decisions are always based on fair and objective criteria, and we expect our partners to meet the requirements outlined in Storskogen's Supplier Code of Conduct, which includes ethics, human rights, working conditions, and environmental considerations.

## Remember!

- Ensure that all purchasing decisions are based on fair, transparent and objective criteria.
- All suppliers and subcontractors must comply with our ethical and environmental standards.

## Example

- Select suppliers who meet sustainability and environmental standards and are transparent about their working conditions.

## Read more

[Storskogen's Code of conduct for suppliers and Sustainability policy](#)



# Marketing methods

We market and promote our products and services responsibly, adhering to relevant marketing laws, product regulations, and industry standards.

This means that the information we provide about our products is accurate, clear, and not misleading.

Our marketing practices also uphold ethical standards and comply with the laws of the countries in which we operate.



## Remember!

- Ensure all marketing is honest, transparent, and not misleading.
- Verify that all product information and marketing comply with applicable laws and regulations in each country where we operate.
- Always adhere to Storskogen's ethical guidelines when communicating with customers and the market.

## Example

- **The right way:** When promoting a new product, provide accurate information about its features and benefits without exaggerating or making misleading claims.
- **Wrong way:** Claiming that a product has features that it doesn't have, or that it meets standards that haven't been verified.

# Trade sanctions and export restrictions

Storskogen conducts its business in full compliance with applicable trade laws and regulations, including sanctions and export restrictions that apply to certain products, individuals, companies, or countries.

We ensure compliance by strictly adhering to relevant international and national regulations to avoid any violations.

## Remember!

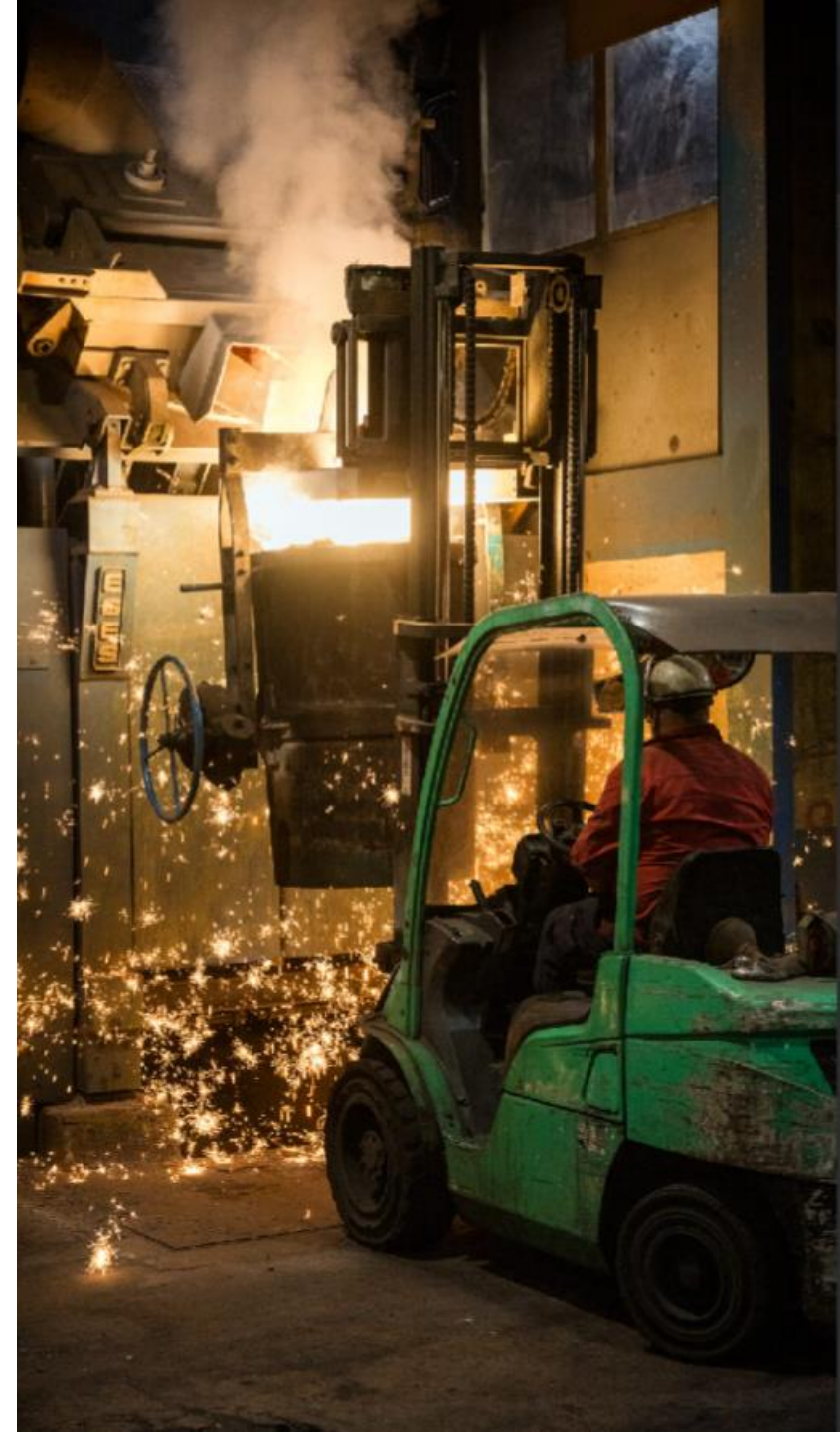
- Always verify current trade sanctions or export restrictions that may impact business dealings with certain countries, companies, or individuals.
- Comply with all relevant trade laws, including sanctions and export restrictions, and contact Storskogen's Compliance Officer if you are uncertain about specific regulations.
- Trading with sanctioned parties can damage Storskogen's reputation and result in legal consequences.

## Example

- **The right way:** When negotiating with a new business partner, screen the company and its owners against relevant sanction lists.
- **Wrong way:** Entering into an agreement with a company from a sanctioned country without conducting a thorough check of the applicable rules and prohibitions.

## Read more

For detailed guidelines on how we comply with trade sanctions and export restrictions, refer to Storskogen's **policy on sanctions and export control**. It outlines our approach to adhering to applicable laws and regulations in our business relationships and transactions, with a focus on protecting both Storskogen and our partners.







# In society

Respect for  
human rights



# Respect for human rights

We support and respect internationally recognized human rights wherever we operate. Guided by the UN Guiding Principles on Business and Human Rights, we continuously assess the impact of our products, operations, and business relationships on human rights. We take proactive measures to prevent any violations of these rights.

We do not tolerate any form of forced labor and strictly prohibit physical punishment, deposits, or the confiscation of identity documents.

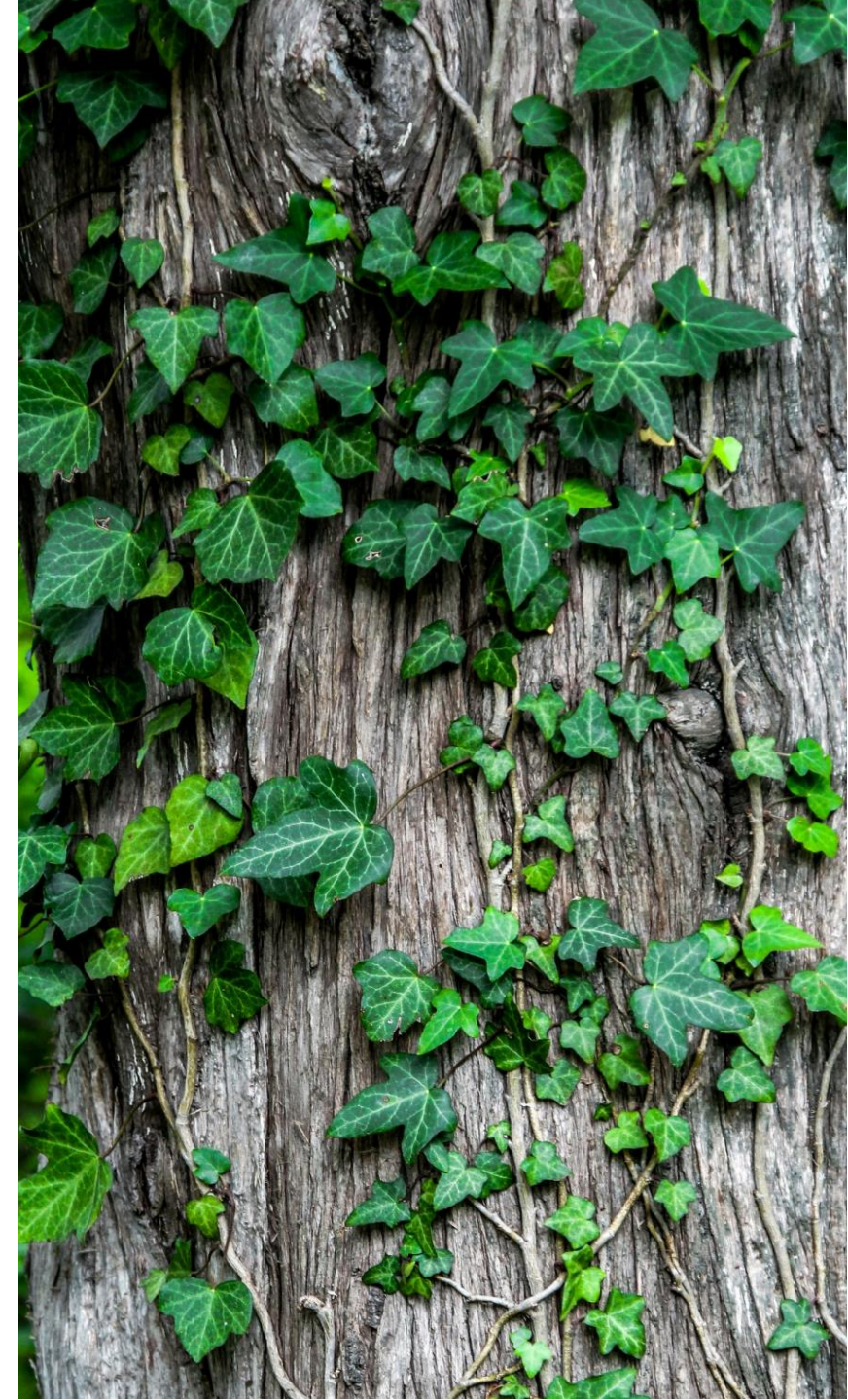
Employees should never be required to pay fees related to their employment, and they always have the right to terminate their employment in accordance with applicable laws or contracts.

## Example

- Treat suspected or actual human rights violations with the utmost seriousness and ensure that the issue is addressed promptly and thoroughly.
- When working with recruitment agencies or subcontractors, verify that their employees have valid work permits and ensure the agencies comply with applicable labor laws, including regulations concerning compensation and benefits.

## Read more

For a deeper understanding of our human rights obligations and guidelines, read about the **UN Guiding Principles on Business and Human Rights (UNGPs)** and **the International Labour Organization (ILO) core conventions** and international labor standards.





# Children's rights

We recognize the need for special protection and respect for children's rights and are committed to supporting these rights in our operations and the communities where we operate.

Child labor or any form of child exploitation is absolutely unacceptable in our operations and value chain.

We strictly adhere to applicable national laws and international standards regarding the minimum age for employment. When our activities impact children, we ensure that their best interests are always prioritized.

## Example

- Ensure that you understand the applicable minimum age requirements by law before hiring anyone under the age of 18.

## Read more

To understand our obligations and commitments regarding children's rights in business, read the **Children's Rights and Business Principles**.

See also **Storskogen Code of conduct for suppliers**.







## Responsible taxpayer

Storskogen is committed to complying with all applicable tax laws and regulations in the countries where we operate.

As a responsible taxpayer, we aim to ensure that our tax obligations are transparent and ethical. We do not engage in unethical tax planning, or any activities aimed at evading taxes illegally. In line with the **OECD Guidelines for Corporate Taxation**, we conduct **country-by-country reporting** to enhance transparency around our tax commitments.

By adhering to these principles, we contribute to societal development and uphold the trust of our stakeholders.



# Bribery and improper benefits

We are committed to combating corruption in all forms and do not tolerate bribery or improper benefits in our operations.

This means that we do not offer, accept, solicit, or receive gifts, payments, or other benefits that may influence, or appear to influence, the objectivity of business decisions. This also includes payments made to expedite administrative processes or routine tasks. Stricter rules apply to interactions with public officials.

We provide gifts and hospitality in a legal and transparent manner, and only when they are appropriate and align with legitimate business relationships. We do not give or accept anything that could create a conflict of interest or raise doubts about our integrity.

## Remember!

- Never give or accept gifts that can be perceived as attempts to influence decisions.
- Ensure that all gifts and hospitality are offered and received in an open, transparent, and business-like manner.

## Example

- **Situation:** A supplier offers a valuable gift in connection with the signing of a new contract.  
**Correct action:** Politely decline the gift and inform the supplier that Storskogen does not accept gifts that could influence business decisions.
- **Situation:** You are considering inviting a customer to an event to foster business relationships.  
**Proper Conduct:** Ensure that the invitation serves a clear business purpose, complies with our representation rules, and is reported according to the guidelines.
- **Situation:** An official offers faster processing of an application in exchange for a payment.  
**Correct action:** Decline the offer and immediately report the incident to your manager or through the whistleblower system.
- **Situation:** You are participating in a third-party event and are offered to have your stay and travel expenses paid by the organiser.  
**Proper Conduct:** Always pay for your stay and travel expenses yourself when participating in third-party arrangements to avoid conflicts of interest.

**Read more:** Storskogen's Anti-corruption policy **Education:** Anti-corruption training



# Anti-money laundering

To protect Storskogen's assets and reputation, we must ensure that our revenues are always legally earned.

Money laundering involves concealing or disguising proceeds from criminal activities to make them appear legitimate.

We fully comply with strict global regulations and national anti-money laundering laws, implementing the necessary processes to identify and prevent such activities.

## Remember!

- Identify and verify all business partners before starting a new business relationship.
- Be vigilant of unusual payment methods, large cash transactions, unexpected transfers, or transactions that seem suspicious or lack clear business rationale.

## Example

- **Situation:** You discover an unusual payment from a business partner that does not match the agreed amount.  
**Correct Action:** Decline this payment and report suspected money laundering to your manager or to the person appointed as the company's compliance officer to investigate any irregularities.
- **Situation:** A customer requests to make payments through multiple accounts or in small amounts to avoid scrutiny.  
**Correct action:** Reject the request and report suspicions of money laundering to your manager or to the person appointed as the company's compliance officer.
- **Situation:** You're asked to transfer funds to a country unrelated to the transaction.  
**Correct Action:** Be cautious and contact your manager or the person appointed as the company's compliance officer to review the payment and ensure that everything is in line with our policies.

**Read more:** [Storskogen's Anti money laundering policy](#)





# Environmental responsibility

Protecting the environment is central to everything we do. We assess our environmental impact throughout the entire lifecycle of our products—from the responsible sourcing of raw materials to resource-efficient production, development, and optimized waste management.

We actively work to continuously reduce the environmental footprint of our products and services. Our innovations aim to deliver sustainable solutions that are safe, resource-efficient, and environmentally responsible.

## Example

- Approach your daily tasks with environmental responsibility in mind. Aim to reduce waste and optimize resource use in every step of your work.
- Follow our guidelines and local laws to ensure the safe handling and transportation of waste, chemicals, and other hazardous substances to protect the environment.

## Read more

Storskogen's **Sustainability policy**.



# Communication

We strive to communicate professionally and transparently, while respecting the confidentiality of company information.

All communications, whether internal or external, should be conducted with care and integrity.

When communicating online or through social media, it is important to maintain the company's credibility and comply with our policies.



## Remember!

- You are personally responsible for everything you post online.
- If you represent Storskogen on social media, ensure that you follow the company's policies and make it clear that any personal opinions are your own.

## Example

- If you identify yourself as an employee of Storskogen on social media, clarify that your statements are personal and not on behalf of the company.
- Don't share sensitive or protected business information online without proper approval.

## Read more:

**Guidelines for communication for Storskogen's business units**

# Community involvement

Storskogen has a strong local presence, with many businesses situated in smaller towns.

We are actively engaged in community initiatives and collaborate with organizations whose vision and goals align with Storskogen's values.

By leveraging local expertise and participating in community projects and sponsorships, we aim to make a sustainable impact in the communities where we operate.

## Remember!

- Ensure that funds are used for their intended purpose in sponsorship or donation initiatives.
- Choose carefully which organizations we work with to ensure they align with our values and goals.

## Example

- Select community projects or organizations that share Storskogen's values and work for a sustainable development.
- Ensure that all community projects you engage in represent Storskogen positively and support long-term objectives.





# Political activity

Storskogen maintains political neutrality and does not engage in lobbying or political funding.

We prohibit political donations and all other forms of support to political parties or candidates. No resources, names, or assets belonging to Storskogen or its subsidiaries may be used to promote political interests.

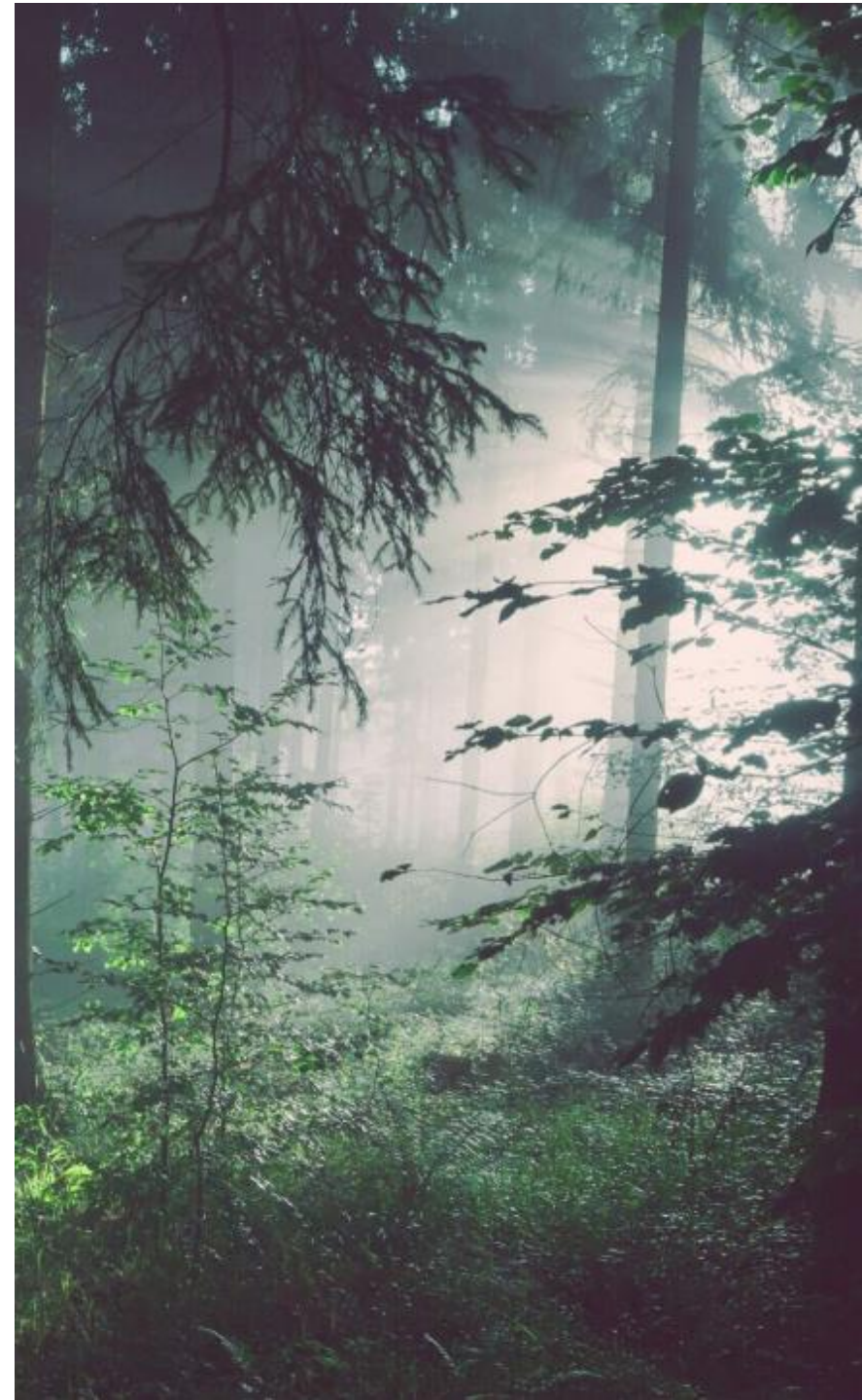
We do not contribute to political campaigns or parties, either directly or indirectly, and do not participate in activities that could be perceived as lobbying.

## Remember!

- Do not use the company's assets for personal support of political candidates or parties.
- Do not create the impression that you are speaking on behalf of Storskogen or that the company supports your personal political views when participating in private political activities or discussions.

## Example

- **Situation:** An employee wants to use the company's premises to arrange a political meeting.  
**Right action:** Politely decline the request and inform that Storskogen does not allow the use of its resources for political purposes.
- **Situation:** A political candidate asks for financial support from Storskogen in a local election campaign.  
**Correct action:** Inform that Storskogen does not give any contributions to political parties or campaigns and report the request to your immediate manager.





## Report a potential breach of the Code of conduct

Each of us is responsible for upholding the integrity and reputation of Storskogen.

Storskogen fosters an open and honest culture where all employees can report suspected violations of the Code or applicable law in good faith.

You can raise concerns with your manager, HR manager, your union/labor council representative in accordance with locally established complaint processes or email [code@storskogen.com](mailto:code@storskogen.com). You can also use Storskogen's whistleblower function, which is managed by a third party, to raise your problem in confidence. The report can be made anonymously to the extent permitted by national law.

Storskogen will investigate reported violations and take appropriate measures. Information provided during investigations will be kept confidential unless disclosure is required by law or if the matter relates to a criminal act.

We do not accept discrimination or retaliation against any employee who reports a breach in good faith. Retaliation is a serious violation of the Code and will result in disciplinary action including termination.

Similarly, an employee who knowingly provides false or incorrect information will be subject to disciplinary action.

Reporting webpage: Instructions on how to report a breach  
<https://report.whistleb.com/storskogen>.



# Definitions

**Accounting fraud** Deliberate misstatements or manipulations of a company's financial statements to misrepresent its financial position.

**Bribes** Offering, promising or accepting something valuable for the purpose of unduly influencing a decision or action.

**Child labour** Work that is mentally, physically, socially or morally harmful to children, and that prevents children from getting an education or inhibits their development. It also includes work that threatens the health or safety of children. The definition follows international guidelines such as the UN Convention on the Rights of the Child and ILO Convention No. 138 on Minimum age.

**Code of conduct for suppliers** Rules and guidelines that suppliers must follow to ensure that they conduct their business in accordance with the company's values and standards for ethics, the environment and working conditions.

**Conflict of interest** A situation where a person's personal or financial interests may affect their ability to make objective and impartial decisions that are in the best interest of the company.

**Copyright** A legal right that protects original works such as literature, music, art, and software from being used without permission.

**Corruption** Unlawful use of a position or power for personal gain, which may include bribery, bribery, or improper benefits in exchange for benefits. This is defined according to the UN Convention against Corruption.

**Forced labour** Situations where individuals are forced to work through threats, violence, accumulated debts, seizure of identity documents or threats of reporting to authorities. Forced labour can also include human trafficking or other forms of slavery and is regulated by ILO Conventions No. 29 and No. 105.

**GDPR (General Data Protection Regulation)** Data protection legislation in the European Union that regulates the collection, processing and storage of personal data. The GDPR gives individuals rights over their personal data and sets requirements for how companies handle this data.

**ILO core conventions** International labour standards relating to fundamental rights in the workplace, such as freedom of association, prohibition of child labour and forced labour, and non-discrimination in employment.

**Insider information** Non-public information that may affect the price of a company's financial instruments, such as shares, and which may not be used to make investments or disclosed to third parties.

**OECD Guidelines for Multinational Enterprises** International guidelines that recommend how companies should conduct their operations in a socially, economically and environmentally responsible manner.

**Personal data** Any information relating to a private individual that can be used to directly or indirectly identify the individual, such as name, social security number, e-mail address or IP address.

**Public officials** Public servants performing a public function, such as tax or customs officials, regulators, politicians, or persons employed by international organisations. The term may vary depending on the laws of different countries.

**Reprisals** Negative action taken against an employee who has reported irregularities or violations. This includes dismissal, demotion or harassment and is illegal under whistleblower protection.

**Sustainability** Processes and decisions that ensure long-term environmental, social and economic responsibility, with the goal of minimizing negative impact on future generations. The sustainability principles follow international standards such as the OECD Guidelines for Multinational Enterprises and the UN Sustainable Development Goals.

**Trade sanctions** Trade restrictions or restrictions that apply to specific goods, services, companies or individuals who trade in or export to countries that are subject to international or national sanctions.

**UN Global Compact** A UN initiative that aims to get companies to align their strategies and activities with universal principles in areas such as human rights, working conditions, the environment and anti-corruption.

**Whistleblowing** The process by which an employee reports suspected violations, irregularities, or unethical behavior within an organization. Whistleblowers are protected by law from retaliation, as provided for in whistleblower legislation.



# Policies

- **Anti-corruption policy** Guidelines to prevent corruption and bribery within the company, as well as rules regarding gifts and entertainment.
- **Anti-money laundering policy** Guidelines to prevent money laundering
- **Business continuity policy** Defines principles for continuity management to help reduce consequences of a larger disruption.
- **Code of conduct for employees** Describes the behavior expected of employees and forms the basis for other policies.
- **Code of conduct for suppliers** Guidelines and requirements that all suppliers and subcontractors must follow, including working conditions, human rights and environmental considerations.
- **Gender equality and diversity policy** Steering documents on gender equality and diversity issues
- **Guidelines for social media** Specifies how employees should act and communicate via social media in accordance with the company's values and policies.
- **Information security policy** Define policies to create a robust level of information security
- **IT-policy** Forms the basis for the company's approach to IT issues
- **Policy regarding sanctions and export controls** Guidelines on how we comply with trade sanctions and export restrictions
- **Sustainability policy** Sets out the company's commitments to reduce its environmental impact and promote sustainable development in all business decisions.
- **Whistleblowing policy** Describes the process for reporting breaches or irregularities and the protection of whistleblowers.
- **Work environment policy** Provides guidelines to ensure a safe and healthy work environment for all employees.