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WHO DOES THE CODE OF CONDUCT APPLY TO?

This code of conduct describes the principles that we as a company are governed by both strategically and in our daily work. It outlines expected behavior for all our employees and how we manage our relationships with customers, suppliers, contractors, as well as other stakeholders and partners.

The code of conduct applies to all subsidiary companies within the group and all our employees.

Our suppliers and contractors are expected to follow similar principles as described in this code of conduct in their own operations.

As an employee, you have a personal responsibility to familiarize yourself with and stay updated on our code of conduct. This also applies to you who work for us temporarily, as a consultant, temporary employee or similar.

As an employee, you should consult your immediate manager in all situations where you experience uncertainty. It is better to ask once too often than too little. The whistleblower function can also be used.

CONTENT


The code of conduct covers the following areas:

- Compliance with laws
- Financial accounting and reporting
- Conflicts of interest
- Political positions
- Information security, integrity and communication
- Relationships with business partners and anti-corruption
- Human rights
- Working conditions and labor rights
- Equality and discrimination
- Whistleblowing
- Protection of company property
- Information to the organization and compliance control

In the event that anything in this code of conduct contradicts the laws of the relevant country, the law prevails.

COMPLIANCE WITH LAWS

Laws and regulations for all countries where we operate must be followed. In addition to this, we and our suppliers are expected to adhere to ethical business principles, as outlined below.

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FINANCIAL ACCOUNTING AND REPORTING

Rundvirke Industries' financial transactions are always reported in accordance with accepted accounting principles. The accounting should present a true and fair view of transactions and not be misleading. The accounting should be transparent, relevant, and comprehensive.

CONFLICTS OF INTEREST

Employees and board members of Rundvirke Industries must manage their private or other external activities or financial interests in such a way that they do not conflict with, or could be perceived to conflict with, the company's interests.

If an employee or board member perceives themselves to be in such a conflict, it should be immediately brought to the attention of their immediate supervisor. Conflicts of interest in, for example, board decisions should be reported and documented in the protocol.

POLITICAL POSITIONS

Rundvirke Industries does not take a stance for or against political parties or candidates. Neither the company as a whole nor any part of the company may be used to promote a political party or its representatives.

INFORMATION SECURITY, INTEGRITY AND COMMUNICATION

The forestry industry is a friendly and helpful sector where most people know each other. Be cautious about sharing information that is not publicly known as it may constitute trade secrets.

Also, exercise caution when using IT tools due to the risk of intrusion, such as phishing.

Do not give the impression of speaking for Rundvirke Industries on platforms like social media unless you have approval to do so. Also, do not use the company's email address in a manner where private opinions could be interpreted as the company's. We have specifically designated spokespersons (usually the CEO) for various issues.


RELATIONSHIPS WITH BUSINESS PARTNERS AND ANTI-CORRUPTION

Rundvirke Industries' relationships with business partners such as suppliers and customers shall be characterized by impartiality.

We do not offer any party, such as customers, potential customers, authorities, suppliers, or representatives of such organizations, any form of advantage that is illegal, exaggerated, or contrary to general business principles. Within Rundvirke Industries, there is an absolute prohibition on giving and receiving benefits that could, or could be perceived to, influence the objectivity of a business decision.

Any exchange of gifts with business partners should be done openly and with caution. A guideline is a maximum amount of approximately 400 SEK. Gifts to representatives of authorities should not be given or received.

Business relationships should not be established with individuals, companies, or countries subject to sanctions.

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Laws and regulations to prevent money laundering must be followed. It is our policy to in all situations actively contribute to reducing the risk that transactions with our entities could be used for money laundering, terrorism, or similar crimes.

HUMAN RIGHTS

Respecting human rights is fundamental to Rundvirke Industries in both our own operations, our value chain, and in the local communities where we operate. We adhere to the UN Declaration of Human Rights. Specifically, this means that we meet the requirements below and demand that our suppliers do the same:


- Not using forced labor in any form, meaning any form of work performed under duress or threat of punishment.
- Ensuring that the terms of employment are based on voluntary consent.
- Following the minimum age for work according to current legislation unless stricter requirements are imposed. The minimum age for work is generally interpreted as the age at which compulsory education no longer applies. If an employee is under 18 years old, special rules must be followed.
- Respecting the right to freedom of association, in accordance with local law
- Encouraging workplace diversity and ensuring a workplace free from discrimination, harassment, or similar issues.

WORKING CONDITIONS AND LABOR RIGHTS

All our own operations have collective agreements, and we expect our suppliers to also have that or equivalent in order to protect their employees' rights and obligations. Contracted forestry contractors must have collective agreements, and this is regularly checked.

Wages, conditions, agreements:

- Pay wages and provide conditions that meet or exceed collective agreements (or equivalent if collective agreements are not applicable) and comply with regulations regarding overtime compensation.
- Comply with legal requirements regarding working hours and rest.
- Have written employment/business agreements.
- Regardless of employment form, be covered by and adhere to collective agreements.
- Ensure secure and enduring employment relationships (prioritize permanent employment).
- In case of job shortage, mitigate consequences together with union representatives.
- Entitled according to collective agreements to compensation/leave for parents/guardians.
- Parental leave should not hinder employment/assignments or result in deteriorated conditions.
- Employees should be covered by the social insurance system and/or supplementary insurance from their home country.
- Ensure handling/replacement of damage to the employee's property, work-related illnesses, work-related injuries that occur during work (this should be done in collaboration).

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Working environment:

- Have a safe and healthy working environment, which also includes any temporary accommodations provided by the company when applicable.
- Apply the Swedish Work Environment Authority's regulations on systematic work environment management (SAM).
- Consultation on work environment issues is applied if >1 company is present at the workplace.
- The employer provides protective equipment and medical supplies according to law and collective agreements.
- The person performing the work should use relevant protective equipment.
- Accidents and incidents are handled and prevented (incident and work-related injury documentation, sick leave registration due to accidents, safety inspections and risk assessments, notes on overtime during regulated working hours).
- Investigations of accidents and incidents, as well as possible revision of SAM routines.
- Access to company healthcare.
- Access to work and safety procedures, as well as emergency procedures.
- Access to personnel facilities to the extent possible and reasonable considering the nature and location of the work.

Information:

- Have described conditions (in employment contracts or separately) for temporary accommodation, travel, return home, and attendance.
- The person performing the work should be informed about wage levels, compensation, and conditions (in relevant languages).
- The employee has relevant knowledge and current competence for the work (this includes knowledge of the content of this document in addition to the competence required for the job).
- Regular development discussions and workplace meetings for permanent employees and recurring fixed-term employees.


Organizational rights:

- Employees have the right to organize themselves and negotiate according to Swedish law and applicable collective agreements.
- Trade unions have the right to visit the workplace if the visit has been announced in good time.

EQUALITY AND DISCRIMINATION

Rundvirke Industries' vision is to be an attractive workplace for everyone. Having an organization and attitude characterized by equality and diversity is fundamental to this goal. We aim to attract, welcome, retain, and develop all talented individuals. No one is excluded in our pursuit of a workplace where everyone is treated with respect and dignity.

Equality encompasses all grounds of discrimination, such as gender, sexual orientation, gender identity, age, disability, religion, or ethnicity.

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At Rundvirke Industries:

- All employees should have equal rights and opportunities regarding work and development possibilities.
- We strive for as diverse a distribution as possible based on discrimination grounds in various types of tasks, project groups, as well as in roles as managers and leaders.
- No one should feel harassed, offended, or bullied in the workplace in any form. Harassment or bullying, regardless of gender or any other background, is equally unacceptable and should be actively combated.
- No one should feel discriminated against in the recruitment process or in the filling of positions, whether it is an internal or external recruitment.
- Salary differences due to gender or other discrimination grounds are not allowed. Nor should other employment conditions differ on the same grounds. Salary and compensations should be determined based on objective criteria (experience, competence, etc.).
- All employees should be informed about and well acquainted with Rundvirke Industries' equality policy to be able to participate and take personal responsibility for equality work.
- The equality aspect should always be considered as a parameter in the assessments and decisions made in daily work.

Every employee has a personal responsibility to follow the code of conduct. If there is suspicion that something is not right, the issue can be raised with the immediate supervisor, another trusted person, or alternatively, the whistleblower function can be used.

Each manager is responsible for ensuring that the goals for gender equality are met and ensured in their own department.

The CEO of each company has a responsibility for the entire operation and therefore also for ensuring that the work on equality is done systematically. This includes incorporating the issue into decisions and other processes to counteract discrimination. It also involves monitoring aspects such as salary setting, types of employment, competence development, and representation in meetings and decision-making forums.

WHISTLEBLOWING


Rundvirke Industries has implemented the rules in SFS 2021:890 on protection for individuals reporting misconduct. This is described in a separate policy "Whistleblowing," including a link to the tool used for whistleblowing.

PROTECTION OF COMPANY PROPERTY

We all have a responsibility to be careful with the company's equipment and property used in the business. It must not be used for unauthorized private use, illegal activities, or other inappropriate use.

INFORMATION TO THE ORGANIZATION AND COMPLIANCE CONTROL

Rundvirke Industries' managers are responsible for making the contents and spirit of this document available and informing within their organization and for encouraging employees to report behavior

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that violates this code of conduct. Information should be provided on a regular basis and to new employees.

Internal compliance control is carried out through regular internal audits conducted by the quality manager, possibly together with a person from another entity or organization.