



## CODE OF CONDUCT

### **NITATORS VISION**

From a sustainability perspective Nitator should be the world's leading supplier of sheet metal components to automotive industry and be the region's most attractive workplace.

This Code of Conduct applies to all activities within Nitator and forms the basis for daily decisions made within the Nitator and forms the basis for daily decisions made within the business and that affect the environment, the employees, and the community.

**NITATORS CODE OF CONDUCT** contains information aimed at covering:

- The work of all units in accordance with applicable laws and agreements.
- The right of all individuals to be treated with respect.
- Conditions such as freedom of association, child labour, safety, and discrimination.
- A safe and healthy working environment and a systematic environmental philosophy throughout the entire process.

The Code of Conduct is the shared responsibility of all employees. Every employee is responsible, within their own remit, for ensuring that all business partners are informed on, and comply with, the content of this Code of Conduct. In cases where we operate in other countries, we follow the laws and regulations in the country in question. The code of conduct applies to both the employee's individual responsibility and the company's responsibility towards employees and the surrounding community. It is the responsibility of management and all employees to ensure that this code of conduct is complied with.

### **BUSINESS PRINCIPLES**

The code of conduct governs our relationship both with each other internally and in our relations with customers and suppliers.

- We do not accept bribery and corruption.
- We use information as a valuable asset.
- We have effectual relationships between employees and management.
- We have effectual relationship with our customers and suppliers.
- We comply with applicable laws and regulations.
- We represent our company Nitator impeccably.

### **FAIR COMPETITION**

We strive to act fair and responsible as a market participant and expects the same from its business partners. We do not exchange information, enter into any agreements with competitors, customers or suppliers that may adversely affect the market or the outcome of a tender process.

## **CONFLICT OF INTEREST**

Consequently, the interest of Nitator Automotive Group and/ or the Business Partner on the one hand and the personal interests of their respective employees / or those of a relative, a friend, or a close relation on the other hand must be kept separate.

Protecting Nitator Automotive Confidential information and intellectual property Nitator Automotive may share confidential information and/or intellectual property elements with its business partners during their relationship. Business Partners are required to handle Nitator Automotives confidential information in accordance with confidentiality provisions in place and in particular:

- protect Nitator Automotives confidential information from improper disclosure
- not to share Nitator Automotives confidential information with a competitor of Nitator Automotive unless Nitator Automotive has given their consent.
- protect Nitator Automotive for counterfeit of parts.
- Report in accordance with section "REPORT OFFENSE AGAINST THE CODE OF CONDUCT AND GRIEVANCE" below any loss of, or unauthorized access (by an employee, officer or other who does not have a "need-to-know" or a third party) to Nitator Automotive confidential information.

Trade sanctions and export control Nitator Automotive business partners are required to comply with all trade sanctions that are applicable with Nitator Automotive and with all relevant export control laws and regulations.

## **COMMUNICATION MEDIA AND SOCIAL MEDIA**

Nitator and its information about the company and employees shall be treated as sensitive information and may not be distributed to unauthorized, exceptions for specific business purposes. Examples of sensitive information are financial results, divestments, strategies, customer information and personnel and organizational information. When communicated through information systems, all employees must be aware that they always represent the company. All employees should act respectfully and be aware that, for example, messages can be used for purposes other than those set. Social media may not be used in a manner that could damage Nitator's brand and reputation. Only appointed representative may comment on Nitator's behalf in the media, which includes all forms of social media.

## **BRIBES AND GIFTS**

Nitator applies zero tolerance in terms of corruption. This means that we never accept, directly or indirectly, bribes or other irregular benefits or remuneration, for the benefit of the business and / or for financial gain. Employees may receive and offer reasonable gifts, services and entertainment from and to customers and suppliers, provided they are not too bounteous or excessive. We either offer or never give a gift or payment that constitutes or can be interpreted as a bribe.

## **HUMAN RIGHTS**

Nitator shall support and respect the protection of human rights.

- We respect human rights in accordance with UN principles. See [www.unglobalcompact.org](http://www.unglobalcompact.org)

- We respect our employees.
- We do not discriminate.
- We offer a good working environment.
- We do not commit, or support forced labour, serfage or slavery.

Nitator is a widely diverse workplace with regards to ethnicity, gender and religion, and equal treatment is the basis for all employees. The equal value of all employees and an open and honest exchange of thoughts and ideas is a matter of course at Nitator. Nitator adheres to applicable laws, agreements and ensures that wages and benefits at least reach up to regulatory levels. Discrimination of any kind is not permitted, and efforts to counteract every type of discrimination shall be an active part of the daily work.

Child labour forced labour and harassment and abuse of any kind is unacceptable to the company. Nitator respects the right of all employees to be a member of a trade union to safeguard their interests as employees, and their right to organise and bargain collectively or individually for wages. An employee's right to refrain from joining a trade union shall be respected. Nitator shall notify the union representatives and the relevant authorities about any changes in the business, pursuant to applicable law.

Nitator respects people's basic right to privacy. Personal data should be collected in a correct and legal manner and be relevant to the purpose for which they have been collected and treated with the utmost care. All forms of forced labour are prohibited, and employees are entitled to terminate their employment under local law or employment contracts.

## **WORKING HOURS**

Business Partners must comply with applicable legislation regarding working hours (including but not limited to overtime and overtime compensation) and rest rules.

## **ENVIRONMENTAL ISSUES**

Nitator strives for a good working environment and works to prevent accidents and injuries. We are convinced that in a workplace, all employees are responsible for protecting each other's health and safety both physically and mentally. We help everyone to create a good working environment. Nitator is conducted in an environmentally responsible manner in order to achieve sustainable development. Nitator should be associated with environmental thinking.

- Our work involves systematic environmental efforts.
- We ensure that employees understand the meaning of our environmental efforts.
- We are to be associated with environmental awareness and we ensure that we comply with applicable environmental legislation.

Our ambition is for continuous environmental improvement in all activities and operations. This is achieved by means of systematic work on environmental issues that are based on applicable legal requirements and guidelines. The ambition is to combine environmental awareness with financial targets and world demand for the achievement of sustainable development.

Nitator Automotive expects their business partners to minimize waste and pollution, be it energy use, transportation, or material handling. Their local presence shall be responsible and respectful also regarding the environment. This includes endeavour to minimize the environmental impact by, for example, reducing waste, emissions, conserving resources and promoting efficient energy use. Transportation and travel should always be considered in terms of sustainability, striving for least possible environmental impact.

Nitator Automotive expects business partners to have:

- An environmental management system in place that allows them to continuously improve their environmental performance.

## **ECONOMIC SUSTAINABILITY**

Economic sustainability is, at heart, about housekeeping with scarce resources. We create economic sustainability by looking at investments from a long-term perspective. Profitability and returns on the funds invested by owners should always be taken into consideration when taking decisions on important strategies and financial action plans. Nitator keeps its owners well informed about the Group's activities, results and strategies, in accordance with established communication channels. We act in a socially responsible manner and within the framework of national legislation in the places where we have operations. We can best contribute to social and economic development by managing our business in a professional and profitable manner, which provides opportunities for creating jobs and supporting our customers.

## **FINANCIAL RESPONSIBILITY**

Nitator shall maintain accurate and up-to-date accounting of financial, administrative, operational and commercial activities.

We must have the most important routines documented regarding accounting, the operational activities as well as business transactions and always be able to provide a copy of this.

We will provide unlimited access for our controllers and auditors to both current accounting and audits and cooperate fully with these.

## **CONTROL AND RESERVATION**

Management is responsible for informing employees about their rights, obligations, and responsibilities under this Code of Conduct. The code of conduct must always be reviewed for new employments. All employees are encouraged and are expected to report departures from this code and act for compliance. When signing business and cooperation agreements, the code of conduct must be attached.

## **REPORT OFFENSE AGAINST THE CODE OF CONDUCT AND GRIEVANCE**

All Nitator employees are encouraged to report suspected crimes against code of conduct to their manager or HR manager according to Whistle-blower policy.

Everyone working at, or with, Nitator Automotive should be comfortable raising questions or

concerns about any ethical issues or non-compliance. If you want to report your question or concerns, please send an email to [whistleblowing@nitator.se](mailto:whistleblowing@nitator.se)

We have read and approved above principles:

Company name:

Name/Signature:

Date:

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