

NITATORS VISION

Our vision is to be one of the World's leading suppliers to the automotive industry and one of the region's most attractive workplaces within the engineering sector.

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 informations 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 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.

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 principles¹.
- We respect our employees.
- We do not discriminate.
- We offer a good working environment.
- We do not commit or support forced labor, serfage or slavery.

Nitator is a widely diverse workplace with regard 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 so as 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.

¹ www.unglobalcompact.org

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 labor are prohibited and employees are entitled to terminate their employment under local law or employment contracts.

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. Nitators 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.

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

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