

LEAX Group - Code of Conduct

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Joachim Blomberg	Tony Nicol	2022-05-05	Roger Berggren	2022-05-05	4.0	1(5)

1 Purpose

LEAX Group Code of Conduct has been created to underline the principles that LEAX Group uses in its relationship with employees, business partners, other stakeholders and society in general.

2 Applicability

This applies to all members of the Board and all employees within LEAX Group.

3 Process Owner

LEAX Group President and CEO

4 Sustainability

To be a long term leading global supplier to the most demanding customers LEAX Group needs to have a sustainability approach. LEAX sustainability work outlines how we act on financial, social and environmental related issues in our operations and its contribution to society.

LEAX is committed to continuously improve the sustainability performance and in cooperation with stakeholders follow the United Nations Global Compact's principles relating to labour practices, human rights, environment and anti-corruption:

<https://www.unglobalcompact.org/AboutTheGC/TheTenPrinciples/index.html>



5 Code of conduct

5.1 Privacy

When we are entrusted with personal information about individuals, we safeguard it and take appropriate steps to protect it from misuse. We observe all applicable privacy laws when we collect, use, and share personal information about individuals.

5.2 Fair competition and anti-trust

LEAX Group will not fix prices or rig bids with their competitors. We will not exchange current, recent, or future pricing information with competitors. LEAX refrains from participating in a cartel.

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5.3 Legal compliance

In each situation, the companies within the Group LEAX shall follow the laws, regulations and recommendations applicable in the countries where the companies operate.

In a situation where laws do not provide guidance, our values and principles below shall then be used as a guide.

If conflict of the laws, rules, and our policy takes place, the legislative compliance is prioritized.

We listen, respect and cooperate with trade unions which are applicable to business scope.

5.3.1 Working hours

Our employees' working hours follows the rules that are established in the country at central and local levels. Working hours are planned in such a way that it gives our employees the time off to recover between each working day.

5.3.2 Wages and benefits

We pay our employees the wages negotiated or legislated between employers and employees. We will never pay less wage than the minimum wage established in the country.

5.3.3 Freedom of association and collective bargaining

Our employees have the right to form and join unions (or other associations) of their own choice and negotiate labour agreements collectively, as well as the right to not do so.

5.4 Relations with business partners

LEAX always acts responsibly and ethically in its business relationships. We do not tolerate any form of corruption.

- Our employees shall never give suppliers, clients, potential clients, government agencies or representatives thereof, rewards and benefits that are contrary to law or their internal business practice.
- We act and make decisions without consideration for personal gain and we do not use relationships with business partners for personal advantage.
- We avoid situations that can create, or give the impression of creating, conflicts of interest. If a conflict of interest cannot be avoided, it must be reported openly to the appropriate line manager.

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- Gifts exchanged, where culturally appropriate, must be of nominal value and entertainment must never go beyond what is reasonable.

5.5 Accounting and reporting

All financial transactions in LEAX Group shall be treated under current law and practice. LEAX Group shall always be able to present reports that are open, true, relevant and timely.

5.6 Conflicts of interest

All employees and Board members shall conduct their private and other external affairs in such a way as not to conflict with the interests of LEAX Group.

Should a conflict of interest arise, it should be reported immediately to immediate supervisor for evaluation by the management.

5.7 Political interference

LEAX Group shall be neutral to political parties and their agents.

No form of sponsorship of parties or candidates shall be present.

5.8 Environmental concerns

In the operations and products of LEAX Group energy and raw materials should always be used with such effectiveness that the waste is minimized.

Our exchange policy ensures that we always choose the input that gives the least impact on environmental and health risks.

Our environmental practices ensure that we routinely inspect, detect, report and resolve current and future risks.

5.9 Human rights

In an atmosphere of openness LEAX Group supports and respects international rules related to human rights and ensure that our business does not conflict with them.

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5.9.1 Harassment and non-discrimination

LEAX Group have zero tolerance for discrimination, harassment and bullying. Each of us has the right to be treated with respect and dignity. LEAX Group shall employ and manage staff in such a way that we do not discriminate anyone based on gender, religion, age, sexual orientation, nationality, political or trade union affiliation, social or ethnic orientation. At all levels of LEAX Group, diversity is encouraged.

5.9.2 Child labour and Young Workers

No form of coercion or the use of workers whose age is below the law may be used.

Our procedures for safety ensure that we, at all times, meet or exceed the laws, requirements and regulations in the countries where LEAX Group operates.

5.9.3 Modern slavery

LEAX Group dissociate from all forms of slavery, servitude and forced or compulsory labour and human traffick. We are committed to act ethically and with integrity in our business dealings and relationships and to ensure modern slavery is not taking place in our own business or in our supply chains.

5.10 Counterfeit parts

LEAX Group are not introducing counterfeit and/or diverted parts and materials into deliverable products.

5.11 Intellectual property

LEAX intellectual property – such as technical inventions, patents, know-how, trade secrets, design and trademarks and related licenses – are highly valuable assets, but that value can be lost or compromised if these are misused or inappropriately disclosed. LEAX Group will act to defend its intellectual property, and is committed to respecting intellectual property that belongs to others.

5.12 Export controls and economic sanctions

As a global company, we comply with international trade rules, by which countries regulate the movement of products, technology, software, and technical information across national borders. Violations can lead to criminal prosecution for the companies and individuals responsible, along with bad publicity, delayed shipments, or even the loss of import/export privileges.

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5.13 Responsibility of Managers and Employees

It is the responsibility of LEAX Group managers to communicate and demonstrate the content as well as the spirit of this document within their organizations, and to encourage employees to reveal behavior that may be non-compliant with these principles. Explicit or implicit approval of questionable actions will not be tolerated.

In addition to standard internal information meetings the managers can also use Intranet to share internal information. External information can be provided through meetings, press release and internet. For the last two channels the "Grandfather" principle should be used.

LEAX Group managers shall in addition to this "Code of conduct" also use "LEAX Core Values" and "Leadership Principles" as a reference for the daily management.

Reports of violations of this code may be done anonymously and confidentially by using the LEAX Group [Whistle-blowing portal](#). Persons, following LEAX Core Values, reporting suspected wrongdoing shall never risk any retaliation. The process is detailed in the instruction "Whistle-Blowing process", LG-010-016

This Code of Conduct will consistently be enforced. Failure to comply with its provisions can result in disciplinary action.

This Code of Conduct has been adopted by the Board of Directors of LEAX Group and can only be amended or waived by the Board. Any amendments or waivers shall be disclosed.