

Code of Business Conduct

Granuldisk AB and its subsidiaries (the Group) strive to be responsible members of the corporate community.

While meeting business objectives, it is essential that all employees comply with the rules for corporate behaviour contained in this Code of Business Conduct (the Code). We act as per our core values in being transparent, long-term and innovative in creating customer value. We share our core values in strategic partnerships across our value chain.

Compliance to the Law and local regulations

The Group is required to comply with all laws and regulations of the countries and jurisdictions in which they operate and work, and behave as good corporate citizens and respect human rights. Employees are required when performing their duties to comply with all applicable laws and regulations.

Employees

The Group:

- is committed to providing safe and healthy working conditions for its employees in all parts of the world and all employees are expected to share this commitment.
- does not tolerate any form of discrimination based on race, gender, age, religion, political opinion, national origin, social origin, sexual preference or other comparable reasons neither in recruitment nor in employees.
- does not tolerate any form of harassment or abuse in the workplace.
- does not tolerate forced labour or compulsory labour.
- recognizes the freedom of association and the right to collective bargaining.

Conflicts of Interest

The Group requires its employees to avoid personal and/or financial activities or interests that could conflict with the interests of the Group. Any conflict arising should be reported to executive leadership team and action taken to avoid any kind of damage to the Group.

Confidentiality and Security

The employees of the Group must ensure that valuable assets and information of the company are adequately safeguarded at all times.

Sustainability

We run our company from an economic, environmental and socially sustainable perspective, which means that we continuously work to reduce our environmental impact throughout the value chain.

We integrate environmental considerations into management decisions, investments, policies, programs and practices across our business, and strive for continuous improvement in our development, sourcing, manufacturing, and transportation activities.

Child labour

The Group does not use child labour in any of its operations and requires its value chain partners to refrain from doing so.

Financial Reporting

The accounting records and supporting documents of the Group must accurately describe and reflect the nature of the underlying transactions. The companies of the Group are required to report in accordance with Sandberg Development Group Accounting Policies.

Local statutory accounts are required to be prepared in accordance with local requirements. Management takes responsibility for the accuracy of these financial reports.

Authorisation

The employees of the Group work within a system of delegated authorization in accordance with their respective roles and responsibilities. The Group follows a joint signatory rule for all documents with material effect as well as for payments.

Anti-Corruption

The business operations of the Group are to be performed in accordance with all applicable laws and regulations and in such a way that high ethical standards will be upheld. The Group does in no way wish to gain a business advantage due to illegal or unethical behaviour.

It is strictly forbidden to directly or indirectly offer money or anything of value in order to unduly influence the recipient in the performance of his or her professional duties or to have the recipient unduly influence someone else in order to obtain or retain an undue business advantage.

The same applies in respect of receiving money i.e. it is forbidden for anyone acting on behalf of the Group to accept, accept a promise of or request an improper reward for the performance of his or her professional duties

Those within the Group responsible for appointing and hiring agents, consultants, distributors or other business partners acting on behalf of the Group and who are subject to the Group's control or determining influence is to review and evaluate the reputation and standing of such third party in relation to anti-bribery compliance.

No one will suffer demotion or other adverse consequences for bringing forward such concerns or questions in good faith or for refusing to pay bribes or for complying with the Policy, even if it may result in the Company Group losing business.

Application

This Code of business conduct applies to all employees within the Group.

It is the responsibility of management to ensure that the principles and requirements contained in this Code are communicated to and observed by all employees.

Any deviation from this Code or supporting policies must be reported immediately to executive leadership team.

Employees will not be penalized for any loss of business resulting from adherence to this Code.

No employee will suffer as a consequence of bringing a breach or suspected breach of the Code to the attention of management.

If there is a conflict between any requirements of this Code and local legislation, the local/national laws always take precedence.

Granuldisk

Jägershillgatan 13, SE-213 75 Malmö, SWEDEN

+46(0)40-671 50 60, Info@granuldisk.com

www.granuldisk.com

