

Gepe Group - Code of Conduct

Our business principles

This code has been established in order to emphasize the basic principles that govern our business. The Code shall govern all employees' daily activities in terms of relationships with employees, customers, suppliers, shareholders and other stakeholders in terms of environmental, social and business responsibilities, and compliance with legislation.

We support and manage our business in accordance with the ten principles of the UN Global Compact, with the general views expressed in the International Labour Organization (ILO) conventions and the OECD guidelines for multinational enterprises.

Our Code of Conduct, together with the policies and standards that apply locally in our companies constitutes the framework for our business and applies to all employees, managers and board members, always and without exception. We also encourage suppliers, consultants and other partners, as far as their influence extends also to follow these principles, which will also be used in evaluations of current and potential partners.

Application

This Code of Conduct shall be incorporated into the policies, standards and regulations that apply locally in all companies of the Gepe group. All employees will be informed of the Code of Conduct and must understand and comply with it. All managers are required to include the code in connection with the introduction of new employees and will actively provide information on it for others. The code, together with other policies on a company level provides guidance and the principles to our daily work. Responsible for the implementation of our Code of Conduct and its follow-up on the company level is the is the CEO of each company.

I. Conducting business according to law and order

We do not engage in illegal activities or operate in contexts where there is illegal activity and we always act according to applicable laws and regulations. We have zero tolerance against all forms of misuse or abduction of assets belonging to our companies by employees or others.

II. Fair competition and Antitrust law compliance

Gepe companies will always comply with all applicable antitrust and competition laws. We believe in a free market economy shaped by competition and protected by antitrust and competition laws. We also believe our customers interests are best protected by our compliance with all applicable laws. Our full commitment to fair competition is the only way to gain our customers long term trust.

As a matter of principle we are always committed to open and fair competition. We do not enter into any agreements with our competitors, formally or otherwise, which fix prices or allocate products, markets, territories or customers. We do not share information about pricing, margins, bids or sales conditions with any of our competitors.

III. Bribery and Corruption

Bribery and Corruption are not tolerated in any form. Employees are generally prohibited from offering, soliciting or accepting any gifts, payments, invitations or services which could reasonably be assumed to have an influence on business transactions, which are beyond the scope of usual business hospitality or are forbidden by applicable law. We take this matter very seriously and refer to the Anti-Bribery and Corruption (ABAC) policies which are implemented in all our companies.

IV. Conflicts of interest

Conflicts of interests may arise when the private interests of an employee or of his/her close relatives, friends or business contacts diverge from the interests of the company.

These situations should be avoided and if this is not possible be disclosed by our employees to their superior or the CEO of the unit they work for. This is important because a conflict of interest can affect an individual's judgment in the performance of his/her duties and responsibilities.

V. Respect and Harassment

Gepe believes that all employees should be treated with dignity and respect. We are committed to create an constructive and pleasant work environment with clear, open and regular communication and everybody's recognition of diversity. We strictly condemn all forms of harassment of our employees by their superior or other employees.

We rely on all our employees to prevent any form of harassment and we consider harassment as a serious misbehaviour which may result in disciplinary actions including discharge. Harassment includes sexual, racial, ethnic and other forms of harassment and may be in the form of verbal, written or physical harassment.

VI. Protecting our Environment

We are committed to act in a manner designed to minimise the use of resources and to reduce the environmental impact of products and processes at all stages of the life cycle, from concept to the waste management. The minimum standards we apply are those outlined in the applicable legislation and environmental protection directives.

We will always chose the most environmentally friendly solution that is economically viable.

Reporting Non-Compliance

The guidelines set forth in this Code of Conduct are central to Gepe group's business culture and sense of responsibility. Group-wide compliance is essential and every employee is responsible for upholding those principles.

All employees are requested to report any violations of the law or of this Code or if they are asked to do something that might be a violation. Reports can be made by our employees to their superior, the CEO of the unit they work for or to the group management.

All reports of misconduct will be treated in confidence. Retaliation against employees who report misconduct in good faith will not be tolerated and be subject to disciplinary action. The same applies to any abuse of these reporting processes.

Gepe Holding AG



Sven Pettersson
Group CEO