LESJÖFORS Springs & Pressings

Lesjöfors Group business partner principles

Introduction

Lesjöfors Group is a subsidiary to Beijer Alma, an international, listed industrial group.

IN ORDER TO GROW, OUR GROUP MUST ACT RESPONSIBLY. This entails that we accept responsibility for people and the environment. We do this by maintaining sound business ethics with a distinct social commitment and through efficient use of resources with reduced climate impact. At the same time, our employees must feel that our workplaces are safe, provide equality and are conducive to personal growth. We must also establish a relationship of trust with our customers, suppliers and other stakeholders. Our Code of Conduct serves as a guide in this regard. The principles below is based in the Code and international guidelines supported by Lesjöfors Group; UN Global Compact, The United Nations International Bill of Human Rights, The ILO Declaration on Fundamental Principles and Rights at Work (ILO), The United Nations Global Compact (GC), The OECD Guidelines for Multinational Enterprises. We realize that achieving a business climate where sustainability is integral to the way we do business requires a team effort. We therefor encourage our business partners to implement these principles in relation to their partners, suppliers and sub-suppliers.

General requirements

Business partners such as suppliers, subcontractors, joint venture partners, agents and distributors shall be made aware of the commitments and expectations in accordance with the principles. Business partners must, in all their activities, follow the national laws and regulations applicable to their operations and employment in the countries in which they operate. Lesjöfors Group requirements may go beyond the requirements set out in national law, in which case the business partner should notify Lesjöfors Group and appropriate action shall be determined in dialogue between the business partner and Lesjöfors Group. Business Partners shall conduct their business in an ethical manner and with high integrity. Business Partners shall respect and act in accordance with applicable laws and regulations relating to anticorruption, anti-money laundering, antitrust, trade compliance, privacy and tax laws and regulation.

Compliance and follow-up

Lesjöfors Group requires its business partners to adhere to the social, business ethics and environmental principles listed here. Lesjöfors Group will monitor and follow up on business partner compliance with these criteria through surveys and audits.

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Principles of Human rights and social justice

- Business partners shall support and respect the protection of human rights. Business
 partners have to be able to confirm that they are not complicit in human rights abuses and
 they must comply with the main international ethical guidelines supported by Lesjöfors
 Group.
- Business partners must support equal opportunities, fairness and diversity and ensure that all employees are treated strictly according to their abilities and qualifications in any employment decisions, regardless of ethnic group, religion, gender, age, nationality, disability, personal relationship, union membership and/or political opinion.
- It is not acceptable to engage in or tolerate the use of child labor. Business partners have to take necessary preventive measures to ensure that they do not employ anyone below the legal age of employment. This means that unless local law stipulates a higher age limit, no person younger than the age for completing compulsory education or younger than 15 (or 14 where permitted by ILO convention No. 138) may be employed. For authorized minors, management is responsible for providing the working conditions, hours of work and wage appropriate for his or her age in compliance with applicable local law as a minimum. The minimum age for hazardous work is 18 years.
- Business partners must not have any forced or involuntary labor. It is not tolerated in any
 form. This includes any work or service performed by a person under the threat of penalty
 and for which the person has not offered himself or herself voluntarily. It also prohibits
 business partners from requiring employees to deposit money or original documents such as
 passports, education certificates and the like, during their employment.
- Business partners is encouraged to maintain reasonable working hours schedules for its employees in order to prevent quality and safety incidents and to minimize strains on employees physical and mental health. Business partners is encouraged to comply with ILO standard on working hours and leave.
- Business partners have to confirm that their workers are free to communicate openly with management to resolve workplace and compensation issues. Employees have the right to choose whether to be represented by trade unions for the purpose of collective bargaining. Lesjöfors Group does not tolerate discrimination against any employee exercising such rights

Principles of Safe and healthy working environment, factory conditions and housing

Business partners are required to make employees' safety a priority at all times. Work premises and factory conditions have to be such that workers can perform their functions in a safe and healthy environment, including fire prevention. To minimize risks, there must be appropriate policies to safeguard employee health and safety, training and clear role descriptions. Facilities for employees must safeguard individuals' dignity and meet personal hygiene needs. Business partners must take appropriate action to ensure safety and prevent accidents and illnesses resulting from workplace conditions, on behalf of their employees. This includes availability of first aid equipment

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Principles of environmental impact

- Business partners shall ideally have an Environmental Management System or, as a minimum, be committed to developing an environmental policy or system, which ensures continuous improvement of their own environmental performance.
- Business partners shall continuously strive to develop their competence with the aim of always being able to offer the environmentally best product or solution.
- Business partners shall work systematically to measure, track and communicate progress on environmental performance in terms of resource efficiency and emissions.

Principles of material compliance & Conflict minerals in order to safeguard certain minimum material requirements

 Business partner shall ensure that the goods (including its individual components) provided shall be in compliance with Directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS) and Regulation EC 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (Reach), in force from time to time. Lesjöfors Group requires manufacturing companies to identify and disclose the source of 3TG minerals (tin, tantalum, tungsten and gold).

Additional references

ILO Code of Practice in Safety and Health, <u>http://www.ilo.org/safework/lang--en/index.htm</u> ILO International Labor Standards, <u>http://www.ilo.org/global/standards/lang--en/index.htm</u> OECD Guidelines for Multinational Enterprises, <u>www.oecd.org</u> UN Convention Against Corruption, <u>http://www.unodc.org/unodc/en/treaties/CAC/index.html</u> UN Global Compact, <u>www.unglobalcompact.org</u> UN International Bill of Human Rights, <u>www.un.org</u> ISO 14001, <u>www.iso.org</u> SA 8000, <u>www.sa-intl.org</u> Beijer Alma Code of Conduct and Group Business principles, <u>www.beijeralma.com</u>