Code of Conduct for the Polykemi Group

Focus on Sustainable Growth













Why a Code of Conduct?

It is very important to us at Polykemi that we be seen as a responsible company, both in our own eyes and in the eyes of those in the world around us. We want the culture we have created and continue to develop, as well as the business we conduct, to be permeated by a strong and positive business practice, by genuinely accepting our social responsibilities and through constantly improving of our effect on the environment.

In every situation we can affect, we shall take responsibility for how our enterprise affects both the local environment and the international environment in which we operate. We do this in a respectful manner, both in dealing with our internal contacts and in collaboration with external contacts.

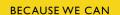
At Polykemi, it is important that our code of conduct become a natural feature of our operation and of our contact with the outside world. It should serve as a support and aid to every employee in his occupation. It shall be easy for each employee to understand how he himself should relate to the code and how to work in order to influence our contacts in a positive direction. We therefore base the code on our fundamental values and on the UN Global Compact.

Adhering to the principles set out in the code of conduct allows us as individual employees and companies to be proud of acting soundly and correctly in doing our jobs. We therefore encourage all employees to become familiar with our values and our code of conduct and to turn our thoughts into actions in our day-to-day activities. Do not be afraid to ask any questions you might have with regard to the code or to speak up if in any situation we are not living up to it.

Polykemi as a company has a major impact on the localities in which we operate and we even have an enterprise that extends into many other countries. We want to leave a positive impression everywhere we can influence our surroundings with our culture, our values and our code of conduct. We also realize and understand that change is not easy, especially not in situations where our influence is limited – but every change begins with a small step.

"If you stop getting better, you stop being good"

Ola Hugoson, Managing Director









Our values

Going for Gold - Focus on Sustainable Growth

Professionalism

"The employees' efforts determine the future of Polykemi"

Professionalism is a balancing act. On the one hand, it is about not sparing any efforts to satisfy the customer. On the other hand, it is about conserving our resources. In order for this balancing act to succeed, we need constant improvement within three areas: customer focus, benchmarking and cost awareness.

Responsibility

"Get up and spread your wings"

Responsibility is positive, enjoyable, stimulating and challenging. That is why it is obvious that Polykemi should set the benchmark. We shall be a company that delegates responsibility and that has employees who are happy to take on such responsibility.

Respect

"Respect others and you will be respected"

Growing as a person requires you to be respected. The foundation for that is quite simply that you show respect yourself. In other words: The way your treat others is the way you will be treated.

Teamwork

"With teamwork, Polykemi can succeed in everything"

Teamwork and participation require a bird's-eye view. That is to say that in every instance you can see yourself in a larger perspective in which you take notice of the requirements and needs of the area in which you find yourself.

Honesty

"Being honest is to venture"

There is a quality that makes all relationships simpler: Honesty! Sure, sometimes the truth hurts, but the alternative is devastatingly worse!









Code of Conduct

Our code of conduct forms the basis for all the company's undertakings. As a company and an employer, Polykemi shall base its actions on the code in all situations.

Employees

Polykemi respects and supports the UN Convention on Human Rights, and our enterprise, along with our employees, shall strive to adhere to the conventions.

A safe and healthy working environment shall be maintained at all of the company's workplaces, in accordance with the applicable laws and regulations.

The company does not tolerate child labor or labor performed through force or threat of violence, as per ILO Conventions C138 and C182.

All employees shall be treated with respect and dignity. No employee shall be subjected to physical, sexual, psychological or verbal attack.

All employees shall be treated equally. No job applicant or employee shall be subjected to discrimination or harassment based on his sex, race, religion, lifestyle, background or origin.

All employees shall have working hours and wages that conform to applicable law, regulation and collective agreement.

Freedom to organize and the right to collective negotiations and agreements shall be respected throughout the entire company in accordance with the applicable law, regulation and ILO convention.

Environment

Ever since 1998, Polykemi has been certified according to the ISO 14000 environmental standard; this commits us to positive development in the area of environment and actively minimizing, or if necessary, completely removing the environmental hazards from our operation.

The company shall work according to the formulated environmental policy and act in accordance with the applicable environmental legislation and regulations.

Chemicals and other materials deemed hazardous to humans or to the environment shall be processed, moved, stored, recycled and disposed of in a safe manner. Dangerous substances shall be minimized or replaced with less dangerous alternatives.

The use of natural resources shall continually be reduced through systematic improvements made in order to render production more efficient.

Waste and all kinds of emissions into the water, into the air and onto the land shall be minimized and a follow-up done.









Business Principles

Polykemi shall maintain a high standard and observe business ethics, respect local laws and not exploit or itself become involved in corruption, bribes, fraud or extortion.

Polykemi shall not enter into business deals in which gifts, payments or other benefits are given out in order to influence any party.

Whistleblower function

In the case that an employee discovers or believes that there are serious irregularities (law crime) within our business, there are several ways to report this.

You can inform your nearest manager, HR manager or contact your union representative.

You can also use our Whistleblower service by sending an email to whistleblower@polykemi.se. In this email function, you can be completely anonymous if you want to.

An employee who intentionally reports irregularities in our operations must feel secure in not receiving any negative penalties for providing this information.

Application and Implementation

The Polykemi code of conduct shall be applied throughout the company's enterprise and in all contacts made in the company's name. The code is the foundation for the behavior expected of employees at all levels and it provides a guideline for all decisions as to what is right and wrong. In some situations, there may still be some ambiguity or the code might not provide an answer. In such situations, each employee shall consult with his superior.

The code of conduct shall be included as a natural support in business undertakings at all levels within the company. It encompasses decisions made at board meetings and management meetings, as well as decisions and actions involved in the day-to-day business activities. It also governs all activities and behaviors practiced within the company and in contact with the company's stakeholders.

In his occupation, each employee in the company has a responsibility of his own at all times to follow and adhere to the principles the code addresses.

The company has a responsibility to ensure that employees at the company have been informed and have understood the content of the code of conduct. Each board member, member of the management group and the head of the company shall have enough information and knowledge in order for him to be able to educate and inform his employees and even follow up on how well the code is being observed.

If an employee does not feel that we are living up to the principles set out in the code, there are several ways to report the matter. You can inform your immediate superior or human resources









manager, or else you can contact your union representative. An employee who in good conscience reports deficiencies in relation to the code of conduct shall feel safe in knowing that he will not face negative consequences.

A failure to observe or a breach of the code of conduct can lead to disciplinary measures.









Global Compacts 10 principles

The UN Global Compact was started at the initiative of then-Secretary General Kofi Annan. The purpose was to create a set of international principles aim at business, which pertains to human rights, labor issues, the environment and corruption. The principles are based on the UN Declaration of Human Rights, ILO fundamental conventions on human right in the workplace and the precautionary principles for the environment, as well as the UN convention against corruption.

Human Rights

Principle 1. Businesses should support and respect the protection of internationally proclaimed human rights within the sphere they can influence, and,

Principle 2. Make sure that they are not complicit in human rights abuses.

Working Conditions

Principle 3. Businesses should uphold freedom of association and effective recognition of the right to collective bargaining,

Principle 4. The elimination of all forms of forced and compulsory labor,

Principle 5. The effective abolition of child labor

Principle 6. Eliminate discrimination in respect of employment and occupation

Environment

Principle 7. Businesses should support a precautionary approach to environmental challenges,

Principle 8. Undertake initiatives to promote greater environmental responsibility, and,

Principle 9. Encourage the development and diffusion of environmentally friendly technologies.

Corruption

Principle 10 - Businesses should work against all forms of corruption, including extortion and bribery.

