



**BE GROUP**

**Code of Conduct**

April 26, 2018



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## 1. INTRODUCTION

This Code of Conduct gives guidance in our daily work to achieve our goals and shows our responsibilities towards our business environment, employees, shareholders, business partners and society in general. It is supplemented by specific BE-wide policies, principles, guidelines for example our business concept and values.

Our business operations are based on high ethical standards. We believe that our excellent reputation contributes to our business success. It is our aim to be a respected company and a good corporate citizen, living according to local laws. We follow The Ten principles of the UN Global Compact (<https://www.unglobalcompact.org/what-is-gc/mission/principles>) and always act according to the laws and regulations of the country in which we operate. It is the responsibility of all employees to be aware of relevant laws affecting their job duties or, in case of doubt, to seek advice to ensure compliance.

Our Code of Conduct is applicable to all employees of BE Group in all our markets. We also encourage our Board members, business partners, suppliers and customers to act in accordance with the principles stated in our Code of Conduct. More specific guidelines for our suppliers are found in our Code of Conduct for suppliers.

### Our Core Values

Our core values gives guidance to how we act. BE Group's core values are:

**Dynamic:** *Innovative and Action-oriented*

**Transparent:** *Performance and Leadership*

**Sustainable:** *Environment, People and Profitability*

Visit our intranet for more information about the Core Values.

## 2. AREAS OF RESPONSIBILITY

### Employees

At BE Group we respect our employees, their human rights and all our workplaces shall be free of harassment and discrimination;

- BE Group shall not discriminate against any employee and job applicant based on race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, and termination. In addition, BE Group shall not require employees or potential employees to undergo medical tests that could be used in a discriminatory way except where required by applicable laws or regulations or necessary for workplace safety.
- BE Group shall respect that employees shall have the right to choose whether or not to be represented by a trade union for the purpose of collective bargaining.

- BE Group does not use or tolerate child labour, the employees shall be at least 15 years of age or the applicable minimum legal age, whichever is higher.
- BE Group shall ensure that salaries and any related benefits correspond to, or exceed, the minimum level stipulated by law and industrial standard for working hours in each country where the company is operating.
- We strive to create and maintain a sought after workplace for all our employees, free of harassment and discrimination. Everyone are to be treated with equal respect and dignity. Furthermore, we promote a culture of equal opportunities and diversity. We do not tolerate any kind of harsh or inhumane treatment, including but not limited to sexual harassment, mental and physical coercion, and verbal abuse.
- BE Group aims at preventing and providing against addiction problems among its employees.
- BE Group endeavours to provide the employees with further education and training in order for the employees to achieve job enrichment, increased competence and powers and to ensure that our employees have the adequate training and education.
- BE Group shall give all employees a fair chance to compete for new employments; only relevant professional skill and competence shall be decisive when choosing the right person for an employment, unless national legislation prescribes otherwise.
- BE Group shall ensure that registration, filing and the use of personal data are treated as confidential and in accordance with GDPR and local legislation.

## Health and safety

BE Group recognises that integrating sound health and safety management practices into all aspects of business is essential to maintain high morale and produce innovative products. BE Group provides safe and healthy working environments in compliance with applicable laws and regulations and are committed to continuous improvements. It is our aim to prevent accidents and to mitigate health and safety risks in the workplace.

The managing director and authorized personnel is responsible for providing the employees with appropriate workplace health and safety information and training, including written health and safety information and warnings, in the primary language of the employees. We expect our personnel to take responsibility for their own safety and the safety of others in the work place.

- Physical hazards shall be eliminated where possible. Where physical hazards cannot be eliminated, BE Group shall provide appropriate engineering controls such as physical guards, interlocks, and barriers. Where appropriate engineering controls are not possible, appropriate administrative controls such as safe work procedures shall be established.
- Appropriate personal protective equipment shall, in all cases, be provided within our facilities. Employees shall not be disciplined for raising safety concerns and shall have the right to refuse unsafe working conditions without fear of reprisal until management adequately addresses their concerns.
- We shall prevent, identify, and assess emergency situations and events and minimise their impact by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, adequate exit facilities, and recovery plans.



- BE Group have local procedures and systems to manage, track, and report occupational injury and illness. Such procedures and systems shall encourage employee reporting, classify and record injury and illness cases, investigate cases and implement corrective actions to eliminate their causes, provide necessary medical treatment, and facilitate return of employees to work.

## Company assets

All employees are responsible for taking good care of BE Group's assets including physical property, financial assets, intellectual property, and any confidential information. Employees have a duty to use the assets only for legitimate business purposes and to protect them from loss or unauthorized use. Our assets may not be used for unlawful or improper purposes.

- We shall protect any confidential material and information entrusted to us by subcontractors, suppliers or customers.

## Business

We strive to be a trustworthy partner to our business partners, suppliers and customers. BE Group requires honesty and integrity from all business areas of BE Group and expect the same from all its business associates, such as customers, suppliers and collaborators. BE Group requires that its business associates shall apply ethical guidelines similar to the ones described in this Code of Conduct. Furthermore we expect our suppliers to follow the additional guidelines in the Code of Conduct for suppliers.

- BE Group stands for free and fair trade, competition and ethical conditions within the scope of existing legal rules.
- BE Group encourages transparency and openness, provided that business secrets that might damage the competitiveness of BE Group and/or relations with customers and collaborators are not revealed.
- We are committed to work against corruption in all its forms, including bribes which are forbidden and all kinds of compensation to agents, suppliers and collaborators shall consequently be based solely on relevant products and services.
- Gifts and other benefits as features of customary hospitality shall not exceed local practice and legislation (not offer nor accept), the managing director is responsible for establishing maximum amounts. Improper benefits (bribes, etc.) comprise among others cash, items, pleasure trips, extravagant meals and other similar benefits or services. A benefit must comply with the following requirements:
  - The benefit must be permitted by local laws, regulations and policies.
  - The benefit must have a clear and legitimate business purpose.
  - It must not be provided in exchange for an improper advantage.
  - The nature, value and frequency of the benefit must be appropriate to the occasion on which it is given.
  - The benefit must be provided in a transparent manner.
- Our employees and directors are expected to promote the best interest of BE Group and act responsibly in doing so. Situations where personal interests may conflict with those of BE Group must be avoided. The establishment of any business relationships must be based on objective criteria.

- All business transactions on behalf of a BE Group company shall be clearly reported in the accounts of the company in accordance with applicable accounting principles of BE Group.
- We do not accept, facilitate or support money laundering. We will conduct business only with reputable parties involved in legitimate business activities, with funds derived from legitimate sources.

## Social

### Communication to shareholders

The policy of BE Group is to be open and available as set out in BE Group's Information Policy. BE Group shall provide objective and continuous information regarding the products, services and development of BE Group. Information of importance to BE Group's business associates and collaborators shall always be provided as promptly as practicable.

- The earnings on the shareholders' investments shall always be taken into consideration when decisions are taken concerning important strategies and actions within BE Group.
- BE Group employees shall be open and transparent without revealing critical information that can affect BE Group in a negative way and/or violate the laws applicable to a listed company.

### Environment

BE Group has a permanent commitment to contribute to an ecologically sustainable development. It is our policy to follow the environmental laws and adopt practices that protect and sustain the environment. We aim at increasing the energy efficiency of our operations, reduce waste, and protect the environment. BE Group's environmental policy states:

- As a minimum comply with current environmental legislation and requirements from local authorities.
- Be economical in our use of energy and natural resources.
- Work towards continuous improvement and to prevent negative environmental impacts. The environmental status is assessed on an ongoing basis through measurements and audits.
- Work to decrease the amount of waste and emissions from our facilities.
- Identify and foster opportunities to make adjustments benefiting the environment when making investments and changes in processes and facilities.
- Maintain a high level of awareness on environmental issues through ongoing training.
- Document and communicate our environmental work to our employees and to provide open and objective information to external stakeholders.
- Maintain adequate preparedness for dealing with environmental incidents and unintentional environmental emissions.

BE Group continuously tries to improve its consideration for the environment and to ensure health and security for people dependent on the business of BE Group. BE Group's ambitions in this respect are outlined by each BE Group company in separate local programmes.



### **Community relations**

BE Group operates in a socially aware manner and within the scope of the national legislation of the countries where BE Group is established. BE Group shall in this connection among other things see to that all employees in BE Group comply with applicable rules on competition such as rules prohibiting agreements with anti-competitive effects. The best way for BE Group to contribute to a social and financial development is to run our businesses with professionalism and profit in order to create jobs and to support our customers.

### **Political issues**

BE Group do not interfere with politics in the countries where BE Group is established. Consequently, it is prohibited for companies within BE Group to give financial support to political parties or politicians or to take part in party politics.

## **3. COMPLIANCE AND WHISTLE BLOWING**

All employees, including management at all levels, must comply with this Code of conduct. Supervisors shall be in charge of introducing the document to existing and new employees. Day-to-day reinforcement and compliance follow-up is part of every manager's responsibility. We encourage our employees to report any possible concerns or violations of this Code of conduct in confidence via the whistle blower function available on the intranet BEGIN or by contacting his/her immediate superior, any member of local executive management. Regardless of the reporting channel, all allegations of potential violations of the Code of Conduct that are made in good faith will receive a fair review with the relevant assistance.

The Board of Directors may review and update this Code of Conduct when necessary. Additional instructions of the application of this document can be given in separate guidelines. In case questions arise regarding the interpretation of the Code of Conduct or compliance with it, please contact your local manager.

Adherence to this Code of Conduct is both an individual and a corporate responsibility. Wilful breach of this Code of Conduct, or unauthorized departure from the procedures derived from this, may result in appropriate disciplinary actions.

This Code of Conduct has been approved by the Board of Directors of BE Group on April 26, 2018.



I hereby confirm that I have read and understood the information stated in this Code of Conduct.

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Date

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Signature

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Name in block letters