

Code of Conduct

Kemetyl Group

Introduction by CEO

Our operations are built on trust. Trust in that we deliver quality and value to our customers and that we act with integrity and awareness of the impact of our operations. 100% trust is one of the three cornerstones in our promise to the customers and all stakeholders, as described in the Value Proposition.

Kemetyl achieve our vision **“Value and sustainability through simplicity and innovation”** by actively living our values responsibility, improvement, respect, customer value and safety.

The purpose of the Code of Conduct is to provide high level principals to how we work in a safe, lawful and ethical manner, always making our best judgements. It demonstrates our commitment to be a responsible business and societal actor by building on UN human rights conventions including the Convention on the Rights of the Child, ILO's Conventions on working conditions and labor rights, Rio Declaration on Environment and Development and UN Convention against corruption.

Scope and responsibility

The Code of Conduct applies to all employees of the Kemetyl Group, temporary employees and to the Board of Directors. We are all responsible for reading and understanding the Code of Conduct and must conduct our tasks and responsibilities according to requirements and principles set by the company. If it is unclear whether an activity is legally or ethically acceptable you must consult your manager.

All managers are responsible for making the Code of Conduct known to employees and to promote and monitor compliance to it.

The Code of Conduct is also to be respected by suppliers and partners. Suppliers and partners are responsible for ensuring that their suppliers comply with the requirements of Code of Conduct.

Compliance with laws, rules and regulations

Complying with the law is fundamental and we always comply with applicable laws in the country

where we do business. Additionally we always adhere to internal rules and regulations, as the management system.

Quality

We demonstrate the ability and willingness to plan, prepare and execute work that is accurate, complete, on-time and reliable. We make fact based decisions and seek improvements in daily work.

If any of the claims in Code of Conduct violate legal requirements, the law prevails. In such cases, Kemetyl is to be informed.

Financial reporting and accounting

We are committed to comply with generally accepted accounting principles and keep complete and accurate records.

Conflict of interest

A conflict of interest can arise if you have a social, financial, political or personal interest that conflicts with the best interests of Kemetyl. It occurs when a person puts his or her own interests before the company's interests and is then unable to effectively perform his or her responsibilities.

If you are in doubt of a potential conflict of interest speak to your line manager.

Fair competition

We are all committed to protect fair and open competition. Antitrust laws govern the way companies behave on the market place and no activity supporting breaches must take place.

Corruption and bribery

All forms of corruption have zero tolerance. We shall not offer, give, receive or request something of value for the purpose of influencing, directly or indirectly, officials or private parties for an improper purpose.

Gifts and hospitality

You must exercise caution and good judgement in relation to offering or accepting gifts and hospitality.

If there is a reason to believe that the purpose of a gift or remuneration is to influence business decisions it shall not be accepted. Small gifts can be accepted but are to be considered as a gift to the company.

Hospitality such as social events or entertainment shall be approved by your line manager. Meals can be accepted as long as it is a clear business reason and that the cost is within reasonable limits. Consult your manager if you have any questions.

Discrimination and harassment

We respect and support the fundamental principles of human and labor rights and acknowledge the employees right to form and join trade unions. We strive for diversity and prohibit discrimination against any employee on the basis of age, gender, sexual orientation, disability, nationality, political opinions, religion or other comparable cause.

We do not tolerate harassment of any employees and must always treat employees, customers and business partners with dignity and respect.

Human Rights and good working environment

Kemetyl comply with all applicable laws regulating the employer-employee relationship. Fundamental human rights should be respected, both concerning own personnel and in the sphere of influence of the supplier. No form of child labor, forced or compulsory labor is accepted.

We work to protect our employees and always follow safety procedures and guidelines. You shall attend to trainings needed and co-operate in safety reporting. Alarm if you believe safety regulations are not followed. Our employees should have knowledge of risks and safety routines and access to the necessary protective equipment. Appropriate measures to prevent and deal with any accidents, including fire, and occupational diseases should be taken.

If the employer (supplier) provides housing for the employees, there is minimum design requirements, for example access to clean water, sanitary facilities, living space and fire protection.

We value the ability to work collaboratively with customers, suppliers and colleagues within Kemetyl

Group at all levels toward mutual objectives. Maintaining a blameless environment by focusing on solutions rather than seeking to find who is at fault is all employees' responsibility.

Confidentiality

When starting the employment in the company you sign a declaration of secrecy. You are responsible for handling data and information in a way that protects the interests of the company. This also applies after conclusion of the employment as long as the information is considered sensitive or confidential.

Corporate responsibility and sustainability

We act responsibly. In business decisions we consider the environmental effect and we achieve business success in a way that demonstrates respect for people and the environment. We comply with applicable environmental laws, regulations and standards.

Company property and assets

Both tangible assets and intangible asset must be safeguarded. It applies to physical assets like facilities, equipment and computers and to intellectual property and confidential information. Company assets are only to be used for business purposes and by authorized employees.

Breaches of the code

Any awareness or suspicion of breaches to the Code of Conduct must be reported immediately to your manager, the manager's manager or to the Board of Directors.

Those who report suspicion of crimes against Code of Conduct do not count on disciplinary action. Violating the Code of Conduct may result in disciplinary procedures. We collaborate with suppliers to ensure that the requirements are met and will consider terminating business relationship with suppliers involved in illegal, corrupt or improper business practices.

Kemetyl reserves the right to unannounced visits for control and follow-up on suppliers to ensure compliance with the Code of Conduct.