

# Code of Conduct

## **BACKGROUND**

Our vision is to be the customers' first choice for bathrooms, kitchens and beyond. We work hard to ensure we have the happiest customers and most dedicated employees in the sector, and to create sustainable and profitable growth by focusing on our cornerstones Customer offering, People and culture, Sustainability and Efficiency.

Our business concept is to offer strong brands with a wow factor that customers are willing to pay a little extra for. Our values – the customer comes first, we win together and I step forward – guide us in our day-to-day work. Combined with our Code of Conduct, which summarises our overall guidelines for acting responsibly, these values form a framework for how we conduct ourselves in our daily activities.

Our Code of Conduct is based on the following:

1. The UN's Universal Declaration of Human Rights and the associated UN conventions.
2. The International Labour Organization's (ILO) Fundamental Principles and Rights at Work.
3. The Organisation for Economic Co-operation and Development's (OECD) Guidelines for Multinational Enterprises.
4. The UN Global Compact's Ten Principles covering human rights, labour, the environment and anti-corruption.

## **SCOPE**

Our Code of Conduct applies to all employees within the Group. Our Code of Conduct may be used in the evaluation of business partners and constitute obligatory requirements for the initiation or continuation of collaboration. Our Code of Conduct may be used in these situations as a whole, or particular elements may be included in contractual documents or other forms of written communication or documents.

We will always comply with the legal requirements and frameworks in place in the countries we operate in. If the Code of Conduct and legislation contradict one another, the legislation shall take precedence.

## **REPORTING NON-COMPLIANCE WITH LEGISLATION OR THE CODE OF CONDUCT, OR ABUSES**

Employees who become aware of violations of applicable legislation or this Code of Conduct must report the violations to their immediate manager without delay. In general, your manager will be best positioned to deal with such situations. If, for any reason, you do not feel comfortable talking to your manager, if your manager is involved in the situation, or they are otherwise impartial, the situation must be reported to the nearest higher manager or a representative of the HR or sustainability functions.

If you require support, assistance, or further information on issues related to this Code of Conduct, please contact your immediate manager or HR.

On our website, [fmmattssongroup.com](http://fmmattssongroup.com), you will find our Whistleblower Policy, which provides information on how to report any misconduct that could seriously harm operations or our employees. The purpose of the Whistleblower Policy is to encourage employees and other stakeholders to report suspected misconduct without any risk of retaliation, as well as to ensure an appropriate investigation process.

Our suppliers are covered by our Supplier Code of Conduct. If any suspected non-compliance with legislation or the Code of Conduct, or any abuses are observed on the part of a supplier, this must be reported as it would be if it were to occur within our own operations.

### **BUSINESS ETHICS**

Our conduct must be characterised by responsibility and respect for our business partners and the local communities in which we operate, at all times, regardless of the country or market. Ethical conduct and good business practice are of utmost importance for sustainable development and profitability. The only factors we may use to convince our business partners are commercial arguments. Our objective is to develop business relationships that are stable in the longer term, in which we are considered a responsible and professional partner.

We must avoid any conflicts of interest between us and our business partners. We always place the interests of our company above any personal interests.

### **FAIR COMPETITION**

We never enter into contracts or agreements – be they express, implicit, oral or written – with a competitor on matters concerning pricing, discounts, campaigns, tenders, conditions of sale or sales areas. We do not exchange sensitive market information with our competitors, either directly or through industry organisations or business partners.

### **WE DO NOT ACCEPT BRIBES**

Bribes, kickbacks and other forms of corruption are strictly prohibited. Neither we as a company nor anyone acting on our behalf may receive, accept, offer or support undue payments, gifts, political contributions, sponsorships, hospitality or other benefits that could influence or be seen to influence the objectivity of a business decision or the decision of an authority.

### **HUMAN RIGHTS AND SAFE WORKING CONDITIONS**

We work actively to ensure our employees are treated fairly, equally, and with respect. We work hard to offer our employees an attractive environment with good working conditions that they enjoy working in and we work together to develop operations in order to achieve our vision and goals. A good working environment is something we strive for at all times in order to ensure our employees' wellbeing and safety, and the working environment must be factored into all decisions taken and activities carried out.

### **WE DO NOT ACCEPT CHILD LABOUR**

All children must be protected from financial exploitation and from carrying out work that could be harmful to their physical and mental health or that could negatively impact their chance to gain an education. FM Mattsson Group does not tolerate child labour in our facilities or in the operations of any of our business partners.

Employees under the age of 18 years must be protected in particular from hazardous tasks that entail risks to health and safety. Work that is dangerous or harmful to children's health or

development is prohibited under all circumstances. This also applies to work that could prevent children attending school. Any particular rules and requirements, such as applicable national legislation, other regulations or applicable collective agreements concerning employees under the age of 18 years, regarding issues such as working times, tasks, and other elements of the employment relationship, shall be adhered to unconditionally in all elements of our operations.

If child labour is discovered in any of our facilities or those of our suppliers/partners, the employer must act in the child's best interests and immediately find suitable solutions in collaboration with the child and their family.

### **WE DO NOT ACCEPT FORCED LABOUR**

By forced labour we refer to work or services carried out on the basis of a threat of punishment or similar and that are not carried out of the individual's own free will. Forced labour, including slave labour, contract labour, or involuntary prison labour is prohibited. Migrant labour or other forms of employment that involve intermediaries entail greater risks of forced labour, and therefore particular attention must be paid to such situations.

Employees shall have the right to leave the workplace at the end of their working hours. All work must be carried out of the individual's own free will and the employee shall be entitled to cease working after a reasonable notice period. The sale of sexual services is often linked to trafficking and forced labour. FM Mattsson Group has zero tolerance for trafficking and works to safeguard human rights. For this reason, FM Mattsson Group does not tolerate any visits to strip clubs or purchasing of sexual services during business trips or during events at which the group is represented. This shall apply regardless of whether the legislation in the country in question permits the purchase of sexual services.

### **WE SAFEGUARD THE RIGHT TO FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

We respect employees' rights to organise or not organise themselves into trade unions and negotiate collectively or individually. No employee may be at risk of harassment or reprisals for exercising these rights. In countries where the freedom of association is restricted or under development, we will ensure that employees may meet with the company's management to discuss pay and working conditions without negative consequences.

### **FAIR EMPLOYMENT PRACTICES**

We believe in and promote fair employment practices, for both ourselves and our suppliers, in terms of not just reasonable remuneration but also fair conditions regarding the scope and duration of the work. We will ensure that employment contracts, employment conditions, pay, and benefits adhere to national legislation, including collective agreements where applicable. Employees shall have the right to equitable remuneration, also known as a living wage, with a minimum wage constituting the lowest possible pay level where applicable.

### **WE BELIEVE IN DIVERSITY AND INCLUSION**

We work actively to increase diversity and inclusion throughout our operations. Discrimination, harassment and victimisation, regardless of the reason, are never acceptable. Respect for each person's unique and equal value forms the basis for how we view people. We will work to ensure active measures are taken to achieve equal rights and opportunities in working life, regardless of gender, ethnicity, civil status, pregnancy, nationality, disability, trade union involvement, sexual

orientation, religion or other beliefs, and work in a targeted way to prevent discrimination on these grounds.

All employees with the same experience and qualifications shall receive the same pay for the same work. Pay shall reflect education and performance.

### **ALCOHOL AND DRUGS**

Using or being under the influence of alcohol or other drugs in the workplace is not acceptable.

This ban is in place to: create safe and secure workplaces; prevent ill-health, accidents, and harmful consumption; and, where necessary, facilitate support and rehabilitation.

### **RESPONSIBLE EXTRACTION OF MINERALS**

We adhere to applicable legislation and regulations regarding dealing with conflict minerals. Conflict minerals are minerals from high-risk areas and areas experiencing conflict, the use of which directly or indirectly contributes to the financing of armed groups who are expected to commit serious human rights violations. Goods delivered to us must meet the requirements set out in applicable legislation and regulations concerning conflict minerals.

### **HEALTH AND SAFETY**

We apply a systematic approach to ensuring a safe and healthy working environment. Risks that could lead to accidents or a deterioration in health must be dealt with immediately. Our working environment efforts are based on national legislation in the countries we operate in. We believe that a safe working environment means, for example, workplaces being kept clean and production machinery being safe, as well as instructions regarding personal protective equipment and working equipment being adhered to.

Dangerous materials and equipment must be stored, handled and transported in accordance with applicable legislation. Emergency exits must be clearly indicated. Exits must not be blocked and must be well lit. All employees must be informed about safety measures, such as emergency exits, fire extinguishers, first aid equipment, etc.

### **RESPONSIBILITY FOR PRODUCTS AND SOLUTIONS**

We guarantee that the Group's products and services meet applicable safety requirements in the markets we operate in.

Our responsibility for customer health and safety also covers ensuring that the products we manufacture and buy in do not contain harmful chemicals or substances, and we understand and fulfil the requirements of the REACH Regulation (EC) No 1907/2006 regarding the registration, evaluation, authorisation, information and restriction of chemicals.

All of our products and solutions must also meet the requirements of the EU's RoHS Directive (2011/65/EU), including amendment 2015/863, regarding substances used in electrical and electronic equipment.

### **PROVISION OF INFORMATION**

Information regarding the Group's financial performance and standing, as well as other information that could affect share prices, is published in accordance with applicable regulations and is published or approved by the CEO or CFO. Such information shall be published in a timely, reliable, and correct manner and the information must be up to date.

## **OUR RESPONSIBILITY FOR SUSTAINABLE DEVELOPMENT**

Sustainability is a central part of our strategy – and a natural part of our daily work. For us, sustainability is about looking at the whole picture and consciously taking into account social, economic and environmental aspects.

We will work on sustainability throughout our value chain and seek to identify areas where we can have a positive impact on people and the environment.

In all that we do, we will seek to use materials and energy as efficiently as possible and to improve our recycling rate.

When developing new products, we will evaluate sustainability aspects to ensure the products' environmental impacts are as low as possible in the manufacturing, use, and recycling stages.

We will combat climate change by achieving carbon dioxide neutral status by 2050.

Our employees will receive training on and be aware of our sustainability work and sustainability goals.

Relevant training shall be provided to our employees as needed, so that they can contribute to the strategic goals, prioritised initiatives, and continual improvement of our operations. All stakeholders and business partners will, through relevant channels, have the opportunity to get involved in our environmental and quality goals, so that they, too, can contribute to the strategic goals and prioritised initiatives of our operations and adapt to our requirements.

This code of conduct is reviewed annually and revised if necessary by the Group's management and approved by the board.

Fredrik Skarp, Group CEO, FM Mattsson Group