

## Fagerhult Group Code of Conduct

Our global presence demands that our employees and business partners take responsibility – for themselves and others. We have therefore created a set of rules, our Code of Conduct. Everyone in our Group is obligated to follow it, our employees, board members and management. We also pass the code on to our business partners and inform them that we expect them to adopt the Code of Conduct and follow it themselves.

## Our Business Principles

We must act as a reliable and honest Group that lives up to its commitments. We believe in long term business relationships, in which we, together with our business partners, lay the foundations for strong financial results, consideration for the environment and social commitment. Our Code of Conduct is communicated to our stakeholders as a natural element of our relationship.

### **Laws and Rules**

In countries where we operate, the laws and regulations of that country must be followed. We respect and follow rules on competition, environmental legislation, labour laws, data protection regulations, agreements and other provisions that affect our operations.

We must not offer business partners and other stakeholders rewards or benefits that contravene relevant laws or reasonable and accepted business practices. We must refrain from taking part in any form of corrupt business practices and our business connections must be characterised by impartiality. The employee that gets invited to events arranged by suppliers, for example fabric tours and study visits, needs approval to attend these from their immediate superior. We will pay for our own travel and living expenses. Neither Fagerhult Group nor any of its employees may accept personal gifts or services exceeding a set level, or take part in entertainment in excess of normal business practices.

### **Personal Relationships at Work**

As in any large organisation some employees may be in, or form, close personal relationships with other employees in the company. In such cases, it is important to appreciate that they can create actual or perceived conflicts of interest or favouritism.

Persons in intimate or family relationships should not work within the same part of the organisation, nor have any hierarchical dependency relationship. A person in a leading position, like an MD or a member of the management team, may not have a close relationship with any other employee in the company and persons working in HR, payroll and finance should not handle the pay, or other employment conditions, of relatives.

### **Personal Interests**

Our employees must avoid getting into situations where their personal or financial interests may come into conflict with those of the Fagerhult Group. In cases where there is a risk of any such conflict of interests, the employee must report this to his or her immediate superior in charge of the matter.

### **Sponsors**

Where we agree to sponsorship arrangements, we look to do so in areas that will mainly benefit our business and operations. Our sponsorship shall agree with our internal rules on this subject. Donations to charity can only be approved by our CEO.

#### **Neutrality and Open Mindedness**

We aim for open communication with our stakeholders within the framework of maintaining business confidentiality. On the issue of political parties and candidates, Fagerhult Group takes a neutral stance. Neither the Group's company name nor the resources of the Group may be used to promote such interests.

## **Human Rights and Working Conditions**

We respect international conventions on human rights. We support and respect fundamental human rights in our operations. We will not tolerate, under any circumstances whatsoever, child labour or labour carried out under duress or threat of violence.

### **Diversity and Equal Opportunities**

Our Group applies equal opportunities to recruitment and treats its employees equally, irrespective of gender, marital status, ethnic or national affiliation, sexual orientation,

transgender identity, race, religion, political views, age or disability. Diversity is encouraged at all levels within the Group. We actively work to eliminate all forms of discriminatory treatment towards our employees. We pay fair wages and provide benefits in accordance with relevant standards in the countries where the Group conducts operations.

## **A Safe and Healthy Working Environment**

We must offer our employees a safe and healthy working environment. We strive to minimize work related accidents and personal injuries. Our units will as a minimum strictly follow national laws and/or collective agreements.

## **Our Environmental Responsibility**

Since lighting requires energy and a luminaire's greatest environmental impact comes from the current that runs through it, our energy efficient luminaires are right at the heart of our environmental work. The cleanest kilowatt hour is the one that never needs to be produced.

In our environmental work we strive to meet or exceed the relevant legal requirements. Our overall ambition is to limit the luminaire's environmental impact throughout its lifecycle – from development, manufacture and use to recycling.

## **Open Dialogue, Development and Demand**

We will have an open dialogue with employees, customers, suppliers, the general public and authorities about our Group's environmental and energy work and continuously train our employees within this area. We must always consider the environmental consequences before new raw materials, products or production equipment are introduced.

We work actively to require environmental consideration on our business partners. We continually develop our environmental work through the formulation of new objectives and regular monitoring.

## Follow up and Information

Our managers in the Group are responsible for providing information and presenting the

contents and meaning of the Code of Conduct within their section of the organization to our employees and business partners. Managers within Fagerhult Group must obviously always set a good example.

Incidents and actions that conflict with our Code of Conduct must be reported to your line manager or Fagerhult Group's HR Director. The code applies to all our operations in our Group and all employees across the globe. The practical application of this code will be monitored on a regular basis and openly communicated.