

## Code of conduct

**Responsible Function:**

People & Leadership

**Approved by:**

Board of Directors

*Luvata Special Products is committed to a high level of ethical conduct and compliance with all applicable local, national and international laws. Our goal is to adhere to legal obligations and to be a good corporate citizen wherever we do business, realising that even the appearance of impropriety can damage our reputation and business.*

*This includes, for example, fair competition, corporate governance, corruption, safety, and the integrity of the products and services Luvata Special Products delivers to customers. It also includes employment, the environment, human rights, and protecting copyright, company assets and other forms of intellectual property.*

Revision	Revision	Author	Approved by	Approved date
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## **1. Introduction:**

Luvata Special Products has always recognised that its own long-term interests and those of its various stakeholders [Note 1] depend on compliance with high standards of conduct, applicable law and good corporate citizenship.

This policy outlines the fundamental expectations of conduct at Luvata Special Products, both from The Group to its employees [Note 2] and vice-versa. This policy should be read in conjunction with other policies that give more detailed information on specific areas, such as employment, bribery and risk. Such additional guidelines, policies and instructions will not contradict this code.

Luvata Special Products has also adopted policies specifically related to certain regional competition laws: in the U.S., the *Antitrust Compliance Policy and Guidelines*, and in the EU, the *EU Competition Law Compliance Manual*. These policies provide employees with a summary of relevant competition and antitrust laws, as well as guidance on issues that may arise in certain business contexts. Compliance with these is also required under this code.

## **2. Workplace practices**

Luvata Special Products will encourage its employees to lead balanced personal and professional lives and strive to provide a safe and healthy workplace for employees, free of harassment or discrimination. Luvata Special Products employees are expected to respect and encourage The Group's values and Behavioural Principles at work. Luvata Special Products is committed to equality of opportunity in all its employment practices and invests in the personal and professional growth of its employees.

## **3. Human rights**

Luvata Special Products upholds an environment that is free from any discrimination based on race, colour, nationality, ethnic origin, age, religion, gender, sexual orientation, disability or marital status.

Luvata Special Products believes in freedom of peaceful assembly and association, as well as freedom of thought, opinion and religion where the expression of those is considerate of the dignity of others. Luvata Special Products will not use child or forced labour nor tolerate working conditions or treatments that are in conflict with international laws and practices.

Luvata Special Products fully supports the Ten Principles of the UN Global Compact, explained in full at [www.unglobalcompact.org](http://www.unglobalcompact.org).

#### **4. Conflicts of interest, gifts, bribes and improper payments**

Luvata Special Products employees must avoid activity that leads to a conflict of interest – that is the personal giving or receiving of favours, benefits or gifts that could be seen to influence objective decisions when conducting business for Luvata Special Products. For further information, please refer to the Anti-Corruption Policy.

#### **5. Corporate funds and records**

Luvata Special Products expects honesty and integrity in all transactions involving corporate funds and assets, and monitors compliance with this objective.

The use of corporate funds or assets, or those of any affiliated entity, for any improper purpose is strictly prohibited. No undisclosed or unrecorded funds or assets of any Luvata Special Products company shall be established for any purpose. No false or artificial entries may be made in the books and records of any Luvata Special Products company for any reason. No employee may participate in any transaction that requires the payment of corporate funds for any purpose other than those described on the payment instrument (cheque, wire transfer, etc.,)

Any employee having information or knowledge of any action which contravenes the above must report it to a senior manager, or via the 'WatchGuard' system on Luvata Special Products' intranet.

#### **6. Protection of Luvata Special Products' assets**

Luvata Special Products' assets include its companies' facilities, equipment and other physical assets as well as intellectual property and confidential information. Employees should be alert to any situations or incidents that could lead to the loss, misuse or theft of Luvata Special Products assets and report any such situations or incidents immediately. For further information, please refer to the Physical Security Policy.

#### **7. Care and use of information**

Luvata Special Products respects the privacy and integrity of its stakeholders and endeavours to adhere to all specific standards on processing personal data and product information. All personal data collected and held by Luvata Special Products will be processed fairly, lawfully and carefully and in a way that aims to protect the privacy of individuals.

Due regard should be given at all times to the protection of proprietary information. No Luvata Special Products employee should use improper means to acquire confidential information. Sometimes, other companies or individuals may disclose confidential information to Luvata Special Products, only if Luvata Special Products agrees not to disclose it and not to use it for various purposes. No employee may sign any confidentiality agreement proposed by a third party unless approved by Luvata Special Products-designated legal counsel. For further information, please refer to the Privacy Policy.

## **8. Environment**

Luvata Special Products is aware that every decision and action can have an impact on the planet and all its other inhabitants. Luvata Special Products will use the highest levels of discretion in treating all living things in a dignified manner. Luvata Special Products encourages this mentality throughout its own operations and those of its supplier network.

- Minimising the use of packaging and chemicals.
- Maximising energy-and-water-saving initiatives.
- Interacting constructively with the communities around us.
- Surpassing legal, industry and ethical guidelines.

For further information, please refer to the Environmental policy.

## **9. Suppliers**

Luvata Special Products will do its utmost to work only with subcontractors or suppliers who adhere to international human rights and environmental laws and practices. Luvata Special Products strives to be aware of the ethical performance of its suppliers and will take immediate and thorough steps in cases where the ethical performance of a supplier comes into question. Luvata Special Products requests that its suppliers avoid raw material procurement from any source where there are clear human or animal rights violations, or where the method of procurement or distribution is illegal.

## 10. The Behavioural Principles

Above all, Luvata Special Products is committed to employing people of the highest integrity. For that reason, Luvata Special Products promotes its seven Behavioural Principles throughout its working culture:

- Communicate clearly and openly, whether the news is good or bad.
- Be long-term relationship driven - understand the needs of customers, colleagues and suppliers.
- Support change and innovation, and encourage good ideas to become realities.
- Be a backer, believers and developer of people – our people are our greatest asset
- Set clear goals, track progress and deliver results.
- Adopt a can-do attitude - be courageous and ambitious in all you do.
- Be bottom-line focused in your day-to-day actions – don't waste anything.

## 11. Implementation

Compliance with this code extends to all matters, including decisions relating to trade, investment, subcontracting, supplying, business development, and all other business and employment relationships. Questions about the application or meaning of any provisions should be directed to management for Luvata Special Products.

If an employee becomes aware of any apparent violation of this code, the additional policies adopted by Luvata Special Products under this code, or any law, rule or regulation, it is that employee's responsibility under this code to report the apparent violation to their supervisor or using the WatchGuard system on the Intranet. No employee will suffer any penalty or retribution as a result of a good faith reporting of misconduct or suspected violations of the law or the code.

### Notes:

[Note 1] The term 'stakeholders' refers to employees, customers, suppliers, shareholders, governmental and non-governmental organisations, the communities in which Luvata Special Products does business, and other parties that have influence over or are influenced by Luvata Special Products.

[Note 2] This code is equally applicable to employees, officers and directors of the company. Any waiver of the code for executive officers or directors may be made only by the Board of Directors or the Management Team.