

Corporate responsibility

OUR CODE OF CONDUCT

Edition 4, March 2024

BEIJER • ALMA

UZMANĪBU
KARSTIS

Contents

INTRODUCTION	3
CORPORATE RESPONSIBILITY	4
RESPONSIBILITY FOR PEOPLE	5
RESPONSIBILITY FOR SOCIETY	6
RESPONSIBILITY FOR THE ENVIRONMENT AND CLIMATE	7
RESPONSIBILITY FOR BUSINESS ETHICS	8
SUSTAINABLE VALUE CHAIN	10
IF SOMETHING IS SUSPICIOUS	11
REFERENCES	12

Introduction

IN ORDER TO GROW, our Group must act responsibly. This entails that we accept responsibility for people and the environment. We do this by maintaining sound business ethics with a distinct social commitment and through efficient use of resources with a reduced climate impact. The Group and our subsidiaries are to be associated with social, financial and environmental sustainability.

Employees are essential for developing our operations and business. As such, they should always feel that our workplaces are safe, provide equality and are conducive to personal growth. We must also establish a relationship of trust with our customers, business partners and other stakeholders. That is why we have a Code of Conduct that serves as a guide in this regard.

The Code is not a document that we read once a year. It is something that we apply every day and that characterizes everything we do. The requirement to take responsibility is clear. The Code of Conduct helps us to take this responsibility, both as individuals and as an organization. It supports our everyday work, providing clearly defined sustainability objectives, result-oriented initiatives and transparent reporting to show what is to be achieved. Our corporate culture also serves as a support in this work. At Beijer Alma, Lesjöfors and Beijer Tech as well as all of their subsidiaries, this culture is characterized by openness, tolerance and access to information – creating yet another driving force for sustainability.

Our corporate culture is decentralized, which means that the role of the individual is key. This signals that everyone has a responsibility. We also have a positive work environment and sound business ethics, which contribute to employee and customer responsibility and satisfaction. This helps to make the Group a place where many people want to work and develop as well as a company that many people want to do profitable, sustainable business with.

Stockholm 2024



Henrik Perbeck
President and CEO
Beijer Alma



Ola Tengroth
CEO Lesjöfors



Staffan Johansson
CEO Beijer Tech





Corporate responsibility

BEIJER ALMA IS AN INTERNATIONAL, LISTED INDUSTRIAL GROUP. Our business concept is to own and develop companies with strong growth potential. The operations focus on component manufacturing (Lesjöfors) and value-added sales, manufacturing and niche technologies (Beijer Tech).

Corporate responsibility is part of our business strategy and a requirement for us to grow profitably. The Code of Conduct describes our responsibility, how we conduct our operations and Beijer Alma's core values. The Code is to permeate daily operations in both thought and deed.

The Code applies to all Beijer Alma employees, managers and Board members. It provides guidance about our stance on responsibility in relation to People, Society, the Environment & Climate and Business Ethics, functioning as a framework. The Code of Conduct is connected to continuous improvement. This means that we work systematically to improve the work environment, reduce our environmental impact, remain updated on laws and regulations at the local and global levels, and regularly evaluate our business ethics.

Our companies are to create added value for customers, shareholders, partners and employees – added value that means we contribute to financial, social or environmental sustainability in different ways, without compromising our aspirations concerning quality and sustainable development. We expect our business partners to familiarize themselves with the Code of Conduct and use similar guidelines in their own operations. The Group has a specific Business Partner Code of Conduct with principles based on international guidelines concerning the environment and social responsibility and ethics.

Responsibility for people

BEIJER ALMA SUPPORTS AN INCLUSIVE WORK ENVIRONMENT and a culture characterized by openness and tolerance, where employees are of the greatest importance. We are to have a workplace that inspires development without compromising on safety or well-being. Everyone must feel that our workplaces are safe, provide equality and are conducive to personal growth. Employees are considered highly essential for the Group's development and suspicions of irregularities are taken very seriously.

OUR RESPONSIBILITY MEANS THAT:

- Our operations are to be conducted so that environmental and work environment legislation is followed with an ample margin.
- We treat all employees fairly and with dignity and respect. This means that we have zero tolerance for discrimination and harassment.
- We do not distinguish between or discriminate against our employees on the basis of religion, gender, age, disability, sexual orientation, nationality, political opinion, social background or ethnic origin.
- We support and promote diversity as well as inclusive work environments. We strive to attract people with differing perspectives, since this provides added value.
- We respect all employees' right to freedom of association and their right to choose whether they are represented by unions and collective bargaining.
- When determining salaries, we always offer a fair salary in line with the market and in line with local rules and regulations. Everyone's contributions are to be rewarded fairly.
- We regularly follow up employees' work and situation through employee performance reviews.
- We follow applicable laws, rules and standards for the industry in terms of working hours.
- We have a vision of zero tolerance when it comes to workplace accidents and do not compromise on workplace health and safety – we take responsibility for our safety and that of others, we follow safety recommendations and use personal protective equipment.
- We take a preventive and systematic approach in order to create a healthy, safe work environment by regularly following up and making improvements.
- We offer our employees opportunities to develop their professional knowledge.
- We process personal data according to the fundamental principles in the General Data Protection Regulation (GDPR).
- We respect the right of our employees to speak freely about circumstances that concern them personally, as long as they do not do so in the name of or in association with the company.





Responsibility for society

BEIJER ALMA AND ITS SUBSIDIARIES RESPECT the UN Universal Declaration of Human Rights and follow applicable legislation and agreements. We identify, manage and address issues that could have a negative impact on human rights, the environment or society. The Group has zero tolerance for all forms of modern slavery and human trafficking, including prostitution and other sex trafficking. We respect children's right to be a child, with a right to education and personal development, and we do not use child labor. Operations are to be conducted so that we meet environmental and work environment legislation by an ample margin.

To grow collectively, we need to act responsibly, towards people, society and the environment. We do this by maintaining sound business ethics with a distinct social commitment.

OUR RESPONSIBILITY MEANS THAT:

- To achieve social sustainability, Beijer Alma does not participate in human rights violations. We work proactively, preventively and correctively to eliminate any negative impact on human rights related to our operations, products or services.
- We do not use child labor, meaning labor under 15 years old according to the ILO. The minimum age for hazardous labor is 18.
- Whenever possible, we become involved in – and interact with – the communities in which the Group operates.
- We prioritize support and sponsorship of organizations that share our values and benefit the communities in which we operate.
- We participate in collaborations and projects with schools, universities, research institutes and industrial networks that are in line with our values.
- We take a neutral stance on political issues. The name of the company and Beijer Alma's financial resources are not to be used in political contexts.

Responsibility for the environment and climate

BY EMPLOYING A SYSTEMATIC AND TARGETED APPROACH to climate and environmental issues, we generate both business and environmental benefits. The aim of our work is to limit our environmental impact, lower costs, reduce risks and contribute to the realization of new business opportunities. We are to take responsibility for the impact that our operations and products have on the environment, for example by reducing greenhouse gas emissions. Our products are to have lasting value and a positive impact. We strive to reduce the impact of these products during their entire life cycle, from choice of material, design and method of transportation to manufacture, customer use and, finally, how they are processed at the end of their life cycle. We work continuously to develop and improve our environmental work through new initiatives and innovations.

OUR RESPONSIBILITY MEANS THAT:

- Our operations are to be conducted so that environmental legislation is followed with an ample margin. We are to have suitable long-term planning in place for new legislation and identify requirements and requests from customers and other stakeholders well in advance.
- Based on the principle of circularity, we strive to minimize our climate and environmental impact from production, product use, transportation and waste management. We help support customers in their sustainability goals and ambitions. Employees as well as business partners are expected to contribute to these goals and to follow the standards in our policy documents.
- We endeavor to reduce our greenhouse gas emissions in the entire value chain, such as through energy-saving measures, transitioning to renewable resources and choosing raw materials with low carbon footprints.
- We take environmental and health aspects into consideration when procuring raw materials, chemical products, packaging and distribution services.
- We offer products and solutions that contribute to reducing our climate and environmental impact.
- We remain well prepared in the event of an emergency by systematically identifying and assessing risks with respect to accidents, fires and uncontrolled emissions to the environment.
- We take a systematic approach to environmental issues. Environmental (ISO 14001) and quality (ISO 9001) management systems are to be in place at all major production units and in other operations that may require certified management systems. The management systems at units with a small number of employees do not need to be externally certified.





Responsibility for business ethics

BEIJER ALMA STANDS FOR TRANSPARENCY and we always act based on sound business ethics. We take responsibility for our actions through sound business ethics and we behave professionally when representing the Group. Free competition is a given for values like justice and respect. Business partners and competitors are treated fairly and respectfully. We maintain close relationships with our various stakeholders, with communication based on regular contact, clarity and a high standard of business ethics.

We protect shareholders' investments and strive to secure competitive returns that continuously improve. Our corporate governance provides the prerequisites for active and responsible ownership, a well-balanced delegation of responsibilities between general shareholder meetings, the Board, the CEO and the auditors as well as openness and transparency towards various stakeholders.

OUR RESPONSIBILITY MEANS THAT:

- We impose demands on honesty and honorability throughout our operations and expect the same of our business partners.
- Bribes are prohibited. All forms of compensation to or from agents, suppliers and other business partners must only be for actual goods or services.
- Gifts and other benefits may comprise an element of conventional hospitality but may not exceed local customs and must be completely in line with local legislation.
- All operations and employees must observe and comply with competition laws.
- Employees are to avoid conflicts of interest between private financial matters and the company's business activities, in situations where they interact with a close acquaintance – for example during an assignment or an interview – and in personal relationships with third parties. When a conflict of interest cannot be avoided, it is important to inform an immediate supervisor in good time.
- All business transactions conducted in a company must be clearly visible in the company's accounts, which must be managed in accordance with the Group's regulations and in line with international accounting standards.

- We apply sound business principles and are responsible and moderate in our advertising and marketing.
- We respect ownership and intellectual property rights, meaning that we do not use the company's resources for private interests.
- The return on shareholders' invested money is always taken into consideration when making decisions on guiding strategies and various courses of action.
- We keep shareholders well informed of the Group's operations, earnings, risks and strategies. Such information is provided in accordance with the regulations where the Beijer Alma share is listed.
- Our communications should be straightforward and honest, and comply with the prevailing legislation, regulations and norms. We are to communicate openly and correctly within the framework of appropriate business confidentiality. Information that is important to our stakeholders is to be provided as quickly as circumstances allow.
- With respect to issues regarding Beijer Alma's operations, only representatives of the management team in question are permitted to speak on behalf of the Group. Accordingly, inquiries about operations are to be referred to local management, the management team for the subsidiary in question or Group management. All external information that could affect the share price is to be presented by the CEO or CFO.
- Report suspicious activities online and be careful and discreet when sharing sensitive information via e-mail or the internet.
- We have a whistleblower system in place to ensure that our employees, business partners and other stakeholders are able to report major improprieties without a risk of reprisal.
- Everyone who works at Beijer Alma has a responsibility to protect information that the company considers confidential. We protect information that is not published publicly about products and innovations, processes and plans, both economic and strategic.





Sustainable value chain

WE EXPECT OUR BUSINESS PARTNERS to follow the social, business ethics and environmental principles outlined in our Code of Conduct, the Business Partner Code of Code of Conduct and the international guidelines supported by Beijer Alma. We also expect that they apply the same regulations and values to their business partners. This means that we want our business partners to strive towards ensuring that their operations, products and services have no negative impact on the environment, people's health or society.

OUR RESPONSIBILITY MEANS THAT:

- We have a sanctions policy and instructions that provide support and guidance if the Group wants to influence a particular behavior.
- We encourage our business partners to introduce certified management systems for quality and the environment.
- We engage in continuous performance follow-up and evaluation of our business partners when it comes to sustainable development and human rights, where shortcomings can lead to obligatory improvement measures. At the same time, we undertake review procedures to confirm with reasonable certainty that certain metals and other materials we use are not sourced from areas impacted by armed conflict.
- We aim to always meet our customers' requirements, needs and expectations by delivering services and products with the right quality. We also ensure that our products meet agreed, statutory norms and health standards.
- Information on how our products are to be used must be correct and clear in terms of, for example, safe and environmentally friendly installation, maintenance, storage and, ultimately, disposal.
- We take into consideration all aspects regarding the quality and safety of our products and offer products and solutions that contribute to reducing our environmental impact.

If something is not right

THE CORPORATE CLIMATE MUST BE TRANSPARENT, with a high level of business ethics. We strive for a trustworthy corporate culture where discussions with colleagues and managers about what is not working, or violations of the rules of the operation, are given. We want to detect any improprieties early if they do not already fall under the framework of our systematic work environment agenda.

INTERNAL HANDLING

The first step is to speak with an immediate supervisor. If that is not possible, employees should contact their supervisor's manager or the human resource organization.

There is a whistleblower process to report suspected improprieties if it is not possible or desirable to go through management or human resources for any reason. It is used when an employee or other individual observes potentially unethical or illegal behavior. The whistleblower process is protected by law and is intended for irregularities and improprieties, not individual work situations or conditions.

EXTERNAL HANDLING

To ensure anonymity, our whistleblower channel is handled through an external company that encrypts and password-protects both the initial reports and the subsequent follow-ups. At the same time, it is our hope that our employees and other stakeholders feel comfortable contacting someone in our operations directly with any questions or allegations as a first step.

WHISTLEBLOWER SERVICE ONLINE

The whistleblower service is available at the following link:

[Whistleblowing report start | Whistlelink](#)

It can also be reached through a link on Beijer Alma's website. If someone wants to register a concern, they fill in a report and submit it. The external company determines whether the report can be addressed within the framework of the Group's whistleblower channel and notifies the person who submitted the report.





References

- The UN Universal Declaration of Human Rights: www.un.org
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work: www.ilo.org
- The UN Global Compact: www.unglobalcompact.org
- The OECD Guidelines for Multinational Enterprises: www.oecd.org
- The UN Guiding Principles on Business and Human Rights: www.ohchr.org
- Corporate Sustainability Reporting Directive (CSRD)
- European Sustainability Reporting Standards (ESRS) – Environmental, Social and Governance information
- Beijer Alma Business Partner Code of Conduct: beijeralma.se
- Beijer Alma material topics: E1 Climate change, E5 Resource use and circularity, E2 Pollution (value chain-upstream), E3 Water use (value chain-upstream), S1 Own workforce, S2 Workers in the value chain (value chain-upstream), G1 Governance



BEIJER • ALMA