



## Code of Conduct

### Table of content

Code of Conduct.....	1
Introduction.....	1
Implementation and follow-up of compliance.....	2
Business Ethics.....	2
Principles of Human rights and social justice.....	3
Child labor .....	3
Freedom of association .....	3
Alcohol and/or drug abuse.....	3
Discrimination, harassment and diversity.....	4
Conflict minerals, REACH and RoHS .....	4
Health and Safety .....	4
Environment and quality.....	5
Adherence .....	5

### Introduction

Sifvert Skruv's goal is to be our customers and supplier's good choice of partner in purchasing and distributing fasteners. To succeed with that we always strive to have satisfied customers, a high level of commitment with employees, and to create sustainable and profitable growth. Sifvert Skruv is committed to work for a good environment and sustainability and take clear economic and social responsibility for our development.

This Code of Conduct establishes some important and comprehensive principles and guidelines that reflect what we want to be and how we want to be perceived. The policy applies to all employees and all our suppliers and partners, but it never replaces existing laws. Should there be a conflict, the legislation prevails.

Our Code of Conduct is based on:

- United Nations Universal Declaration of Human Rights and Associated UN Conventions
- ILO Nuclear Conventions on Principles of International Business and Social Policy
- UN Global Compact
- ISO 14001 and 9001
- Swedish laws and practices

## Implementation and follow-up of compliance

Sifvert Skruv's CEO has the overall responsibility to implement and to make sure that our employees and suppliers work with and understand our code of conduct. With this Supplier Code of Conduct, we want to communicate to our suppliers to respect them and to operate as it were their own, and act in accordance with internationally recognized standards on Human Rights, Labour Rights, Environment and Anti-corruption. By approving our Code of Conduct, the supplier promises to follow and ensure that they comply with Sifvert Skruv's Code of Conduct.

## Business Ethics

Our daily actions will always be characterized by responsibility and respect for customers, suppliers, business partners and the society we operate in. An ethical and good business practice is important for our development and profitability and to attract competent staff. We strive to convince our business partners with commercial arguments. Our goal is always to develop long-term stable business relationships with customers, suppliers, and partners.

Suppliers that Sifvert Skruv makes business with must not use illegal payments, bribes, kickbacks or other questionable inducements to influence any business transaction. Sifvert Skruv specifically prohibits bribery by any of its employees or agents. A practice that conflicts with this policy might be considered acceptable in a particular country, however it is not acceptable to Sifvert Skruv.

## Principles of Human rights and social justice

### Child labor

Sifvert Skruv respects the children's right to development and education. Suppliers must not engage in child labor. The supplier shall ensure that no employee is younger than the legally fixed age for employment. Minimum age is the age for completion of compulsory schooling, but not younger than 15 years. The supplier should abide by the United Nations Convention on the Rights of the Child (1989) and comply with all relevant national and international laws, regulations, and provisions applicable in their country of production or operations. If it is found that a child produces products, the employer must act on the basis of the best interests of the child and is expected to work together to reach a satisfactory solution that improves the situation of the individual child. Sifvert Skruv also expects suppliers and partners not to use any form of forced labor or work associated with any form of punishment.

### Freedom of association

Suppliers must respect the right of employees to join any organized associations of their own choosing and to bargain collectively as permitted by local laws and regulations. Suppliers shall respect the recognized unions. The supplier should also equally respect an employee's right to refrain from joining a union. In order for our suppliers to collaborate with Sifvert Skruv, no employee is required to risk harassment or reprisals in order to exercise these rights. Suppliers shall comply with applicable laws, agreements and industry standards on working hours and compensation.

### Alcohol and/or drug abuse

Sifvert Skruv wants to create a safe and secure workplace and has zero tolerance for alcohol and other drugs during working hours and does not allow people affected by alcohol or drugs to stay on the company premises. The purpose is to prevent ill health, accidents, malicious use and, if necessary, support and rehabilitation.



16 januari  
2023

---

## Discrimination, harassment and diversity

Suppliers shall promote and value diversity and gender equality among employees. We do not approve any form of discrimination and harassment. We promote a human vision and respect for each person's unique and equal value and we expect our business partners to comply with this vision.

## Conflict minerals, REACH and RoHS

Sifvert Skruv follows applicable laws and regulations regarding the handling of conflict minerals. Conflict minerals are minerals from high-risk areas and conflict-affected areas, the use of which directly or indirectly contributes to the financing of armed groups that are expected to commit serious human rights violations. Goods delivered to Sifvert Skruv must comply with the requirements of applicable laws and regulations on conflict minerals, as defined by the United States Dodd-Frank Act, Section 1502. Sifvert Skruv requires companies to identify and disclose the source of 3TG minerals (tin, tantalum, tungsten and gold) used in products supplied to Sifvert Skruv on request.

Regarding compliance with REACH and RoHS, find our statements and declaration of compliance on our website.

## Health and Safety

Suppliers shall have a safe and healthy working environment for all employees, in accordance with international standards and national legislation. Appropriate information on health and safety should also be offered to the employees. Any form of risks that can lead to accidents or bad health among employees should be handled promptly. All workers should be informed of security measures such as emergency exits, fire extinguishers, first aid equipment, etc. Where the supplier provides its employees with accommodation such accommodations must as a minimum be clean, safe and meet the employee's basic needs.



16 januari  
2023

---

## Environment and quality

All supplier to Sifvert Skruv should take preventive measures in relation to environmental challenges, undertake initiatives to promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies. A supplier's actions should be based on relevant national and international laws, regulations, and standards with respect to the environment. Supplier shall minimize its environmental impact and continuously improve its environmental performance. We also expect all our suppliers to be certified according to ISO 9001 and ISO 14001 or equivalent quality and environmental management systems.

## Adherence

We hereby agree to adhere to all principles outlined in Sifvert Skruv Supplier Code of Conduct.

**Sifvert Skruv**