

Code of Conduct

Eleda Group



1 About Eleda Group's Code of Conduct

The Board of Directors of Eleda AB ("Eleda") is responsible for this Code of Conduct, which applies to all companies within the Eleda Group ("the Group" or "Eleda").

The CEO of Eleda Group is responsible for this Code of Conduct, while the CEO of each subsidiary is responsible for their own codes of conduct and their compliance. The Code of Conduct outlines the expectations we at Eleda have of each other and our partners. It also provides guidance on how to act correctly in business relationships and how to handle potentially difficult situations.

The Code of Conduct is based on Eleda's values, our view on sustainable business, and the 10 principles of the UN Global Compact. It applies to all employees within the Group.

2 Human Rights

2.1 Fundamental Rights

Eleda supports and respects the protection of human rights and does not participate in any activities that could risk violating these rights.

2.2 Personal Integrity

We are committed to protecting the personal data and privacy of all individuals. We comply with applicable data protection laws to ensure the confidentiality and integrity of the personal data we process.

3 Business Ethics and Anti-Corruption

3.1 Legislation and International Conventions

We always comply with the laws, regulations, and rules applicable in the markets where we operate. We expect our business partners to do the same.

3.2 Anti-Corruption, Representation, and Gifts

We conduct business professionally and ethically and fight all forms of corruption within our operations. Bribes, hidden commissions, gifts of an exclusive nature, or other illegal or unethical benefits are not allowed.

We neither request, accept, nor offer representation or gifts that could influence – or give the impression of influencing – our own or our partners' business decisions. The representation or gift must serve a business purpose and have a limited value. We use our judgment when deciding to offer or accept representation or gifts. We reject exclusive gifts and dinners, inappropriate entertainment, or similar.

Charitable donations, such as those at Christmas, must be decided by the respective company's CFO. We never make contributions to political organizations.

We only engage in activities we can openly support.

3.3 Business Relationships

We strive for long-term and good relationships, we work competitively and never enter into agreements with competitors or any agreements regarding pricing, cartels, or similar.

3.4 Conflicts of Interest

We avoid situations and contexts that could put us in an actual or perceived conflict of interest. This can be the case when there is a direct or indirect personal interest in a company with which an agreement is to be made.

3.5 Money Laundering

We do not accept money laundering and avoid putting ourselves in situations with a risk of money laundering. In case of suspicion, or if money laundering is detected, it should be reported to the nearest manager.

We carefully investigate potential customers' and business partners' operations and history and ensure that they engage in legitimate business activities. We follow a precautionary principle and contact the nearest manager for payments or transfers that feel suspicious or are not specified in contracts or agreements. We never handle cash.

3.6 Sanctions

We do not cooperate, directly or indirectly, with any person or organization on sanction lists, including those from the UN, EU, UK, and USA. We do not do business, directly or indirectly, with countries or regions subject to sanctions. Therefore, we need to know the external parties and their actual owners with whom Eleda does business. We are vigilant when external parties may be on a sanctions list or have a related company in a sanctioned country.

4 Employees

4.1 Equality, Diversity, and Non-Discrimination

We promote equality and diversity and provide everyone with equal opportunities for development, education, and promotion within their own work area regardless of sex, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation, age, political opinions or social origin.

4.2 Harassment and Forced Labor

We treat each other with respect and attentiveness and do not accept any form of psychological or physical punishment, threats of punishment, discrimination in employment or work, workplace bullying, sexual or other forms of harassment, or forced labour.

4.3 Child Labor

Eleda does not accept any form of child labour. All employees must be at least 15 years old or have the minimum age required for compulsory schooling if it is higher than 15 years.

4.4 Freedom of Association

Eleda values the right to freedom of association and respects collective agreements. All employees have the right to join associations and organizations and to organize themselves in a union without risking discrimination, harassment, or any type of retaliation.

5 Environmental and Sustainability Work

We maintain a precautionary principle towards environmental challenges and work preventively to avoid environmental damage.

We strive to minimize our environmental impact and commit to implementing initiatives that promote the development of sustainable methods and practices to minimize our environmental impact as much as possible.

5.1 Compliance and Reporting of Violations

The Code of Conduct is a living document that is continuously followed up and updated. Employees are responsible for following the guidelines of the Code of Conduct in their daily work. The CEO of each subsidiary is responsible for this policy and its compliance. The ultimate responsibility for compliance with this code lies with the CEO of Eleda Group.

Suspected unethical behaviour should be reported to the nearest manager without delay. For misconduct that is of public interest or within any of the areas specified in the EU Whistleblower Directive (European Parliament and Council Directive (EU) 2019/1936 on the protection of persons reporting breaches of Union law), an anonymous report can be made to the Eleda Group's whistleblower function, which can be accessed via the web link below. An independent third party manages this function. For all reporting of violations of this Code of Conduct made in good faith, there is a prohibition against retaliation against the reporter.

<https://eledawhistleblowing.hwrs.se>

Violations of our Code of Conduct will be investigated and lead to actions. This can take the form of a warning, dismissal, or in the worst case, prosecution.