

BIM Kemi Code of Conduct

BIM Kemi Group (hereafter 'BIM') is committed to conducting business in a sustainable and responsible manner - in the interest of the company, its staff and the general public. Promoting proper business ethics, respect for internationally recognized human rights, decent working conditions and environmental practices part of our strategy to act in a socially responsible manner.

Our operating values and corporate philosophy are laid down in "BIM SPIRIT"¹. The values described therein form a commitment for all employees with regard to their conduct within BIM as well as in relation to third parties.

BIM Kemi AB's board has adopted the enclosed code of conduct to clarify what we expect and require of both ourselves and those we work with. BIM expects all its employees (including but not limited to its Board of Directors, permanent and non-permanent employees, volunteers and representatives) to make systematic, targeted efforts to conduct their work in full compliance with this code of conduct, applicable domestic and international laws and conventions, as well as other relevant BIM policies and directives, such as the Sustainability, Anti-corruption and Work Environment Policy.

This Code of Conduct is inspired by the UN Global Compact's ten principles², the UN Guiding Principles on Business and Human Rights and the Sustainable Development Goals' (SDGs)³.

For further guidance regarding this Code of Conduct, BIM Employees should contact their line manager who is responsible for offering support and guidance in the application of this Code of Conduct.

General Principles

Compliance with national and international laws and regulations

BIM Employees shall comply with all applicable domestic and international laws and regulations as well as the UN Global Compact, including those pertaining to anti-corruption, competition law, transportation, environment, safety and health and customs regulations.

The highest protection prevails principle

In case of a (perceived) conflict between the BIM Code of Conduct and domestic law, BIM expects its employees to adhere to the rule which provides the highest level of protection to the person in question, i.e. the higher protection prevails. Deviations from the Code of Conduct shall always be brought to the attention of the line management for approval and *significant* deviations shall require a prior approval by BIM's Board of Directors.

Responsibility for third parties

All BIM employees shall make a systematic and targeted effort to ensure that BIM suppliers, sub-contractors and other business partners are aware of BIM's Supplier Code of Conduct and shall comply with the standards established therein.

¹ BIM SPIRIT, more information can be found in the Handbook of employment

² UN Global Compact consists of ten universally accepted principles within the areas of human rights, labour, environment and anti-corruption. More information at <https://www.unglobalcompact.org/what-is-gc>

³ The Sustainable Development Goals (SDGs) consists of 17 goals to promote prosperity while protecting the planet. More information at <https://www.un.org/sustainabledevelopment/>

Business Ethics

Responsible Business

BIM employees are expected to conduct their business in a transparent and ethical manner, act with integrity and avoid business situations which could directly or indirectly hurt the integrity of BIM as a company. BIM employees shall employ fair business practices including the adherence to laws and regulations regarding competition law and accurate and truthful advertising. BIM employees shall comply with the domestic tax laws and regulations in the countries where it operates. BIM employees shall not conduct private, financial or other external activities in conflict with the interests of BIM. The BIM assets and resources shall be used for BIM objectives and not for personal gain or other inappropriate activities. BIM employees shall not accept, facilitate or support money laundering or tax evasion.

Anti-Corruption & Fraud

Employees at BIM are required to know and comply with BIM anti-corruption policy. This also includes that all acts of corruption, fraud, extortion and/or embezzlement are prohibited. BIM employees shall not offer, pay or accept bribes or payments. Employees at BIM shall not give, solicit or receive directly or indirectly any gift, entertainment or other favour that may be seen to influence the exercise of their function, performance of duties or judgement. All BIM Employees shall avoid situations which may result in compromising appropriate business decisions and they shall not participate in illegal inducements in business or government relationships. In case a BIM employee is insecure whether or not a certain action can or cannot be undertaken without breaching this paragraph, he/she shall always ask his/her closest manager for guidance.

Transparency

BIM employees shall act transparent and keep up to date records of the elements relevant to demonstrate compliance with this Code of Conduct. All financial transactions shall be reported in line with valid accounting standards and the accounting must be recorded correct and fair.

Information security

BIM Employees are expected to follow the domestic and international legislation regarding gathering and exchanging information with external parties. BIM Employees shall protect the confidentiality of confidential information which has been entrusted to them by BIM and/or third parties: This includes, but is not limited to, proprietary information such as;

- Technological and technical knowledge, expertise, experience, know-how, inventions, specifications, formulae, samples, and
- Financial, business and personnel information, and
- Other information, disclosed at any time and in any form, is considered Confidential Information.

Human Rights

Compliance with international law

BIM and its employees shall respect all internationally recognized human rights including civil cultural, political, social and economic rights, such as those defined in:

- the Universal Declaration on Human Rights
- the International Covenant on Social and Economic Rights
- the International Covenant on Civil and Political Rights
- The eight core conventions of the International Labour Organisation (ILO) regarding the freedom of association and protection of the right to organize, right to organize and collective bargaining, (abolition of) forced labour, minimum age, child labour, equal remuneration and discrimination.

Non-discrimination

BIM is committed to providing an inclusive and welcoming environment for all employees, clients, suppliers and other business partners.

BIM employees shall not discriminate on the basis of race, colour, religion, gender, gender expression, age, national origin (ancestry), disability, marital status, sexual orientation, union membership or any other personal characteristic in any of its activities or operations. These activities include, but are not limited to, hiring and firing of staff, promotions, selection of vendors, suppliers or other business partners.

Remuneration and Working Times

BIM shall ensure that its employees work in compliance with all applicable laws and mandatory industry standards pertaining to regular working hours and overdue hours. BIM ensures that remuneration and benefits at least conform to the statutory minimum wage and the statutory working hours/licensing agreement of the country concerned as well as binding collective agreements.

Freedom of Association

BIM must recognize employee's basic right to freely associate, belong to a union and bargain collectively, in accordance with the applicable legislation and international conventions.

Child Labour

BIM shall ensure the minimum age as defined by the International Labour Organization's Minimum Age Convention 1973 No 138 is respected. This means that:

- The minimum age specified shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years.
- Notwithstanding the provision above, in case BIM operates in a country whose economy and educational facilities are insufficiently developed it may, after consultation with the organizations of employers and workers concerned, where such exist, initially specify a minimum age of 14 years.
- The minimum age for admission to any type of employment or work which by its nature or the circumstances in which it is carried out is likely to jeopardise the health, safety or morals of young persons shall not be less than 18 years.

Forced Labour

BIM shall not make use or in any way benefit from forced, prison, bonded or involuntary labour.

Health and Safety

BIM managers are responsible for the physical and emotional well-being of their employees'. BIM managers must provide a safe and healthy working environment. BIM managers shall ensure that all employees are aware of health, safety and environmental risks and get appropriately trained to minimize risks and possible impacts of emergency situations. The observance of safety regulations shall be monitored continuously and any inadequacies remedied immediately. Preventive health and safety programs must be in place for all BIM's processes. BIM managers shall have an active and targeted approach to ensure the workplace is free of bullying and inclusive for all.

Environment

Environmental Protection

BIM shall support and undertake initiatives to promote greater environmental awareness and responsibility. BIM shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions with the potential to adversely impact on human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment. BIM Kemi shall encourage the development and diffusion of environmentally friendly technologies. Further environmental requirements are to be found in the BIM Kemi's Environmental Policy, Directives and Guidelines.

Others

Reporting a concern

BIM employees are encouraged to report actual, potential or suspected violations of the BIM Code of Conduct. Reports can be either in line with the BIM's regular channels of reporting and communication or the BIM Report mechanism. The Reporting mechanism can be found in BIM Handbook of employment.

Implementation of the Code

BIM Kemi will provide information about this code as part of the induction process for all new employees. The corresponding supplier code will also be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter. The effectiveness of this policy and its implementation will be reviewed by group management on a yearly basis.

In doubt or question regarding BIM Kemi Code of Conduct, please contact your line manager or BIM's Director of R&D & Sustainability at HQ: Heino Kuusk heino.kuusk@bimkemi.com

In case of serious breaches which could directly harm the operations or brand of BIM KEMI please also cc the President/CEO of BIM Kemi AB, Anders Rietz anders.rietz@bimkemi.com