

SUSTAINABLE BUSINESS – GNOTEC CODE OF CONDUCT

THIS CODE OF CONDUCT describes how we should behave in different circumstances and situations for a sustainable business. It is based on the 10 principles laid down in the UN Global Compact, which covers human rights, labour, the environment and anticorruption.

The Code of Conduct applies to all Gnotec companies and to all employees in the Gnotec Group, regardless of local standards. It should guarantee a high level of quality in everything we undertake.

All employees have individual responsibility for being aware of and complying with the rules and guidelines that ensue from this Code of Conduct. The term 'individual responsibility' also implies responsibility for reporting any breach of this Code of Conduct to the CEO, CFO or Head of Human Resources of Gnotec Group. Contact details available on our website or through the switchboard. As part of our commitment to this Code, anyone who reports a deviation shall be safe guarded from personal negative consequences for the 'whistle blowing'. Any attempt to suppress such information or individual will lead to disciplinary and/or legal action.

Ask yourself "Am I doing the right thing in this situation? Is this for the best of Gnotec? Is it according to the law? If this became public, would I be proud of how I handled it?"

If still uncertain regarding interpretation of this Code of conduct or course of action in a given situation, consult with your manager or the senior management at the company concerned.

1. COMPLY WITH THE LAW

- Remain informed about relevant legislation in the country in which you are operating or with which you are doing business. Do not make your own interpretations of the laws and rules and do not try to circumvent them.
- Seek advice from the senior management when local laws and rules conflict with these instructions or generally accepted norms and values.
- If necessary, seek legal advice via the Gnotec head office.

2. RESPECT PREVAILING COMPETITION LEGISLATION

- Never enter into any form of competition-limiting agreements with competitors regarding prices, discounts, quantities, customers, suppliers etc.
- Never co-ordinate Gnotec's actions with those of your competitors.
- Avoid contact or discussions with competitors in matters that are sensitive from a competition point of view. Reject any attempt by our competitors to enter into such discussions.

3. RESPECT LOCAL CUSTOMS AND TRADITIONS

- Remain informed about local customs and traditions if you work with or in a country that is foreign to you, and align with such customs and traditions as far as possible.
- Be aware of religious, political, social, ethnic and cultural norms and values that could be different to yours.
- Obtain advice from the senior management if local customs and traditions conflict with these instructions or generally accepted norms and values.
- Learn the local language if you intend staying in a country for more than a year.

4. MAINTAIN HEALTH AND SAFETY

- Always maintain correct health and safety instructions and ensure that effective preventive measures are taken.
- Avoid the use of toxic or hazardous substances, materials and processes.
- Follow carefully instructions, policy and stipulations regarding health, safety and the environment at your workplace.

5. PROTECT THE ENVIRONMENT

- Endeavor to minimize the company's environmental impact by, for example, reducing waste and promoting efficient energy use. Transportation and travel should always be considered in terms of sustainability, striving for least possible environmental impact.
- Observe local environmental regulations or international standards if they are stricter.
- Encourage the development and dissemination of eco-friendly technologies.

6. RESPECT BASIC HUMAN RIGHTS

- Gnotec shall protect its co-workers against violation of their human rights and, if necessary, arrange legal assistance.
- Never accept violation of basic human rights, at Gnotec or at its Business Partners.
- Gnotec shall never use child labour, prison labour or any other form of forced labour.

7. CONDUCT BUSINESS RESPONSIBLY

- Never be complicit in any form of bribery or corruption. Never hint at, offer or ask for bribes and do not accept or pay bribes. Exceptions are business entertainment and giveaways of a minor value.

- Ensure that all payments made by Gnotec, directly or indirectly, now or later, are linked to an order and only pass to the Business Partner's company and no other party, with the exception of legitimate intermediaries.
- Consult with the Gnotec management if there is any doubt regarding the legitimacy of a proposal for payment or service to an individual manager/co-worker at a Business Partner's or a third party indicated by such a person.
- In the case of employees who draw up purchasing, production or assembly contracts at a third party, the same rules apply although conversely.

8. CHOOSE RELIABLE BUSINESS PARTNERS

- This applies to customers, suppliers, sub-suppliers, agents, representatives and other business partners. Gnotec's definition of "reliable" means a good financial background, a healthy approach to business, a management team with a spotless criminal record, sustainability values and by all other standards, clear-cut rules of procedure that are in line with Gnotec's Code of Conduct.
- Gnotec's contact person with the Business Partner shall make sure to keep a log of all agreements, arrangements and contracts and file this carefully to guarantee continuity.

9. PURSUE A RESPONSIBLE HUMAN RESOURCES POLICY

- Gnotec shall pay its employees according to current agreements and local standards.
- Gnotec shall be an equal opportunities employer. We must never discriminate on the grounds of gender, ethnicity, sexual orientation or religious belief.
- Freedom of association and the right to collective bargaining must be maintained.

10. SERVE COMMUNITY INTERESTS

- Gnotec shall always strive for a friendly, service-minded relationship with the local community.

11. PROVIDE A THOROUGH ACCOUNT

- Gnotec shall maintain a careful and updated account of financial, administrative, operational and commercial matters.
- Gnotec shall keep a record of the most important routines for accounting administration, operational routines and business transactions and always ensure a copy of these routines is available.
- Gnotec shall offer unrestricted access and full co-operation to Gnotec's controllers and auditors, both for regular bookkeeping purposes and for audits.