

CODE OF CONDUCT

1. Purpose

Environmental, social and corporate governance (“ESG”) is an essential part of Trafik & Fritid strategy.

Trafik & Fritid is committed to follow all applicable laws and regulations, labor and environmental laws and human rights – in our own operations and in relation to our business partners and towards society. The integrity, reputation and profitability of Trafik & Fritid ultimately depend upon the individual actions of our directors, officers, employees and representatives.

This Policy sets out standards of behavior required by our directors, employees and representatives at Trafik & Fritid. Trafik & Fritid requests not only its employees but also asks its suppliers, co-operation partners, contractors and subcontractors to comply with the principles of this Policy.

2. General principles

We act honestly, ethically and lawfully. We are responsible in relation to colleagues, customers, suppliers, contractors, subcontractors, the environment and the whole society we are working and living in. We strive to improve the conditions for health, environment and sustainable development for the society. We support and respect the international agreements on human rights. We do not allow bribery or any other improper benefits that can influence decisions.

Our social responsibility is to be a safe and inspiring workplace for our personnel (safe and good workplace, wellbeing, career development).

3. Employee relations – health, safety, human rights and labor standards

We shall actively work for occupational safety and health. We are committed to providing our employees a workplace that is free from known safety and health hazards, and a work environment free from discrimination, harassment, or personal behavior not conducive to a productive work climate. No violence, threat or harassments are accepted. We are committed to continuous improvement of occupational health and safety. Our target is zero accidents at work, occupational disease or work-related exposure.

The employer guarantees fair terms of employment and possibilities for all employees without any discrimination based on age, race, color, nationality, religion, gender, disabilities, sexual orientation or ethnic affiliation. The employer respects the employees’ right to create and join unions and negotiate collectively.

We support and respect the protection of human rights as expressed in the UN Declaration of Human Rights. As an employer, Trafik & Fritid accepts the basic labor rights stated by the International Labor Organization (ILO): freedom of association, the effective recognition of the right to collective bargaining, the abolition of forced labor, and equality of opportunity and treatment. We do not accept child labor and request our subcontractors and suppliers

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to comply with the principles of this Policy.

4. Compliance with laws and regulations

4.1 Prohibition of corruption and bribery

We do not become involved in business relationships that may lead to conflicts of interest. We do not pay bribes or illegal payments to obtain or retain business. We shall never accept, offer, require or ask for bribes or any improper benefits that can influence anyone's decision. We do not pay to facilitate favorable decisions or services from authorities.

The following are examples of what can be regarded as corruption and are not allowed for Trafik & Fritid employees:

- Offering or accepting money or other valuables (eg. personal discounts for private purchases from supplier) in a business relationship
- Accepting other services for private gain (eg. accepting free tickets, trips etc.)
- Freely or with discount accepting supplier's products or services
- Offering or accepting private loans from supplier's or other business contacts
- Improperly favoring suppliers in which one's own or family members or friends hold key positions

Trafik & Fritid employees are not allowed to be simultaneously employed by or run a business with close collaboration with the supplier – Trafik & Fritid employees should avoid private purchases from the company suppliers. If there is a possible conflict of interest regarding any supplier, Trafik & Fritid employee must withdraw him/herself from that case, citing a possible conflict of interest and inform Trafik & Fritid Management Group of the subject matter.

4.2 What is permitted?

Working meals in the form of lunch or dinner at a normal cost are permitted.

We do not accept gifts from business partners exceeding normal standards of hospitality. If the acceptance of a gift or favor contains the remote possibility of a conflict of interest, always clarify the situation with Trafik & Fritid Management Group in advance.

Invitations to training and conferences where meals are included are permitted, but Trafik & Fritid pays always for the travelling costs. Training must be work related. Training and conferences from the supplier should be avoided, if Trafik & Fritid is simultaneously having a tender competition in which the supplier is likely to attend.

Trafik & Fritid may organize and offer business related training and educational events for marketing purposes for customers and potential customers. Training and educational events shall always have a business related educational program. Trafik & Fritid may provide training attendees with reasonably priced meals and overnight stays in connection with the program. Travel costs are not paid by Trafik & Fritid and Trafik & Fritid is not permitted to facilitate or pay for meals, travel, accommodation or other expenses for spouses or any other person who does not have a professional interest in the information being shared at the training meeting.

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4.3 Competition laws

We will comply with the competition laws of every jurisdiction in which we do business. We will not engage in bid rigging; we will not fix prices; we will not allocate markets; and we will not abuse market power. For example, we will not discuss prices, costs, profits, or marketing strategies with our competitors.

4.4 Supplier audits

When evaluating contractors, subcontractors, suppliers and partners their ability to comply with this code will be assessed and be an important selection criterion. Suppliers are requested to allow Trafik & Fritid, or any third party authorized by Trafik & Fritid and reasonably acceptable to the supplier, to conduct in the presence of the supplier an audit of the supplier's operations relevant for this Policy eg. the supplier's facilities and relevant extracts from books and records.

5. Environment and Sustainability

Trafik & Fritid considers sustainability as an obligation and aims to do business in the responsible way. We are developing our expertise to help our customers to be more sustainable and our product portfolio includes environmentally friendly products.

Trafik & Fritid requests its suppliers to follow EU environmental REACH regulation and in particular, Trafik & Fritid requests its suppliers to warrant that the products supplied to Trafik & Fritid should not contain substances of high concern ("SVHC") placed in the EU REACH regulation candidate list above the concentration of 0,1 % w/w of the article.

6. Action in case of infringements to this policy

Notification of any behavior within Trafik & Fritid that deviates from this policy should be reported to the immediate superior or, in case of suspicion it will not have any effect, to the Trafik & Fritid Management Group. All notifications shall be taken seriously and be investigated. Notifications on behavior at partners, contractors, subcontractors or suppliers that deviates from this code shall be reported to the immediate superior or to the Trafik & Fritid Management Group.

7. Infringement and disciplinary measures

The spirit of this Policy is to develop sustainable business relationships by correcting the reported issues. It is important to emphasize that infringements to this Policy can lead to sanctions (eg. cancellation of a contract, business relationship or employment contract) according to laws and agreements. The seriousness of the infringement and the degree of personnel authority to act should be in proportion to the size of any disciplinary measures.

8. Review and update of this Policy

This Policy is accepted and reviewed on annual basis by Trafik & Fritid Management Group and CEO. Trafik & Fritid employees shall be requested to comply with this Policy and are given training to understand the terms and conditions of this Policy.

Management Group as a compliance officer shall ensure a proper understanding and application of the Policy and shall keep an integrity safe record of the notifications on infringements of the Policy and the measures taken. Questions regarding this Policy, its application to specific circumstances, and reports of actual or suspected violations can be raised to any level of the supervisory chain, Management Group and CEO.

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