

CODE OF CONDUCT

Zetterbergs Industri AB

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The reason for our code of conduct

Zetterbergs Code of conduct

The Code of conduct has been developed to emphasize the values and principles that govern our relationship with employees, customers, business partners and other stakeholders. It serves as a starting point for Zetterberg's policies and rules.

Our Code of Conduct covers all employees in the company. As a manager at Zetterbergs, you have a special responsibility to always act as a good role model and follow up that the code is complied with by the employees.

To simplify for our employees and managers, we have jointly with all employees developed a policy document called Leadership and employeeship policy that describes how we as employees and leaders should act and value in different situations that we face.



How we want our company

Zetterbergs wants to be an attractive workplace where the staff thrives. We also want to be a successful company in our industry, where the experience of our products and our service makes customers return.

Creating a good corporate culture is an important part of being able to get there. Our values – Customer Value, Stability, Reliability and Commitment – underpin everything we do in the company.

We have high goals and visions. Steering documents of various kinds describe how we should get there. Each of us has our own responsibility to contribute and follow these in order to together create the Zetterbergs we want.

Everyone should feel important. Each person's knowledge and commitment affects the end result. Each person's behavior, actions and safety thinking affect our work environment.

If we work together towards the goal and take advantage of competence, willingness to participate and have respect for each other and our professional roles, we create the conditions to succeed. We all have different conditions and responsibilities. We have developed our Employee and Leadership Policy together and it helps us shape Zetterberg's corporate culture. A corporate culture where safety and responsibility are in focus along with positivity and consideration for each other.

The manager must ensure that employees follow what we have said we will do based on our governing documents and policies, and report any behavior that is not compatible. Each individual employee also has a responsibility to report. Non-compliance can lead to disciplinary action.

Our code is reviewed regularly and should be kept up to date.



This is Zetterbergs

Zetterbergs was founded over 100 years ago. We manufacture bodies for trucks and trailers with an emphasis on construction vehicles. Our bodywork shall be of the highest quality and provide an attractive overall economy for our customers.

With a long tradition of craftsmanship combined with modern technology, we create our products to satisfy our customers. We have the entire production chain under one roof, and in a price-pressured industry where many choose to produce abroad, we go the other way. We want to continue to offer Swedish-made products to create a focus on profitable sustainability.

We offer products of high quality and stylish design.

Mission

We develop, manufacture, and assemble innovative superstructures, tippers, and components of the highest quality for both civilian customers and the defense sector. With a strong focus on sustainability, we offer premium solutions that meet our customers' expectations and create long-term value.

How we act

Zetterberg's main asset is our dedicated employees and managers as well as our strong brand and concept. We are a traditional business with a focus on corporate culture and values, which is a strength we care about retaining.

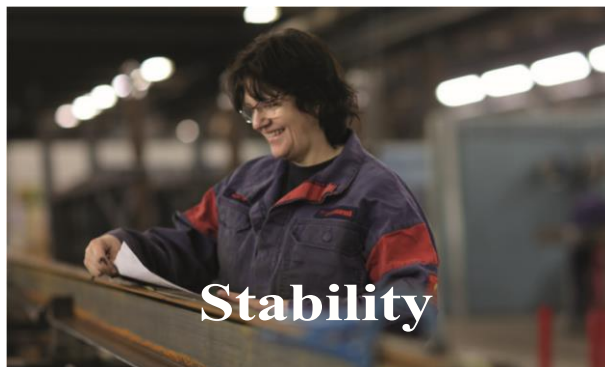
Common to our business is that we as a company, our managers and employees should act based on customer value, stability, reliability and commitment.



Our company values



In our work and in our decisions, we focus on activities that create value for the customer.



Our actions and relationships are based on long-term thinking.



Our way of being towards customers, suppliers and each other is characterized by an open and honest attitude.



Through employees with knowledge, will and ability, we together create a successful company where we thrive.



Social responsibility

Work environment

A good and safe working environment is a strategically important part of Zetterberg's development and a prerequisite for our employees. The employer has the main responsibility for the work environment and we will work systematically with the work environment and fire safety regulations. The goal is to create a physically, mentally and socially good and developing workplace for all employees. Where risks of occupational injuries and work-related ill health are prevented.

Each manager is responsible for ensuring that active work environment management is conducted. All employees have a work environment responsibility by following safety regulations and pointing out risks and shortcomings in the work environment to their immediate manager.

Our managers are responsible for the safety of employees and, in addition to giving instructions and ensuring that these are followed, must also create an understanding of the necessary safety measures. Work adaptation and rehabilitation issues should be included as an important and natural part of work environment management.

Our company shall be kept free from abuse. An alcohol and drug-free workplace is a necessary condition for our employees' safety, working climate and health.



Working time

At Zetterbergs, we adhere to applicable laws and collective agreements regarding working hours and leave. Working time schedules are designed to prevent strain on the physical and mental health of employees.



Personal protective equipment

Working at Zetterbergs means that work should be done as safely as possible without being exposed to injuries. This means that different jobs require different types of personal protective equipment that the employee should use to perform their duties. Procedures for what protective equipment is required for each work can be found in our personnel manual. Information about current protective equipment is informed to the relevant staff as well as in the case of new hires.



Safety of machinery

To handle certain types of machines at Zetterbergs, the employee must receive the right training. Some types of work with machines require a certain type of permit before you can perform that type of work. These permits must be signed before the person is authorized to use the machines.

Crisis prepared

Depending on the type of preparedness that is necessary, there are different routines set up for how we at Zetterbergs should act. This is available and documented for all employees in our personnel manual. There are procedures to be found on the following:

- » Routine in the event of an incident
- » Routine in case of occupational injury
- » Routine in case of serious accident
- » Routine in case of fire

At Zetterbergs, we work preventively regarding fire protection, which means that we conduct regular fire drills to ensure that our routines work. After a fire drill, an evaluation of the outcome is carried out based on the routines we have set up.

Incident and accident management

Every incident and accident must be investigated according to the written procedures that exist. In the event of an incident or accident, a report must be drawn up to describe:

- » What happened?
- » Why did it happen?
- » What injury/accident occurred?
- » Suggestions for action.



After that, an assessment is made based on the case. In the first place, we must eliminate the risk, in the second place limit the risk and, ultimately, protect the employee with protective equipment. Working methods, and work instructions will also be reviewed and see if changes are required in existing routines to ensure that similar incidents or accidents occur in the future.

Ergonomics

At Zetterbergs, safety rounds are carried out several times a year. This is to systematically work with work environment issues. During these safety rounds, things that concern the ergonomic conditions of the workplace are also handled.

Handling chemicals

In order to prevent chemical substances present in our operations from causing ill health or accidents, we at Zetterbergs must have knowledge to identify chemical risks as well as the necessary instructions and procedures to reduce or eliminate chemical work environment risks. There is an established policy document in our management system that describes in detail how we handle chemicals in our business.

Diversity, equality and inclusion

Zetterbergs strives for a mix of personalities and characters that make the company dynamic and open up for innovation in large and small. We strive for a workplace that stands for diversity and equality.

All current and potential employees should be treated without prejudice regardless of gender, transgender identity, or expression, sexual orientation, religion, or other belief, ethnicity, disability, or age. This means that we do not discriminate when recruiting, setting salaries, skills development, promotion, dismissal or in our daily meeting with each other. Similarly, customers and other stakeholders are treated fairly and open-mindedly.

Recruitment, development efforts and promotion take place on the basis of competence, qualification, merit and performance.



Salary policy

The basis of our salary policy is the company's core values, which are customer value, stability, reliability and commitment. Salary is remuneration for work performed. The salary is an important part for the company to be able to recruit and retain the staff required to successfully run and develop the company. Zetterbergs supports the requirements for systematic salary setting in accordance with our collective agreements. Salary setting means that good performance is recognized and rewarded. The principle is equal pay for equal work, regardless of gender, age or other differences.

Harassment and bullying

Zetterbergs does not tolerate any forms of harassment, discrimination or victimization. Employees and managers have a responsibility to pay attention to whether there is harassment in our workplace. Thereafter, the necessary measures shall be taken to counteract such behaviour.

Fundamental human rights and working conditions

Basic human rights must be known, respected, and applied equally to all employees regardless of employment conditions.

All employees have the right to join associations and organizations of their choice and to negotiate with them collectively through the trade unions with which Zetterbergs has agreements.

We do not accept any forms of slavery, such as forced labour, debt bondage and human trafficking. We respect children's right to personal development, education and we do not use child labour.

We distance ourselves from the purchase of sexual services and other activities that may involve cleaning human trafficking, whether during or after working hours in connection with a business trip. This applies regardless of the country in which it takes place or whether it is allowed or prohibited in that country. If there has been a violation of human rights within Zetterbergs, it should always be remedied.

Road safety

Several of Zetterberg's employees drive vehicles as part of their work. We must act in accordance with current legislation in the country in which the vehicle is driven, have a safety mindset, be environmentally conscious and cooperate with our fellow road users. This applies regardless of whether we travel in our own or the company's vehicle during working hours.



Financial responsibility

Business and accounting policies

We will act as a reliable and honest company and live up to our commitments. We only engage in such business activities that comply with national laws, international conventions, entered into agreements and that are in accordance with the Code of Conduct. We respect and comply with competition rules, environmental legislation, labor laws, agreements and safety requirements as well as other regulations that set the framework for our business. We believe in long-term relationships where we, together with our business partners, create a basis for good financial results.

All financial transactions should be recorded in accordance with the accounting policies of the enterprise and comply with applicable laws, rules and norms. The records shall show all types of transactions in a correct and non-misleading manner. External financial reporting shall be reliable and complete.

Customer and quality

As a company, we have expectations of us from all our customers. Maintaining a good quality of our products and a good service to our customers is a success factor for the company's continued positive development. We keep our promises and are an exemplary partner that develops together with our customers and partners. We shall comply with applicable laws, agreements and internal rules and processes.

Products and services must be delivered at the right time, in the right place and at the promised quality to maximize the benefit for our customers.

We have a continuous dialogue with customers about their needs and we listen to their views. We are flexible and responsive to what they demand and desire from us.

We must have effective routines for handling complaints. This is to ensure the correct processing of the end customer and the return of the right information to the supplier. By measuring customer satisfaction and working systematically, we identify measures and shortcomings in the business.



Disclosure of Information

Zetterbergs strives for full transparency and accuracy in all information we share with customers, suppliers, authorities and other stakeholders. Our communication must always be reliable, factual and based on verified data.

Through our certified quality and environmental management systems (ISO 9001 and ISO 14001), we ensure a structured and traceable handling of information. We combine ongoing quality controls with systematic improvement work and an established KAM structure for key customers, providing a consistent picture of our operations and their development.

We report in accordance with applicable laws and regulations, both to authorities and to our business partners. All deviations and improvement measures are followed up in a structured manner to ensure that our information is always up to date, relevant and correct.

Purchase

Purchases within Zetterbergs should always be handled responsibly. Through responsible sourcing, we can ensure reliable and long-term business relationships.

We expect our suppliers to live up to national laws and regulations and respect international conventions. We must have a clearly communicated purchasing process and we actively cooperate with our suppliers to achieve improvements.

We must always have written agreements and follow up set requirements and act in the event of deviations.

Countering corruption, benefits, gifts and bribery

Corruption distorts the market, disrupts free competition and is contrary to legislation. It damages the brand and destroys the reputation of the company and individuals. Corruption is behaviour that causes decisions and actions to be influenced inappropriately. These are conflicts of interest, embezzlement, bribery, extortion, fraud, nepotism or cronyism. No form of corruption is tolerated, including money laundering, the offer or receipt of bribes, gifts, or entertainment deemed lavish. Neither directly nor indirectly, for example through a third party.

All representation shall be characterized by moderation and judgment so that the parties maintain full credibility and an independent position vis-à-vis each other. We have rules for what kind of gifts and entertainment are allowed.

Counterfeit Parts

Zetterbergs has zero tolerance for counterfeit components and spare parts. To ensure that only genuine and quality-assured materials are used, we work exclusively with manufacturing companies and approved suppliers.



All deliveries must be accompanied by valid material certificates and supporting documentation. We carry out ongoing supplier evaluations through our purchasing function to ensure traceability and long-term partnerships with reliable manufacturers.

Intellectual Property

Zetterbergs fully respects intellectual property rights and protects both our customers' and our own innovations, drawings and technical solutions.

Non-disclosure agreements (NDAs) are used when necessary to regulate the exchange of information, and access to design data is strictly authorization controlled. All technical documentation is stored in controlled systems with backup and access restrictions.

We further strengthen protection through continuous information and training for our employees on information handling, as well as through an active IT plan that includes continuous system updates, protection against viruses and cyberattacks, and other security measures to guarantee maximum information security.

Export Controls & Sanctions

Zetterbergs strictly complies with all international regulations on export control and sanctions, including those issued by the EU, the UN and other relevant authorities. We ensure that our products are never delivered to countries, organizations or individuals subject to international sanctions.

For each new customer relationship, a documented sanction and credit check is carried out via external partners. The procedure is formalized and described in our internal governance documents. If a potential customer is identified in a high-risk country or on a sanction list, special approval from top management is required before the business can proceed.

Through this process, we guarantee that our deliveries are always made in compliance with applicable laws, international commitments and sanction regimes, and our procedures are regularly updated to reflect changes in regulations.

Whistleblowing

Zetterbergs offers a whistleblower function where employees and external parties can report suspected violations anonymously. Reporting is done via a form that is accessible from the company's website (<https://zetterbergs.se/visselblasare/>) and is handled by HR in accordance with applicable legislation.

We guarantee that all cases are treated confidentially and without risk of retaliation for the reporter. The function is followed up regularly to ensure its effectiveness, and we continuously evaluate the possibility of strengthening the system further.



Environmental liability

Zetterbergs – Environmental Work

Zetterbergs is committed to conducting business in a way that contributes to a long-term sustainable society. Our greatest environmental impact comes from transportation, energy use in facilities, and the handling of chemicals and waste, but we also work actively with other important environmental aspects.

We focus on:

- » **Reducing greenhouse gas emissions** from transportation, production, and other activities.
- » **Increasing the share of renewable energy** in all our operations and promoting energy efficiency.
- » **Driving decarbonization** by phasing out fossil fuels and high-carbon materials.
- » **Limiting air pollutants** and contributing to improved air quality locally and globally.
- » **Ensuring sustainable resource management** and minimizing material and raw material waste.
- » **Promoting reuse and recycling** of products, materials, and waste.
- » **Protecting soil quality** by preventing leaks and contamination.
- » **Reducing noise emissions** from transportation and production activities.
- » **Complying with applicable laws and customer requirements** and maintaining clear routines to ensure compliance.
- » **Using chemical products with lower environmental impact** and ensuring their safe handling.
- » **Continuously measuring, following up, reviewing, and improving** our operations from an environmental and energy perspective.

