

# Code of Conduct

## CEO Statement

At Nederman, we have a clear vision: a world where industrial air pollution is no longer a threat to human health or the planet. This represents the essence of the value we bring to our customers, their workers, and future generations.

Being a partner to our customers means focusing on both what we deliver and how we deliver it. Every team member, at every level, plays a vital role in protecting people, the environment, and our business—and in building relationships based on integrity and respect. Our three commitments:

- Innovate and deliver solutions that protect the planet, people, and production from industrial air pollution.
- Maintain high environmental standards and protect workers, through our operations, as part of our company culture, and throughout our value chain.
- Conduct business responsibly and transparently, building trust with customers, suppliers, colleagues, and communities where we operate.

We know our work creates a net positive impact. But we also recognize the costs to people and the environment from our materials, manufacturing, and product use. That's why we're committed to reducing these impacts and making sustainability central to everything we do.

It starts with every one of us: trusting one another, thinking critically, making ethical decisions, acting with integrity online and offline, and living our values every single day.

This Code of Conduct is our guide. It outlines Nederman's expectations on you for protecting the planet, people, and our business. I encourage you to read, reflect, and discuss it with your colleagues. Our teams build our success, and the choices we make define our impact.

Should you have any questions, please do not hesitate to contact the functions listed in every chapter of this Code of Conduct.

Sven Kristensson

CEO

Nederman Group

## A culture built on strong values

Our corporate values define who we are and what we stand for:

### Sustainable customer relationships

- We focus on our customers' needs
- We are passionate about developing value-enhancing solutions
- We deliver on our promises and commitments
- We know that profitability is a must for us to drive our future growth while remaining a dependable long-term partner

### Respect for the environment and each other

- We believe that caring for the planet is an obligation that provides unique business opportunities
- We work against discrimination, treating each other the way we wish to be treated.
- We respect each other's views and encourage coworkers to express opinions and ideas.

### Courage to act

- We promote open and honest communication
- We take initiative and accept accountability for our actions
- We encourage innovative thinking that solves challenges and leads to improvements
- We embrace and drive change.

## Who this Code applies to, and how to use it

Nederman's Code of Conduct is your guide to connecting our vision, values, and policies to our commitment to sustainability and high standards of professional conduct.

Living up to this Code of Conduct is mandatory and non-negotiable. It applies to Board members, the management team, and managers as well as permanent and temporary employees, consultants, and contractors working under the Nederman brand. Across our organization. In all functions. Wherever we operate.

Managers must lead by example and align their actions with the Code of Conduct. As a manager, you are responsible for ensuring your teams receive proper training and commit to the Code and related policies. You must also report potential violations and manage communications with care for all involved. To that end, seek guidance from HR and Sustainability functions or the relevant policyholder when needed.

## Compliance in practice

We must comply with all applicable laws and regulations, our Code of Conduct, policies, and related directives. If this Code conflicts with local law, the stricter rule applies—unless it violates the law.

### Violations of the Code

Violating our Code of Conduct or Group policies may result in disciplinary action, including dismissal. Since many rules are based on legal requirements, non-compliance could also lead to legal consequences for both you and Nederman.

If you suspect misconduct, illegal activities, or policy violations, please report them immediately to your direct manager, manager's manager, or HR representative. Or, if you prefer, you can submit a report through a whistleblower system that a third party operates. This helps ensure your anonymity. This channel is also available to Nederman suppliers and other stakeholders [nederman.trumpet-whistleblowing.eu/](https://nederman.trumpet-whistleblowing.eu/)

Nederman will protect and support reporters and ensure their confidentiality.

A designated investigation team will be tasked to impartially assess every concern reported. If a breach is confirmed, we will take appropriate actions, including disciplinary measures, corrective measures, or legal notifications if required. We are committed to ensuring no retaliation occurs against individuals who report concerns in good faith.

## Informed by international principles and guidelines

This Code covers internationally recognized principles for conducting business. It includes guidelines from the UN and other multinational agreements on protecting human rights and the environment and conducting business ethically. The Code is designed to help us comply with relevant legislation. It also mirrors our contribution to the UN Sustainable Development Goals and our commitment to the ten principles of the UN Global Compact.

## Explore further

You can find out more about how environmental, social, and business ethics-related topics can affect our stakeholders, Nederman, and you as employees, and what we must do together to address them:

- [The Nederman Sustainability Policy Framework](#)
- Related policies are accessible through links throughout this Code.

- [The Nederman Group Sustainability Plan](#) has four focus areas: Clean air, Co-workers, Climate, and Circularity with targets and initiatives for 2030.
- [Guide Us management system](#)
- [Our Annual report](#) for updates on performance, impacts, risks, and opportunities.
- Supplier Code of Conduct.

## Protecting the environment

Air pollution, climate change, and the transition to greater resource efficiency are challenges in society. As a company, we take an active role in tackling these issues.

### Clean air

Nederman's customers operate in industries where manufacturing threatens air quality. We work to reduce this risk, protecting production quality, the environment and workers. This means continuously improving our products to meet strict air quality standards and sharing our expertise with partners.

### Climate action

We have set a reduction target that covers greenhouse gas emissions from the materials used in our offering, our operations, and the use phase of our products. Our climate impact is most significant when our product are with our customers, with the electricity consumed over decades of use. That's why innovation for energy efficiency is central to our climate action.

### Circular innovation and resource use

A circular business model involves shaping our value chain to minimize, extend, recover, or recycle resources associated with our products. By shrinking our environmental footprint and using resources more efficiently, we can deliver lasting customer value, protect ecosystems, and save resources for future generations.

We focus on designing products and developing services using recycled materials, extending product lifespans, and repurposing them into new products.

## Actions that matter

We have targets that guide us in doing our part to improve air quality and circularity and reduce our value chain climate impact. The Group's production companies shall be certified according to ISO 14001:2015 for environment management and ISO 9001:2015 for quality. We conduct regular internal and external audits to ensure we meet expectations for environmental protection and are equipped to meet our targets. Nederman staff are regularly trained on the content of our sustainability plan.

We expect that our suppliers comply with our Suppliers Code of Conduct in their operations and among their suppliers.

## What this means to you

- We all contribute to improving the environmental performance of our operations and products, guided by the targets defined in our Sustainability Plan, our Environmental Policy, and local laws.
- Create a priority list of how your team can reduce its environmental footprint.
- Seek opportunities for continuous improvements to support our commitments to clean air, climate, and circularity.
- Accurately document and manage environmental impacts—never falsify records.
- Ensure all required environmental permits are in place.
- Engage our customers and suppliers in our goals and share this knowledge.

## Relevant policies and documents

- *Environmental Policy\**
- *Quality Policy\**
- *Supplier Code of Conduct\**
- *Measuring and Monitoring Policy\**

For more information, contact Nederman Group CFO

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\* Documents marked with an asterisk are currently under internal review.

## Protecting people and promoting human rights

Every decision we make affects those around us. That's why we strive to minimize harm—whether directly or indirectly—on people. We aim to create positive impacts for everyone connected to our business, from supply chain workers to employees and customers' workers.

### Health, safety, and wellness

Health and safety are at the heart of our business. Nederman's products are designed to protect customers and employees from the harmful effects of industrial processes. We strive to protect our own workforce too. Preventing accidents, work-related illnesses, and other health issues is essential for fostering a productive, resilient, and supportive workplace where individuals can thrive.

### Protecting human rights

A key part of our human rights policy is ensuring fair labor practices and safe working conditions. We uphold high labor standards and demand the same from our suppliers and partners. We do not tolerate child labour, forced labour, discrimination, harassment, or abuse. We stand for fair wages, reasonable working hours, and the right to collective bargaining.

### Diversity and inclusion

We are committed to a workplace where everyone is treated fairly and respectfully. We do not tolerate discrimination of any kind — gender, race, religion, age, sexual orientation, nationality, political opinion, union affiliation, disabilities, or social/ethnic origin.

## Actions that matter

We identify, manage, and continually reduce health and safety risks and improve our operations' well-being. Continual learning is key. Nederman employees and contractors are regularly trained in health and safety priorities. We review all safety measures to gain insights and share best practices across the business, helping us better manage and reduce risks. At some manufacturing sites, we have ISO 45001 certification for occupational health and safety.

We believe that a healthy workforce is a productive and happy one. To achieve this, we offer a range of programs locally, designed to encourage wellness in all aspects of life for example nutritional guidance, fitness programs, mental health support and health screenings.

All employees are free to join—or not join—employee organizations. Managers must respect this right and maintain constructive dialogue with representatives.

We have zero tolerance for harassment in the workplace. We tailor our actions both globally and locally to create a more inclusive and equitable workplace for example regular surveys, cultural competency training, equal pay audits and increased representation.

All our suppliers and business partners must sign the Nederman Group Supplier Code of Conduct, commit to upholding human rights, and report potential violations, especially those affecting under-age workers. We expect suppliers to ensure the same high standards of their suppliers.

## What this means to you

- Every colleague is accountable for their own health and safety and that of others. Consider how your actions impact people and their safety, work to minimize harm, and adapt as necessary.
- Treat everyone with respect, dignity, and courtesy, regardless of differences.
- Make employment decisions free from discrimination.
- Do not misuse your position over other employees. Speak up against bullying or harassment.
- Engage suppliers and customers in upholding high standards to protect workers and local communities.
- Report suspected human rights, safety violations, or discrimination to your manager or through the Whistleblower system.

## Related policies and documents

- [Nederman Group Sustainability Policy Framework](#)
- [Nederman Group Sustainability Plan](#)
- *Human rights policy\**
- [Diversity policy](#)
- [Health and safety policy](#)
- *Measuring and Monitoring Policy\**

For more information, contact Nederman Group SVP HR



## Protecting our business

In Nederman Group, we are committed to conducting business with ethics, integrity, and transparency. Nederman has zero tolerance for corruption, including bribery, fraud, and dishonesty. We are making all employees aware of their responsibilities when IT comes to IT security during their employment/engagement process and the Nederman IT security policy is available on GuideUs Policies. All employees of Nederman have a duty to familiarize themselves with the requirements of these policies.

We compete fairly based on the merit of our products, brands, and services. We do not tolerate under-the-table agreements with competitors, customers, suppliers, or business partners.

When personal matters risk influencing business decisions, there is a conflict of interest. Potential conflicts involve holding another job that contradicts Nederman's interests, hiring a friend or family member, or having a financial stake that could impact your judgment.

We maintain high standards of digital conduct and keep cybersecurity as a top priority, which is increasingly critical in today's business environment. We protect our customers' rights by safeguarding privacy and personal data and offering clear, accessible terms. To maintain trust, we review and improve our practices in accordance with evolving data protection standards and promote responsible information and information systems use.

## Actions that matter

We take measures to prevent corruption and fraud in activities conducted under Nederman's name and investigate any suspected breaches. We also comply with all local, national, and international laws wherever we operate and stay informed of legal requirements.

We meet all legal, quality, and safety standards in product design, development, manufacturing, marketing, and sales. No product is delivered until all requirements are met. Our presentations are accurate, and all claims are substantiated.

We take measures to protect employees' and customers' data.

## What this means to you

### Fair trade

- Ensure fair treatment by applying consistent conditions for similar transactions.
- Never agree or coordinate with competitors on pricing, trading conditions, production, bids, customers, or market activities.
- Respect customer independence—never fix or dictate resale prices.

### Anti-corruption and anti-fraud

- Regularly participate in anti-corruption training.
- Never give or accept bribes, gifts, or anything considered one.
- Neither you, your family, nor your friends may gain improper benefits from your position.
- Private expenses such as personal travel or entertainment may not be claimed as business expenses.
- Giveaways and gifts should be reasonable in value and serve a promotional purpose, not a personal one.

### Conflict of interest

- The best way to handle conflicts of interest is to avoid them. If they arise, be open and transparent. Share potential conflicts of interest with your manager or HR representative.
- Identify potential areas that may conflict with Nederman's interests or affect your performance and dedication to your job. Consult with your manager to confirm if you may take outside jobs or activities.

#### Product quality and data protection

- Do not expose Nederman to risk, loss of intellectual property, or legal action.
- Always adhere to legal requirements and Nederman policies in product design, manufacturing, sales, performance, and marketing.
- Never cut corners or compromise compliance.
- Do not manipulate performance in testing or misrepresent product quality, safety, or features.
- Take measures to prevent Nederman from being exposed to risks such as virus attacks, compromise of network systems and services, or loss of intellectual property.

#### Intellectual property

- Contact Nederman CEO or CFO if you believe Nederman could claim or should protect valuable intellectual property rights or if third parties are infringing or appear to be infringing on our intellectual property.
- Always respect the valid intellectual property rights of others.
- Before developing an idea or invention with third parties, consult your manager about patents, design rights, trademarks, domain names, or copyright issues.
- Any intellectual property you develop during your employment with Nederman remains the company's property, even after your employment ends.

#### Related policies and documents

- [Nederman Group Sustainability Policy Framework](#)
- [Nederman Group Sustainability Plan](#)
- [Anti-corruption and anti-fraud policy](#)
- [Anti -Trust policy](#)
- *Conflict of interest policy\**
- [Export control and sanctions policy](#)
- [IT security policy](#)
- *Measuring and Monitoring Policy\**
- [Employee Privacy policy](#)
- [Quality policy](#)
- [Whistleblower policy](#)

For more information, contact Nederman Group CFO