

Brickpack AB Code of Conduct



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At Brickpack doing things the right way is an important part of who we are and how we'll be successful. That is why integrity and taking pride in what we do are important factors to our success, both individually and as a company.

Brickpack's Code of Conduct reflects our commitment to integrity and taking pride in what we do. It brings to life our Core Values, principles, and expectations for how we conduct business; which is to always do what is right regardless of business pressures. The Code of Conduct applies to all of us and violations will not be tolerated. Managers have the added responsibility to lead by example and ensure our Code of Conduct is followed by the teams they lead.

The Code of Conduct does not cover every situation that might be encountered, and it is not a substitute for good judgment and common sense. We must understand the basic principles and standards in the Code of Conduct and apply them in our work.

Together, through our continued commitment to the values in this Code of Conduct, we foster integrity and pride in what we do, as part of our work atmosphere and overall success.

Content:

- Our core values
- Social Responsibility
- Basic human rights and working conditions
- Diversity, equality and non-discrimination
- Health, work environment and safety
- Anti-corruption/favours, gifts and bribery
- Anti-money laundering
- Fair Competition and Antitrust
- Import Laws, Export Controls And Economic Sanctions
- Conflict of Interests
- Environmental responsibility
- Financial responsibility
- Proprietary information and data privacy
- Communication and financial information
- Whistleblowing Reporting

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Statement of Our Core Values

At Brickpack Corporation, we are passionate about living our Core Values *every day*.

Core Values

Ownership

We empower our employees to utilize their individual and collective strengths, expertise, energy, and determination to deliver on our commitments.

Quality

We provide our customers with 100% conformance to all specifications and requirements. We strive to achieve and maintain zero defects and 100% on-time delivery for all operations and customers. We aspire to always delight our customers in all aspects of our products and services.

Partnership

We are a true partner with our customers, suppliers and community by building and maintaining open, trusting and honest relationships.

Mission

At Brickpack Corporation, our mission can be summed up in a single statement. Everything we do and all our success is guided by this single purpose...

“To be a leading development, design, manufacturing, and marketing organization, supplying gaskets and / or other details, which must be punched, pressed and cut in series and with the right quality to the world market in an environment sensitive to the needs of customers, employees, the community, and the industry”

Continuous Improvement

We are a learning organization that pursues continuous improvement by monitoring, measuring and analyzing data to improve productivity, processes, tasks and ourselves in order to delight our customers, stakeholders and employees.

Knowledge

We are knowledgeable in terms of our products, processes, markets and customers. It is with this knowledge that we are able to continuously improve and grow our company as a world-class supplier of gaskets and sealing solutions.

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SOCIAL RESPONSIBILITY

BASIC HUMAN RIGHTS AND WORKING CONDITIONS

Basic human rights must be recognized, respected, and applied equally for all employees, regardless of their form of employment. All employees have the right to join trade unions and organizations as they choose and to engage in collective bargaining through the trade union organizations with which Brickpack has agreements. No employee should risk harassment or retaliation for exercising these rights. The same applies for employees who choose not to join or establish an association.

We do not tolerate any forms of modern slavery, such as forced labor, bonded labor, or human trafficking. We respect children's rights to personal development and education, and we do not use and accept child labor.

We comply with local laws or agreements regarding working hours and do not permit working hours that are not in compliance with local laws and industry standards. We ensure that employees are entitled to appropriate resting and lunch breaks during working hours.

Brickpack shall not engage with private or public security forces with the goal of protecting a business project.

Brickpack shall ensure the same from its suppliers, service providers or other business partners.

DIVERSITY, EQUALITY AND NON-DISCRIMINATION

We all deserve to work in an environment where we are treated with dignity and respect. Brickpack Corporation is committed to creating such an environment, because it brings out the full potential in each of us.

Brickpack promotes diversity, equality, and fairness, and a work environment where all employees are valued and respect one another. Brickpack is dedicated to the principles of equal employment opportunity.

We prohibit unlawful discrimination against applicants or employees based on age, race, sex, color, religion, national origin, disability, military status, genetic information, sexual

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orientation, gender identity, political affiliation, or any other status protected by applicable laws.

We aim to offer a workplace where differences are respected and appreciated. Our employees and customers must feel a sense of inclusion.

All existing and potential employees must be treated fairly and without prejudice, regardless of gender, transgender identity or expression, sexual orientation, religion or other beliefs, ethnicity, disability or age. This means that we do not discriminate in conjunction with recruitment, the setting of salaries, promotions, termination of employment or in our daily interactions with each other. No employee is to be subjected to victimization, such as bullying, psychological abuse, social exclusion, sexual harassment or other forms of harassment.

Customers and other stakeholders are also to be treated fairly and without prejudice.

HEALTH, WORK ENVIRONMENT AND SAFETY

Brickpack is dedicated to maintaining a healthy and safe work environment that meets or exceeds applicable legal requirements and standards about health and safety. Safety procedures have been designed to educate you on safety in the workplace.

We have a vision of zero injuries and we believe that accidents, incidents, injuries, near misses, work related illness and unsafe conditions are preventable.

Each manager is responsible for ensuring that active health and safety work is conducted. All employees have a health and safety responsibility, which involves following safety regulations and reporting risks and deficiencies in the work environment to their immediate manager.

Brickpack has an uncompromising approach to drugs. An alcohol and drug-free workplace is a necessary requirement for our employees' security, work climate, health and safety. Any misuse of alcohol or illegal drugs while on company premises or in business relations is strictly prohibited. Employees are expected to perform their work in a safe manner, free from the influences of alcohol, illegal drugs or controlled substances.

ANTI-CORRUPTION/FAVOURS, GIFTS AND BRIBERY

No form of corruption is tolerated. Brickpack and its employees does not accept bribes, favors, or gifts or solicitation of such, whatever the form, method, or purpose, in its business dealings. Neither directly nor indirectly, such as through a third party. Brickpack conducts regular risk analyses to assess the risk of corruption. No employees are

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permitted, through their position or role in the business, to demand, accept or make personal gain in the form of gifts, offers or goods from a supplier. All business entertainment is to be moderate in nature and characterized by good judgement, so that the parties retain full credibility and an independent position in relation to each other. All payments and transactions must be reported correctly.

ANTI-MONEY LAUNDERING

Money laundering allows criminals and others to use funds obtained illegally to support criminal activities, such as trafficking, terrorism, or fraud. Brickpack does not accept or support money laundering. Ensure that you know the terms of all transactions and be alert for signs of money laundering. Money laundering can occur in many ways. Unusual transactions, irregularities in the way payments are made, large cash payments, payments made by third parties for the benefit of another party and payments from offshore banking locations must be carefully reviewed before being accepted.

FAIR COMPETITION AND ANTITRUST

Brickpack believes that fair competition is vital to ensure market efficiency. Brickpack is committed to fair competition and complies with antitrust and competition law. Brickpack will compete vigorously and fairly and without anticompetitive understandings or agreements with competitors, suppliers, business partners or customers.

IMPORT LAWS, EXPORT CONTROLS AND ECONOMIC SANCTIONS

Customs import trade laws require all imported goods to be accurately declared and the payment of duties and taxes, when applicable.

It is the policy of Brickpack to comply with all laws and regulation including those governing sanctioned parties and the Brickpack export of products, services and technical data. All Brickpack employees and officers as well as affiliates shall ensure such compliance

Many countries (including the United States) place controls and/or prohibitions on certain international transactions for national security, foreign policy and other reasons. Export control laws govern the exports of products, software, technology (including technical data and technical assistance) and services ("Items"). Export control laws may restrict the sale and/or shipment of products to certain specified countries, specified entities and specified individuals, and for specified end-uses.

Brickpack, wherever located, must comply with all such applicable laws, rules and regulations and the highest standard of conduct set forth by Brickpack.

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Prior to engaging in an international transaction, you must ensure that such transaction complies with all applicable laws, rules and regulations and Brickpack policies. Neither sales or shipments must be made to any individual or firm appearing on an applicable sanctioned parties list issued by the United Nations, the European union or national states including in particulate the United States of America

CONFLICT OF INTERESTS

Brickpack works with many suppliers, service providers, customers, and others while doing business. A conflict of interest may arise when personal activities and relationships interfere with the interests of Brickpack. Examples of conflict of interest situations are relations between employees, personal gain from corporate opportunities, doing business with family members, investing in outside businesses and outside employment. If a situation that may be perceived as a conflict of interest occurs it should be disclosed promptly to one's manager.

COUNTERFEIT PARTS

Our suppliers develop, implement, and maintain methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, and mark parts obsolete as appropriate.

ENVIRONMENTAL RESPONSIBILITY

Brickpack is committed to environmental responsibility by striving to minimize the environmental impact of waste, pollution, transportation and energy consumption, and by adhering to legal and other relevant requirements. We must meet the requirements of applicable legislation as well as customer demands. Routines for ensuring compliance with legislation and regulations are to be communicated and made available within the operations. We must ensure that chemical products and goods are handled safely. As far as possible, we must market and sell products and goods that have a minor impact on the environment.

Brickpack shall actively mitigate its impact on climate change and air quality by reducing or eliminating greenhouse gases (GHG) and other air emissions that pose a hazard to the environment and selecting energy sources responsibly and taking a progressive approach towards adopting lower-carbon-intensity and renewable energy sources

Brickpack shall use good environmental practices that avoid deforestation and protect against conversion of natural and critical habitats leading to a loss of biodiversity

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Brickpack, where applicable, makes any effort to avoid noise pollution, monitoring, controlling and largely reducing noise emissions caused by industrial machinery, construction and vehicles.

Brickpack aims to reduce or eliminate waste of all types including water and energy by practices such as improving production, maintenance and processes, change of material, conservation and recycling and reusing materials.

Brickpack does not accept any form of violation of animal rights as declared by the World Organization for Animal Health. Animals shall not be raised and killed for the sole purpose of furthering a Supplier's business success.

FINANCIAL RESPONSIBILITY

We shall act as a reliable and honest company that lives up to its obligations. We only become involved in business activities that comply with national laws, international conventions, signed agreements and our Code of Conduct. We respect and comply with competition rules, environmental legislation, labor market laws, agreements, safety requirements and other rules that govern our operations. The Group believes in long-term business relationships that allow us to work with our business partners to create a platform for achieving strong financial results. All financial transactions are to be recorded in accordance with the Group's accounting policies and comply with applicable laws, rules and standards.

PROPRIETARY INFORMATION AND DATA PRIVACY

Intellectual property: Our intellectual property such as patents, trademarks, copyrights and trade secrets, as well as technical data and software, is a valuable asset and must be protected carefully. This obligation continues even after the end of one's employment. We respect the intellectual property belonging to others and avoid any unlicensed use of a third party's inventions, trademark, logos, software and photos.

Confidential information: Employees are obligated, during and after employment with Brickpack, to maintain the confidentiality of proprietary or confidential information of Brickpack that the employees receive or to which they are exposed during employment. Employees may not misuse or inappropriately disclose any assets of Brickpack.

Data privacy: We are committed to complying with fair, transparent and legally compliant standards in relation to personal integrity, such as GDPR, as well as other requirements from customers and suppliers. We only process personal data in accordance with applicable data protection laws and regulations and only for lawful, explicit and specified purposes.

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COMMUNICATION AND FINANCIAL INFORMATION

Transparency: In all our communications, both written and spoken, we are committed to open and transparent communications within the bounds of commercial confidentiality. We provide reliable and relevant information on our activities in a timely, regular manner.

The purpose of the information activities carried out within our company is to support the company's vision, business concept and strategies. Such activities are to strengthen people's confidence in the company and the brand and create business and customer value. Brickpack shall practice fair marketing and provide customers and other business partners with factual and unbiased information about its products and services.

Information made public shall be correct, relevant and clear. Information shall be disclosed in an open and prompt manner and be compliant with applicable legislation, requirements and internal policies.

Inside information shall remain confidential until disclosed and no unauthorized party shall be given access to such information.

Political Affiliation: We do not take political stands. Therefore, we do not use Brickpack's assets to support political campaigns or candidates, or otherwise provide services to political endeavors.

In cases where the Code of Conduct does not provide direction, persons covered by the Code shall act in accordance with internal policies and rules; and consult with their immediate manager. Secondly, they shall consult with the Company's CEO where possible, and thirdly they shall consult with the Chairman of the Board. Board members shall consult with the Chairman of the Board and, secondarily – depending on the nature of the matter – with other board members. In cases where such consultation cannot take place, they shall act in accordance with what is legal, reasonable and ethical.

In the event of suspicion of a breach of the Code of Conduct, those covered by the Code must inform their immediate superior, in the second place, the Company's CEO and, in the third place, the Chairman of the Board. Board members must inform the Chairman of the Board and, in other respects, depending on the nature of the issue, other Board members.

WHISTLEBLOWING REPORTING

It is understood that all reports are made in good faith and will be treated in an expeditious and serious manner. All employees are encouraged to report on any activity that the employee reasonably believes to constitute fraudulent activity or is in violation of any government

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regulation to the appropriate level of Hoosier Gasket management. Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting. Whistleblower protections are provided in the areas of confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law, and/or to provide an accused, appropriate legal right of defense. Hoosier Gasket will not retaliate against a whistleblower. Any whistleblower who believes he/she is being retaliated against must contact the Human Resources Director, or any member of Hoosier Gasket management, immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

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