



| Established by manager of | Owner | Date | Revision |
|---------------------------|-------|------------|----------|
| Group CEO | CEO | 2019-10-10 | 2 |

Purpose and Scope

This document defines the minimum requirements for the entities to meet the HP Tronic Group Code of Conduct.

Background

HP Tronic Group is aware of its social responsibility and the goal is to combine business with social and environmental responsibility. The Code of Conduct clarifies the Group's position and commitment to all customers, suppliers as well as to employees and other partners. The overall goal is to ensure the respect of human rights, labor rights and environmental protection, both within the Group and with our business partners.

The Code of Conduct is based on internationally recognized conventions on human and labor rights and international environmental regulations. Companies and sub-contractors to companies that supply products or services to HP Tronic Group are to comply with this Code of Conduct.

In some cases, political or cultural circumstances can make it difficult for suppliers and service providers to meet certain requirements of the Code of Conduct. In such cases, HP Tronic Group can be open to alternative approaches.

The Managing Director, General Manager or similar of each legal entity within the HP Tronic Group is responsible for the implementation and fulfillment of the Code of Conduct for the legal entity.

The Group CEO is overall responsible for the Code of Conduct and its fulfillment.

Legal requirements

1 Legal requirement

1.1 The general rule is that HP Tronic Group, its suppliers and their subcontractors are to comply with the national legislation of the countries in which they operate. Should any of the requirements of the Code of Conduct differ from those set forth in national legislation, the national legislation is regarded as directory.

Working Conditions

2 Forced Labor

2.1 No form of forced labor, wage slavery or involuntary labor may occur.

2.2 Employees should not be forced to pay any deposit or be forced to hand over their identity cards to the employer. Employees shall be free to terminate their employment after reasonable notice.

3 The right to freedom of association and collective bargaining



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3.1 HP Tronic Group respects the right of employees to be represented by trade unions and other employee representatives and have the right to collective bargaining.

3.2 Entity in HP Tronic Group may not discriminate against trade unionists or prevent them to carry out their union duties.

4 Child Labor

4.1 Children under the age of 18 may not engage in activities that are harmful to health and safety, including night work.

4.2 Children under 15 years of age (14 or 16 in some countries) must not perform work in such a way that their schooling is hindered or adversely affected.

5 Discrimination

5.1 No employee shall be discriminated due to their ethnical background, religion, age, disability, gender, marital status, sexual orientation, union membership or membership in a political organization.

5.2 Measures shall be taken to protect the employees against sexually harassment, being insulted or exploited, discriminated or dismissed on unfair grounds such as marriage, pregnancy, parenthood or health status.

5.3 All employees with the same experience and qualifications should receive equal pay for equal work.

6 Intimidation and physical punishment

6.1 Physical punishment and abuse or threats of physical abuse are prohibited. The same applies to sexual abuse and other forms of humiliation.

7 Working Environment

7.1 The working environment must be safe and promote good health, considering the general knowledge of the industry and specific risk factors. A clear set of instructions and descriptions of procedures for the work environment containing safety, fire protection and emergency preparedness shall be established and followed.

7.2 All employees must undergo regular and documented safety training. This shall also include seasonal employees.

7.3 Employees shall have access to clean sanitation and clean drinking water. The employer must also ensure access to places where food can be stored safely, if needed.

7.4 If the employer provides accommodation it must be clean, safe and adequately ventilated. Accommodation must have access to clean sanitation and clean drinking water. Fire protection and emergency preparedness should meet the same standard as in the workplace.

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8 Salaries

8.1 The employee salaries/wages must be at least in accordance with national laws regarding minimum wage or industry practices. Furthermore, the salary should always be large enough to cover basic needs.

8.2 Wages as well as procedures for how and when the wages are paid are to be agreed between the employer and employee and documented before employment is started. The agreement should be formulated in a way understandable for the employee.

9 Hours of work

9.1 Hours of work shall be in accordance with national laws or current industry practices and must not exceed the working hours as stated in the prevailing international conventions. It is recommended that the ordinary working hours shall not exceed 48 hours per week.

9.2 Employees shall be entitled to at least one day off per week.

9.3 Overtime shall follow industry practices or government regulations. It is recommended to be limited to a maximum of 12 hours per week.

9.4 Staff shall always receive overtime compensation in accordance with applicable law.

10 Employment

10.1 All employees are entitled to an employment contract written in a language they understand.

Environmental Protection

11 National and international environmental laws and regulations

11.1 Production must not conflict with national or international environmental laws and regulations.

11.2 Procedures and regulations for waste management, handling and disposal of chemicals and other hazardous substances and emission treatment must be established and must at least comply with legal requirements.

11.3 Consideration should be taken to environmental aspects throughout the whole value chain and not only in operations. Local, regional and global environmental issues should be considered.

Bribery and Corruption

12 Bribery and corruption

12.1 High level of integrity is expected in all business relationships. Every conceivable form of corruption, extortion and fraud is strictly prohibited. No form of bribery shall under any circumstance be given or accepted.



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Requirements for Suppliers

13 Trust and cooperation

13.1 HP Tronic Group expects all suppliers to respect the Code of Conduct and to actively do their utmost to achieve this standard.

13.2 The HP Tronic Group believe in collaboration and we are willing to work with our suppliers to find realistic solutions for all occasions. The HP Tronic Group is prepared to consider cultural differences and other factors that may vary from country to country, but we will not compromise on the basic requirements of safety and human rights.

14 Inspections

14.1 The HP Tronic Group reserves the right of making unannounced visits at any time to all factories/suppliers that produce and deliver goods/services to the Group. The Group also reserve the right to have an independent party (e.g. an NGO or consulting firm) chosen by us to make inspections to ensure compliance of this Code of Conduct.

15 Non-Compliance

15.1 If the HP Tronic Group finds that a supplier does not comply with the requirements of this Code of Conduct the business relationship will be terminated unless improvements are made within an agreed time period. If repeated violations of the code are found the Group will immediately terminate the relationship with the supplier.