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# Code of Conduct

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HOW WE DO BUSINESS IN SUSTAINABLE WAYS

Updated April 2020

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This Code of Conduct was put together to present guidelines for how we do business. Below you find a short introduction to BrainLit.

## Who we are

In 2012 Swedish inventor Tord Wingren founded BrainLit in Lund in Sweden. Together with a dedicated and bold team he has since patented the BrainLit BioCentric Lighting™ System, developed high quality products to go with it and in a sustainable way commercialized the solution with customers around the world.

Our headquarters is still located in Lund, in Medicon Village, with subsidiaries and affiliates providing light for health on three continents and growing.

## What we do

We supply systems that provide BioCentric Lighting™ (BCL™). BCL is a truly unique concept for light that mimics natural daylight to benefit health and wellbeing.

BCL is fundamentally designed from the deep understanding of the circadian system in human beings in our scientific board, with professors in medicine, environmental psychology, psychiatry and physics as prominent members.

In addition, it is founded in scientific studies performed by us and 3rd parties, where we measure the impact our light has on users. Accordingly, BCL takes into account all aspect of light that is simultaneously relevant for health.

Our system and control software make sure luminaires deliver the right light from a health perspective at any point in time, at all times.

Our solution is fundamentally based on a feedback driven self-learning control system, which is covered by our founding patents filed in 2012.

## Why we do it

With more people eager to be all they can be, the interest in how we as humans can gain from spending time in daylight indoors increase rapidly.

This is the key driver for our passion about bringing light for health all over the world, the platform for our BioCentric Lighting™ System and all in all the reason why BrainLit exists.

## Questions on us or the content in this Code of Conduct?

You may come across a situation that appears to not be in conformance with our principles as set out in our Code of Conduct, our policies, or the law. If so, we expect you to bring your concern to our attention.

Your privacy and integrity are of greatest importance to us at all times. This is particularly relevant at those times when you or one of your colleagues step forward to report a concern or suspected breach of this code, policies, or the law. There will be no retaliation taken against an employee or business partner who, in good faith, voices their concern.

[info@brainlit.com](mailto:info@brainlit.com) • +46 46 37 26 00 • [www.brainlit.com](http://www.brainlit.com)

## INTRODUCTION

Who we are .....	2
What we do .....	2
Why we do it .....	2

## 1 AT OUR WORKPLACE

1.1 We believe in fair working terms and conditions .....	5
1.2 We are committed to health and safety .....	7
1.3 We offer a world of opportunities for personal growth .....	9
1.4 We believe diversity and inclusion to be important .....	10
1.5 We keep accurate and complete records .....	12
1.6 We protect our company's assets .....	14

## 2 IN OUR MARKETPLACE

2.1 We are committed to quality .....	16
2.2 We respect competition laws .....	18
2.3 We ensure responsible trade .....	20
2.4 We view our suppliers as our business partners .....	22
2.5 We ensure protection of personal and business critical information .....	24

## 3 BRAINLIT IN THE WORLD

3.1 We have zero tolerance for bribery and corruption .....	26
3.2 We are committed to environmental responsibility .....	28
3.3 We ensure efficient and accurate tax management .....	30
3.4 We communicate honestly, transparently and in a timely manner .....	32
3.5 We handle public matters with integrity .....	34
3.6 We are active members of the communities in which we operate .....	36

# 1 AT OUR WORKPLACE

## 1.1 WE BELIEVE IN FAIR WORKING TERMS AND CONDITIONS

Fair working terms and conditions mean a decent and humane work environment, which allows everyone to perform at their best throughout our company and wherever we operate.

### OUR PRINCIPLES

As a company we understand our responsibility to our employees and will promote safe and healthy labor practices.

We have zero tolerance for any form of child, forced, or compulsory labor.

We will not permit working hours that are not in compliance with national laws and industry standards.

We will pay wages and provide benefits that are market competitive and consistent with industry standards in the countries in which we operate.

We recognize and respect our employees' right to freedom of association and collective bargaining.

### FOR YOU THIS MEANS

- You have a responsibility to understand your own employment conditions.
- Your manager/supervisor has a particular responsibility to lead by example and promote fair working conditions.
- You are entitled to a written employment contract or offer of employment stating the terms and conditions of your employment.
- You can expect clear and regular communication regarding your wages and benefits.
- You have the right to appoint worker representatives and form workers' associations or join trade unions of your own choosing.
- Your decision on whether or not to join a trade union or form workers associations or appoint worker representatives is an individual choice; you will be respected regardless of which decision you make.
- In those situations in which the right to freedom of association and collective bargaining are restricted under law, BRAINLIT can facilitate means of independent and free association and bargaining if you request it.
- You will be treated with respect and will not be subjected to physical, verbal or financial punishment.

### WHAT SHOULD I DO?

- ? **Throughout this document it is referred to "we". Who are "we"?**
- ! The term "we" is used to describe all the employees of BRAINLIT regardless of business area, product area, function, or role. It applies to all our subsidiaries worldwide and joint ventures which BRAINLIT controls. We all share a responsibility to follow our Code of Conduct, our policies and the laws and regulations that applies in our daily work.
- ? **We have a large customer order that requires many of us to work the maximum overtime for several months in a row. Although I understand the business need, it is putting a strain on my family. Is there anyone I can talk to in order to find a workable solution?**
- ! Of course you should always start by speaking with your immediate supervisor or manager. Be sure he/she clearly understands the strain you and your family are experiencing. In most cases an appropriate solution can be reached with open and honest dialogue. If it is not possible to reach an acceptable agreement, contact either your Human Resources or Work Representative, if applicable, for further advice.

### FOR MORE INFORMATION

Relevant policies, procedures and guidelines: [www.brainlit.com](http://www.brainlit.com)  
 Contacts: your manager/supervisor, Human Resources team

## 1.2 WE ARE COMMITTED TO HEALTH AND SAFETY

Health and Safety mean the provision of leadership, workplace environments and work practices that results in a culture where every person is committed to preventing injury and occupational illness.

### OUR PRINCIPLES

When conducting our business we are committed to our vision of “Zero Harm” to our employees, our contractors, our suppliers and our customers.

We integrate health and safety into every aspect of our daily business and believe a fully embedded health and safety culture is a business advantage.

We believe that a critical success factor is having active, courageous and visible safety and health leadership regardless of one’s role.

We recognize, promote and share good health and safety practices throughout our business.

### FOR YOU THIS MEANS

- You take the time to understand the safety and health risks present in your daily work as well as the actions you can take to prevent them.
- You always comply with all current health and safety policies, all local health & safety legislation, rules and procedures, and you share your ideas if you identify further ways to minimize risks.
- You do a personal risk assessment immediately before starting a task to ensure that the procedures, personal protective equipment and emergency provisions are adequate and in place.
- You stop work and immediately report any issue to your manager/ supervisor if you believe a task may cause an injury or illness to you or your colleagues.
- Regardless of your role, you demonstrate active, courageous and visible leadership in health and safety matters.
- You take personal actions to ensure that your health and wellbeing are not negatively affected by your work and participate in the Health and Safety programs offered at your location.
- When conducting company business and during business travel you have the responsibility to exercise sound judgment for safe conduct.
- You ensure that you are always “fit for work”. This means you are free from any adverse effects due to medical or physical conditions, drug or alcohol use, fatigue or stress.

### WHAT SHOULD I DO?

- ? **I have an urgent task to do which I thought was safe, but now the workplace conditions have changed and I’m concerned that I could be injured.**
- ! Do a personal risk assessment to check that the procedures and your equipment are still adequate for the task. If you remain unsure, stop the work and immediately talk to your manager/supervisor.
- ? **I’m taking some over the counter medication I bought from the pharmacy to help with flu symptoms. It says on the package that they can make some people drowsy. Do I need to tell anyone at work?**
- ! You should discuss this with your supervisor before you start work, to ensure that the effects from your medication (or from any lack of sleep caused by the illness) will not put you or others at risk of injury.
- ? **I’m taking a business trip for a few days. What do I need to think about before I leave?**
- ! Prepare yourself by:
  - Researching your route and your destination.
  - Take part in safety and security awareness programs.
  - Plan for different risk scenario.
  - Have a list of up-to-date emergency numbers and contacts

You are ultimately in charge of your own security.

### FOR MORE INFORMATION

Relevant policies, procedures and guidelines: [www.brainlit.com](http://www.brainlit.com)  
 Contacts: your manager/supervisor, Human Resources team

## 1.3 WE OFFER A WORLD OF OPPORTUNITIES FOR PERSONAL GROWTH

We aim at offering working conditions that stimulate employees to perform successfully, to assume personal responsibility, and to continuously develop their personal and professional competence.

### OUR PRINCIPLES

We have a culture where employees feel empowered to set tomorrow's standards by creating, acquiring and transferring competence.

We offer development opportunities that evolve and enable our people to turn their ambition into sustainable development for the individual, the team, and the business.

Regardless of our location or organization, we all have the right to participate in the Performance Management process.

We act as role models when it comes to target setting, conducting the performance dialogue and follow-up.

### FOR YOU THIS MEANS

- You are responsible for your own learning, to continuously develop your skills and competencies required to succeed in your daily work.
- You contribute to the target setting process, the performance dialogue and the follow up process.
- You are up-to-date with the latest business developments and the impact they have on your daily work.
- As a manager, you ensure that the business strategy is broken down into targets that are clear to everyone on the team.
- As a manager, you must review progress and coach employees by requesting and giving feedback.

### WHAT SHOULD I DO?

- ? **I recently transferred to a new department and am unclear as to what development opportunities might exist specific to my new role. Who should I turn to?**
- ! Begin by speaking with your immediate supervisor/manager. If he or she is unable to assist you, reach out to your Human Resources representative.
- ? **It's time for the individual performance dialogue with my supervisor. What is expected of me as an employee?**
- ! Prepare yourself by reviewing your job description and your targets. Reflect on your performance and target fulfillment. Think about your development needs.

### FOR MORE INFORMATION

Relevant policies, procedures and guidelines: [www.brainlit.com](http://www.brainlit.com)  
 Contacts: your manager/supervisor, Human Resources team

## 1.4 WE BELIEVE DIVERSITY AND INCLUSION TO BE IMPORTANT

We view diversity as personal and cultural differences, as well as different work and life experiences. Inclusion is our approach to promoting diversity, whereby we enable all employees to contribute in line with their full potential and make use of it in our daily business.

### OUR PRINCIPLES

We believe diversity and inclusion represent sources of innovation and tools to fulfill customer expectations in our global marketplace, and view them as a means to attract, develop and retain talent.

Working together as a team and utilizing the unique competencies and everyone's know-how is crucial to our success. In order to be able to benefit from all of our diverse perspectives, we are committed to a culture of inclusion in our workplace.

We are committed to providing equal opportunities regardless of race, ethnicity, national origin, religion or belief, gender, sexual orientation, gender identity or expression, age, disability, marital or family status, or any other characteristic protected by applicable laws and regulations.

We do not accept any form of intimidating or disrespectful behavior, bullying, harassment, unwanted sexual advances or unlawful discrimination.

### FOR YOU THIS MEANS

- You always encourage a positive work environment, where everyone is appreciated, respected and valued for their differences and you stimulate a culture of inclusion.
- You are open-minded, promote team spirit, and encourage new ideas and learn from others.
- You do not exclude people from opportunities for development, discussions or employment within your organization.
- You encourage and promote development of a diverse workforce at all levels and in all functions.

### WHAT SHOULD I DO?

- ? **José is new to our team. As his manager, I know he has a lot of experience that would be of value to us. However, he rarely speaks in meetings to share ideas. I'm thinking this may be because we hold our meetings in his second language. Should I leave him alone and hope that he starts contributing more in the future?**
- ! Being new on a team is challenging by itself, but even more so in meetings – especially when working in a second (or even third) language. When the opportunity arises in meetings, ask direct questions to José about his perspectives or experience; facilitate his participation, just as you should do with any team member who may seem reluctant to speak.
- ? **At the workplace I have noticed that one of my colleagues is not being treated well. Managers, as well as colleagues, are talking about this person in a judgmental way and at lunchbreaks the person is systematically left eating lunch alone. What do you expect me to do?**
- ! All employees are strongly encouraged to report any concern of perceived bullying, harassment or unlawful discrimination to management or Human Resources. You can also talk to your colleague about his or her view of the situation.

### FOR MORE INFORMATION

Relevant policies, procedures and guidelines: [www.brainlit.com](http://www.brainlit.com)  
Contacts: your manager/supervisor, Human Resources team

## 1.5 WE KEEP ACCURATE AND COMPLETE RECORDS

This includes both financial and non-financial records such as meeting minutes, memoranda, contracts, financial statements, payrolls, expenditures, human resource records, safety and environmental records, product information, and accounting source documents.

### OUR PRINCIPLES

We believe that the integrity and accuracy of our business records are of utmost importance.

We maintain well-managed and accurate records consistent with all applicable legal requirements and industry standards. This applies to each and every detail of our business.

We prepare our financial records in a timely manner, they are factbased representing our business dealings.

We maintain a system of control of the business record's accuracy at all times.

### FOR YOU THIS MEANS

- You are responsible for maintaining accurate records of your business dealings every day.
- You retain and maintain documents and records in accordance with applicable customer and legal requirements.
- You comply with the delegated authority levels for approval of financial and other business decisions.
- You ensure that every entry in all reports or records is accurate and is not false or misleading.
- You record your working hours and business expenditures accurately and according to local procedures.
- You are responsible for documenting and maintaining accurate and honest records of product and process verification.

### WHAT SHOULD I DO?

- ? **It's the last week of the first quarter. In order to stay within our budget, I'm thinking about booking certain expenses in the second quarter for supplies and other materials that we received earlier this month. Can I do this?**
- ! Absolutely not. All expenses and revenues must be recorded in the period that they are incurred or realized.
- ? **I was on a business trip and misplaced a few receipts for taxis and meals. Can I still get reimbursed if I don't have anything to document my expenses?**
- ! Possibly. It is recommended that you always use a credit card when traveling on company business, since that can potentially be used as proof of an expense. If you accidentally lose your receipts, you should contact your manager/supervisor to find out whether you can be reimbursed. For expenses in excess of a particular amount, your manager/ supervisor may refuse reimbursement without receipts. Even if you are allowed to be reimbursed, any documentation that you are required to produce must accurately reflect your expenses. It is never acceptable to create a false, misleading or inaccurate expense for reimbursement.

### FOR MORE INFORMATION

Relevant policies, procedures and guidelines: [www.brainlit.com](http://www.brainlit.com)  
Contacts: your manager/supervisor, Group Finance

## 1.6 WE PROTECT OUR COMPANY'S ASSETS

Assets can be tangible or intangible. Examples of tangible assets are real estate, raw material, products, machines or personal equipment. Examples of intangible assets are brands, patents, trademarks, know-how, trade secrets, copyrights, goodwill and information.

Fraud includes any intentional or deliberate act to deprive the company of property or money by deception or other unfair means. Theft occurs when property belonging to the company is taken without the required approval.

### OUR PRINCIPLES

We are mindful and protect our company's assets from damage, loss and criminal acts, as they are vital to our business.

We comply with internal controls designed to safeguard and protect our assets.

We only use assets for business purposes unless otherwise authorized by appropriate management.

We never use company assets for personal gain or for illegal activities.

### FOR YOU THIS MEANS

- You have a responsibility to use appropriate means to safeguard our company's assets from loss, theft, damage and/or misuse.
- You comply with and adhere to the company's internal controls and procedures.
- You use our brand, patents, trademarks, know-how, and copyrights responsibly and as instructed.
- You do not use our company's computers, phones or IT systems to view materials that are inappropriate, illegal, sexually explicit, or otherwise offensive.
- If you become aware of theft, damage and/or misuse of our company assets, or have any questions about appropriate use of them, speak with your manager.
- You have a responsibility to report suspicions or concerns of fraudulent behavior, theft, money laundering, or other irregular activity.

### WHAT SHOULD I DO?

- ? **A customer contacts you indicating that a product purchased is of very poor quality and he/she suspects it is not a genuine product from our company, but a copy with our company's brand.**
- ! You should immediately contact our legal team, so they can start an investigation in order to find the source for the product and take legal measures.
- ? **In printing a document at the office you find a copy of a purchase order that appears similar to an order that you know was finalized a few days previously. You read the scope of supply and note that additional items appear to have been included to that which was originally ordered. You suspect that the original purchase order has been altered to include the additional items. What do you do?**
- ! You are strongly encouraged to report your concerns or suspicions to your manager, or alternatively report your concerns to headquarters.

### FOR MORE INFORMATION

Relevant policies, procedures and guidelines: [www.brainlit.com](http://www.brainlit.com)  
 Contacts: your manager/supervisor, Legal Department

# 2 IN OUR MARKETPLACE

## 2.1 WE ARE COMMITTED TO QUALITY

Quality is conformance to requirements, meaning that we pay attention to every aspect and deliver what is expected from us, right the first time, on time, every time.

### OUR PRINCIPLES

Our efforts and activities are driven by an understanding of our customers and their business needs, and we are dedicated to ensuring the best quality.

We are committed to providing our customers with products and services that meet or exceed their expectations.

Quality leadership, reliability, delivery and sustainability are crucial for complete customer satisfaction.

“Zero defects” is our guiding principle in everything we do to achieve quality excellence.

### FOR YOU THIS MEANS

- With a “right from me” mentality you continuously strive for operational excellence by eliminating the possibilities for mistakes in every single operation and transaction.
- You have a responsibility to understand our quality principles, objectives and Key Performance Indicators (KPIs), and you clearly support our business needs and strengthen our customer focus.
- You listen to our customers (both internal and external) and understand their needs and challenges before agreeing on requirements.
- You are trained and qualified to do your job.
- You are proactive in learning and improving every day.

### WHAT SHOULD I DO?

- ? **If we have time, we will do it right. However, at the end of a quarter we feel the pressure to “make the numbers” and there may not be enough time. Then we ship whatever comes out.**
- ! Quality and safety go hand in hand. If we start to deliver products and services that do not conform to agreed requirements, we put our customers and our brand name at risk. This is not allowed. If you are feeling pushed in this direction – talk to your manager.
- ? **I find it hard in my daily work to be sure that I have actually done everything right – what can I do to improve?**
- ! Having the mindset of doing everything right the first time should be one of our top priorities, because it is better and more efficient than correcting things afterwards. To do this, you must make sure that you understand all requirements related to your operation or task. If you work in a team, discuss these requirements with your team and make sure everyone has a common understanding. Also, make sure you have a way of meeting each requirement. If there is any uncertainty, discuss and clarify this with the person or function that receives your job (your “Customer”). It may be possible to change a requirement so it fits you and your Customer, but any change must be done formally, by following the rules in your organization (documentation, approvals and so on).

### FOR MORE INFORMATION

Relevant policies, procedures and guidelines: [www.brainlit.com](http://www.brainlit.com)  
 Contacts: your manager/supervisor

## 2.2 WE RESPECT COMPETITION LAWS

Competition and antitrust laws prohibit anti-competitive agreements, abuse of market power and anti-competitive mergers and acquisitions.

### OUR PRINCIPLES

We believe competition is in the best interest of our company, our shareholders, our customers, our employees, and society at large, as it drives efficiency and innovation, which are the basis of a wellfunctioning market economy.

We respect competition laws in all the markets in which we are active.

We train our employees to ensure that they are knowledgeable regarding competition law and to make sure they can identify situations where competition law considerations are relevant.

We ensure that expert in-house legal advice is available to assist employees in navigating competition laws.

### FOR YOU THIS MEANS

- You have a responsibility to understand our company's competition law policy and requirements related to your daily work.
- You do not make any arrangements with competitors that could restrict competition.
- You cannot discuss or exchange sensitive commercial information with competitors.
- You have to seek timely legal advice from our Legal Department if you are considering an arrangement that is unclear as to whether it would achieve a business objective in a legitimate way.
- You must always contact our Legal Department if you become aware or suspect that competition law has been breached.

### WHAT SHOULD I DO?

- ? **I am considering attending a meeting where competitors will also be present. What should I be aware of?**
- ! You can only participate in a meeting with competitors if you are sure that the purpose of the meeting is legitimate. For example, it is generally acceptable to participate in trade association meetings or to meet a competitor who is also our supplier to discuss the terms of supply. If you are in doubt about whether the purpose is legitimate, you must seek advice from our Legal Department. If you attend, you need to understand the competition law prohibitions related to contacts between competitors and the procedures for how to handle such contacts.
- ? **I want to collect information on our competitors' strategies and prices. Which sources can I use?**
- ! Information about competitors' commercial behavior can be gathered from all public sources, such as websites, brochures, annual reports and trade publications. You are also allowed to accept information received from a customer regarding a competitor if it is given voluntarily in a legitimate negotiation. It is completely illegal to obtain commercially sensitive information directly or indirectly from competitors.

### FOR MORE INFORMATION

Relevant policies, procedures and guidelines: [www.brainlit.com](http://www.brainlit.com)  
 Contacts: your manager/supervisor, Legal Department

## 2.3 WE ENSURE RESPONSIBLE TRADE

Trade regulations cover areas such as rules of origin, customs classification of goods, customs valuation, export control classification, export license management, restricted party screening, embargo and sanctions, anti-boycott provisions, and conflict mineral regulations. Conflict minerals are raw materials whose extraction, transport, or trade directly or indirectly support armed groups and/or cause gross human right violations in conflict-affected and high-risk areas.

### OUR PRINCIPLES

We deliver products and services to countries all over the world and we are dedicated to ensuring compliance with all applicable import and export laws and regulations.

We actively work to ensure our company has a high awareness of trade compliance and our aim is to incorporate trade compliance in all daily operations.

We believe that a well-functioning trade compliance structure will facilitate new business opportunities. We aim to create a culture where knowledge sharing and cooperation is encouraged, which leads to a widespread application of best practice processes.

We want to be a leader when it comes to responsible trade and we contribute to the development of appropriate trade measures in the world trading community.

### FOR YOU THIS MEANS

- You have a responsibility to understand the trade compliance requirements and regulations related to your daily work.
- When conducting trade you always need to consider the following factors:
  - What – you must know the characteristics of your goods, physical as well as non-physical.
  - From – you must know the origin and legislation for the country of shipment
  - To – you must know the sanctions and legislation of the destination country.
  - Who – you must know that your business partner is not restricted.
  - Why – you must know the end-use of the goods.

Special notice should be given to the transfer of intangible goods (non-physical) due to the difficulty to control such goods.
- You are responsible for understanding the company’s policy and position regarding conflict minerals when sourcing materials that may contain such minerals.

### WHAT SHOULD I DO?

- ? **I have a direct delivery to a customer in a sanctioned/embargoed country. Can I ship the goods directly or is there something I need to consider before?**
- ! Any business conducted with countries affected by sanctions/embargoes has to undergo an approval process. This is to ensure that BRAINLIT fulfills all legal requirements of the sanction regulation.
- ? **I have noticed that the product-related data on import/export declarations is not always correct (e.g. country of origin, tariff code, customs value) and sometimes this causes delays in our shipments when they pass through Customs.**
- ! It is very important to use correct information on all declarations.

### FOR MORE INFORMATION

Relevant policies, procedures and guidelines: [www.brainlit.com](http://www.brainlit.com)  
 Contacts: your manager/supervisor

## 2.4 WE VIEW OUR SUPPLIERS AS OUR BUSINESS PARTNERS

Suppliers are all companies and entities that deliver goods or services to BRAINLIT. These may be tangible goods, such as materials, components or machines, or intangible goods such as software, drawings, intellectual property, or know-how. Services can, for example, include assembly, cleaning, and security, consulting, sales, or engineering.

### OUR PRINCIPLES

We take responsibility for the suppliers with whom we cooperate and expect the same level of integrity, honesty and ethical behavior from them as they can expect from us.

We partner with suppliers with whom we can build mutually beneficial relationships.

We are committed to the fundamental principles on human rights, labor rights, the environment and the fight against corruption throughout our operations, which also includes our suppliers.

### FOR YOU THIS MEANS

- As an employee engaged in purchasing you have a responsibility to ensure that the Supplier Code of Conduct is always part of the contractual agreement with suppliers.
- When you place an order with a supplier you first must ensure that the supplier has been approved according to the Supplier Code of Conduct.
- If you are aware of any non-compliance with our Supplier Code of Conduct, contact our Head of Purchase at headquarters.

### WHAT SHOULD I DO?

- ? **I have discovered that one of our suppliers is not complying with the BRAINLIT Supplier Code of Conduct. What should I do?**
- ! Contact our Head of Supply at headquarters for guidance. Depending on the nature of the non-compliance there are alternative measures to assist in the development of a corrective action plan with the supplier.
- ? **I need a new supplier. What is required from me?**
- ! Contact your local purchasing organization who will conduct a risk assessment and approval of the supplier. As part of the risk assessment the supplier will perform a self-assessment, and their compliance with the Supplier Code of Conduct will be monitored. Depending on the outcome of the risk assessment the compliance monitoring may include an onsite audit by our Supply organisation.

### FOR MORE INFORMATION

Relevant policies, procedures and guidelines: [www.brainlit.com](http://www.brainlit.com)  
Contacts: your manager/supervisor, Supply Organisation

## 2.5 WE ENSURE PROTECTION OF PERSONAL AND BUSINESS CRITICAL INFORMATION

Personal information is any information directly or indirectly related to an individual. Business critical information is information such as business plans, strategic documents, planned mergers and acquisitions, manufacturing information, intellectual property, research and development information and financial information. The unauthorized use or dissemination of business critical information can cause significant harm to our company's business or reputation if it is incorrect, unavailable, or disclosed to an unintended audience. Personal and business critical information exists in many forms; for example, written on paper, electronically stored, and spoken in meetings.

### OUR PRINCIPLES

We make sure that information is reliable and available to those who need it, when they need it.

We are committed to the protection of personal information of our employees and stakeholders with whom we engage.

We handle personal information responsibly and in compliance with laws and regulations in countries where we operate.

We handle information about our company and related parties with caution and take measures needed to ensure protection of business critical information.

### FOR YOU THIS MEANS

- You make sure that information is trustworthy and reliable as well as available for those who need it, when they need it, but only on a need-to-know basis.
- You do not access, collect, store, process, or share personal or business critical information without proper authorization.
- If you have been authorized to share personal or business critical information with anyone inside or outside the organization, you make sure it is in line with company policies and procedures, as well as, applicable laws of the country in which you operate.
- You must ensure the protection of personal or business critical information related to our customers, suppliers and joint ventures.

### WHAT SHOULD I DO?

- ? **How can I help to protect personal or business critical information?**
- ! By acting according to company rules for handling information. You must make the rest of the organization aware that this information is to be protected and handled appropriately. If you handle personal or business critical information, you must make sure that it is accurate and available for those who need it. You must also take extra precautions to safeguard the information when necessary.
- ? **Why can't I have access to all information that is available?**
- ! To ensure confidentiality. Access to personal and business critical information must always be based upon a need-to-know basis.

### FOR MORE INFORMATION

Relevant policies, procedures and guidelines: [www.brainlit.com](http://www.brainlit.com)  
 Contacts: your manager/supervisor, Legal Department

# 3 BRAINLIT IN THE WORLD

## 3.1 WE HAVE ZERO TOLERANCE FOR BRIBERY AND CORRUPTION

Bribery is the offering, giving, receiving, or soliciting of something of value for the purpose of influencing the action of an official or private company in the discharge of their duties. Corruption means abuse of entrusted power for private gain, which could include conflicts of interest, embezzlement, kickbacks, extortion, or nepotism/cronyism.

### OUR PRINCIPLES

We are committed to conducting business with high integrity and we have zero tolerance towards all forms of bribery and corruption.

We do not directly, or through third-parties acting on our behalf, pay or offer to pay bribes.

We do not offer or accept gifts that will improperly influence our business decisions or those of our partners.

We always make business decisions in the best interest of our company.

We comply with relevant conflict of interest policies which provide for the disclosure of any potential conflicts of interest.

We are committed to and comply with all anti-money laundering legislation, including reporting obligations.

### FOR YOU THIS MEANS

- You have a responsibility to understand the company's position regarding bribery and corruption.
- You do not make facilitation payments or permit others to make them on your behalf.
- You do not engage in activities that create any type of conflict between your personal interest and the interest of our company.
- When using third parties, such as distributors or agents, you require that they conduct business at the same level of integrity and honesty that is consistent with high ethical values as we do.
- In your relationship with customers, competitors, suppliers and distributors, you avoid activities that limit the ability to compete fairly or that could influence you or your counterpart's judgment (such as excessive gifts or entertainment).

### WHAT SHOULD I DO?

- ? **You are asked by a senior representative of a customer to help "get a visa" for his son who is traveling to Germany for holidays. This is a very important customer and you are afraid that you will upset him if you refuse. On the other hand, you know that it would be easy for you to get an invitation letter from our German office and that on this basis his son could obtain a business visa. What do you do?**
- ! Our anti-bribery and corruption rules prohibit the giving of any advantage in return for an illegal benefit. Our business cannot depend on favors we give to customers and the absence of cost does not make the favor acceptable. In addition, visa fraud is a very serious criminal offence in the European Union and you could put your European colleagues in jeopardy by accepting the request. You must politely refuse the request by explaining that it is our company's policy not to assist with visa procedures except for business trips organized by our company.
- ? **Your brother owns a construction company. You have the final say on which construction companies should be contracted to build new plants or buildings for the company. What do you do?**
- ! You should not contract with a company with which you have a direct or indirect personal interest in. Potential conflict of interest situations should be avoided through disclosure of those interests directly and/or indirectly held.

### FOR MORE INFORMATION

Relevant policies, procedures and guidelines: [www.brainlit.com](http://www.brainlit.com)  
Contacts: your manager/supervisor, Supply Organisation

## 3.2 WE ARE COMMITTED TO ENVIRONMENTAL RESPONSIBILITY

Environmental responsibility means operating our business and providing products and services in a way that minimizes environmental impact and contributes to a more sustainable future.

### OUR PRINCIPLES

We create a culture where our overall business objectives lessen the impact on the environment according to our sustainable ambition.

We actively work to improve our environmental performance in our own operations and do our utmost to influence the performance of our suppliers and customers.

We use a risk-based and sustainability perspective when identifying environmental aspects and determining ways to reduce or minimize the impact of our business on the environment.

We take positive, precautionary actions if we identify that our activities may harm the environment.

We practice the “Polluter Pays Principle” – a commonly accepted practice that those who produce pollution should bear the costs of managing it to prevent damage to human health or the environment.

### FOR YOU THIS MEANS

- You have a responsibility to understand the environmental requirements of your role.
- You take the time to understand the environmental risks and significant aspects present in your daily work and the preventative actions you can take to reduce them.
- You consider the environmental consequences of wasting energy, water and other resources when doing your work and make improvements where you can.
- You seek to re-use and/or recycle materials as much as you can and you follow your local procedure on waste separation to minimize environmental harm.
- You follow applicable requirements and your local procedures for use, storage, labeling, transport and disposal of chemicals.
- You report, share information and learn from incidents, near misses and hazards.

### WHAT SHOULD I DO?

- ? **At my production site we have a habit of not following the local procedure on waste separation. What should I do?**
- ! First you should encourage your colleagues to understand and follow the local procedures for waste separation. You can also contact your manager, who can provide support with waste handling training.
- ? **In the place where I'm working I have noticed that we are not always using electricity in an efficient way. Electrical equipment are often left idling and are not shut down when not in use. What should I do?**
- ! You should contact your supervisor or manager and bring up your suggestion for improvement. If the equipment can be set up to be switched on only when needed energy use can be reduced and money can be saved. If successful, your energy saving suggestion should be shared with other locations.

### FOR MORE INFORMATION

Relevant policies, procedures and guidelines: [www.brainlit.com](http://www.brainlit.com)  
Contacts: your manager/supervisor

### 3.3 WE ENSURE EFFICIENT AND ACCURATE TAX MANAGEMENT

Taxes consist of direct taxes, indirect taxes, and payroll taxes. Direct taxes are for example corporate income tax and withholding tax paid in foreign countries. Indirect taxes includes such taxes as VAT (Value Added Tax), GST (Goods and Services Tax), sales tax, social security contributions paid by the employer, energy and environmental taxes, real estate taxes and land tax, payroll tax such as income tax withheld by the employer from the employee's gross salary or wages, as well as income tax paid on fringe benefits such as company car, house allowance, and medical insurance.

#### OUR PRINCIPLES

Efficient and accurate tax management means that we conduct our business and supporting tax processes with demonstrable integrity, in a manner that produces correct tax outcomes at accurate cost.

We are committed to our social and legal obligation to pay the amount of tax legally due in each jurisdiction, as required by country legislation.

We are also committed to the obligation to our shareholders to administer supporting tax processes as efficiently as possible and to produce efficient and correct tax outcomes.

We believe in open and transparent dialogue related to tax issues.

We practice the "Polluter Pays Principle" – a commonly accepted practice that those who produce pollution should bear the costs of managing it to prevent damage to human health or the environment.

#### FOR YOU THIS MEANS

- You apply care when administering your activities from a tax perspective and understand tax touch-points of your activities.
- You involve Finance Department at headquarters at an early stage when assessing/implementing any change to the way we operate.
- You always comply with relevant tax laws, regulations and company procedures in your business.
- You hold yourself and others accountable for addressing tax related issues promptly.
- You follow relevant policies and procedures when seeking tax advice internally or externally.
- You consider local and global tax consequences of your actions.
- You are mindful in your tax-related communications with third parties.

#### WHAT SHOULD I DO?

- ? **You hire staff employed by a foreign BRAINLIT company and pay a fee for their services. If you pay the fee directly to them, you will need to gross up the payment for withholding tax. Someone makes a suggestion that you pay the amount to another BRAINLIT company in a third country, who will then reimburse the first company for the amount. Due to the application of tax treaties, no withholding taxes are payable under this alternative and your company will save the withholding tax amount.**
- ! Consider whether the proposed arrangement reflects the commercial reality of the transaction, whether it has the potential to breach any antiavoidance laws, what impact it might have on BRAINLIT companies operating in the tax jurisdiction that seeks to apply the withholding tax, and finally, what impact it might have on BRAINLIT's reputation. If concerned, contact our Finance Department for advice.
- ? **You are involved in negotiating a major contract with a customer. The contract has global aspects in a number of ways, as the goods will be delivered to another country and the customer is a foreign entity.**
- ! There is often a delicate balance between tax interests of the customer and BRAINLIT. Unless you are confident that you understand how tax applies, confer early with our Finance Department.

#### FOR MORE INFORMATION

Relevant policies, procedures and guidelines: [www.brainlit.com](http://www.brainlit.com)  
Contacts: your manager/supervisor, Finance Department at HQ

### 3.4 WE COMMUNICATE HONESTLY, TRANSPARENTLY AND IN A TIMELY MANNER

Communication is about increasing engagement within our company, building a strong brand and managing our reputation to help achieve our business objectives. It can be verbal and written, internal and external, via such channels as the intranet, the internet, publications and other media such as newspapers, television or radio. It also includes social media such as blogs, internet forums, social networking sites, content communities, and instant messaging.

#### OUR PRINCIPLES

We have officially designated spokespersons to communicate publicly on behalf of our company in order to ensure professional, consistent, legally compliant, and honest responses to requests from the media, analysts and investors.

We ensure that we fulfill the obligations we have as a listed company.

We act and talk in a way that reflects our core values and that builds trust for our brand at all times as we all represent our company when interacting with our stakeholders and the public in our daily work.

We keep our customers and other external stakeholders, as well as internal stakeholders, well-informed in a timely manner, assisting them in understanding our business developments.

We openly share information, best practices and feedback throughout the whole organization and promote transparency, but keep confidential information to ourselves at all times.

We always make sure that information is accurate and not misleading.

#### FOR YOU THIS MEANS

- You only speak to the media, analysts or investors, or engage in social media on behalf of our company, if you have authorization to do so.
- You do not share non-public information that may have an impact on our share price with unauthorized persons.
- You act with care and integrity, use good judgment and are consistent with our core values when using social media and in all your communication.
- You avoid all rumors, by promoting open and constructive dialogues.

#### WHAT SHOULD I DO?

- ? **A journalist called me directly with questions about an accident that recently occurred at one of our production sites.**
- ! Only authorized spokespersons within Communications Department are entitled to answer questions from and speak with the media on behalf of our company. You should therefore inform the journalist and put him/her in contact with our appointed spokespersons.
- ? **I am on a train and hear someone in the row behind me talk about matters related to our company that are inappropriate to share openly in a public setting or be disclosed to persons outside the organization.**
- ! You should remind the person about our principle of acting and talking in a way that reflects our core values and that builds trust for our brand while keeping proprietary information confidential at all times.

#### FOR MORE INFORMATION

Relevant policies, procedures and guidelines: [www.brainlit.com](http://www.brainlit.com)  
Contacts: your manager/supervisor, Communications Department

## 3.5 WE HANDLE PUBLIC MATTERS WITH INTEGRITY

Public matters include dealings with government, their agencies and representatives, when conducting lobbying efforts, or engaging with political parties or trade organizations and their representatives.

### OUR PRINCIPLES

We engage in public policy issues vital to our company's success and related to our business.

We are responsible for knowing and complying with all applicable laws and acting with integrity when dealing with governments, their agencies and representatives.

Our company is politically neutral. Our employees are free to participate in public matters and political life in their free time and in their capacity as private citizens.

We will not make any contribution, directly or indirectly, to any candidate for public office, political parties, or other political organizations except through industry organizations.

### FOR YOU THIS MEANS

- You must be mindful that any political activities in which you engage are not done on behalf of our company. It is on your own time and only in the capacity as a private citizen.
- You will not be given time off with pay for political activity, although time off without pay may be possible if consistent with local procedures.
- You may only engage in lobbying on behalf of our company if you have authorization to do so.
- When authorized to engage in public policy issues or lobbying on behalf of our company, you must follow all applicable laws, be honest, act with integrity, and show respect.

### WHAT SHOULD I DO?

- ? **Can I organize a rally for a particular cause or candidate? Can I do this at the lobby of my workplace?**
- ! You are entitled to express your political views on your own time and to participate in political expression as you see fit. You may not, however, organize or engage in political conduct during work time or conduct such activity on company property.
- ? **My neighbor is politically engaged and asks to visit my workplace. Can I let them in?**
- ! The first thing to do is to talk to your manager and evaluate together the purpose of the proposed visit. If it is solely for a political purpose, it is probably inappropriate. However, if it is beneficial for our company, it may be a good opportunity to say yes. It requires a thorough discussion based on our rules.

### FOR MORE INFORMATION

Relevant policies, procedures and guidelines: [www.brainlit.com](http://www.brainlit.com)  
 Contacts: your manager/supervisor, Communications Department

## 3.6 WE ARE ACTIVE MEMBERS OF THE COMMUNITIES IN WHICH WE OPERATE

Active membership of the community includes activities such as donating and raising money for local charities, supporting volunteering in a community, sponsoring of local events, training and employing people from a community, supporting a community's economic growth, support for universities, research and other charitable institutions.

### OUR PRINCIPLES

We believe that our long-term success is tied to the development of healthy and thriving communities.

We encourage community investment activities that support our strategy, vision and core values.

We contribute to the successful development of the communities in which we operate.

We view community investments as an important factor to help us recruit, retain, engage and develop our people, and also enhance the reputation of our company as a good corporate citizen.

We make sure that resources and time spent on charitable contributions are appropriate, reasonable and authorized.

### FOR YOU THIS MEANS

- You only respond to funding requests from a community on behalf of our company if you have authorization to do so.
- You are mindful in your choice of sponsorship objects and community projects and you make sure that the resources and time invested benefit all parties involved with clear goals, measurable outcomes and visible results.
- You have a responsibility to know which activities the company will not sponsor.
- When you participate in community volunteer activities on behalf of the company, you make sure they are in line with global and local company policies.
- You respond to requests for contributions from our communities in a timely and respectful manner.

### WHAT SHOULD I DO?

- ? **I've received a request from our community to partner with an organization investing in the development of a school. What is the right procedure to follow?**
- ! Every sponsorship or community involvement project in which our company participates must be viewed as a business contract and include a written agreement on obligations for both parties and a budget. All our engagements must follow our Code of Conduct. The investment or sponsorship engagement needs to be measured and monitored, and project goals and targets must be created in accordance with our normal criteria.
- ? **Where can I find information on which activities and projects the company will not sponsor?**
- ! Some examples of activities and projects that our company will not sponsor are those activities that in any way are in conflict with our Code of Conduct, are personal hobbies or interests of decisionmakers or employees, or risky sport events, projects or other events.

### FOR MORE INFORMATION

Relevant policies, procedures and guidelines: [www.brainlit.com](http://www.brainlit.com)  
Contacts: your manager/supervisor, Communications Department



[www.brainlit.com](http://www.brainlit.com)