

# Code of Conduct

## Christian Berner Tech Trade AB (publ)

English version

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Document name: Code of Conduct  
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Owner: CEO  
Approved by: The Board  
Valid from: 28-04-2016

## Code of Conduct – Christian Berner Tech Trade AB

The Christian Berner Code of Conduct aims to clarify the company's values and provides guidance for how our staff should behave in a professional and ethical way in their day-to-day work. The Code of Conduct is addressed to the Board, our staff, business partners and suppliers.

### Values and vision

Our values are business acumen, development, ethics and morals. These values are the basis for our activities and they must permeate the entire organisation. Christian Berner acts with responsibility. We act towards others as we would wish them to act towards us. We adopt a holistic perspective to work, with good business ethics, the environment, people and the company's future at the heart. We follow the relevant international conventions, the United Nations Global Compact, and ILO's and OECD's guidelines for multinational enterprises. As an employee, you must follow the company's policies, guidelines and instructions.

### Staff

At Christian Berner, we are firmly committed to developing good employeeship in an environment where transparency, honesty and trust prevail. We achieve this by each and every person taking responsibility for our shared working environment.

We expect our employees to work and act based on our values, with a focus on the keywords of business acumen, development, ethics and morals. Our leaders are characterised by a committed, personal leadership of the activities, staff and financial matters.

Our HR policy contains a more detailed description of the company's basic values, goals and activities for attracting, retaining and developing our employees and the company as a whole.

### Diversity and equality

Christian Berner assumes an ethos of recognising the equal value of all human beings and a level playing field between individuals and groups. No person should suffer discrimination or victimisation on the grounds of ethnic background, religion, physical or mental disability, age, gender, sexual orientation or other grounds, and we strive for diversity in terms of gender, ethnicity and social background.

### Working environment and safety

Christian Berner wishes to have a good, healthy and safe physical and psychosocial working environment. The company applies zero tolerance to drugs and alcohol at work.

### Recruitment and induction

Recruitment processes must be undertaken in a professional manner, with selection based on qualifications and suitability for the post in question. We do not employ staff under the age of 16. For tasks that are considered more risky, the age limit is 18 years.

### Salaries

A salary should reflect the employee's expertise, work performance, responsibilities and development within their field.

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### **Employee data protection**

The management of Christian Berner is responsible for ensuring that national legislation is followed with regard to the processing of employees' personal data. This includes, among other things, the company ensuring that all processing of personal data is minimised to what is business critical and that before an employee's personal data is processed, the employee in question must be informed of what information is being processed and why.

### **Rules for IT, internet, e-mail and social media**

Christian Berner applies a high ethical standard to digital communication. Anyone communicating on social media in their professional role always represents their company and Christian Berner Tech Trade. For that reason, all communication must be in line with our values and be consistent with how we communicate in other channels. In summary, this means that employees must show good judgement in their digital communication, take responsibility for how they communicate and be honest.

### **Business ethics and integrity**

Ethics is one of our core values and therefore an integral part of our business that is given sufficient time and resources.

#### **Unethical behaviour**

Christian Berner's day-to-day operations must be conducted in accordance with good business practice. They must maintain a high level of ethical integrity in everything we do. No form of fraud, bribery or similar illegal activity is tolerated from employees, business partners or suppliers.

#### **Gifts and entertainment**

Christian Berner's staff must not accept personal gifts, services, travel, entertainment or similar benefits from customers, suppliers or other business partners of more than a negligible value. Entertainment and gifts must be characterised by openness and moderation, and they must always have a natural connection with the business relationship.

#### **Handling of confidential information**

Information is an asset. Confidential information relating to our business or customers must only be used for the purpose for which it is intended.

#### **Use of company funds or assets**

All employees are expected to be loyal and jointly responsible for protecting the assets of Christian Berner. Assets must not be used for personal purposes or to support operations or activities outside Christian Berner.

#### **Sponsorship and charity**

Sponsorship is approved by the CEO. Charity is not part of our business activities and therefore is ultimately approved by the Board.

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## Quality and the environment

We support our customers with sound solutions in terms of quality and the environment. We promote environmentally sustainable development and an environmental approach throughout the entire business chain, from supplier to customer, and work with suppliers that share our ethos of quality, the environment and ethics. Our employees possess a high level of technical expertise and deliver excellent service, and they take personal environmental responsibility for the company's operations.

## Accountability, monitoring and compliance

We wish to emphasise with this Code of Conduct that we are anxious to do good business that promotes social, economic and environmental development. We are always open to dialogue on ethical dilemmas, with both external and internal stakeholders.

### Accountability and monitoring

The responsibility for ensuring that overall day-to-day operations are conducted in accordance with the Code of Conduct lies with your immediate manager.

### Compliance

All employees exemplify the Christian Berner Code of Conduct and must comply with it in their day-to-day work. It is extremely important, therefore, that serious and repeated deviations from the Code of Conduct, or irregularities in general, are reported, in the first instance to your immediate manager. Breaches of the rules and guidelines in the Code of Conduct may lead to repercussions. Employees who bring attention to serious errors do not risk any repercussions.

## Practical help

The Code of Conduct does not provide all the answers for how you should act and what decisions you should take. Instead, it is important to think ahead. Usually, it is a matter of using common sense and your experience. Here are some questions you can ask yourself, or discuss with a colleague if you are facing a moral dilemma or need to make a difficult decision.

- Is it legal? Is it moral?
- Am I a good role model?
- Have I made a decision that can stand up to scrutiny in newspapers and on the TV news?