

Elanders' Code of Conduct at a glance¹

General Information

With its Code of Conduct Elanders intends to ensure that its business will be conducted with the highest ethical standards, with integrity and in compliance with all applicable laws in a manner that excludes considerations of personal advantages or gains.

Scope of application

The Elanders Code of Conduct applies to all full and part-time employees, temporary workers, senior managers and Board of directors of Elanders Group companies, and those who work on Elanders' behalf including suppliers, vendors, agents, consultants and other third parties. All of these aforesaid obligors will respect this Code of Conduct and will actively do their best to meet Elanders' standards.

I, as the signatory of this document, hereby ensure:

Protection of Elanders' Physical and Financial Assets

- To safeguard and protect Elanders' assets and property from loss, damage, destruction, misuse, theft, fraud and embezzlement, both for tangible and intangible assets.

Health and Safety of Employees

- To follow Elanders' healthy and safe working conditions provided for all our employees and workers and to promote health and safety practices in our workplace.
- To conduct operations in compliance with applicable health and safety laws and regulations.
- To be accountable and responsible for contributing to a healthy and safe work environment in line with the under-signer's role and responsibilities and to fostering safe working attitudes.

Non-Discrimination

- To promote equal opportunities and treat colleagues and all related parties with respect regardless of skin color, race, ethnicity or nationality, social background, disabilities, pregnancy, political or religious conviction, gender, sexual orientation, gender identity or expression, age, marital or family status, or any other characteristic protected by applicable laws and regulations.

Workplace Harassment

- To provide a working environment whereby all our employees and workers can work free of harassment.
- To refrain from behaviors that can be considered as harassment for example: jokes related to race, religion, ethnicity, etc., teasing or bullying that cause someone to feel humiliated, unwelcome flirting or advances, violence or threats of violence. This also includes behaviors such as gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

Data Privacy, Confidential Information and Intellectual Property

- To commit to protecting privacy and confidentiality when dealing with Elanders' information and personal data in accordance with applicable data protection laws and regulations.
- To protect the confidential information and intellectual property rights of Elanders and its customers, suppliers and other stakeholders.

Environmental Protection

- To endeavor to minimize environmental impact by reducing or eliminating waste of all types, including water and energy.

Guiding principle

If you are unsure how to act in certain situations, a guiding principle is to ask yourself the following:

- Is this against the law?
- Would this be considered unethical?
- Could this potentially jeopardize and/or damage Elanders' reputation?
- Would it be embarrassing if I read about this in the media?

If the answer is "yes" to any of these questions, then stop your actions and consult with your closest manager for advice.

Reporting of violations

All obligors of this Code of Conduct are required to report any improper behavior, practices or actions that is not compliant with the Code of Conduct to the respective local Managing Director or to Elanders Group using any of the following ways:

Physical mail:

Elanders AB
Att. CFO
Flöjelbergsgatan 1C
SE-431 35 Mölndal
Sweden

e-mail:

whistleblowing@elanders.com

Telephone:

+46 31 750 07 50

.....
Place and date

.....
Signature

¹ The complete Elanders Code of Conduct can be found on our homepage under <https://www.elanders.com/about-elanders/sustainability/csr/>.