

Beijer Ref

Supplier Code of Conduct

Overview and scope

Beijer Ref AB, including its subsidiaries and their branches (collectively “Beijer Ref”) is committed to the highest standards of ethics and business conduct. As stated in our Code of Ethics, Beijer Ref employees must comply with the law, honour their commitments, act in good faith, uphold Beijer’s values and hold themselves accountable.

Our suppliers are critical to our success and, in order to provide superior products and services in a responsible manner, we require You to meet our expectations for ethics and compliance.

For the purposes of this Supplier Code, “Supplier” means any company, corporation or other entity or person that sells, or seeks to sell, goods or services to Beijer Ref or its operating companies and subsidiaries worldwide, including the Supplier’s employees, agents, subcontractors and other sub-tier sources.

This Supplier Code of Conduct (the “Code”) sets forth our expectations for each of our Suppliers, and aligns with the expectations we maintain for our own directors, officers, employees and representatives. Beijer Ref understands and expects that our Suppliers will have their own internal codes of ethics and conduct. This Code is not intended to be an exhaustive list of all ethical and business conduct requirements to be followed by suppliers.

You are responsible for ensuring that Your directors, officers, employees, representatives, and business partners understand and comply with the expectations set forth in this Code.

By signing this document or otherwise providing written confirmation, You acknowledge and agree that it is responsible to comply with this Code of Conduct.

General Disclaimer: The expectations set forth in this Code are not intended to conflict with or modify the terms and conditions of Your contracts with Beijer Ref. If a contract requirement is more restrictive than this Code, You must comply with the more restrictive contract requirement.

Compliance with laws and regulations

You must be aware and maintain full compliance with all laws and regulations that apply in all the countries where You operate and do business. You shall always be compliant with the highest requirements from either this Code of Conduct or local laws and regulations where they operate. All suppliers must follow the trade regulations and export control regulations which is valid for the country they conduct their business and activities.

Product safety

You must make all efforts needed to make sure that the products and services supplied are safe and have correct and complete information about safety risks and how to use the product ensuring highest possible product safety. All required inspection and testing operations must be completed properly by appropriate authorized and qualified individuals and any required certifications must be completed accurately.

Competition on Fair Merits and Anti-corruption

You must compete on the basis of merits of its products and services.

You shall comply with international anti-corruption conventions. You may not receive or offer compensation that could be interpreted as bribery or facility payments (e.g. payments to expedite or secure performance of a governmental action like obtaining customs clearance). Beijer Ref do not accept Suppliers trying to have impact on decision made by government, suppliers, and companies within the Beijer Ref group.

You must not engage in any anti-competitive conduct for any reason whatsoever, whether on Beijer Ref's behalf, its own behalf, or on behalf of others. Accordingly, You must never rig bids, fix prices, or allocate customers or markets, or exchange Beijer Ref's or its own competitively sensitive information (e.g. price, cost, output, etc.) with Beijer Ref's competitors or Your own competitors. You must also refrain from abusing Your market power, whether for Your benefit or for the benefit of others, by refusing to deal, engaging in predatory or discriminatory pricing practices, conditioning the sale or provision of a particular product or service with that of another product or service, or undertaking similar abusive tactics.

Accuracy of records and submissions

You must maintain books and records that accurately and completely reflect all transactions related to Beijer Ref business and each of Your submissions to Beijer Ref, its customers and regulatory authorities must be accurate and complete. You must never make any entry in its books and records, or alter, conceal, or destroy any document to misrepresent any fact, circumstance or transaction related to Beijer Ref.

Fair treatment and non-discrimination

All employees employed by Your company shall be treated with respect and without any harassment in any form. There shall not be any discrimination at any time, nor during the decision of hiring personnel. This means, but is not restricted to, age, ethnicity, national or social origin, gender, sexual orientation, marital or parental status, pregnancy, disability or serious illness, religion or union membership.

Work environment

You shall comply with all work environment regulations and take control of the responsibility for the health and safety of its employees, temporary staff and consultants. Providing a safe, healthy and hygienic workplace is a must for the supplier. You shall provide training and ensure that the employees are educated in health and safety related issues. You shall also control hazards and take preventive actions against accidents.

Child labour

You shall not have employees who are below the age of 15 as a minimum requirement. If the legislation requires a higher age then the legislation should be followed. You must be able to show with documentation the age of all employees. You shall also ensure that all new employees have finished compulsory schooling requirements.

Trafficking, forced labour and migrant workers

You must comply with all laws and regulations prohibiting human trafficking. You shall not use any form of forced labour, such as involuntary prison, victims of slavery, involuntary work or illegal employees. You shall not financially punish their employees, such as payment reductions or withholding payments. All employees must have the choice to leave their employment freely upon agreed notice period without salary deduction.

Migrant workers shall be treated on an equal basis as local workers. You must have procedures and methods for minimizing the risks of human trafficking.

Working hours and compensation

You shall follow local wage regulations and/or collective agreements. If such does not exist, employees should be compensated at least the minimum so they can meet their basic needs. Furthermore, You shall ensure that working hours, including overtime, do not exceed applicable legal requirements, and where such requirements do not exist Beijer Ref is recommending employees not to exceed sixty hours per week including overtime. Furthermore, You shall ensure that employees are allowed at least one uninterrupted day off per week.

Environment

You must comply with environmental international conventions and local laws in the countries where they operate. You shall limit the negative environmental impact, both direct and indirect, with realistic actions and work with continuous improvements to reduce the negative impact.

You shall also comply with any specific requirements, such as banned or restricted substances that have been communicated as part of contracts /agreements.

Supply chain initiative

Beijer Ref expects that all suppliers make reasonable efforts to ensure that its suppliers and sub-suppliers understand and comply with this Code of Conduct.

Conflict minerals

Beijer Ref suppliers shall comply with federal laws and regulations requiring disclosure of the use of conflict minerals. The term "conflict minerals" refers to certain identified minerals which could be, indirectly or directly, contributing to the financing of armed conflicts. Conflict Minerals are tin (Cassiterite), tungsten (Wolframite), tantalum (coltan), gold and the derivative metals from these minerals. Beijer Ref expects its suppliers to have in place policies based on the OECD guidelines enabling Beijer Ref to make sure that components

and products delivered from the supplier are conflict-free and that the materials do not have origin from activities which may finance conflicts.

Ethics & Compliance Program

Proportionate with the size and nature of Your business, You must have management systems and processes in place that (a) ensure compliance with applicable laws, regulations and the requirements set forth in this Code; (b) promote an awareness of and commitment to ethical business practices, including, the expectations set forth in this Code; (c) facilitate the timely discovery and disclosure (to Beijer Ref and others, as appropriate) and implementation of corrective actions for violations of law, regulations or the expectations set forth in this Code; and (d) provide training to the Supplier’s employees on compliance requirements.

Code Compliance

You will permit Beijer Ref and/or its representatives to assess Your compliance with the expectations set forth in this Code in performing work for Beijer Ref, including on-site inspection of facilities and review of associated books, records and other documentation. You are responsible to have all necessary documents showing compliance to this Supplier Code of Conduct and upon request provide that information to Beijer Ref. Suppliers must also provide Beijer Ref upon request with additional information and certifications evidencing compliance. Besides this You will address any violation of the Code that comes to Your knowledge. In such a case You shall immediately inform Beijer Ref of the violation and take appropriate actions/corrective measures to comply to the Code.

In the event of any wrongdoing, You will fully cooperate with any related investigation conducted by Beijer Ref. You will ensure that Your business partners also fully cooperate if such investigation involves their performance.

You (and Your business partners) must correct any non-conformances identified during assessments. Beijer Ref does not assume any duty to monitor or ensure compliance with this Code, and You acknowledge and agree that You are solely responsible for full compliance with this Code.

Date

Company name

Signature

Name

Title