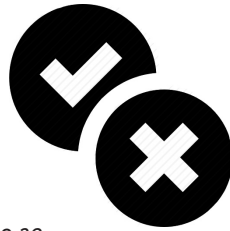


# CODE OF CONDUCT FOR EMPLOYEES

## AT THEDESIGNCONCEPT



This Code of Conduct is based on the following international standards and conventions:

- The United Nations Declaration of Human Rights (1948)
- The United Nations Rights of the Child Article 32
- The United Nations Declaration against Corruption
- ILO Fundamental Conventions on forced labour, child labour, discrimination, freedom of association and the right to organize (no. 29, 87, 98, 100, 105, 111, 138 and 182)
- ILO Occupational safety and health legislation (no. 170 and 155), other labour legislation and environmental protection legislation in the production country.
- UN Global Compact's ten principles of environment, labour law, human rights, and anti-corruption

### PURPOSE OF THE CODE OF CONDUCT

thedesignconcept's Code of Conduct defines the expectations we have on how our employees and others, who act in our name, behave in different situations. By following the Code of Conduct, those who meet thedesignconcept will get an understanding of what we stand for and feel safe with thedesignconcept.

### RESPONSIBILITY FOR THE CODE OF CONDUCT

The code applies to board members, employees and all who act in our name. The manager is responsible for their employees understanding of the Code of Conduct and that they act in accordance with the code. Deviations from the code are reported to the nearest manager, its superior or anonymously to the Lammhults Design Group's whistle-blower function ([whistleblower@lammhultsdesigngroup.com](mailto:whistleblower@lammhultsdesigngroup.com)). There shall be no retaliation or other negative consequences for persons reporting in good faith. Failure to comply with the Code of Conduct may be considered to violate the employee's terms of employment, which may have consequences for the employment.

### HUMAN RIGHTS

thedesignconcept respects and promotes human rights within our own business and in our supply chain. We

make sure that we do not directly or indirectly contribute to violation of human rights. This applies to our own organization as well as to companies in the supply chain. thedesignconcept is responsible for setting requirements that are at least equivalent to those set in thedesignconcept's Code of Conduct for suppliers.

### FORCED LABOUR/SLAVE LABOUR

Forced labour means work or services performed under threat of punishment or similar and not carried out on a voluntary basis. thedesignconcept does not use forced labour, slave labour, involuntary labour, contract work or involuntary imprisonment. Employees shall not be required to pay a deposit or surrender their identity papers to an employer, and they shall be free to terminate a work contract after a reasonable period of notice.

### CHILD LABOUR

The term child labour refers to all economic activities carried out by a person of school age or younger. No person shall be employed at an age younger than 15 years unless otherwise stated in national legislation. No person shall be employed if they are younger than the legal age for employment, if this age is higher than 15.

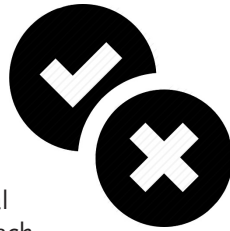
Young adults between the ages of 15 and 18 will not be engaged in labour that is hazardous to their health or safety, including night work, provided they have reached legal age to work and have completed national schooling. If child labour is discovered, the employer must act in the best of interests of the child and find suitable and long-term solutions in consultation with the child and the child's family.

### DISCRIMINATION AND DIVERSITY

thedesignconcept's Sustainability Policy and Code of Conduct stipulates our zero tolerance to discrimination or harassment in any form. Our employees will not be discriminated in working life based on ethnicity, religion, age, disability, gender, marital status, sexual orientation, trade union membership or political affiliation. We provide measures to protect employees from sexually

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intrusive, threatening, insulting or exploitative behaviour and from discrimination or termination of employment on un-justifiable grounds, e.g., marriage, pregnancy, parenthood, or medical status. Employees have a responsibility to treat each other with respect and create a safe environment at the workplace.

### **EQUAL OPPORTUNITIES AND EQUALITY**

At thedesignconcept, working conditions, rights, payroll, and development opportunities must be according to the principle of equal treatment. Recruitment processes must be done based on competence and suitability for the job. All employees in thedesignconcept with similar experience and qualifications shall receive equal pay for equal work.

### **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

Employees shall, without exception, have the right to join and establish trade unions by their own choice and to bargain collectively. thedesignconcept will not discriminate against trade union representatives or prevent them from doing trade union work.

### **HEALTH AND SAFETY**

thedesignconcept strives for a good working environment and has a vision for zero serious accidents. Our company shall work systematically to prevent sickness and injury among employees. thedesignconcept keeps a register of accidents and incidents. All employees have access to all necessary protective equipment as well as needed devices to assist in the work. All employees are trained in health and safety and fire drills are held regularly.

### **BUSINESS ETHICS, ANTI-CORRUPTION, AND BRIBERY**

thedesignconcept does not accept and does not practise bribes and unfair or anti-competitive arrangements. thedesignconcept shall comply with laws, regulations, agreements, and accepted standards that applies on the markets in which we operate. thedesignconcept will maintain the guidelines defined in this Code of Conduct

also on markets where unethical documents do not clearly fall outside the current legislation. thedesignconcept does not accept any form of corruption, here defined as a person utilizing their position to achieve an undue advantage for one's own or other's gain. Certain benefits, such as everyday work meals, minor samples and goods without major market value are acceptable. For such benefits to be acceptable, they shall be presented openly and transparently, and approved by the nearest manager and be addressed to a certain function rather than a person. Further information about business ethical boundaries is available in the Swedish Anti-Corruption Institute code on gifts, rewards, and other benefits in business. ([www.institutetmotmutor.se/english/](http://www.institutetmotmutor.se/english/))

### **CONFLICTS OF INTEREST**

All affected by the Code shall handle financial interests and other external activities in a way that does not violate, or may be perceived to contradict, the interests of the company. Still, situations must be avoided where conflicts of interest can arise or are perceived to arise. If a conflict of interests may arise, the concerned person must raise the matter for discussion with the nearest manager or the board.

### **FAIR COMPETITION**

Effective and fair competition is a prerequisite for a functioning market for our companies. Therefore, thedesignconcept avoids unnecessary contact with competitors. If contact with competitors takes place, this must be carefully arranged to comply with the competition rules. thedesignconcept must never prevent, restrict, or eliminate fair competition.

### **ANCILLARY ACTIVITIES**

Activities that are not of a private character and that employees have beside their employment at thedesignconcept, are defined as an ancillary activity. Ancillary activities shall be reported and approved by the nearest manager.

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### SUPPLIERS AND COLLABORATORS

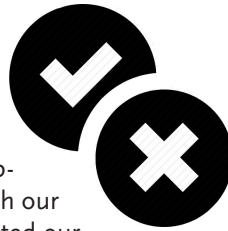
thedesignconcept respects concluded agreements and commitments. We strive to only collaborate with suppliers and partners that comply with our environmental requirements and who have accepted our Code of Conduct for Suppliers or have their own Code of Conduct that includes the requirements we set.

### INTERNAL & EXTERNAL COMMUNICATION

Everyone working in thedesignconcept is a representative of the organisation. We therefore expect all employees to communicate in a responsible way and in accordance with this Code of Conduct. Employees who are authorized to act against external stakeholders must do so in accordance with the principles of this Code of Conduct.

### HANDLING OF INFORMATION AND ASSETS

thedesignconcept shall ensure that the personal data of employees and customers are handled in a responsible way that complies with current legal requirements regarding data management. Pricing or other information



that could damage thedesignconcept are normally covered by professional secrecy that the employees must comply to. Confidential and sensitive company information shall be handled in a secure and structured manner. Furthermore, employees are responsible for ensuring that logins, data, and work materials are handled safely. All employees shall treat all information that may be critical for business with care.

### IRREGULARITIES

thedesignconcept does not accept irregularities of any kind. Irregularities may, for example, be to acquire unjustifiable benefits or payments, to disclose confidential or non-public information, to destruct information or assets, to deliberately tamper with thedesignconcept or our employees, to make false statements or to report incorrect information.

Mikael Stigaard Kjeldsen  
**CEO**