
Code of Conduct

Martinsson Elektronik AB enjoys an invaluable reputation for corporate and technical trustworthiness within our specialties.

1.1 Introduction

Martinsson Elektronik AB enjoys an invaluable reputation for corporate and technical trustworthiness within its specialties, based on conducting business with integrity and in compliance with the laws and regulations governing its activities. Success in business depends on building and maintaining the trust of customers, employees and the general public.

This Code of Conduct (“the Code”) applies to Martinsson Elektronik AB and all of its counterparties such as i.e. its suppliers, customers, partners and subcontractors whereas “we” or “us” in the Code refer to all of the abovementioned parties.

This Code is based on and supplements applicable law, international agreed standards, conventions and guidelines and is the basis for all internal regulations.

1.2 Business principles

Ethics

We always conduct our own services honestly and honorably, and expect our clients and suppliers to do the same. Our advice, strategic assistance and the methods imparted through our training, take proper account of ethical considerations, together with the protection and enhancement of the moral position of our clients and suppliers.

Money laundering

We shall not accept, facilitate or support money laundering, corruption, bribery or unfair anti-competitive practices. All types of actions comply with internal regulations, as well as relevant business practices and applicable legislation.

Duty of care

Our actions and advice will always conform to relevant law, and we believe that all businesses and organizations, including this consultancy, should avoid causing any adverse effect on the human rights of people in the organizations we deal with, the local and wider environments, and the well-being of society at large.

Trade compliance

We must comply with international trade rules as well as the applicable national trade rules. Therefore, we investigate export license requirements and export control requirements before we export any products, software or other technical solution to another country. We also need to be in control over the documentation in order to establish classification, valuation and country of origin for all products, software and technology.

Conflict of interest

We and our employees undertake to recognize as well as report if a conflict of interest between the company’s interest and private interest may appear. Therefore our employees does not make any transactions with our suppliers or customers that are not available to the public in order to profit private interests.

Confidentiality

We are committed to maintaining the highest degree of integrity in all our dealings with potential,

current and past clients, both in terms of normal commercial confidentiality, and the protection of all personal information received in the course of providing the business services concerned. We extend the same standards to all our customers, suppliers and associates.

Contracts

The quality of our service and the value of our support provide the only true basis for continuity. We always try to meet our clients' contractual requirements, and particularly for situations where an external funding provider requires more official parameters and controls.

Intellectual property and moral rights

We retain the moral rights in, and ownership of, all intellectual property that we create unless agreed otherwise in advance with our clients. In return we respect the moral and intellectual copyright vested in our clients' intellectual property.

Quality assurance

We maintain the quality of what we do through constant ongoing review with our clients, of all aims, activities, outcomes and the cost-effectiveness of every activity. We encourage regular review meetings and provide regular progress reports.

Accounting and reporting

We must comply with all relevant regulations and generally accepted principles that govern accounting and reporting. This also applies to taxation. Overall transparency and accuracy shall govern our actions in relation to accounting and reporting.

Professional conduct

We conduct all of our activities professionally and with integrity. We take great care to be completely objective in our judgment and any recommendations that we give, so that issues are never influenced by anything other than the best and proper interests of our clients.

Product compliance

We design, manufacture, market and sell products and all the products and service we provide shall comply with all applicable legislation, regulatory requirements, specified product safety standards as well as internal standards.

1.3 Principles of human rights and social justice

Human rights

We shall support and respect the protection of internationally proclaimed human rights and make sure we are not complicit in human rights abuses.

Labour

We comply with all applicable laws, regulations, collective bargaining agreements as well as industry standards for wages, working hours, leave, public holidays. We ensure, or provide, access to adequate social benefits to which our employee are entitled to by law. Any and all forced or compulsory labour is prohibited as well as human trafficking. We may not inflict corporal punishment or coercion of any kind on our employees.

Freedom of association

Employees have the right to bargain collectively and to organize themselves in labour unions and we may not discriminate against worker representatives on the grounds of their function or against unionized workers because of their membership

Child Labour

We shall always comply with the minimum employment age in each country, and never employ anyone under the age of 15, even if it is permitted under local law. For work which can be regarded as

dangerous in the sense that it can be considered a risk to individual development, physical or mental health, it shall never be performed by anyone under the age of 18.

Health and safety

We provide a safe and healthy work environment in accordance with international standards and national. We shall establish, communicate and follow occupational health and safety guidelines and procedures in order to reduce or prevent accidents and occupational diseases. The procedures must include how to manage, record and report occupational accidents and diseases.

Equality and non-discrimination

We always strive to be fair and objective in our advice and actions, and we are never influenced in our decisions, actions or recommendations by issues of gender, race, ethnic origin, nationality, religion, sexual orientation, union affiliation or any type of disability.

1.4 Environmental principles

We must obtain and maintain all environmental permits and registrations required by law.

Resource efficiency

Our products and processes shall be designed a way that energy, natural resources and raw materials are used efficiently, and waste and residual products are minimized and at all time follow environmental protective legislation.

We also take all required precautions when handling, transporting and disposing of chemicals or materials that could present a health risk of any kind. We apply internal guidelines for reporting any discharges, spills or other negative environmental impact we become aware of.

1.5 Monitoring and reporting

We certify to have adequate processes for monitoring and verifying the compliance with the Code as well as for reporting potential non-compliance with Code together with measures to come to terms with a failure of compliance.