

# Permobil Supplier Code of Conduct

3 OCTOBER 2019

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## Dear Supplier,

This Supplier Code of Conduct defines and outlines the non-negotiable minimum standards required from all Permobil suppliers and sub-suppliers.

This Code is based on Permobil's Code of Conduct. Permobil is a signatory to the United Nations (UN) Global Compact, and we adhere to its Ten Principles reflecting human rights, labour, the environment and anti-corruption. We further support the rights of all people as described in the Universal Declaration of Human Rights adopted by the UN and in the conventions of the UN's International Labour Organization.

In addition to any requirements in agreements entered into between you and any person or entity within the Permobil Group, you, your parent companies, subsidiaries and other affiliated entities and your sub-suppliers (jointly the "**Supplier/s**") are required to comply with this Code.

It is expected that you have relevant management systems in place to monitor your compliance of this Code. It is also expected that your relevant employees and sub-suppliers are informed of and comply with this Code. Where needed, information should be provided in local language and in a manner understood by all. You are requested to inform Permobil if you discover a breach of this Code in your operations.

Upon request, you as a Supplier must, by way of providing information or allowing access to premises to Permobil or its representative (including to your sub-supplier/s), verify to Permobil's reasonable satisfaction that you comply with this Code.

This Code is not intended to create new or additional rights for any third party.

Sincerely,

Permobil



Bengt Thorsson  
Chief Executive Officer  
Stockholm, 3 October 2019



Jonas Cederhage  
EVP Supply Chain  
Nashville, 3 October 2019

## 1. Compliance with Laws

The Supplier shall comply with any applicable laws and regulations and the UN Global Compact as a minimum standard. In the case of conflict, local laws will prevail. However, if the Code of Conduct sets a higher standard than existing legislation, the Code of Conduct shall apply.

## 2. Human Rights

We support and respect the protection of internationally proclaimed human rights and strive to avoid human rights abuses. Suppliers will:

- support and respect the protection of internationally proclaimed human rights and avoid human rights abuses; and
- not use or source conflicted minerals and metals, such as tin, tantalum, tungsten and gold mined in areas affected by conflict or in mines that rely on forced labour, in any of their products, manufacturing processes or other business operations and by complying with all currently existing and future regulations regarding conflict minerals (including the US Dodd-Frank Act and applicable EU Regulation).

## 3. Labour standards

We care for our people and the people affected by our workplaces, and we continuously strive to develop a work environment that promotes health, safety and well-being. Suppliers will:

- prohibit and prevent forced, compulsory or involuntary labour in any form, including child labour. The International Labour Organisation's (ILO) framework for minimum age for admission to employment or work must be followed and it should be respected that labour is freely given and that employees are free to leave in accordance with established rules;
- provide a healthy and safe work environment for employees and take appropriate actions to prevent workplace accidents or illnesses;
- be driven by dignity and respect, treat everyone as equals, refrain from discrimination and foster equality and inclusion of people from all geographies and cultures, regardless of sex, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation, age or any other status that may be protected by local law;
- ensure that working hours, pay and terms of employees are fair and reasonable, and comply at a minimum with applicable laws or industry standards, whichever is higher;
- respect the employees' freedom of association; and
- ensure that workers have a mechanism to report grievances and that facilitates open communication between management and workers.

## 4. Business ethics, Anti-corruption and Anti-trust

We are committed to conducting business with a high level of integrity, and we do not tolerate any form of bribery or corruption, including embezzlement, money laundering, kickbacks, extortion or fraud. Suppliers will:

- conduct business in a legal and ethical manner and comply with all applicable laws, regulations and generally recognized standards;

- comply with applicable laws relating to anti-corruption and work against corruption in all its forms, including extortion and bribery, illegal payments, bribes, kickbacks, facilitation payments or other questionable inducements to influence any business transaction;
- comply with applicable competition and anti-trust laws;
- have in place adequate procedures and mechanisms for preventing, promptly reporting and appropriately acting upon suspected violations of any anti-bribery, anti-trust, money laundering and ethical business standards;
- avoid conflicts of interest as well as the appearance of such in its business activities, as well as in its dealings with the Permobil Group;
- comply with applicable national and international trade and export control laws, rules, regulations and embargoes; and
- not import, export or re-export any product without all requisite licenses and approvals from the applicable governmental agency or authority, the country of origin and the original country of export.

## 5. Environment

We are committed to protecting the environment and believe that we can make major contributions to a more sustainable world. Suppliers will:

- ensure compliance with all applicable environmental, health and safety laws and internal standards;
- identify hazardous materials, chemicals and substances, and ensure their safe handling, movement, storage, recycling, reuse and disposal;
- work for an ecologically sustainable society, inter alia by applying environmentally sound manufacturing practices and support a precautionary approach to environmental challenges through the use of resources and environmental considerations in the selection of products, activities, technologies and services, for instance by considering factors such as energy consumption, materials use and end-of-life treatment; and
- maintain in place an environmental policy applicable to your respective business, including action plans for the prevention and reduction of negative environmental impact.

## 6. Integrity and Intellectual property

We are committed to the highest standards of integrity and compliance with applicable laws and regulations in every aspect of our relationships. Suppliers will:

- respect individuals, and their personal data, in a manner consistent with applicable privacy and data protection laws;
- safeguard and make only appropriate use of confidential information, including personal data, and ensure that all employees' and business partners' privacy are protected; and
- respect and manage your own and others technology, know-how and other intellectual property in a manner that protects intellectual property rights.

## 7. Quality, Safety and Regulatory compliance

We are committed to providing products that are safe and of the highest standards of quality. Suppliers will:

- comply with all applicable quality, regulatory and industry standards and regulations; and
- ensure that all products and services supplied to Permobil meet the highest levels of quality and safety and deliver high reliable and safe products.

## 8. Reporting and Enforcement

The Supplier shall promptly report any suspected violations of this Code to Permobil, (to your contact person or through our whistleblowing channel available on our external website) and immediately take corrective actions in case of any violations of this Code. Permobil will offer guidance specifying which issues need to be corrected or improved. Permobil reserves the right to cancel outstanding orders, suspend future orders or terminate the agreement with the Supplier in case of material breach of this Code by the Supplier.

Additionally, a breach of this Code may constitute a material breach of contract under the main agreement between Permobil and the Supplier entitling Permobil to enforce the remedies specified therein (which may include termination of the main agreement).