

Code of Conduct *Balco Group*





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Introduction, purpose and application

Our Code of Conduct comprises our ethical guidelines and core values, which form the basis for all our work within the Balco Group (Balco).

The Code of Conduct has been developed with the aim of encouraging fair and secure working conditions and protecting human rights, as well as seeking to uphold a responsible approach to environmental issues and apply high ethical standards within the Balco Group.

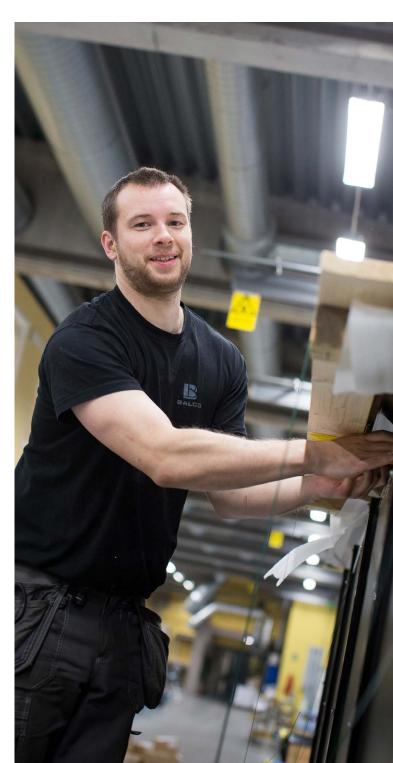
Apart from describing our ethical guidelines and the principles that are to be applied, the Code of Conduct clarifies and describes how we are to act in our daily work and how we are to behave towards one another, and in dealings with customers, suppliers, authorities and other stakeholders. The Code of Conduct applies to all Balco companies, board members, group management, managers and employees, and as far as possible to suppliers, business partners, subcontractors and customers.

Balco does not accept any violations of the Code of Conduct.









Our core values

Our core values – Pride, Entrepreneurial Spirit, Quality – are the foundation on which both our business and our brand are based. Balco's core values describe what characterises us and what we stand for.



Pride

We are proud of our history and our success. We are proud of our fellowship, and of the respect we show to one another and our customers. We are proud that our product not only contributes to an improved quality of life and creates a place for life but also provides positive effects seen from a sustainability perspective.



Entrepreneurial spirit

Since its inception our business has been characterised by an entrepreneurial spirit, which is just as important today as it was then. Innovation, creativity and entrepreneurship lead to creation of growth and development of both products and people, which will always be a priority at Balco. By being responsive to our customers' needs, whilst fearless, we continue to drive the industry's development forward.



Quality

By having quality as one of our guiding principles, we have laid the foundation for what Balco is today and for what we will be in the future – a reliable and safe partner throughout the balcony project. A steady focus on stable processes and sustainability combined with job satisfaction mean that Balco is associated with quality, both by our customers and partners and by our employees. Balco shall constantly endeavour to meet the demands our customers make of our products and their quality. We support fair and free competition, are businesslike and act in a way that allows us to stand for our principles. We follow the agreements we have concluded, and expect our customers and partners to do likewise.

Business ethics

Laws and regulations

Balco shall always comply with applicable laws, regulations and ordinances in the countries in which we operate. Balco conducts its business with great integrity and morality, presumes and requires our business partners will act in a similar manner.

Customer and supplier relations

In addition to complying with applicable regulations and laws, we shall also act in an honest way that allows us to stand for our principles in our business relations. We honour the agreements we have entered into, and make the same demands of our customers and business partners.

Bribery and corruption

Balco always acts responsibly and ethically, and never directly or indirectly accepts bribes or other improper benefits or remuneration. We make decisions based on Balco's best interests, and never take personal gain into account. Situations where long-term objectivity could be affected, e.g. by participating in travel and major events, must be avoided.

Competition laws

Balco does not participate in any illegal trade partnerships or cartels. We place great emphasis on product development, and we are taking the industry forward, which means that we are never afraid to be compared with our competitors. We are playing an active role in Balkongföreningen (Balcony Association) and are working to ensure that everyone in the industry follows the applicable regulations and laws.

Financial crime, reporting and accounting

As the market leader in the Nordic region, Balco takes its responsibility for combating financial crime within the balcony industry. This means that we take good care of our accounting and bookkeeping and are transparent in dealings with our stakeholders. We actively dissociate ourselves from the black economy, as well as from those suppliers and customers who do not share our values.





Balco respects and supports the UN Guiding Principles on Business and Human Rights, and seeks to promote them, both within its own business and within the supply chain.

At Balco safety comes first – always. Our workplaces shall be safe and secure – we have a zero vision regarding workplace accidents. Apart from safety and security we prioritise job satisfaction, and are working hard to ensure our employees have equal opportunities to develop and pursue a career within the company.

Human rights and fair working conditions

Fair working conditions

Balco complies with laws and/or collective agreements in the countries in which we operate. The wages paid within the group shall be at least equivalent to the statutory minimum wage in each country and in accordance with each agreement.

Work environment, health and safety

A safe, secure and sustainable work environment without accidents or ill health is Balco's top priority. We shall work systematically to achieve this and shall adopt a long-term approach, whilst at the same time working actively to enable our employees to develop and thrive within the group.

Equal opportunities and diversity

At Balco, employees, consultants, trainees and job seekers shall be treated equally regardless of gender, ethnicity, religion or other belief, disability, age, sexual orientation or transgender identity or expression. Balco shall actively promote equal rights for women and men regarding work, terms of employment and other working conditions and opportunities for development. We shall promote ethnic diversity, which means that everyone shall have equal opportunities and rights regardless of race, colour, national and ethnic origin and belief. Our aim is to achieve gender balance and promote the diversity perspective.

Bullying, harassment and discrimination

We do not tolerate discrimination or harassment in any form. We are working actively to prevent and counteract bullying, harassment and discrimination, and always take direct action where we suspect such behaviour.

Child labour

We do not accept child labour, defined as work done by

persons under the age of 15, either within Balco or at our suppliers. Exceptions are only permitted for suitable holiday work.

Forced and bonded labour

No forms of forced labour are permitted, and neither is the use of illegal labour or prisoners. This includes all forms of coercive contract. No-one may be detained at the workplace against his or her will.

Prohibition on purchasing sex and sexual exploitation

Any form of purchase of sexual services, whether by cash purchase or in the form of payment of rents, school fees, bills etc. is prohibited. Visits to strip, porn, or illicit clubs in connection with performance of one's work are also prohibited, because they could be linked to other illegal activities that Balco dissociates itself from.

The right to freedom of association

We respect the right of all employees to form and join the trade unions of their choice as well as to negotiate collectively.

Fair terms of employment

Balco shall provide attractive terms of employment and never undercut national legislation regarding the minimum wage and other statutory remuneration. Working hours shall comply with the national legislation of the country in which the employee works.

Balco only cooperates with business partners who ensure a safe and healthy working environment with fair employment conditions for their employees.





For Balco, sustainable entrepreneurship is a prerequisite for creating a business that grows, which is profitable and creates value over time for the group's customers, employees, shareholders and other stakeholders. We shall act in accordance with the principles contained in the UN Global Compact, seek to achieve the 2030 Global Goals, run the business along the OECD Guidelines for Multinational Enterprises and have the UN Guiding Principles on Business and Human Rights as a guide.

Sustainability and environment

Climate and environment

The world is facing many environmental challenges. Combating climate change and achieving the goal of the Paris Agreement is one of the greatest challenges of our time. As a leader within our industry, we need to assume our responsibility and help by reducing our business's carbon footprint. We do this, in par,t by increasing the energy efficiency of our production units and reducing our CO2 emissions.

As a manufacturing company, we have identified how we can contribute, and how we affect the UN's global goals. Our goal is for Balco to deliver climate-smart products to the market, with as low a carbon footprint as possible. We shall do this by streamlining our processes, using materials and methods that have the least possible environmental impact and minimising climateimpacting emissions to air, soil and water.

Products and the business's environmental impact

Balco shall continuously seek new solutions that can help reduce the environmental impact of our production and our products. Long-lasting materials with robust designs shall be used to make our products sustainable in the long term.

Balco's environmental work shall be an integral part of the company and shall permeate the entire business. Furthermore, Balco shall take the initiative and work consistently to minimise the company's environmental impact. Balco shall be at the forefront of the development of energy-efficient balconies. The products shall be manufactured using environmentally friendly materials, and we shall work actively to reduce waste and energy consumption, at the same time as seeking to increase the reuse of materials.

People

At Balco we want to create a safe, secure and healthy workplace, and ensuring this involves continuously carrying out measurements and monitoring and creating plans of action regarding sick leave, accidents and staff turnover.

Balco shall be an open and inclusive company where employees thrive, perform and develop. A fundamental requirement is that companies within the Group be safe and secure workplaces for both employees and subcontractors. We work systematically to eliminate accidents in order to realise our zero vision.

Managers at Balco shall conduct annual appraisal interviews with each employee, in order to identify training needs, set career paths and find a balance between work and leisure.

Social engagement and sponsorship

Balco is working actively on improved social inclusion and a generally positive development of society, by supporting local organisations, associations, foundations and other activities where engagement and inclusion are priority areas. Furthermore, Balco's partnerships shall create added value, either for employees or for our customers and business partners.

Any collaborative activity shall be in line with our values, and act according to applicable legislation. No managers or employees with direct or indirect links to sponsored activities are permitted to participate in, or influence a decision on, cooperation or a financial transaction. When certifying financial transactions, managers and employees associated with sponsored activities are not permitted to do so independently.







Communication, social media and reporting of violations

All employees are ambassadors for Balco and our brand. Balco shall be characterised by honest, direct and clear communication with all stakeholders.

Communication and information

We respect each employee's freedom to express an opinion on matters that concern them personally. Matters concerning Balco's business, financial status, relationship with suppliers etc. shall be referred to the local company management or group management.

Social media

Balco employees are encouraged to share nonconfidential information related to our business on their social media accounts, e.g. images of projects, news, promotions and job adverts. However, only staff who are formally responsible are permitted to represent Balco in social media and on our digital platforms. In other words, conveying Balco's opinion is not acceptable unless formal authorisation to do so has been given.

If you identify yourself as a Balco employee on social media, it is especially important that you bear in mind compliance with the Code of Conduct and communicate in a correct and pleasant manner. In the discharge of our duties we do not take part in political debates, but we are happy to publicly discuss issues relating to our industry or product.

In your spare time, participating in political discussions is of course acceptable, provided you do not identify/ present yourself as a Balco employee, and the discussions are legal and are conducted during your private time.

The marketing and HR departments that have the primary responsibility for Balco's social media.

Reporting violations and the whistle-blower function

Balco has a zero-tolerance policy regarding violations in areas such as business ethics, compliance with legislation and the exercise of human rights, and in matters of bribery, corruption and competition laws.

If you identify a violation of the Code of Conduct or fraudulent conduct you have a responsibility to report this. In the first instance, you should report the violation to your line manager or an employee in the HR Department.

Employees, partners and other stakeholders can also report a breach of the Code of Conduct to our whistleblower function, which is administrated by the chair of the Balco Audit Committee (whistleblower@balco.se).

If a violation of the Code of Conduct is reported, an investigation into the infringement or fraudulent conduct will be carried out as soon as possible. All reporting is treated in a strictly confidential manner, and there shall be no retaliation against persons reporting in good faith, nor any other negative consequences for them.

Compliance

Compliance with the Code of Conduct is continuously monitored within the business. Managers at all levels have a particular responsibility for setting a good example and complying with the Code of Conduct.

If an employee materially or repeatedly violates the Code of Conduct, disciplinary action will be taken. If a business partner violates the Code of Conduct, the cooperation will be evaluated and may be terminated if there is no improvement.

Updating and ratification

The Director of Human Resources is responsible for the Code of Conduct, and the Group CEO approves it. Thereafter, it is ratified annually by the Board of Directors.



