

# **Code of Conduct**

**Fiskeby Board AB**

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## BUSINESS ETHICS

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### **Business Ethics**

Fiskeby acts with a holistic approach, competence, integrity and shows respect. Fiskeby intends to establish stable, long-term relationships where the company systematically develops products and services through mutual collaboration. Fiskeby is only involved in business activities which follow applicable laws, and our business relationships are characterized by high ethical and moral standards. Bribery and other forms of corrupt business are forbidden. Neither Fiskeby nor any party acting on Fiskeby's behalf may receive payments, gifts or other contributions that may influence a business decision or official decision. Corruption, bribery and unfair anti-competitive measures distort markets and prevent financial, social and democratic development. Fiskeby does not tolerate such actions.

### **Legal Competition**

Fiskeby must follow all relevant competition laws. These laws prevent contracts and other agreements between competitors which would inhibit or obstruct competition. This includes price fixing, division of customers and geographical market, cartels and abuse of a dominant position.

### **Conflicts of Interest**

Always work in Fiskeby's interest and avoid conflicts of interest. A conflict of interest arises when private interests or relationships impact (or appear to impact) the execution of work tasks.

### **Information Security**

As an employee, it is forbidden to create gains by utilizing company information or your position within the company. Some information is confidential for business, personal or integrity reasons, such as trade secrets, financial details and details of product development, manufacturing methods or employees. Our IT routines ensure sufficient data protection for our customers.

### **Marketing**

All products and services are to be presented in a correct and fair way. Fiskeby markets its products in an objective and informative manner.

### **Financial Integrity**

In order to maintain the high degree of trust that shareholders, employees, business contacts and authorities have in us, our corporate accounts must always be correct and truthful.

We report all financial transactions correctly in accordance with local accounting principles, and follow the general advice from the Swedish Accounting Standards Board BFNAR 2012:1 and the Swedish Annual Accounts Act.

Environmental and sustainability work is very important for Fiskeby Board AB. The company's business concept is based on recycled materials and using these resources optimally and efficiently. The manufacture of Multiboard requires natural resources - recycled fibers (wood), energy, chemicals and water. Fiskeby is the only reused fiber based paperboard mill in Scandinavia. Fiskeby contributes to sustainable forest use and preservation of the biological diversity through its involvement with the Forest Stewardship Council. By enabling the recycling of complex packaging, such as drinks packaging, these can also be included in the recycling stream.

Fiskeby minimizes its environmental impact by combining innovative solutions with new technology. The impact on the environment is measured and evaluated so that the correct resources for effective action can be allocated. A key tool to achieve this is the environmental management system ISO 14001.

All employees are trained in sustainability in order to be able to act in an environmentally-conscious manner.

The diagram illustrates the value chain of Fiskeby 1637, centered around a circular logo with the text "1637 Fiskeby" and a stylized eagle. The chain is represented by a circular flow of arrows connecting various stages of production and distribution:

- Raw Materials:** The chain starts with raw materials like sand and gravel, represented by a yellow arrow pointing to a pile of sand and a yellow excavator.
- Production:** The materials are processed into various products, shown by a blue arrow pointing to a factory with large storage tanks.
- Finished Products:** The products are then distributed to various markets, represented by a green arrow pointing to a truck loaded with bags of cement.
- End Users:** The final products are used in various applications, shown by a red arrow pointing to a house and a road.

The diagram also includes icons for different types of products, such as cement bags, concrete blocks, and a truck, as well as a small inset showing a person using a product.

## SOCIAL SUSTAINABILITY

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### **Corporate Social Responsibility**

Fiskeby operates its business as a responsible corporate citizen, and supports and respects international agreements on human rights. The company is a key player in the society in which it operates, and is constantly striving to be an attractive workplace through cooperation and contact with schools, university and local authorities.

### **Health and Safety**

Fiskeby shall maintain a working environment that meets all legal requirements and standards. The working environment must be safe, enjoyable, stimulating and developmental, in physical, mental and social aspects, and we will work together to create a healthy and safe environment with no workplace accidents. All employees have both the right and the duty to highlight any failings in the working environment and, through their own responsibility and involvement, to continuously contribute to and impact on a positive development of the working environment in the company.

### **Alcohol and drugs**

Fiskeby's Alcohol & Drugs policy is to create and contribute to a safe physical and psycho-social working environment free from alcohol and drugs. This includes all employees, consultants and contractors working within the company's business operations. During working hours and at the workplace, all effects of and use of alcohol, narcotics and non-medicinal drugs is forbidden. In terms of narcotics and misuse of medication, this also applies outside of working hours. Moderation should also apply for alcohol intake at staff parties, business trips and entertainment. Alcohol-free options are always available.

### **Diversity**

Fiskeby strives for a workplace characterized by diversity and equality. Diversity and an inclusive working environment are key factors to achieving success, and equal opportunity is a given concept in employment. At Fiskeby, we do not tolerate any discrimination based on gender, ethnicity, religion or other belief, political opinion, disability, sexual orientation, age or other characteristics as protected under applicable law.

### **Discrimination**

An important principle in committing to a diverse and inclusive workplace is the company's zero tolerance towards harassment. Discrimination in the workplace is not permitted. All employees must treat each other with dignity, respect and courtesy. Discrimination means recurring blame or negative events aimed at individuals in an offensive manner and which can lead to them being ostracized from the workplace community. It is important to always think of how your own behavior or choice of words is interpreted by others.

**Child labor, forced labor and human trafficking**

Under no conditions may child or forced labor or human trafficking be part of Fiskeby's business operations. Neither do we accept this exploitation - child or forced labor or human trafficking - from suppliers, contractors or business partners hired by or in collaboration with Fiskeby. The company will not employ anyone under the age of 18, unless expressly indicated as part of a national work placement or training scheme that is to the obvious advantage of the individuals participating.

**Collective agreements and staff development**

Fiskeby is a member of Industriarbetsgivarna, the Swedish Association of Industrial Employers. The company follows the collective agreements between Industriarbetsgivarna and the trade union organizations in respect of working hours, employment conditions and all other issues relevant to the relationship between the company and the employee. The aim of and need for the development within the business is the basis for all staff development. Competent staff are a prerequisite for business development. Competence means knowledge, proficiency, contacts, experience and desires.

Developing staff is part of the company's daily work. The initiative can come both from the employee and from the company. The closest line manager is responsible for follow-up. The performance review is an important instrument to find out the employees' desire and need for development in their current role, and interest in other roles.

**Trade unions**

Fiskeby has a long tradition of good relations with the trade union organizations. Everyone who so desires may be a member of a trade union. The relation between the company and the trade union organizations must be characterized by respect for these organizations' job to look after their members' interests.

**Whistleblowing**

Any observation of behavior that is illegal or constitutes a violation of the principles in this Code of Conduct must be reported either in person or in writing to the employee's closest superior. If the employee feels it is difficult to report to their closest superior, the report can be instead made to the company's HR manager.

**Product quality and Product safety**

Fiskeby manufactures packaging paperboard for the food industry, which means that the products must meet both the Swedish and European legislation in terms of product safety.

**Communication with authorities and media**

The company wants to create a constructive, trusting and fruitful dialogue with authorities and media. The company is working towards an open and transparent dialogue with all parties, e.g. owners, local residents, politicians, media and authorities.

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Arvid Sundblad, CEO