



**Suzuki
Garphyttan**

Code of conduct

1. Introduction

As a world leading supplier of advanced spring wire, Suzuki Garphyttan plays an important role in the society and has a good reputation of conducting business in a responsible way with high ethical standards. Our vision "Together for a better tomorrow" expresses Suzuki Garphyttan's long-term direction and the decisions we make. The Code of Conduct is a set of principles to help all our employees to take the right decisions in their daily work and hence maintain the good reputation, we have. It is about ensuring legal compliance and avoiding ethical risks, but also to work with continuous improvement to build an even stronger future for our company.

The Code is built on Suzuki Garphyttan's core values "Care, Dare & Share" as well as the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention against Corruption as outlined in the ten principles of the United Nations Global Compact.

2. Who does it apply to?

Our Code applies to everyone in Suzuki Garphyttan Group, at every level, including employees, supervisors, and managers. You as our employees are encouraged to adhere to our Code, take initiatives, make decisions, and drive our business forward. Through living our Code, we will bring our vision and purpose to life, every day in everything we do.

Suzuki Garphyttan also has a separate Code of Conduct for Suppliers, including contractors, distributors, and agents, in which our requirements on them are outlined.

3. Our principles

3.1 Obeying the Law

We respect legislations and regulations regardless of site location and our employees are required to comply with the laws and regulations of the countries in which we operate.

As a global company, there may be limited circumstances where local laws differ from the principles set forth in our Code. In the case of conflict between our Code and local laws or regulations, the local laws or regulations shall prevail.

3.2 Respect in the workplace

We aim to provide a great place to work, where our employees feel respected, trusted, supported, and safe.

3.2.1 Safety, health and work environment

We have a zero-accident vision and we are fully committed to provide a safe work environment for everyone at Suzuki Garphyttan.

We are committed to ensuring a safe and healthy workplace, and believe it is all employees' responsibility to take measures to prevent injuries by minimizing risks at the workplace.

[Read more](#): Safety, Health & Work Environment Policy

3.2.2 Drugs and alcohol

We strive to be a working place free from alcohol and drug abuse. It is prohibited for employees to work under the influence of drugs or alcohol, since it can create a safety hazard and affect the employees' judgement.

[Read more](#): Local Policy per site

3.2.3 Non-discrimination

We ensure equal opportunities for all our employees and do not tolerate discrimination against any employee on the grounds of their racial or ethnic background, age, gender, disabilities, sexual orientation, religious beliefs, family status, social origins, political opinions, union membership or any other characteristic.

[Read more](#): Non-Discrimination Policy

3.2.4 Harassment

We do not tolerate any form of disrespectful behaviour, bullying, harassment, unwanted sexual advances, such as purchase of sexual services that may in the worst case can support human trafficking.

[Read more](#): Non-Discrimination Policy

3.2.5 Freedom of association

We respect the right of all employees to form and join an association to represent their interests as employees, to organize, and to bargain collectively or individually.

We also respect any employee's choice to refrain from joining a union.

3.2.6 Working hours

We ensure that our employees on a regular basis are not required to work more than 48 hours per week and are provided with at least one day off for every seven-day period.

We also ensure that overtime work (more than 48 hours per week) does not exceed 12 hours per employee per week and is not demanded other than in exceptional business circumstances.

3.2.7 Compensation

We provide fair wages and benefits in accordance with applicable collective agreements. When no collective agreement exists, we follow relevant industry standards.

We inform our employees about wages and benefits in a clear and regular way.

3.2.8 Forced or compulsory labour

We do not tolerate any form of forced, bonded or compulsory labour or physical punishment. No one may be required to lodge deposits or be deprived of their identity papers upon commencement of their employment.

We ensure that are employees are free to leave their employment after termination of employment.

3.2.9 Child labour

We refrain from employing children under 15 years of age unless it occurs in a government-approved training program for young people, e.g., practical experience and/or internship.

We do not accept products from suppliers that utilize child labor in their contracting, subcontracting or other relationships for the manufacture of their products.

3.2.10 Accuracy of records

We ensure that all our business and financial records are accurate, and financial transactions are not reported in a misleading manner.

3.2.11 Company's assets

We protect our company's assets (tangible and intangible) from damage, loss, and criminal acts, as they are vital to our business.

We only use assets for business purposes unless otherwise authorized by appropriate management. We never use company assets for personal gain or for illegal activities

[Read more](#): IP Guideline and Guideline for how to handle documents with sensitive information

3.2.12 Privacy and personal data

We respect the privacy of all individuals and will collect and process personal data responsibly.

We collect, process, and store personal data from customers, consumers, employees or third parties for legitimate business purposes only and will protect it from unauthorized use or disclosure.

3.3 Respect in the market

3.3.1 Fair competition

We prohibit agreements or understandings between competitors that limit competition, including price fixing, allocation of customers or geographic markets, bid rigging or abuse of a dominant position. Suzuki Garphyttan's contacts with business partners are characterized by impartiality and follow good business practices.

3.3.2 Conflict of interest

We do not accept that any private interests, personal relationships, or activities outside Suzuki Garphyttan influence, or even appear to influence, our ability to make an objective decision.

3.3.3 Anti-corruption

We are committed to conducting business with high integrity and we have zero tolerance for all forms of corruption including bribery, conflicts of interest, embezzlement, fraud, extortion, or nepotism/cronyism.

We do not offer, accept, request, or authorize gifts, payments or other advantages that could affect or appear to affect the objectivity of a business decision. This includes facilitation payments made to speed up administrative or other routine tasks.

3.3.4 Quality

We are committed to delivering high-quality solutions to our customers. Our efforts and activities are driven by continuous improvements and an understanding of our customers and their business needs.

[Read more](#): Quality Policy

3.4 Respect in the society

3.4.1 Environment

We reduce the environmental impact by using a precautionary risk based environmental management system.

We practice the "Polluter Pays Principle", which means that those who produce pollution should bear the costs to prevent damage to the environment.

We actively work to improve our environmental performance in our own operations

We optimize material, energy, and water use

We promote a circular economy by using efficient material re-cycling.

[Read more](#): Environmental Policy

3.4.2 Communication

We report and communicate in a transparent, truthful, and timely manner.

[Read more](#): Communication Policy and Guideline

3.4.3 Community relations

We strive to contribute positively to our local communities by building long-term relationships based on open and honest dialogue and we contribute to the improvement of economic, environmental, and social conditions by an open dialogue with relevant stakeholders in the societies where we act.

3.4.4 Political activities

We are politically neutral and do not make payments or donations in any kind to political parties or candidates.

4 Raising concerns

We strive to have an open and honest workplace. We encourage our employees to raise any concerns regarding potential violations of the Group's Code of Conduct, policies, and practices without feeling fear of being harassed, discriminated, or retaliated against.

[Read more](#): Whistle Blowing Policy