

CODE OF CONDUCT

At DeltaNordic we are committed to be the most attractive partner offering our customers the best solutions in advanced electric and electronic systems. We will do this by providing high quality and innovative services with added value solutions while using resources in a sustainable, socially and environmentally responsible manner.

At DeltaNordic we strive to be a preferred employer of both current and potential employees. Our aim is to attract, develop and keep qualified and motivated people in a professional environment.

At DeltaNordic we see transparency as paramount. In all communications, both written and spoken, we are committed to being open, truthful, and accurate within the limits of commercial confidentiality. For more information and published materials, please visit our company website at www.deltanordicgroup.se.

Wherever we operate, our reputation is our most valuable asset and is determined by how we act. DeltaNordic always strives to live up to both international and industry best practices, and adhere to all applicable laws, rules and regulations in the countries where we carry out our business.

In order to build trust and confidence and to show our commitment sustainable development throughout our entire company, we will support and adhere to applicable parts of:

(Please click on below to read more)

[United Nations Universal Declaration of Human Rights](#)
[Principles of the United Nations Global Compact](#)
[OECD's Guidelines for Multinational Enterprises](#)

We also support and adhere the eight fundamental conventions by the ILO governing body. These are:

(Please click on the respective convention to read more)

1. [Freedom of Association and Protection of the Right to Organise Convention, 1948 \(No. 87\)](#)
2. [Right to Organise and Collective Bargaining Convention, 1949 \(No. 98\)](#)
3. [Forced Labour Convention, 1930 \(No. 29\) \(and its 2014 Protocol\)](#)
4. [Abolition of Forced Labour Convention, 1957 \(No. 105\)](#)
5. [Minimum Age Convention, 1973 \(No. 138\)](#)
6. [Worst Forms of Child Labour Convention, 1999 \(No. 182\)](#)
7. [Equal Remuneration Convention, 1951 \(No. 100\)](#)
8. [Discrimination \(Employment and Occupation\) Convention, 1958 \(No. 111\)](#)

The following pages describes what above declarations, conventions etc. means to DeltaNordic (also referred to "the company" or "we" in the following pages) as a company and how we shall act to comply with them. We at DeltaNordic understand that adopting above declarations, conventions etcetera is a dynamic rather than static process, and we will always try to improve ourselves.

This Code of Conduct is governed by the Compliance Department in association with the Management Team of the company. For implementation of Code of Conduct, the Management Team has full responsibility.

LABOUR AND HUMAN RIGHTS

Anti-discrimination

DeltaNordic shall not discriminate against any employee based on race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status in hiring and employment practices such as applications for employment, promotions, rewards, benefits, access to training, job assignments, wages, discipline, and termination. In addition, DeltaNordic shall not require employees or potential employees to undergo medical tests that could be used in a discriminatory way except where required by applicable laws or regulations or necessary for workplace safety.

Fair Treatment

DeltaNordic shall commit to a workplace free of harassment and discrimination. The company shall not threaten employees with, or subject them to harsh or inhumane treatment, including but not limited to sexual harassment, mental and physical coercion, and verbal abuse.

Prevention of Involuntary Labour and Human Trafficking

Suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or prison labour. This includes the transportation, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. All work must be voluntary, and employees shall be free to leave work or terminate their employment with reasonable notice. Employees must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment.

Prevention of Underage Labour

At DeltaNordic, child labour is strictly prohibited. The company shall only employ workers who are at least 18 years of age. DeltaNordic shall obtain documentation to legally prove the date of birth for all employees. A register carrying all such records shall be maintained. Exceptions from the minimum age are juvenile employees; holiday workers and those in work experience programs, organized by schools, universities or governmental institutions provided that it is for a short period and the juvenile employees do not perform work likely to jeopardize their health, safety, or morals.

Working Hours, Wages and Benefits

Except in emergency or unusual situations, a work week shall be restricted to 40 hours, and employees shall take at least two days off every seven days. All overtime shall be voluntary. Under no circumstances shall work weeks exceed the maximum permitted under applicable laws and regulations. DeltaNordic shall pay all employees at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. The company shall not use deductions from wages as a disciplinary measure.

DeltaNordic shall offer vacation time, leave periods, and holidays consistent with applicable laws and regulations. The company shall maintain a transparent and reliable system for records on working hours and wages and pay employees in a timely manner and clearly convey the basis on which employees are being paid. In addition, DeltaNordic shall provide accident insurance covering medical treatment for work related accidents to all employees.

Freedom of Association

DeltaNordic shall respect the right of employees to associate freely with, form, and join employees' organizations of their own choosing, seek representation, and bargain collectively, as permitted by and in accordance with applicable laws and regulations. The company shall protect against acts of interference with the establishment, functioning, or administration of employees' organisations in accordance with applicable laws and regulations.

HEALTH AND SAFETY

Prevention of Chemical Exposure

DeltaNordic shall identify, evaluate, and control worker exposure to hazardous chemical, biological, and physical agents. The Company must eliminate chemical hazards where possible. Where chemical hazards cannot be eliminated, the company shall provide appropriate engineering controls such as closed systems and ventilation. Where appropriate engineering controls are not possible, DeltaNordic shall establish appropriate administrative controls such as safe work procedures. In all cases, the company shall provide employees with appropriate personal protective equipment.

Emergency Prevention, Preparedness, and Response

DeltaNordic shall prevent, identify, and assess emergency situations and events and minimise their impact by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, adequate exit facilities, and recovery plans.

Occupational Safety Procedures and Systems

DeltaNordic shall establish procedures and systems to manage, track, and report occupational injury and illness. Such procedures and systems shall encourage employee reporting, classify and record injury and illness cases, investigate cases and implement corrective actions to eliminate their causes, provide necessary medical treatment, and facilitate return of employees to work.

Ergonomics

DeltaNordic shall identify, evaluate, control and reduce employee exposure to physically demanding tasks or environments, including manual material handling, heavy lifting, prolonged standing, highly repetitive or forceful assembly tasks, loud noise and poor light.

Health and Safety Communication

In order to foster a safe work environment, DeltaNordic shall provide employees with appropriate workplace health and safety information and training, including written health and safety information and warnings, in the primary language of the employees. Suppliers shall post, in the primary language of its employees, Material Safety Data Sheets for any hazardous or toxic substances used in the workplace, and properly train employees who will come into contact with such substances in the workplace. Records of the training shall be kept including names of participants, dates of the training and an overview of the training content.

ENVIRONMENT

Substance of Concern Management and Restrictions

DeltaNordic shall comply with any applicable laws and regulations such as REACH and RoHS prohibiting or restricting the use or handling of specific substances. However, DeltaNordic is only a contract manufacturer and can therefore only be responsible for the components and materials sourced by its own choice, and not for any components and materials assigned by or given from its clients.

Pollution Prevention and Resource Reduction

DeltaNordic shall endeavour to reduce or eliminate wastewater, solid waste, and air emissions, including energy-related indirect air emissions and substances of concern in articles, by implementing appropriate conservation measures in the production, maintenance, and facilities processes, and by recycling, reusing, or substituting materials.

DeltaNordic recognises that integrating sound health and safety management practices into all aspects of business is essential to maintain high morale and produce excellent products. The company shall commit to creating safe working conditions and a healthy work environment for all employees.

DeltaNordic shall endeavour to use energy more efficiently and avoid energy waste. The company shall monitor power and energy consumption, adopt management practices, switching off equipment not needed, and reducing energy consumption where possible.

ETHICS AND ANTI-CORRUPTION

Business Integrity

DeltaNordic shall not violate any international anti-corruption conventions, -laws or -regulations of the countries in which the company operates, and shall not engage in corruption, extortion, or embezzlement in any form.

DeltaNordic supports fair competition and do not enter discussions or agreements with competitors, and we must uphold fair business standards in advertising, sales, and competition. DeltaNordic does not take any political stands and is to maintain a high ethical standard, above all in accordance with this Code of Conduct and good business practice.

Business partners

DeltaNordic seeks business partners whose policies are in line with our values stated in this Code of Conduct. Business partners are selected and evaluated of objective factors including quality, delivery performance, price, and reliability.

Gifts and Hospitality

DeltaNordic and its employees are expected not to give or receive improper benefits or benefits that may be regarded as improper remuneration in order to obtain or retain business, or in order to secure any other improper advantage in the business relations with its clients and suppliers. Such improper benefits include cash, items, pleasure trips, extravagant meals or services of another nature.

A benefit must comply with the following requirements:

- The benefit must be permitted by local laws, regulations and policies.
- The benefit must have a clear and legitimate business purpose.
- It must not be provided in exchange for an improper advantage.
- The nature, value and frequency of the benefit must be appropriate to the occasion on which it is given.
- The benefit must be provided in a transparent manner.

Disclosure of Information

DeltaNordic must record and disclose information regarding their business activities, structure, financial situation, and performance in accordance with applicable laws, regulations and prevailing industry practices.

Whistle-blower Protection and Anonymous Complaints

DeltaNordic shall provide a complaint mechanism for employees to report workplace complaints and compliance violations in accordance with company practices, local laws and regulations. The protection and confidentiality of whistle-blowers shall be ensured and retaliation shall be prohibited.

Data Privacy, Intellectual Property and Confidentiality

DeltaNordic shall always respect data privacy and intellectual property rights. The company must safeguard and only make appropriate use of confidential information. The transfer of technology and know-how must be done in a manner that protects intellectual property rights.

MANAGE COMMITMENT AND CORE VALUES

Management Accountability and Responsibility

DeltaNordic must have a management system that meets the standards of ISO 9001 or similar. Company representatives, responsible for ensuring implementation and periodic review of the management systems, shall clearly be identified. The review shall have at least the following content:

- Risk Assessment and Management – A process to identify environmental, health and safety, business ethics, labour, human rights, and legal compliance risks associated with their operations; determine the relative significance of each risk; and implement appropriate procedures and controls to mitigate the identified risks.

- Performance Objectives with Implementation Plans and Measures - Written standards, performance objectives, targets, and implementation plans, including a periodic assessment of the performance against those objectives.
- Audits and Assessments - Periodic evaluations in place to ensure that the company is complying with applicable laws and regulations.

Employee Feedback

DeltaNordic shall have an ongoing process to obtain feedback from employees on processes and practices to foster continuous improvement.

Corrective Action Process

DeltaNordic shall have a process for timely correction of any deviations identified by an internal or external audit, assessment, inspection, investigation, or review.

Core values

DeltaNordic core values are:

- Customer focus
- Sustainable future
- Professional pride