



## CODE OF CONDUCT FOR BUSINESS PARTNER



# 1. Introduction

Founded in 1963 in Trosa, Sweden, Camfil AB (referred herein and including any entity within the group as "Camfil") is a leading manufacturer of premium clean air solutions. Camfil provides commercial and industrial systems for air filtration and air pollution control that improve worker and equipment productivity, minimise energy use, and benefit human health and the environment. Camfil's products help to protect people, processes and the environment by defining, developing and delivering solutions that combine clean air with energy efficiency in a sustainable and profitable way. Camfil proudly serves and supports customers in a wide variety of industries and in communities across the world.

For Camfil, responsible acting means that we conduct our business in a manner that is fair, reliable and transparent. That includes what is commonly referred to as compliance - full observance of all applicable laws, internal regulations and binding voluntary commitments. Camfil operates to the highest standards and has policies in place governing our behaviour both internally and externally. We want it to be clear to everyone doing business with Camfil that they must avoid any behaviour in conflict with Camfil's values.

To support our efforts in identifying potential ethical violations, Camfil has for many years been providing a whistleblowing service to employees for reporting their concerns confidentially. This whistleblowing service is also offered to our Business Partners. By using this function, Business Partners can report knowledge or suspicion of activities that are illegal or are not aligned with Camfil's moral and ethical values as stated in this Code.


Please use this

<https://wb.2secure.se/wbui/>

to get access to the whistleblowing service.

**Enter the code: hvz901**



**2Secure** 

Register case by entering the company code

This Code of Conduct ("Code") sets out minimum acceptable standards in our business interactions with customers, suppliers or intermediaries ("Business Partner"). Camfil requires Business Partner to comply with the requirements set out in this Code (as amended from time to time), and to make sure that its sub-suppliers are aware of and comply with standards that are equivalent to the requirements set out in this Code. The Business Partner is required to comply with the principles of non-discrimination concerning supplier selection and treatment.

The Business Partner acknowledges that Camfil may request the Business Partner to disclose which sub-suppliers it uses. Camfil supports and works actively to comply with international guidelines regarding the environment, human rights, working conditions, anti-corruption, and business ethics, including the UN Global Compact's

ten principles derived from The Universal Declaration of Human Rights, The International Labor Organization's Declaration of Fundamental Principles and Rights at Work, The Rio Declaration on Environment and Development and The United Nation Convention against Corruption.

This Code harmonizes with our internal code of conduct and is based on the above mentioned international guidelines. Camfil reserves the right to reasonably change the Code and expects the Business Partner to accept those changes.

We want to thank you for your contribution to maintaining Camfil's good reputation and the trust placed in us.

## 2. General Compliance

Camfil acts with integrity in dealing with others and also expects the Business Partners to respect fundamental values such as human and labour rights, equal treatment and non-discrimination. The Business Partner shall comply with all laws and regulations applicable to its business. In the event of discrepancies between this Code and applicable law, the strictest standard shall apply.

The Business Partner shall have adequate active management systems and controls in place to secure and monitor its and its sub-suppliers compliance with this Code (or equivalent own standards) as well as applicable laws and regulations. The system shall be in proportion to the size, complexity and risk environment of the Business Partner's operations.

The Business Partner shall avoid all conflicts of interest that may adversely influence the business relationship with Camfil.

# 3. Business Ethics

## 3.1 Anti-corruption and Money Laundering

Business Partner shall not engage in, nor tolerate, any form of corruption, blackmail, embezzlement or bribery, whether directly or indirectly. The Business Partner shall not offer, nor accept, any benefits or other means to obtain any improper or unfair advantage. The Business Partner shall never allow a third party to engage in corrupt practices on the Business Partner's behalf. In light hereof, Business Partner warrants to comply with all applicable anti-bribery, anti-corruption and anti-money laundering laws, including, but not limited to Chapter 10 of the Swedish Penal Code, the Swedish Act on penalties for money laundering offences, Bribery Act 2010 of the United Kingdom, Foreign Corrupt Practices Act 1977 of the United States of America (collectively referred to as "Anti-Bribery and Anti-Corruption Laws").

The Business Partner shall take preventive actions and perform adequate due diligence(s) to avoid being part of or facilitating money laundering, terrorism financing and/or other financial crime. Business Partner will not, under any circumstances, conceal the origin of illegally obtained money through banks and other businesses to make it seem as if the money has been obtained legally.

## 3.2 Fair competition

Business Partner shall act in accordance with national and applicable international competition laws and not enter into discussions or agreements with competitors concerning pricing, market or customer allocation, market sharing, bid rigging or other similar activities which could have anti-competitive effects.

## 3.3 Intellectual property

Camfil's intellectual property, if applicable, must be treated with appropriate care.

Business Partners must respect the intellectual property rights of others.

## 3.4 Trade Compliance

Business Partner agrees to comply with sanctions and export control laws and regulations which are applicable for the Business Partners in all activities, actions and transactions conducted with Camfil, including, but not limited to, economic, financial and trade sanctions and export controls administered by the European Union ("EU"), the United States ("US") and the United Nations ("UN"), and other jurisdictions to the extent applicable ("Sanctions and Export Control Laws").

Business Partner agrees that it shall not sell, or otherwise transfer possession of or title to products provided by Camfil to any third-party or for use in any manner inconsistent with Sanctions and Export Control Laws.

Business Partner represents, while in business interaction with Camfil, that it is not, directly or indirectly, one of the following, and is not owned (50 percent or more) by, controlled by, or acting on behalf of or at the direction of one or more of the following:

- persons, groups or entities subject to restrictions under the Sanctions and Export Control Laws; or
- a political subdivision, agency, or instrumentality of the governments blocked by, or under equivalent broad sanctions of, the UN, the EU or the US.



# 4. Human & Labour Rights

## 4.1 Fundamental human rights and labour rights

The Business Partner shall comply with and respect internationally proclaimed human rights, and make sure that it is not complicit in human rights violations. The Business Partner shall assess the risk of causing, contributing to or being linked to serious human rights violations and take immediate action to rectify any violations or risks.

Business Partner undertakes to not practice any form of discrimination. No employees shall be discriminated against, including but not limited to, on the grounds of sex, race, colour, age, pregnancy, sexual orientation, religion, political opinion, nationality, ethnic origin, disease or disability. All employees of the Business Partner shall be treated strictly according to their abilities and qualifications in any employment decisions, including but not limited to hiring, advancement, compensation, benefits, training, layoffs and termination.

Business Partner shall respect the employees privacy and prohibit behaviour including gestures, language and physical contact that is sexual, coercive, threatening, abusive or exploitative.

## 4.2 Forced labour and modern slavery

Camfil is committed to preventing any forms of modern slavery, forced labour, child labour, or human trafficking and we respect all internationally proclaimed human rights as reflected in this Code. The Business Partner shall not use or benefit from forced labour or any other form of involuntary labour, including involuntary prison labour, slavery and servitude.

The Business Partner shall not employ persons younger than 15 (or 14 where permitted by ILO convention or younger than the legal age for employment, if higher than 15). The Business Partner shall recognise the rights of young labour (below 18) to be protected from economic exploitation and from work that is hazardous or interferes with the individual's education or moral, social, spiritual, mental or physical development.

For authorized minors, management is responsible for providing working conditions, hours of work and wage appropriate for his or her age and in compliance with applicable local law as a minimum.



### **4.3 Workplace requirements**

The Business Partner shall comply with all applicable laws, regulations and industry standards on working hours and wages and apply whichever that is stricter.

Employees of the Business Partner shall be entitled to an employment agreement or offer of employment (at-will or otherwise) stating the terms and conditions of their employment. It must not be required from employees to hand over government-issued identification such as passport or work permits as a condition of employment. Employees shall be free to leave employment after reasonable notice. Employees shall be entitled to at least one day off in every seven-day period (unless otherwise regulated by applicable laws). Business Partner shall carry out its operation in a way that limits overtime work to a level that ensures humane and productive working conditions.

The Business Partner shall pay at least the statutory minimum wage or the wage negotiated in an applicable collective agreement, whichever is higher. No unfair deductions shall be made and earned wages shall not be deducted as a fine or penalty under any disciplinary practice.

Consistent with applicable laws, workers shall be free to join associations of their own choice. Business Partner shall not interfere with workers who wish to lawfully and peacefully associate, organize or bargain collectively. The decision whether or not to do so should be made solely by the workers. The Business Partner shall not threaten, penalize, restrict or interfere with workers' lawful efforts to join associations of their choosing or to bargain collectively.

No employee shall be subject to corporal punishment or to physical, sexual, psychological or verbal harassment or abuse.

# 5. Health & Safety

Business Partner shall ensure a safe and healthy workplace for all individuals. Occupational safety and health protection are an integral part of all business processes and are included from the outset – starting in the planning phase – in all technical, economic, and social considerations. Business Partner shall provide training and ensure that employees are educated in health and safety issues.

All employees of Business Partner shall promote safety and health in their work environment and comply with the health and safety regulations. The core of Camfil's business is providing good indoor air quality to protect people, processes, and products. Camfil understands the importance of indoor air quality's impact on people's health and wellbeing and expects all Business Partners to provide good indoor air quality. The Business Partner shall continuously carry out risk assessments and consider the specific company and industry risks, and take actions to mitigate identified risks. Business Partner shall set up or use a reasonable occupational health and safety management system to track and report occupational injury and illness.

Adequate personal protective equipment shall be made available at no cost, with instruction in its use, to all employees.



**3** GOOD HEALTH AND WELL-BEING





## 6. Environment

Environmental and climate protection are key corporate objectives for Camfil. As an established global company, Camfil takes responsibility to understand and minimize the environmental impact we contribute to. Camfil expects the same from its Business Partner. Business Partner shall comply with all applicable environmental laws and regulations and support a precautionary approach to environmental challenges. Business Partner shall obtain, maintain and comply with all required permits and licenses for its operations. Every Business Partner bears responsibility for conserving natural resources and helping protect the environment and shall endeavour to avoid or reduce adverse environmental impacts from its operations.

Business Partners shall strive to integrate practices and technologies that promote energy efficiency and sustainable use of resources. To actively reduce its direct and indirect greenhouse gas emissions, the Business Partner is encouraged to establish environmental plans and to set climate targets.

Product design and process control should integrate the following principles: natural resources preservation, waste and emission reduction, energy efficiency, pollution risk prevention, use of hazardous substances reduction and substitution, use of recycled materials and development of alternatives for product recycling.

Business Partner shall handle hazardous substances and chemicals responsibly, and where reasonably possible, substitute such substances for less hazardous ones. Business Partner shall store hazardous and combustible materials in secure and ventilated areas and disposes of them safely and legally. Business Partner shall take reasonable efforts to avoid the use of raw materials which directly or indirectly finance armed groups who violate human rights.

It is recommended that the Business Partner has an environmental management system (EMS).



## 7. Audit Rights

Business Partner acknowledges and agrees that Camfil shall have a right to conduct audits, including confidential employee interviews, of the Business Partner and its business to ensure Business Partner's compliance and fulfilment of this Code. Camfil has a right to request Business Partner to once a year provide Camfil with a written assurance letter, either by a form provided by Camfil or a report approved by Camfil, describing the actions taken or measures to be implemented by Business Partner to assure compliance with this Code. The assurance letter should contain, among others, the actions taken to mitigate the impacts of the Business Partner's operation on the environment and health and safety; the actions taken to ensure respect for the rights of workers and prevention of human rights abuses, and instruments in place to fight corruption and bribery.

The right to perform audits shall also include a right to receive relevant information upon request and without Camfil's staff physically present at Business Partner's site.

Audits performed by third parties are only permitted, in case of the Business Partner's explicit consent.

## 8. Non-Compliance

The Business Partner shall promptly notify Camfil of any non-compliance or suspected non-compliance of this Code, either caused by the Business Partner itself or its sub-suppliers. Failure to notify Camfil of such non-compliance shall constitute a breach of this Code.

Failure by Business Partner to comply with any part of this Code shall constitute a material breach of any existing or future agreements with Camfil.





# Our Code of Conduct going forward

## Business Partner Acknowledgement

Name:

Company:

Signature:

Dear Business Partner,

Sustainability and ethical business conduct responsibility are pillars of Camfil's business practices. We are convinced that high ethical standards and strong values will help us fulfill our strong commitment to the customers, company, business partners, employees, and our communities. We require all our suppliers and other Business Partners to meet high standards, follow ethical practices, support human & labour rights along with a sustainable business approach that will help us deliver the very best.

The Code of Conduct for Business Partners is developed as a requirement for all our Business Partners, including customers, suppliers or intermediaries, and shall therefore be valid for all Camfil's suppliers, and other Business Partners through contractual terms and conditions.

This Code defines our ethical conduct expectations from our Business Partners. The complex business environment globally can raise various challenges and the Code of Conduct guidance for Business Partners will ensure that our high ethical standards are maintained at all times. Business Partners are expected to protect and promote the human rights of their employees. Camfil expects fair employee treatment and rightful application of international labor standards. Also, Business Partners are expected to ensure that adequate measures are put in place to protect the health and safety of the employees and to mitigate the environmental impact of the business operations.

I expect all our Business Partners to respect our core values and follow this code.



Mark Simmons  
CEO and President  
Camfil Group



## CAMFIL – A GLOBAL LEADER IN AIR FILTERS AND CLEAN AIR SOLUTIONS.

For more than half a century, Camfil has been helping people breathe cleaner air. As a leading manufacturer of premium clean air solutions, we provide commercial and industrial systems for air filtration and air pollution control that improve worker and equipment productivity, minimize energy use, and benefit human health and the environment.

We firmly believe that the best solutions for our customers are the best solutions for our planet, too. That's why every step of the way – from design to delivery and across the product life cycle – we consider the impact of what we do on people and on the world

around us. Through a fresh approach to problem-solving, innovative design, precise process control and a strong customer focus we aim to conserve more, use less and find better ways – so we can all breathe easier.

The Camfil Group is headquartered in Stockholm, Sweden, and has 33 manufacturing sites, six R&D centres, local sales offices in 30 countries, and about 4800 employees and growing. We proudly serve and support customers in a wide variety of industries and in communities across the world. To discover how Camfil can help you to protect people, processes and the environment, visit us at

[www.camfil.com](http://www.camfil.com)



camfil



camfilgroup



camfilgroup



camfil