



BECKERS GROUP

CODE OF CONDUCT

The basis of our Code of Conduct

Beckers Group is a privately owned global coatings company with leading positions in coil and special coatings. We supply to architectural and transport industries, appliance manufacturers, agricultural, construction and earthmoving equipment (ACE), as well as an array of industrial equipment. We also provide striking finishes for mobile phones and other electronic devices.

Across all of these industries we deliver innovative coatings solutions, as well as products, and we are doing our utmost to make our products and solutions, and therefore our customers' products more sustainable.

We shall act in accordance with the following group values: customer focus, ability to shape and adapt, team spirit and trust and integrity.

We have a deep engagement for our society and environment and want Beckers Group to make a positive contribution to the communities in which we operate. We expect our management teams to look upon their environmental performance, social responsibility and ethical behaviour as a competitive advantage.

These values shall reflect the spirit in which we conduct our day-to-day activities. Hence, they form the basis of our Code of Conduct; the purpose of which is to clarify their significance to the way in which we conduct our daily business.

Our commitment

We shall adhere to high standards of ethics and business morals in all our operations and relations. Furthermore, we shall conduct our business in an environmentally and socially



responsible manner and behave appropriately towards all of our stakeholders – our customers, suppliers, employees, shareholders, governments and non-governmental organizations (NGOs), the communities in which we operate and other parties that have influence over or are influenced by Beckers Group and its companies.

In particular, we embrace, support and enact – within the sphere of our influence – the core values in the areas of human rights, labour standards, the environment and anti-corruption as expressed in the Ten Principles of the United Nations Global Compact, the Guiding Principles on Business and Human Rights as well as the Children’s Rights and Business Principles, as in appendixes 1-3.

We review our Code of Conduct periodically and are committed to making changes in its content and implementation when circumstances so demand.

Scope

Our Code of Conduct is applicable to all locations and units within Beckers Group and applies to all employees, officers and directors of the group. It is to be adopted and followed by all of our companies.

Legal compliance

With production and sales facilities in more than thirty countries around the world, Beckers Group and its companies are subject to a wide range of legal requirements. We shall comply with all applicable laws and regulations that relate to our activities in the countries in which we operate. It is the responsibility of each employee, officer and director to make sure that they are aware of and abide by the laws and regulations that apply to them in their position as representatives of a company within Beckers Group.

Naturally, legal systems are often highly complex and change over time. Therefore each manager has to do his or her utmost to keep track of laws and regulations that relate to their areas of responsibility. In case of uncertainty, it is the responsibility of each employee to seek appropriate advice on relevant legal requirements and other legal issues.



Human rights

We support and respect the protection of internationally proclaimed human rights, such as the Universal Declaration of Human Rights, within the sphere of our influence. We promote diversity and equality and shall not be complicit in human rights abuses.

All employees must be treated equally, have equal opportunities and not be subjected to discrimination based on for example ethnic or national origin, creed, skin colour, gender, marital status, sexual orientation, religion, political opinion, nationality, social origin, disability or union membership.

We do not use child labour. Employees and other personnel must be at least 16 years of age or have reached national school-leaving age upon completion of compulsory schooling, whichever is higher. The minimum age for hazardous work is 18 years of age.

We do not accept any form of forced labour or any other forms of involuntary labour. Neither do we tolerate working conditions or treatment that are in conflict with international laws and practices.

Accounting and reporting

All business transactions and payments within each unit in Beckers Group and its companies must be recorded in a timely and accurate manner. We follow strict accounting principles and standards and have appropriate internal controls and processes to ensure that accounting and financial reporting comply with Beckers Group's and its companies' respective reporting manual together with all applicable laws and regulations.

Conflicts of interest, gifts and bribes

Business decisions must be based on the best interest of Beckers Group and its companies rather than personal considerations or relationships. All employees must avoid engaging in activities that could lead to conflicts of interests.



A conflict of interest occurs when an employee's personal interests interfere with his or her ability to use his or her judgment objectively in the best interests of Beckers Group. Such a conflict can for example arise where an employee or member of his or her family has a financial interest that could affect such employee's judgment or where an employee gains personal enrichment through access to confidential information. A conflict of interest can also arise when an employee or a member of his or her family has a personal interest, directly or indirectly, in any supplier or customer of the group. If an employee believes that he or she may have direct or indirect conflicts of interest, he or she must disclose such potential conflicts to management.

No one may, directly or indirectly, demand or accept, offer or give any kind of bribe, kickback or any other unlawful or unethical benefit to employees or other representatives or associates of Beckers Group or its companies or any third party. Any such offer or proposed arrangement must be reported immediately to management.

Gifts of other than nominal value may not be accepted without full disclosure to and prior relevant clearance from the employee's line manager.

Confidentiality

All information obtained at work should be considered confidential unless it is freely and publicly available. Confidential information should only be used for its intended purpose and never be disclosed to anyone other than colleagues or other authorized people who have a need-to-know. The obligation to keep information confidential continues even after an employee leaves the Beckers Group.

Workplace practices

All our activities must be conducted with respect for employee health and safety. All employees shall be provided with a safe and healthy working environment. We should take appropriate action to prevent workplace accidents or illnesses.



All employees shall be free to join associations of their own choice and shall have the right to collective bargaining. In countries where these practices are legally restricted, we strive to have parallel means in place to allow concerns to be brought to management attention.

All employees should know the basic terms and conditions of their employment. Salaries, including overtime and benefits, shall equal or exceed local legal and industry minimum standard.

All employees should be treated with respect and dignity and not be subjected to any discrimination, abuse or harassment.

Business ethics

Beckers Group's companies shall compete vigorously but honestly for business and uphold the highest standards in business ethics. We respect antitrust and fair competition laws that prohibit certain actions that unfairly and dishonestly harm competitors. Across the board we act in accordance with fair business, marketing and advertising practices.

Environment

Environmental issues are an integral part of our business. We support long term sustainable development, life-cycle thinking and a precautionary approach to environmental challenges. We further strive to minimize negative environmental impact from our operations and products and to apply the substitution principle.

We will fulfil or exceed environmental demands in laws, regulations and international conventions applicable to countries in which we operate.

All our subsidiaries are required to operate an appropriate environmental management system.

Community involvement

All our activities must be conducted with respect for the well being of the local communities in which we operate. Beckers Group maintains a neutral position with respect to political parties. Our employees are however encouraged to play an active role in society, including through activities in political parties. We also encourage our employees to actively participate in the communities in which they live and work and to propose community involvement projects to management.

Suppliers

We will do our utmost to contract only those subcontractors and suppliers who themselves adhere to international human rights and environmental laws and practices, monitor their ethical performance and take immediate and thorough steps in cases where this ethical performance comes into question.

Compliance

Our policy is to support open and fair discussion of issues and worries. Employees are encouraged and expected to report any and all incidents of non-compliance with this Code of Conduct. Failure to comply may result in civil and criminal liability and /or disciplinary action, including termination of employment.

Advice or guidance on the interpretation of this Code of Conduct is available from Beckers Group. Any employee who suspects any breach of this Code of Conduct should immediately bring this to the attention of Beckers Group.

Employees can use our confidential “whistle blowing” phone, Email or physical mailing address. These can be used to bring concerns and issues to the attention of the Beckers Group management or an external person. We will in turn make every effort to maintain the anonymity and confidentiality of those reporting.



Telephone numbers and addresses for these purposes are shown below and are also available on our website www.beckers-group.com

Telephone numbers

Chief Financial Officer (Oliver Laune) +33 48 225 03 49

External contact (Ragnar Lindqvist) +46 42 489 22 17

Email addresses

codeofconduct@beckers-group.com

ragnar.lindqvist@rliab.se (external)

Mailing addresses

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External:

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Helsingborg
Sweden

None of the management within Beckers Group's companies will be held accountable for any loss of business resulting from compliance with this Code of Conduct. There shall be no retaliation or other negative consequences for persons reporting in good faith.

I have read and understood the Beckers Code of Conduct document

Date:

Name in capital letters:

Signature:.....

Appendix 1 The United Nations Global Compact's Ten Principles

Appendix 2 Children Rights and Business Principles

Appendix 3 Guiding Principles on Business and Human Rights