

Business Ethics Policy

The logo for ELPROMAN, featuring a stylized 'E' icon composed of three horizontal bars (the top and bottom are dark blue, the middle is red) followed by the word 'LPROMAN' in a bold, dark blue, sans-serif font.

Category
Policies

Approved by
Sophie Österman

Approved date
2024-11-15

Document number
Q0211L

Purpose

Our business ethics guideline permeate how we do business with our customers and suppliers. We envision ourselves as a trusted partner in delivering electronic components and cables, committed to contributing to your success! These guidelines outline our intentions regarding our business conduct and our approach to engaging with all stakeholders.

Responsibility

All employees have the responsibility to follow Elproman's Business Ethics. Managers has the responsibility to communicate and demonstrate the content as well as the spirit of this document within the company, and to encourage employees to reveal behavior that may be non-compliant with our Business Ethics.

Anti-Corruption

It is essential for every individual to uphold ethical and legal standards in our business processes to foster fair competition and promote transparency and accountability. Influencing business practices through direct or indirect bribery, or any form of sponsorship, is illegal and can lead to serious legal repercussions for both the supplier and the purchaser.

We have a strict zero-tolerance policy for any form of extortion or bribery, including inappropriate payment offers to or from employees or organizations. Our relationships with business partners are founded on fairness. We do not offer customers, potential customers, government agencies, or their representatives any rewards or benefits that violate applicable laws or widely accepted business practices.

Employees are prohibited from accepting payments, gifts, or other forms of compensation from third parties that could compromise their objectivity in business decisions. Our company, Elproman, will never engage in offering or accepting bribes or any corrupt payments in any form.

Privacy

We protect and store all our data against GDPR regulations. We do not use or reveal content-related personal data or reveal any other personal data without our customers, suppliers, or personnel's explicit, separate, and individual consent.

Financial responsibility

All payments and transactions must follow all applicable laws, requirements of our parent company, established accounting policies, and Authorization routine. We will never tolerate dishonesty or false recordkeeping.

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Disclosure of Information

We ensure that required information, other than confidential business information, is disclosed to investors, employees, customers, and other relevant parties in a timely, accurate, complete, understandable, convenient, and affordable manner.

Fair competition and anti-trust

At Elproman, we believe in free and open competition and are committed to never engaging in improper practices that may limit competition. We do not seek to gain competitive advantages through unethical or illegal business practices. Elproman maintains honesty in competition, focusing on product quality, price, integrity, and customer service. We uphold these principles in our daily operations and fully comply with the antitrust laws of every country in which we operate. We are dedicated to integrating these values into all our operational processes.

- **Always** proceed carefully whenever interacting with competitors.
- If Elproman gets exposed to an anti-competitive offer or suggestion, we must make it very clear that we will **never** be involved and then end the discussion or contact and ensure that all responses are kept on file.
- Ensure that the suppliers we are collaborating with comply with our Business Ethics and have a Code of conduct & Business Ethics policy or equivalent.
- **Never** share sensitive information of business partners or other third parties with competitors
- **Never** discuss and agree to share customers, volumes, supplies or divide geographic markets with competitors.
- **Never** impose a non-compete restriction prohibiting a purchaser from buying from another supplier.

All employees at Elproman are expected to understand and conduct their activities in strict accordance with this Policy and the antitrust laws.

Conflicts of interest

All employees must avoid any interests that conflict or appear to conflict with the interests of Elproman or the parent company, or that could reasonably be perceived as harmful to Elproman's reputation. Every employee at Elproman is bound by our Code of Conduct to act in the best interests of the company and never for personal gain.

Counterfeit parts

We expect all our suppliers to develop, implement, and maintain methods and processes suitable for their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, and parts should be marked as obsolete when appropriate.

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Export controls and economic sanctions

We respect and comply with the laws, rules, and regulations that apply to our business operations worldwide. We will never engage in transactions with sanctioned entities.

Protection of Intellectual property

Our suppliers must respect intellectual property rights and safeguard customer information. The transfer of technology and know-how must be conducted in a manner that protects these intellectual property rights.

Whistleblowing and protection against retaliation

We do not accept wrongdoings such as financial misconduct, discrimination, or any type of retaliation in our organization. All employees are whistle blowers and should immediately report certain types of wrongdoings to Management or HR.

Elproman Ethical Rules - Doing Business the Right Way

- **Follow the Law:** We respect and comply with the laws, rules, and regulations that apply to our company.
- **Deliver Quality:** We are committed to providing high-quality products and services.
- **Act with Integrity:** We neither offer nor accept bribes, inappropriate gifts, or representations.
- **Be Passionate:** We are passionate about what we do and how we conduct our business.
- **Be Competent:** We strive for competence in all aspects of our business operations.