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# **OEMS CODE OF CONDUCT**



## PURPOSE AND SCOPE

This Code sets out the principles that govern OEM's work and decisions. It ensures that we always act ethically, transparently and responsibly, regardless of market or situation. The Code applies to all companies, employees, representatives and partners acting on behalf of OEM. Suppliers and external partners are covered by the Supplier Code of Conduct.

The Code of Conduct is complemented by the Supplier Code of Conduct, the Environmental Policy, the Occupational Health and Safety Policy, and other governing documents. Together they provide a clear framework for our sustainability and ethics work. The Code covers areas identified as material in OEM's double materiality assessment.

All employees shall undergo training in the Code at onboarding and regular refreshers to ensure awareness and compliance.

## INTERNATIONAL FRAMEWORKS

OEM's Code of Conduct is based on the UN Global Compact, which sets out ten principles on human rights, labour, environment and anti-corruption. We also follow international guidelines such as the UN Guiding Principles on Business and Human Rights, the ILO Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises and the UN Convention against Corruption.

These frameworks are applied throughout the value chain, including suppliers and partners. Together they form the basis for our decisions and actions.

## HUMAN RIGHTS

OEM respects and promotes internationally recognised human rights in all parts of its operations and value chain.

1. OEM **supports and respects international human rights** within the company's sphere of influence.
2. OEM does not participate in **human rights abuses**.

## LABOUR RIGHTS AND WORKING CONDITIONS

OEM creates a work environment where rights are respected and each employee can contribute on equal terms.

3. **Freedom of association** is respected in accordance with local legislation. Employees have the right to participate in trade union activities, and collective bargaining is recognised. Working time laws and the principle of a living wage are complied with.
4. All forms of **forced labour** are prohibited. All employment shall be voluntary with the possibility to terminate in accordance with law and agreement.
5. **Child labour** never occurs. No one under 15 is employed, and particularly demanding work requires a minimum age of 18.
6. **Discrimination and harassment** are prohibited, regardless of sex, age, ethnicity, religion, political opinion, sexual orientation, disability, trade union affiliation, HIV status or other similar ground. Procedures for reporting and handling are in place.

OEM prohibits forced, child and slave labour throughout the value chain. OEM does not charge or participate in charging recruitment fees, and all recruitment partners shall be licensed and follow ethical guidelines. Suppliers are expected to confirm their adherence to the Code of Conduct by signing our Supplier Code of Conduct.

## OCCUPATIONAL HEALTH AND SAFETY

OEM provides a safe, secure and healthy work environment. Group companies work systematically to prevent risks and accidents and apply routines that correspond to the principles of ISO 45001. Work-related stress is prevented through dialogue, reasonable workload and psychological safety.

We promote an inclusive work environment with active efforts for diversity, gender equality and equal treatment. The corporate culture is followed up through employee surveys, dialogue and leadership development.

## ENVIRONMENT AND SUSTAINABILITY

OEM works long-term to reduce environmental risks and integrate sustainability into operations, in line with international guidelines.

7. OEM supports a **precautionary approach to environmental risks**.
8. OEM undertakes initiatives to promote greater **environmental responsibility**.
9. OEM encourages the development and diffusion of **environmentally friendly technologies**.

We work according to our three sustainability focus areas, Product, People and Planet, to integrate responsibility into product development, care for employees and environmental work.

## ANTI-CORRUPTION, BUSINESS ETHICS AND LEGAL COMPLIANCE

We conduct our business responsibly, transparently and in accordance with applicable laws and ethical standards.

10. OEM works against corruption in all its forms, including extortion and bribery. Any improper advantages, bribes or unethical business practices are prohibited. Reported cases are investigated, documented and followed up.

Relevant employees receive training in business ethics and anti-corruption. All gifts, representation and internal approval procedures shall follow our guidelines to prevent conflicts of interest. The whistleblowing function provides a secure channel for reporting and employees are protected against retaliation.

OEM always complies with applicable laws and regulations, including export controls, international and national sanctions, competition law, anti-money laundering and accurate accounting. Trade with sanctioned countries, companies or individuals is prohibited and shall always be checked before business decisions are made.

## DATA PROTECTION AND INFORMATION SECURITY

Information and personal data are handled confidentially and with integrity in accordance with the GDPR and internal procedures. Business-critical information is protected through internal processes. Employees are responsible for following IT security procedures and reporting suspected security incidents.

## APPLICATION, RESPONSIBILITY AND FOLLOW-UP

The Code of Conduct shall be followed in daily work and integrated into all decisions, relationships and processes. Each company within the OEM Group is responsible for implementing the Code in practice through procedures, training and follow-up.

In situations where the Code does not provide a clear answer, decisions shall always be made based on law, ethics and the company's values. Assessments shall also be based on consequences for employees, customers, society and the company's reputation. In case of uncertainty, decisions shall be discussed with the immediate manager or another appropriate decision-maker in the organisation.

The Code is approved by Group Management. The Sustainability Manager is responsible for implementation, training and annual follow-up. Compliance is monitored through internal controls, whistleblowing reports and audit review where needed.

All employees are expected to familiarise themselves with the Code of Conduct, comply with it and report suspected violations.





Read more at  
**[oem.se/en](https://oem.se/en)**