

Dokumentnamn	<b>Code of conduct</b>	Dokumentnummer	
Dokumenttyp:	<b>Policy</b>	<b>COC-1E</b>	
Justerad av	<b>Andreas Lundberg</b>	Utgåva	Sida
Datum	<b>20260601</b>	<b>3</b>	<b>1 (4)</b>
Status	<b>G</b>		

**Our vision and long-term strategy aim to reduce our environmental impact, have a healthy growth, run the business in an ethical and correct way towards customers, suppliers, personal and other stakeholders. Our code of conduct show how we should act. The code of conduct is bare minimum and apply for all supply chain.**

## **1 HUMAN RIGHTS AND WORKING CONDITIONS**

### **1a – Modern slavery and forced labour**

AB Kils Automatsvarvning condemn all form of modern slavery and forced labour.

The following does not exist in our organisation

- Confiscation of identity documents
- Withholding of wages
- Abuse working conditions
- Debt bondage
- Violence or any other kind of exploitation or abuse

### **1b – Child labour**

No child labour occurs in our organisation. We don't hire minor personal. Young persons above 13 years may be allowed to work during holidays all according to Swedish law.

### **1c – Working hours and leave**

AB Kils automatsvarvning follows Swedish law and is affiliated to collective agreement. We practice a normal working week. We use overtime temporarily when needed and never as a permanent way to increase capacity. All employees are entitled to sick leave and sick pay, parental leave, continuous summer holidays and other leave according to agreement and law.

### **1d – Wages and benefits**

Our employees shall be paid fairly in accordance with the applicable collective agreements. It is in AB Kils automatsvarvnings best interest to offer employees' salaries and benefits that well exceed legal minimum requirements. Each individual employee signs an employment contract, in Swedish, together with management. Salary and benefits are documented. Salary increases are made at least according to agreement.

### **1e – Non-discrimination and fair treatment**

AB Kils automatsvarvning don't discriminate anyone on account of:

- Gender or identity
- Age
- Nationality, ethnicity, skin colour or cultural background.
- Religion of belief
- Disability, genetics, or health information including pregnancy
- Sexual orientation
- Union affiliation

Humiliation and physical punishment are not tolerated nor are employees allowed to be subjected to verbal, psychological, physical or sexual harassment or abuse.

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### **1f – Freedom of association and collective bargaining**

All Employees shall have the right to lawfully form, join or not join labour unions, bargain collectively, seek representation and join worker’s councils in accordance with local law and international conventions. Employees shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, intimidation or retaliation. Where local law sets restrictions on the right to freedom of association and collective bargaining, Supplier shall allow alternative forms of worker representation, association and bargaining

### **1g – Grievance Mechanism and Whistle blowing**

Employees and stakeholders shall have access to clear and fair channels to raise complaints, concerns, or deviations. All cases must be handled confidentially, impartially, and without retaliation, and followed up in a transparent manner.

Whistleblowing enables the reporting of suspected misconduct, legal violations, or breaches of the Code of Conduct. Reports may be made anonymously where permitted by law, and whistleblowers shall be protected from retaliation. All reports are taken seriously and investigated promptly.

Complaints are registered at our website [www.abka.se](http://www.abka.se)

### **1h - Land, Forest and Water Rights**

We respect the land, forest, and water rights of local communities and Indigenous peoples. We recognize their right to use and manage natural resources and commit to engaging in fair, transparent, and respectful dialogue before starting any activities that may affect their rights or livelihoods.

### **1i - Forced Eviction**

We do not tolerate forced eviction. No individual or community shall be displaced unlawfully or without proper consultation, fair compensation, and respect for human rights. All relocations must follow applicable laws and international standards, ensuring dignity and protection for those affected.

### **1g – Diversity, Equity and inclusion**

We are committed to fostering an inclusive work environment where everyone is treated with respect and dignity. We strive to maintain a healthy climate where everyone has the opportunity—and feels safe—to speak up. We value differences and see them as a strength that helps us make better decisions and build stronger collaboration. All employees share the responsibility to contribute to a safe and inclusive culture

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## 2 HEALTH AND SAFETY

AB Kils Automatsvarvning will assure that all risks are identified such as risks with machines and chemical substances. If it is possible all risks shall be eliminated or substituted. If not possible routines and instructions to prevent risks for health and safety should be implemented. All employees shall be equipped with necessary safety equipment. Training and education in first aid, handling of chemicals and risk awareness should be performed regularly.

Employees have access to clean drinking water, hygienic toilet facilities, hygienic food preparation, storage and eating facilities, adequate ventilation, light and temperature levels, and acceptable levels of noise and dust pollution.

## 3 RESPONSIBLE SOURCING OF RAW MATERIAL.

If any of our products contain any of the 3TG or cobalt, it is reported where it is mined. Our products or the raw material included shall not contribute to any of the current conflicts in the world where mining of 3TG and cobalt occurs.

## 4 ENVIRONMENTAL PERFORMANCE

### 4a – Raw material and energy

AB Kils Automatsvarvning continuously monitor the use of raw material, water and energy. The documentation is shared with municipality annually and to any customer upon request. The documentation becomes input for upcoming environmental objectives, continuously reduce use of raw material is a main goal.

### 4b – Emission and waste management

AB Kils Automatsvarvning monitor and document emission, such as GHG, and waste continuously. The documentation is shared with municipality annually and to any customer upon request. To minimize waste is an important part of our environmental objectives. The documentation is input for continuous improvement.

### 4c – hazardous substances

AB Kils automatsvarvning identify hazardous or potential hazardous substances in the chemicals that are used. We keep the most recent data sheets for all chemicals in the facility along with information on how to handle them. When possible, the principle of substitution is used. All our products are registered in IMDS and submitted to customer. We apply the black, grey, and red list.

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## 5 BUSINESS ETHICS

### 5a – Fair competition

AB Kils automatsvarvning respect and comply with all applicable fair trade, competition and anti-trust laws and regulations and shall not have any anti-competitive discussions or enter into any anti-competitive agreements, including illegal price-fixing, market sharing, customer allocation or other illegal restrictive practices, at any level of the production or distribution chain.

### 5b – Business integrity

AB Kils automatsvarvning should have an honest, open and transparent relation with customers. We strive to show that we are a reliable business partner. Employees shouldn't have any interests that could jeopardize our integrity.

### 5c – Confidentiality and intellectual property rights

We protect our customers information against misuse, mishandling, counterfeit, theft, fraud or improper disclosure in accordance with applicable law and contractual terms.

### 5d – Financial responsibility and accurate reporting

We ensure that all financial information is accurate, complete, and transparent. All transactions must be recorded in a timely manner and in accordance with applicable laws and accounting standards. Accounting and reporting must never be misleading or contain inaccuracies. We do not accept manipulation, falsification, or intentional misclassification of financial data.

We maintain effective internal controls to prevent errors and irregularities. All financial information must be properly documented and traceable. Employees are responsible for following guidelines and reporting accurately. Managers have a particular responsibility to ensure strong internal controls.

Any suspected irregularities must be reported in accordance with established procedures. We always act with integrity and diligence in our financial reporting

## 6 DATA PRIVACY

Whenever we are entrusted with personal information about individuals, we shall safeguard it and take appropriate steps to protect it from misuse. All applicable data privacy laws as well as the contractual terms shall be observed when collecting, storing, using, processing or sharing personal information about individuals. We follow laws and regulations regarding data privacy as GDPR.