



# Code of Conduct



## Contents

### 03-04    **PRINCIPLES**

Purpose  
Owner  
Who does the Code of Conduct apply to?  
How we govern our actions in Flokk

### 05-08    **OUR GUIDELINES**

Protecting the environment  
Safeguard health and safety  
No alcohol and illegal drugs  
Anti-Bribery & Anti-Corruption (ABC)  
Handling gifts and other benefits  
Entertainment, travel and representation  
Sanctions Policy  
Anti-Money Laundering policy (AML)  
Conflicts of interest  
Free competition  
Human rights and labour rights  
No discrimination and harassment  
Diversity, Equality & Inclusion  
Forced and compulsory labour  
Freedom of Association and the Right to Collective Bargaining  
Child Labour  
Confidentiality and data security  
The use of Flokk's assets and property  
Use of social media

### 09        **BREACHES OF THIS CODE OF CONDUCT**

Whistleblowing and reporting of breach  
Follow up





# Principles

## Purpose

Flokk is the market leader in the design, development and production of workplace furniture in Europe. We seek to conduct our business with a high ethical standard to be a respected and trusted business partner for all our stakeholders. We also expect high ethical behaviour from all our employees by acting in accordance with this standard.

Flokk's **Code of Conduct (CoC)** should guide our employees in every aspect of our business to help them act lawfully, honestly, ethically, and in the best interests of the company while performing duties on behalf of Flokk.

Our vision *Inspire Great Work* and our values *Human-centred, Sustainable, Innovative* commit us to run the business in a responsible and sustainable manner, and they should be reflected in everything we do.

Our values demand a culture of innovation and thinking in new ways, a strong focus on our customers, and our overall results. We believe this will provide commitment, understanding and direction for our employees. Adhering to and practicing our values contribute to a good and healthy working environment and added value for our customers and our owners. This is a common responsibility for all employees.

## Owner

The responsibility for safeguarding and implementation of the CoC lies with Group HR in cooperation with the Flokk Line Managers. Line Managers in all parts of the organisation and at all levels have a responsibility for ensuring that their employees /subordinates/direct reports act in compliance with the CoC. If in need of advice or guidance related to the CoC, employees must consult the Line Manager or Group HR.

Flokk is committed to make this CoC known in all parts of our organisation. Group HR is the owner of this document.

## Who does the Code of Conduct apply to?

This CoC applies to all employees in Flokk, regardless of position or whether they are a full-time, part-time or temporary employee. As a leader, you have a special responsibility to lead by example and act in accordance with the intention in this code, including also the cases where the code sets a higher standard than international laws, regulations or standards.

The CoC also applies to members of the Board of Directors as well as external Board Members in subsidiaries of Flokk. All employees must confirm that they are aware of, and will act in accordance with the content of the CoC. The CoC is an integrated part of the employment contract. Breaches of the CoC will be a threat to Flokk's business and reputation.

Suppliers, consultants and other business partners must also comply with relevant parts of our high ethical standards when working with us. Flokk has its own Code of Conduct for business partners (CoC BP), which must be included in agreements with these parties.

## How we govern our actions in Flokk

Flokk's Code of Conduct is founded on key United Nations (UN) and International Labour Organisation (ILO) conventions and documents, including the Ten Principles of the UN Global Compact. Where national laws and regulations address the same subjects as the above-mentioned conventions, documents and Flokk's guidelines, the most stringent shall apply.

Flokk understands that its operations and business conduct can potentially have negative impact on people, society, and the environment. As such Flokk is committed to actively work with due diligence for responsible business conduct. At the same time Flokk see great possibilities in achieving positive impacts, and this is what we naturally strive for.





IAN  
ING

# Our guidelines

## Protecting the environment

In Flokk, sustainability awareness and actions are key aspects of our daily operations. Flokk measures taken to minimise negative impact on the environment and human health must be supported continuously throughout the whole value chain. In line with the precautionary principle, this includes office behaviour, minimising greenhouse gas emissions and local pollution, the use of harmful chemicals, pesticides, promoting and ensuring an efficient and sustainable use of resources, energy and water, and conservation of biodiversity. The local environment at any site shall not be exploited or degraded.

National and international environmental legislation and regulations shall be respected and relevant discharge permits obtained. Flokk environmental & energy policy generally exceeds legal provisions. Where these address the same subject, the most stringent shall apply.

Flokk expects all employee to act sustainable and to be good ambassadors for the company. Flokk employees should conduct themselves ethically and responsibly, and take external stakeholders and the society in which we operate into consideration. We expect all our employees to cooperate fulfilling our environmental & energy reduction ambitions.

## Safeguard health and safety

Flokk's employees, contracted workers and visitors have the right to a safe and secure workplace. Systematic HSE work is about being one-step ahead and identifying risks and implementing actions. It is a continuous process and a natural part of our activities so you will be just as healthy when finishing work as when you arrived.

Flokk's employees take responsibility and care about own health and colleagues health. All incidents in the workplace and all unsafe or harmful working conditions should be notified to the Line Manager, safety representative or HSE Manager. It is also possible to report directly in Flokk's Quality Management system (TQM).

## No alcohol and illegal drugs

Flokk have zero tolerance for any use of drugs and alcohol during normal working hours. During travel, customer meetings, general company representation or any other work-related occasions, we expect moderation, as all employees in these situations are Flokk representatives. Gaming, use of social media and other addictive activities must not affect job performance in any way.

We refer to our Policy for alcohol, drugs and gambling addiction in Flokk (TQM id 6092).

## Anti-Bribery & Anti-Corruption (ABC)

Flokk is committed to the highest ethical standards of business ethics and professional conduct. Maintaining a culture of respect, honesty, trust and integrity is vital to our success. We have a zero-tolerance approach to bribery and corruption, which is not accepted in any form. This includes all forms of bribery, extortion, facilitation money, kickbacks and improper private or professional benefits to customers, also including agents, contractors, government officials, suppliers or employees of any such party.

Flokk expects all employees to avoid situations that may lead to a conflict between the company's interest and their own personal interests. Flokk employees should also refer to the definition of bribery and corrupt behaviour described in chapter II of The United Nations Convention Against Corruption.

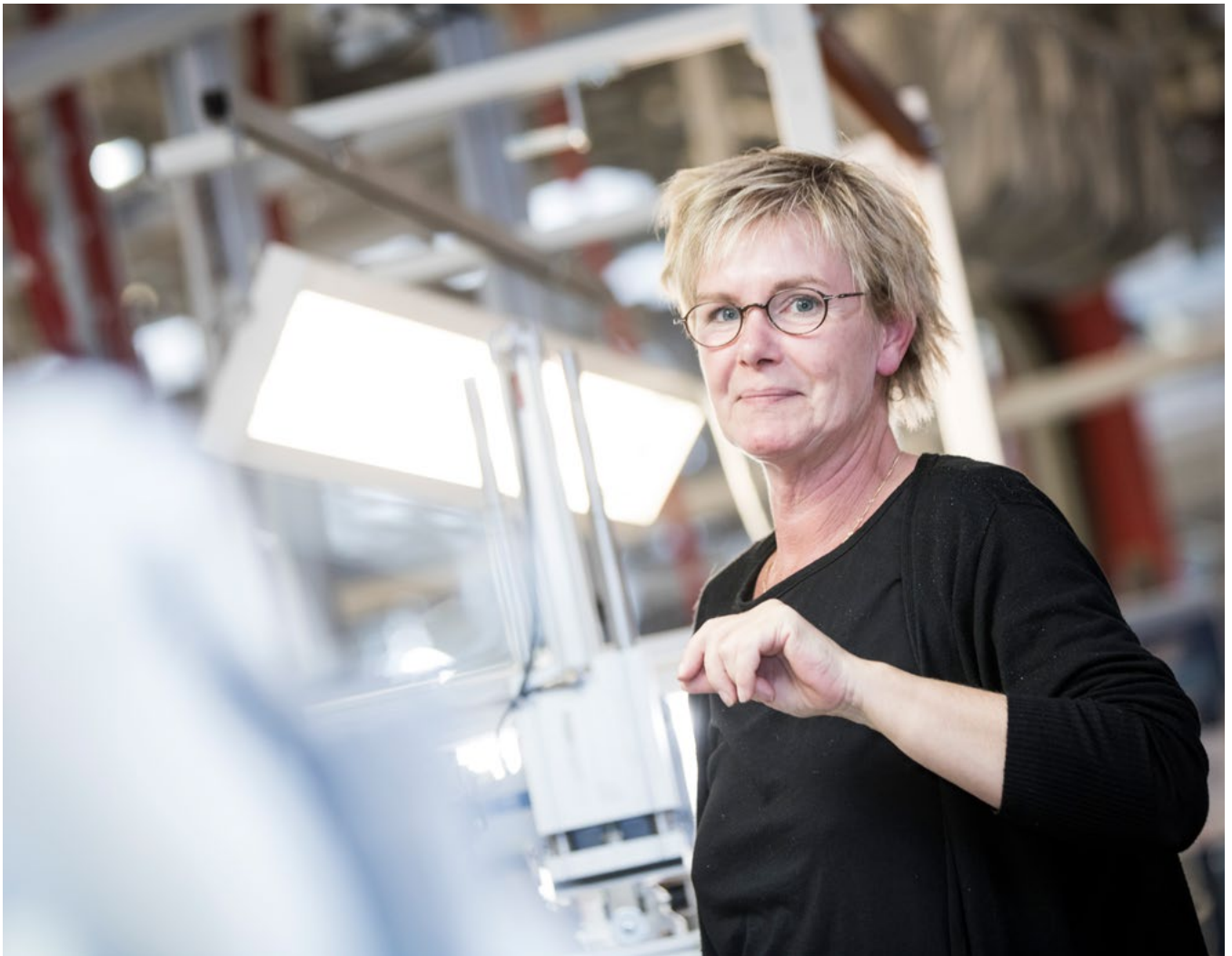
We refer to Flokk's Anti-Bribery & Anti-Corruption (ABC) Policy (TQM id 6358).

## Handling gifts and other benefits

Employees of Flokk must never offer, promise, request, demand or accept money, products or other forms of gifts or rewards resulting in taxation in any form for the company, the employee or a business associate.

We expect that our guidelines concerning gifts and suspected bribery are adhered to. If an employee considers giving or receiving a gift worth more than





EUR 50, this requires pre-approval from the Line Manager. The greater the value of a gift, the greater the chances of it being considered an inappropriate bribe. Anything valued at less than EUR 50 is generally acceptable, but one should be aware that this may vary between countries.

Employees should always consider whether the gift can appear to affect their loyalty to the company. This can harm our reputation and our brand. When and if in doubt, the Line Manager, Line Manager's Manager or your HR Manager in Group HR must be consulted.

### **Entertainment, travel and representation**

The outlined principles above also apply to invitations, travel and participation in events organised by suppliers or business associates. We refer to Flokk's Travel and Business Expense Policy (TQM id 2142) for guidelines regarding entertainment and representation on behalf of Flokk. All employees must, for their own sake comply with these guidelines and our business ethics. Entertainment/representation expenses which exceed 100 EUR requires pre-approval from the Line Manager. In general, caution should be exercised regarding this.

### **Sanctions Policy**

Financial sanctions are a significant part of the global fight against financial crime and are used by governments all over the world to restrict or prohibit trade with foreign targets, which are involved, or suspected of being involved, in illegal activities. All new customers, dealers or business partners shall be checked if they are mentioned on any of the targeted sanctions list for UN and US. There must be no business with Cuba, Iran, North Korea, Sudan, Russia/Crimea and Syria. Sanctions lists play an important role in Flokk's Anti-Money Laundering (AML) Policy and will significantly affect how, and with who, we do business.

Employees of any of the Flokk Group companies have a duty to inform the Group Compliance Officer about a match in the Sanction List search and further evaluation will be done based on our compliance standards.

We refer to Flokk's Sanctions List Policy (TQM id 6346) and Flokk's Anti-Money Laundering (AML) Policy (TQM id 6356).

### **Anti-Money Laundering Policy (AML)**

There is an ongoing risk that Flokk may be targeted by criminals for money laundering purposes. Flokk

expect all employees to be aware of warning signs of money laundering and to always remain vigilant to in respect of these.

We refer to Flokk's Anti-Money Laundering Policy (TQM id 6356) for what to be aware of regarding suspicious behaviour.

### **Conflicts of interest**

Employees of Flokk must actively avoid situations where conflicts between the company's and their own personal and/or financial interests may arise. This can be in connection with the purchase of goods or services, or in situations involving personal relationships (include spouse, other immediate family or relatives and close friends).

All employees must be loyal to Flokk, treat confidential information with great care and avoid any involvement with external parties in competition with Flokk's business.

If a conflict of interest situation arise, the Line Manager, Line Manager's Manager and your HR Manager in Group HR should be notified. Relevant actions will be taken on behalf of Flokk in order to protect the employee and the company.

### **Free competition**

Flokk supports free competition and fair trade. Competition and antitrust issues may arise from

contacts between Flokk and its competitors, suppliers or customers. All employees must comply with competition and antitrust laws and refrain from all unfair behavior towards competitors.

Anti-competitive behaviors may include, but not limited to:

- entering into agreements, including informal understandings, with competitors for price fixing, bid rigging, market allocation and agreements to restrict supply
- exchanging competitively sensitive information with competitors
- abusing a potential position of market dominance
- imposing restrictions on customers or suppliers
- entering into certain mergers and acquisitions

Our employees must not be party to breaches of any form of competition regulations such as e.g. illegal price fixing, illegal market sharing or other agreements that limit free competition under any circumstance. We expect all employees to adhere to these regulations. If in doubt and a potential situation arise, the Line Manager, Line Manager's Manager and your HR Manager in Group HR should agree mitigating actions.

### **Human rights and labour rights**

We demonstrate our work ethics in the way we operate, such as respecting human rights, employee rights and international labour law. As Flokk employees we must support and respect human





rights, employee rights and international labour law, both within your own actions and operations and in the supply chain.

All employees of Flokk **must** comply with our values and act as good ambassadors for the company.

It is expected that colleagues, business associates, customers and other we meet are treated with respect and graciousness, and any behaviour that may be perceived as discriminating, threatening or harassing is not acceptable. Flokk employees must support the work to promote diversity and equal opportunities in the organisation.

### No discrimination and harassment

In Flokk we shall have no discrimination when hiring, compensating, giving access to training, promoting, terminating or retiring employees based on ethnic affiliation, social or ethnic origin, nationality, civil status, pregnancy, age, physical ability, religion, political opinions, union membership, gender, gender-crossing identity or expression, sexual orientation, or other character traits that are protected by applicable legislation. Discrimination refers to any distinction of employees that is not based on merits or qualities, but involves differential treatment on biased grounds.

Harassment may not occur in the organisation. Harassment are instances when employees are exposed of harsh or inhumane treatment. In Flokk any form of psychological or physical abuse or punish-

ment, threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, is prohibited. When representing Flokk in any situation, it is totally prohibited to purchase any form of sexual services in any country.

Flokk is concerned about protecting employees from discrimination and harassment and our People Policy clearly communicates this (ref TQM id 2203).

### Diversity, Equality & Inclusion

Flokk is an equal opportunity employer and we ensure individuals have the same opportunities for employment and promotion based on their ability, qualifications and suitability for the work. We aim to create a safe, respectful and inclusive place of work so our people can contribute to living our corporate values, improving our global brand and achieving sustainable business results.

All Flokk employees must adhere to a set of guidelines in this respect:

- communicate respectfully with all colleagues, regardless of title or level. Be mindful of remote communication, where opportunities of misunderstandings are greater. Use video communication when it makes sense. A face-to-face discussion benefits from all social signals absent with other forms of communication.
- behave in a way that does not offend, intimidate,









degrade, insult or humiliate others. This includes jokes, banter, ridicule or other insults.

- understand and act upon the fact that what may be acceptable to one person may not be to another.
- as an employee, go out of your way and across cultures to include people in casual, conversational or work-related team interactions. Avoid slang or idioms that might not translate across cultures or be deliberate in explaining them to share our diverse cultures and languages.
- challenge poor practice in others, helping to promote good practice and create change (don't ignore inappropriate banter, jokes, etc.)
- commit to self-improvement. If you, as an employee, is approached as having acted in a way that has offended another individual, listen with an open mind and reflect on self-improvement.

We refer to Flokk's Policy for Diversity, Equality & Inclusion (TQM id 6347).

### **Forced and compulsory labour**

There shall be no forced, bonded or involuntary prison labour in Flokk. All labour must be voluntary without threat of penalty or similar. Employees shall not be required to lodge deposits or identity papers in any form and shall be free to leave Flokk after reasonable notice.

### **Freedom of Association and the Right to Collective Bargaining**

Employees, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively. Flokk shall not interfere with or obstruct the formation of unions or collective bargaining.

Employee representatives shall not be discriminated and shall have access to carry out their representative functions in the workplace. Where the right to freedom of association and/or collective bargaining is restricted under law, Flokk shall facilitate, and not hinder, the development of alternative forms of independent and free workers representation and negotiations.

### **Child Labour**

In Flokk, the minimum age for workers shall not be less than 15 and comply with the national minimum age for employment, or the age of completion of compulsory education, whichever of these is higher. If local minimum is set at 14 years in accordance with developing country exceptions under ILO Convention 138, this lower age may apply.

### **Confidentiality and data security**

Through their work in Flokk, employees are obliged not to divulge any personal data or information about individuals' personal circumstances, operational or business-related information to unauthori-

zed parties. The duty of confidentiality also applies after the employment has ended.

All employees have a responsibility to contribute to comply with our Information security policy and procedures (GDPR/privacy is an integral part of the Information security policy). This is instrumental when safekeeping and protecting information and data and to stay compliant with laws and regulations. We refer to the following documents:

- Information security and privacy policy (ISO 27001) (TQM id 2346)
- Guidelines for general information security in Flokk (TQM 6355)
- Guidelines for Personal data protection in Flokk (TQM 6005)
- Guidelines for the use of personal devices provided by Flokk (TQM is 6354)

### **The use of Flokk's assets and property**

Employees **must** handle Flokk's assets and property responsibly and with great care. This applies to tangible assets such as stocked material/goods, tools, machinery, IT equipment and interior as well as to intangible assets such as patents, ideas and general confidential information.

Nobody shall unduly use tangible or intangible assets for private purposes or for activities that are not relevant to their work as employees in Flokk. IT equipment must not be used for computer games, gambling, pornography streaming, and promotion of racism or other purposes that can be perceived as offensive.

### **Use of social media**

Employees must be aware and alert when sharing information related to Flokk on social media channels, as they will be perceived as a representative of the company. Flokk expects all employees to ensure that all communication is in line with our values and consistent with how Flokk communicate on other digital based channels and platforms.

We refer to Guidelines for the use of social media in Flokk (TQM id 2631).

# Breaches of this Code of Conduct

## Whistleblowing and reporting of breach

Whistleblowing means to report censurable and non-confirmative conditions at the workplace. As an employee, if you have a reason to believe that there are unacceptable conditions in Flokk, you are required to report this internally as soon as possible. *Financial fraud, corruption, sexual harassment or drug addiction* are examples of conditions for notification.

Flokk will safeguard whistleblowers. Any reports of unacceptable conditions shall be treated as confidential, and the whistleblower's identity shall be protected from any form of retaliation. Protection in this respect means that Flokk will not remove, suspend, threaten, harass, or discriminate against an employee who reports such conditions.

As an employee, you should submit your reporting to Flokk in the following order:

- Line Manager/safety representative/employee representative
- Line Manager's Manager
- Site/Country Manager
- HR Manager in Group HR
- Flokk's CEO
- Anonymously in Flokk's Quality Management system (TQM) via an app or the link [Anonymously Whistleblowing](#) on the intranet.

An employee may also notify an external supervisory authority or other public authority.

Other external notification, including to the media, can only take place if the employee, in good faith, submits notification of unacceptable conditions that are in the public interest and the employee has first provided internal notification according to the above.

We refer to Flokk's Whistleblower procedure (TQM id 5089).

## Follow up

In the event of breach of the Code of Conduct, the company will prepare a plan for remedying the specific breach. Violation of the Code of Conduct is subject to disciplinary actions and will have consequences for the employee in the form of oral or written warning, or in serious cases, dismissal.

As an employee in Flokk, you should in all work-related circumstances comply with the guidelines stated in the employee contract, the position description and this Code of Conduct.

All employees are required to conduct mandatory digital training related to CoC, which is monitored in our training platform [Learning@Flokk](#).

New recruits are required to conduct the CoC training as part of their compulsory induction program.

Flokk is committed to remediation if our operations directly or indirectly have caused harm to people or the environment.





**The Code of Conduct with its content is read, understood and accepted:**

Date \_\_\_\_\_

Place \_\_\_\_\_

Name (in block letters) \_\_\_\_\_

Title \_\_\_\_\_

Signed by \_\_\_\_\_