

# **Business Ethics policy**

### 1. Purpose and objective

This Business ethics policy is a statement about Mobile Climate Control's (MCC) view on Business Ethics and how we should act related to this issue.

We constantly strive to develop and maintain sound and solid relationship with our stakeholders. Our Business Ethic policy is together with our Quality, Environmental, Financial, Information and Human Resources policies fundamental and substantial in this quest. These policies together form MCC's Code of Conduct.

### 2. Policy

The relations to our stakeholders – customers, employees, owners, suppliers and partners, and to the society – must be characterized by fairness and common sense.

This force us to act and behave to minimize the risk of jeopardizing our individual or corporate reputation, e.g. we do not spread or abuse confidential information, we only sell products aimed for heating, ventilation and cooling of vehicles to customers in the defense segment.

Employees are individually responsible for acting in line with MCC's established policies and procedures, to practice common sense and report any shortcomings in own and colleagues business environment.

Our work with Business Ethics is based on each employee having an open mind and assuming ownership of the actual situation as well as working in accordance with our core values:

# Respect to build trust

- We comply with internationally established norms, all legislation and regulations (e.g. rules for export controls, laws and regulations related to product safety) and remain neutral in political issues.
- We prevent corruption by our Anti-Corruption Directive and by adhering to the United Nations Convention against Corruption (UNCAC).
- We work in a systematic way and integrate the Business ethics work into our daily work.
- We support and respect the protection of internationally proclaimed human rights e.g. to assure the avoidance of using child¹ or other forced, slave or involuntary labor in our workplaces and supply chain.
- We do not accept the purchase of sexual services in any country and we condemn all sexual exploitation of children and the usage of child pornography.
- We have transparent and efficient systems for surveillance, measurement, evaluation of our financial transactions and other processes.

<sup>&</sup>lt;sup>1</sup> Child = any person under the age of 15 or any applicable higher statutory minimum age.

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#### Innovation to assure development

- We continuously improve our knowledge of and ability to maneuver in Business Ethics issues.
- We continuously strive to have our operations free from bribery, corruption or other activities<sup>2</sup> that could lead to unfair competition, undue impact or other conflict of interests.
- We continuously and systematically improve the transparency in our processes through regular risk analysis.

# **Courage and Action to enable movement**

- We expect and continuously encourage our business partners to practice similar business ethics. Their compliance with our business ethics and internationally proclaimed human rights as well as avoidance of bribery and corruption is a part of our supplier evaluation.
- We expect and continuously encourage each employee to report any shortcomings in own, colleagues or business surroundings.
- We have the courage to continuously challenge our ways of working and thus extend the limits for what is possible to achieve.

<sup>&</sup>lt;sup>2</sup> Other activities = e.g. anti competitive agreements and unlawful price/market information exchange with competitors