


# Code of Conduct

## Darekon Group 2017

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## Preface

The reputation of Darekon is built with the help of all employees through their commitment to do their best to enhance this reputation and to work in accordance with our vision to become the leading contract manufacturer of medical equipment and for specific industrial electronics in the Baltic Sea region by offering customers flexible and high-quality services. Darekon's customers are at the heart of the company's development. The continuous enhancement of the firm's operations and its sure, sustainable growth serve to provide the customer with a truly reliable quality contract manufacturer. Sustainable business- sustainable development is our slogan.

The corner stones of the management system are the strategy and values of the company: client-centred, profitability and continuous development of operations. Our operation is based on confidentiality, transparency and cost-efficient cooperation benefitting all parties.

Darekon looks to the future with long-term sustainability in mind. Business ethics, communication, human rights and labor standards, environment and health and safety are important elements in this context. Our policies and this Code of Conduct are further based on:

- UN Universal Declaration of Human Rights and connected UN Conventions
- UN Global Compact
- EU directives
- National laws and decrees
- ISO 14001
- Customers requirements
- GDPR, General Data Protection Regulation

## GENERAL PRINCIPLES

People whose work contributes to Darekon's success should not be deprived of their basic human rights, or be forced to suffer physically or mentally from their work. Darekon's employees have an obligation to all interest groups to observe high standards of integrity and fair dealing. Unlawful and unethical business practices undermine interest groups trust.

Violations of the Code of Conduct, or failure to detect and report violations through willful disregard, may result in disciplinary action, including suspension or termination of employment.

### Implementation

The overall responsibility for the Code of Conduct and the implementation here of lies with the CEO of Darekon.

## Managers' responsibility

Darekon managers have additional responsibilities in conjunction with the Code of Conduct. Managers should communicate and reinforce the Code of Conduct to employees and foster a work environment that encourages employees to act ethically and in compliance with the Code of Conduct.

All managers have the responsibility to communicate and distribute relevant parts of the Code of Conduct, as described below, to employees and to handle any concerns or complaints. Any concerns or complaints related to the Code of Conduct should wherever possible be communicated to the representative of the local management or the local person who handles Code of Conduct issues.

Communications will be held confidential and no employee will be discriminated against for reporting, in good faith, violations of the Code of Conduct. All communications will be duly handled, and the reporting person will be informed, if possible, about the result of the investigations.

## Code of Conduct in relation to our business partners

All responsible persons are expected to make sure that our business partners are informed of our Business Partner Code of Conduct. Any violations of the Darekons Business Partner Code of Conduct may jeopardize the business partner's business relationship with Darekon, up to and including termination.

## Monitoring

Darekon will follow up and monitor the implementation of the Code of Conduct. Violations will be handled immediately.

## Business Ethics

Darekon respects the laws and regulations in the countries in which it operates and requires that its employees do the same. Darekon does not accept any corrupt activities, including but not limited to bribery, conflicts of interest, fraud, extortion, embezzlement and unlawful kickbacks.

The Code of Conduct does not replace legislation and if the two are in conflict, legislation takes precedence. If the Code of Conduct sets a higher standard than the existing legislation, the reverse applies. It should be noted that the Code of Conduct and related policies are not necessarily limited to the requirements of national laws and regulations.

## Anti-bribery

Darekon does not accept bribery.

This means that Darekon prohibits its employees from making or approving any offer, promise, payment, or gift of anything of value to any individual, with an intent to improperly influence a decision by the individual.

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Similarly, it also means that Darekon employees are prohibited from receiving anything of value provided there is an intent to improperly influence their decision making.

## Fraud

Darekon does not accept fraud in any form.

## Entertainment and gifts

Entertainment and gifts, whether given or received, should be limited in value, for a business purpose, well documented and reasonable. Purchasing and sales activities shall be handled with utmost integrity. With careful consideration, entertainment, gifts and expenses of modest value could be acceptable, except whenever such arrangements could improperly affect the outcome of business transactions.

## Business representatives

Darekon could be held liable for the wrong doings of business partners engaged or instructed to act for or on behalf of Darekon. Therefore, they should be carefully reviewed and used only for legitimate business purposes, on arm's length, commercially reasonable terms. Those engaged to act for or on behalf of Darekon are expected to comply with the Darekon Business Partner Code of Conduct.

## Discount, rebates, commissions and bonuses

Excessive price concessions and compensation can be used to facilitate bribery. The terms of these arrangements should be in writing and should be commercially reasonable.

## Political contributions

Darekon does not make political contributions. Individual participation in politics, including donations, must not involve the use of Darekon's funds, time, equipment, supplies, facilities, brand or name.

## Charitable contributions and sponsorships

Darekon supports charitable groups for legitimate purposes. Donations must be aimed to benefit society and in a manner that demonstrates corporate social responsibility. No donations shall be made with the express or implicit requirement to use or purchase any Darekon product. Further, Darekon does not use sponsorships as a subterfuge for bribery.

## Records and reports

The integrity of Darekon's record keeping and reporting systems is of utmost importance. Employees must take special care to make sure that records are accurately and completely prepared and reviewed, whether they are for internal or external use. Employees must apply accounting rules and controls, as described in the corporate manual, and follow company procedures for retaining and disposing of records.

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## Conflict of interest

Conflict of interest between the employee and the company must be avoided. Should such conflict occur, or if there is concern it might develop, the employee is required to notify the company in writing and to discuss the matter with the immediate manager.

Conflicts of interest concern the following areas:

### Outside business activities

Darekon expects its employees to devote their full working hours exclusively to their work. An employee is not allowed to engage in any external activity, if it could be in competition with Darekon's business

### Personal financial interest

Personal financial involvement in activities that might conflict with Darekon's interest must be avoided, e.g., ownership in companies where Darekon's activities have a major impact. This may also apply to family members.

## Confidential information

Any information that, if disclosed, risks placing Darekon at a competitive disadvantage shall be treated as confidential and must only be disclosed to anyone in need of the information to perform the work.

This also applies after the termination of employment. It is further advised not to discuss, directly or over the phone, confidential or other matters that could lead to a competitive disadvantage, in places or situations where such discussions could be overheard. The same applies to all e-mail or internet communication. Employees should not provide confidential information about Darekon except pursuant to a written confidentiality agreement.

Employees may possess or have access to confidential information from former employers, vendors, customers or competitors. Darekon respects the integrity of and confidentiality of such information. Employees must not use or disclose such confidential, proprietary information unless it has been properly obtained and its disclosure authorized. Employees should never act as information intermediaries or forward confidential information from vendors, customers or competitors to other parties, even if authorized to do so.

## Patents, trademarks and copyrights

Any new inventions, processes, works of authorship, technology advances or unique solutions to business problems developed or discovered during the scope and period of employment with Darekon shall be the property of Darekon. It remains the right of Darekon to decide whether to file patent or other protection for them. Darekon does not intentionally infringe upon the intellectual property of others.

## Computer software

Darekon respects computer program copyrights and conforms to applicable laws and regulations concerning the use of computer software and expects all employees to follow applicable laws and regulations and, for example, not copy any programs unless the license specifically permits it.

## COMMUNICATION

### General

All communication on behalf of Darekon, regardless of which communication channel is used, needs to be inline with Darekon business values and policies. Darekon employees must be professional, honest and accurate and always maintain confidentiality in their communication. Sensitive or undisclosed corporate information shall not be discussed or published.

### E-mail correspondence and internet use

E-mail communication should be dealt with the same way as other written business communication regarding content, formal language and handling of documents. Company e-mail and internet functions should be used only for company purposes and therefore all traffic is company property. Darekon reserves the right to monitor e-mail and internet use according to instructions and requirements of national laws and regulations.

### Telephone conversations

Darekon does not monitor telephone calls, unless for specific reasons, such as training. Any case of monitoring will be agreed upon between the employee and the company in advance. Any third party will be informed, in advance, about the monitoring.

### Social media

All posting about Darekon in social media, including blogs, content communities, internet forums and social networks, shall respect copyright laws.

Extra attention shall be taken when communicating about Darekon or using the Darekon logotype. Acting on behalf of Darekon in social media channels is only assigned to specific individuals.

Social media shall not be used in a way that could harm Darekon's reputation. Misleading or unfair content about Darekon, colleagues, competitors or other interest groups shall never be posted

### Interest group communication, dialogue and engagement

Darekon is open to communication and input from its interest groups and always makes an effort to answer questions and to participate in relevant surveys and studies.

## HUMAN RIGHTS & LABOR STANDARDS

### Child labor

Darekon does not accept child labor.

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Darekon recognizes the right of every child to be protected from economic exploitation and from doing work that is likely to be hazardous to their physical, mental or spiritual health, harmful to their moral or social development, or to interfere with their education.

A child in this context is a person younger than 15 years of age, or 14 years of age in accordance with the exceptions for developing countries as set out in Article 2.4 in the ILO Convention No. 138 on Minimum Age. If relevant national legislation has set a higher age, this age will apply.

Some countries apply the definition of young workers to persons above the minimum age and below 18, which means that there might be legal restrictions regarding the type of work that they are allowed to perform.

### Forced or bonded labor

Darekon does not employ or accept any form of forced or bonded labor, prisoners or illegal workers. Darekon acknowledges that means to force people to work can include a deposit payment or demand to deposit identity documentation or other personal belongings, all of which is prohibited. All workers shall have the right to leave their workplace and accommodation (if provided) freely during the hours when they are not working.

### Freedom of association and collective bargaining

Darekon employees have the freedom to join, or not to join, an association of free choice, as well as establish an association of free choice, to organize and to bargain collectively and individually in accordance with local laws and regulations. No employee should risk being harassed or retaliated against for exercising these rights.

### Workers' contracts, working hours and compensation

Darekon complies with local laws and regulations regarding workers' contracts and working hours, including overtime and overtime compensation. Salaries should be paid regularly and comply with the applicable local legislation and the local market situation. Employees are entitled to a minimum of two days off in seven and to take time off for established national and local holidays. Employees should be granted the stipulated annual leave, sick leave and maternity/ paternity leave without any negative repercussions.

### Discrimination, harassment and diversity

Darekon values and promotes diversity and gender balance. Darekon provides a work environment where everybody should be treated with respect and dignity and be given fair and equal opportunities for development.

Therefore Darekon does not tolerate any form of discrimination or harassment in the workplace due to race, ethnicity, sexual orientation, gender, religion, age, disability, political opinion, nationality or any other potentially discriminatory factor.

## Employment and medical records

Employment and medical records are kept confidential and will not be disclosed to any person unless required by law or with the written consent of the employee concerned. Employees' medical records are kept separately from all other employee records in locked cabinets or the equivalent.

## Alcohol and/or drug abuse

Darekon works proactively to remove any workplace hazards. Employees should not be on company premises or in the workplace if they are under the influence of, or adversely affected by, alcohol, to the extent this impairs the employee's ability to perform his or her work duties.

Darekon has zero tolerance on drugs, and does not allow its employees to be on company premises or in the workplace if they are under the influence of drugs.

## Human rights under special circumstances

In addition to the already mentioned human rights issues, there might be circumstances under which further human rights perspectives might arise. Examples could be in respect of new operations and impact on the local community, impact on indigenous people's rights or security measures. Even if such examples are not common, Darekon is aware of the potential impact on human rights and acts according to relevant international or local law. If no official guidelines are available, Darekon will seek other sources so as to choose the best approach under the specific circumstances.

## Community outreach

Darekon aims to act as a good corporate citizen wherever it operates and supports local, regional and global communities in appropriate ways.

## Responsible sourcing of minerals

Responsible sourcing of minerals Darekon is committed to comply with relevant laws and regulations requiring disclosure of the use of conflict minerals. Conflict minerals are minerals from high risk and conflict-affected areas that have directly or indirectly contributed to financing of armed groups, where some groups are believed to be responsible for serious human rights violations. Goods provided to Darekon shall be in compliance with relevant laws and regulations regarding conflict minerals.

## ENVIRONMENT

### Environment and sustainability

Darekon shall meet legal environmental requirements and expects all its units to have the environmental permits and licenses needed for their operations. All employees are expected to support and take responsibility for Darekon's environmental performance.

Darekon encourages the development and diffusion of environmentally friendly technologies. Darekon requires all units with significant environmental impact to implement certifiable environmental management systems.

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Darekon continuously seeks ways to reduce the consumption of resources, including energy, waste and water, prevent pollution, have noise levels at acceptable levels and improve the overall environmental impact of its operations and products along the value chain. Chemical and hazardous materials shall be labeled properly and stored safely, and recycled, reused and disposed of correctly.

## Health & Safety

Work environment Darekon works systematically with health and safety and is committed to provide a safe work environment. Risks that can cause accidents or impair the health and well-being of our employees shall be reduced. Therefore, occupational health and safety hazards shall be identified, evaluated and managed through a prioritized process of hazard elimination, engineering controls, and/or administrative controls.

A safe work environment means, for example, that work areas are kept clean and free from pollution, machines used in production are safe and do not risk the health of the employees, and instructions regarding the use of personal protection and work equipment are adhered to. Further, the work environment shall be well lit, and have temperature and noise at acceptable levels. When noise is above acceptable levels, personal protective equipment such as ear protection shall be used. All units should provide adequate and clean changing rooms, washrooms and toilets, separate for men and women. Darekon's visitors shall receive information about our health and safety principles when visiting our facilities.

## Building and fire safety

Hazardous material and equipment must be stored according to applicable rules and policy. There should be clearly marked emergency exits. Exits must not be blocked and should be well lit. All employees shall receive information about the safety arrangements such as emergency exits, fire extinguishers, first aid equipment, etc. An evacuation plan should be displayed on each floor of a building. The fire alarm should be tested and evacuation drills carried out on a regular basis.

## First aid and medical care

First aid equipment must be available at appropriate locations, and at least one person in each location should be trained in basic first aid. A doctor or nurse should be contacted if necessary in the event of an accident on the premises. The company should cover the costs of medical care for injuries incurred on its premises if they are not covered by social security or insurance, provided safety rules have not been violated