## IVL's Code of Conduct







## CONTENTS

CEO: our actions build trust	4
Introduction to the Code of Conduct	6
Foundations of the Code of Conduct	6
Application of the Code of Conduct	6
Violations of the Code of Conduct	6
Whistleblowing Policy	6
Principles of the Code of Conduct	7
Our business ethics and responsibilities	8
IVL fully complies with prevailing legislation, ordinances, regulations, and rules	8
We never accept bribes nor participate in corruption	8
We never participate in or contribute to fraud or money laundering	8
We work with reliable partners and suppliers that act responsibly	8
We protect confidential information	8
We act responsibly with the company's property and resource	8
We avoid exposure to conflicts of interest and are independent	8
We look favourably on healthy competition	8
Our working conditions	10
We show respect for human and civil rights	10
Zero tolerance for child labour or forced labour	10
We respect freedom of association and collective bargaining agreements	10
We ensure a secure, safe, and healthy workplace	10
We take measures to safeguard good working conditions	10
We promote diversity and non-discrimination	10
IVL in the community and the world-at-large	12
We engage in efforts to promote sustainability	12
Political engagement and involvement	12
Our marketing and sponsorships	12
We have open communications in the workplace	12
Our financial and other reporting is to be done with honesty and accuracy	12

## Our actions build trust

IVL Swedish Environmental Research Institute is a prominent company in the field of the environment and sustainability. By means of applied research and commissioned activities, we contribute to achieving the global sustainable development goals.

We are working to continuously renew ourselves in pace with developments in the field of the environment and sustainability, and adapting our operations accordingly. Thanks to our long-term commitment and sound knowledge, we are able to influence our clients benefiting from sustainability efforts.

With our actions in our daily work, we build trust with our clients and business partners, and among our co-workers. Trust is crucial for us to be able to operate our activities in a responsible manner and live up to expectations.

Our Code of Conduct shows how we are expected to act as a company and as an employee. It helps us to make the right decisions in our daily work and it applies to all employees and in all countries where IVL has activities. It likewise applies to the members of the Board of Directors as well as our suppliers and business partners.

An act violating our Code of Conduct risks harming the trust and confidence others have in us as a company. Therefore it is important that you as an employee are well versed in our Code of Conduct and comply with it. If you find yourself in a situation where you can't find the direct answer in it, you are expected to act according to common sense. It may also be a good idea to speak with your immediate superior if you have questions or issues arise.

The Code of Conduct, together with our core values; credibility, holistic approach and foresight, is the basis of our organisational culture. Which helps us achieve our vision — a sustainable society.



Marie Fossum Strannegård CEO



The Code of Conduct, together with our core values, credibility, holistic approach and foresight, is the basis of our organisational culture.

Which helps us achieve our vision – a sustainable society.

## Introduction to the Code of Conduct

The Code of Conduct shows who we are and is a compass for how we are to act as individuals and a company.

The IVL Swedish Environmental Research Institute (IVL) is an independent research institute working in the fields of sustainability and the environment. Our vision is a sustainable society that facilities the transition by:

- · taking science to society
- turning environmental problems into solutions
- bending linear processes into a circular economy

We work with applied research and consultancy projects with the objective of promoting ecologically, economically and socially sustainable growth in business and the society-at-large. We do this with integrity and high ethical requirements.

#### Foundations of the Code of Conduct

The IVL Code of Conduct is based on the ten principles of the UN Global Compact and on IVL's core values; credibility, holistic approach and foresight. The Code of Conduct has been adopted by IVL's Board of Directors for the purpose of emphasising the principles that apply to our employees and members of our Board. It governs IVL's conduct in relation to our employees, suppliers, business partners and other stakeholders.

IVL's activities are governed not only by our Code of Conduct but also by internal governance documents and guidelines, which have been gathered together on our intranet. Code of conduct will be communicated and regularly revised.

#### Application of the Code of Conduct

In our work and in our business relationships, we will always act ethically and responsibly. The Code of Conduct applies to all employees, in all locations in all the countries in which we operate. It also applies to members of IVL's Board of Directors.

All employees must understand the Code of Conduct and live by it in their daily work. Managers are responsible for ensuring that their team is aware of the contents and

meaning of the Code and that compliance is maintained within their area of responsibility.

Employees will receive regular training in the Code of Conduct. All new employees will receive an onboarding introduction into the contents and meaning of the Code of Conduct.

#### Violations of the Code of Conduct

If an employee violates our Code of Conduct, depending upon the matter in question, it can lead to disciplinary action, possible dismissal from employment, and, in the event of a violation of the law, also criminal prosecution. IVL has zero tolerance for any form of retaliation against anyone who reports a deviation from the Code of Conduct or suspicion of deviation.

#### Whistleblowing Policy

It is important that irregularities are detected at an early stage, so that the proper remedial measures can be implemented and any damage or risk of harm minimised. IVL provides a system that allows each employee to make a report of suspected a violation of law, regulations and/or the Code of Conduct.

Any employee who detects or suspects an irregularity in the organisation is expected to report this to Ramberg Law. The report is to be made in writing to ivlwhistleblow@ramberglaw.se. IVL guarantees each employee's right to submit a report anonymously.

The Code of Conduct governs IVL's conduct in relation to our employees, suppliers, business partners and other stakeholders.

# Principles of the Code of Conduct

## Our business ethics and responsibilities

## IVL fully complies with prevailing legislation, ordinances, regulations, and rules

IVL has a well-deserved reputation as an independent company that takes its responsibilities seriously. This is based on our integrity and on the fact that our activities are conducted in full compliance with the statutes, regulations and rules that govern the company's activities. We comply with these in the countries in which we operate and we respect different cultures and traditions.

#### We never accept bribes nor participate in corruption

IVL has zero tolerance for corruption or bribery. Corruption means for instance that someone takes advantage of their position or abuses it in some manner in order to gain personal gain or benefits. IVL may not offer clients or business partners any benefits in violation of applicable law or good business practices. Employees may not give payments, gifts or other forms of compensation to a third party, nor receive such from them, that may affect the objectivity of a business decision.

### We never participate in or contribute to fraud or money laundering

IVL and its employees may not engage in any form of behaviour that may indirectly or directly lead to fraud and money laundering offences.

## We work with reliable partners and suppliers that act responsibly

IVL expects partners and suppliers to comply with the principles in IVL's Code of Conduct. The principles in IVL's Code of Conduct must be applied when evaluating current and future suppliers.

#### We protect confidential information

In our relationships with clients and partners, we gain access to confidential information. This information must be protected against unauthorised access or dissemination to unauthorised parties, and all communication of confidential information must be restricted.

The results of our co-financed projects are public information and may be disseminated in various channels. However this does not apply to the results of our assignments, which are confidential and can only be communicated after the appropriate written agreement has been entered into with the client.

We collect, process and retain personal data in full compliance with the EU General Data Protection Regulation (GDPR).

### We act responsibly with the company's property and resources

We use the company's assets and equipment for IVL's activities.

## We avoid exposure to conflicts of interest and are independent

It is important for our credibility and reputation as a reliable partner that we avoid activities and situations that may be harmful to IVL, our clients, or our partners. As an employee or member of the Board of Directors, we all have a responsibility to avoid or inform our immediate superior or other relevant party about situations where personal and financial interests or relationships conflict with, or may be perceived to conflict with, IVL's interests and work tasks and responsibilities.

#### We look favourably on healthy competition

All employees of IVL must always, and without exception, comply with applicable competition legislation and regulations.



We continually observe generally accepted business practices and maintain an ethical approach in all our activities. The same applies in relationships with clients, partners and other stakeholders.

## Our working conditions

#### We show respect for human and civil rights

IVL supports and respects the protection of internationally recognised human and civil rights in accordance with the ten principles of the UN Global Compact, and the OECD Guidelines for Multinational Enterprises. We work in accordance with the UN's Guiding Principles on Business and Human Rights.

#### Zero tolerance for child labour or forced labour

IVL will not tolerate any form of child and/or forced labour.

## We respect freedom of association and collective bargaining agreements

Freedom of association and the right to collective bargaining agreements shall be respected in all activities. We comply with collective bargaining agreements and respect employees' right to trade union and political engagement.

#### We ensure a secure, safe, and healthy workplace

IVL must be a safe and healthy workplace and we actively work in a structured manner with protecting both the physical and social work environment. We report incidents and accidents via systematic work environment management systems, and engage in measures to prevent accidents, occupational injuries and illnesses. We regularly monitor our physical and social work environment.

As employees, we comply with IVL's policies and guidelines related to health and safety.

#### We take measures to safeguard good working conditions

IVL takes measures to safeguard fair terms of employment in the countries we operate and does not tolerate terms and conditions of employment that are below what is required according to national and local legislation or the fundamental core conventions of the International Labour Organisation (ILO). Signed collective bargaining agreements shall be respected and complied with. Working hours and minimum wages must comply with national laws of the country in which the work is performed.

At IVL, it is important to have a balance in one's life – in regards to both private time and working hours, and this must be respected.

#### We promote diversity and non-discrimination

We have zero tolerance for any form of bullying, social exclusion, discrimination, sexual harassment, or other harassment or other forms of abusive treatment or victimisation. IVL will be an inclusive workplace and provide employees with equal rights and opportunities regardless of gender, religion, age, disability, sexual orientation, nationality, political opinion or outlook, trade union membership, social or ethnic origin.

At IVL, all employees have a responsibility to behave in an appropriate and respectful way towards each other. All employees have a responsibility to speak up and indicate that behaviour is not desirable. All managers have a responsibility to act immediately if they become witnesses to or receive information about suspected abusive treatment or victimisation or harassment in any form.



IVL offers good working conditions and complies with the principles of the UN's Universal Declaration of Human Rights.

We also require our business partners to do so.

## IVL in the community and the world-at-large

#### We engage in efforts to promote sustainability

IVL's activities are expected to contribute to ecologically, socially and economically sustainable growth.

Our systematic sustainability work is reported annually in our annual reports according to the Global Reporting Initiatives standards (GRI).

In our daily work, we work according to IVL's Sustainability and Environmental Policy. We take responsibility for, and minimise directly and indirectly, the environmental impact of our own activities. We work with the client's needs at the centre and focus on quality and efficiency as we develop our activities. We integrate sustainability aspects when investing in equipment and in purchasing. When travelling for the company, we comply with IVL's Travel Policy.

#### Political engagement and involvement

IVL takes a neutral position with regard to partisan political parties and candidates.

#### Our marketing and sponsorships

Marketing should be aimed at increasing awareness of IVL and always be factually accurate and comply with applicable statutes and regulations. We sponsor only activities that are in line with the company's values and vision. Sponsorships that do not comply with the established guidelines may be revoked/terminated

#### We have open communications in the workplace

IVL's communications are to be characterised by transparency, accessibility, and credibility. Information provided must be correct and factually accurate.

## Our financial and other reporting is to be done with honesty and accuracy

IVL's financial transactions must always be booked in accordance with generally accepted accounting principles and the bookkeeping and financial reports must indicate the transactions accurately and in a non-misleading manner.



Sustainability must permeate everything we do, in all parts of our activities. This applies in relation to clients, partners and other stakeholders – and in our internal work.

