

CORPORATE SOCIAL RESPONSIBILITY POLICY

QleanAir Scandinavia AB | Version 3 | Adopted Dec 4, 2018.



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CSR-policy for QleanAir Scandinavia

1. Introduction

QleanAir Holding AB operates in a world that expects companies to be aware of their impact on society based on environmental, economic and social factors.

This policy concerns QleanAir Holding AB's work in Corporate Social Responsibility ("CSR policy"). CSR is a concept underpinned by the idea that a company should take into consideration the development of society as a whole by considering the effect of its activities on customers, suppliers, employees and shareholders, as well as society and the environment as a whole. QleanAir Holding AB's CSR policy provides a description of the QleanAir Holding AB Group's targeted approach to such factors. QleanAir Holding AB's CSR policy is supported by the Group's other policies.

2. Values and business principles

QleanAir Holding AB's activities shall be conducted in accordance with the Group's vision, values and guidelines for sustainable development. In addition to all financial requirements, goals and guidelines of the company, business activities shall be conducted with high standards of integrity and ethics.

The QleanAir Holding AB Group, its companies and its employees shall observe the following guidelines:

- QleanAir Holding AB shall comply with the laws and regulations that apply in the countries where the Group operates as well as with the Group's CSR policy.
- QleanAir Holding AB respects the UN Declaration of Human Rights (www.un.org) and ILO core conventions (International Labour Organization) and accepts its responsibility to respect the rights of employees and society to the extent that they are affected by the Group's operations.
- QleanAir Holding AB has an open attitude in dialogue with those affected by the Group's operations. QleanAir Holding AB responds to requests from outsiders and communicates with relevant parties in a timely and efficient manner.

In areas where QleanAir Holding AB has an influence, the Group shall endeavour to ensure that suppliers and subcontractors comply with the relevant principles contained in this CSR policy. All employees within the QleanAir Holding AB Group are responsible for ensuring that they, as well as the operation within which they work, act in ac-

cordance with these values and business principles. It is each employee's responsibility to ensure that they have sufficient information about relevant laws, regulations and policies relating to all business, personnel and investment decisions.

The management within each business area is responsible for ensuring this CSR policy is implemented and complied with in the Group's operations. It is the responsibility of each senior executive to report all possible cases of fraud or other criminal behaviour to a member of the Group management. Confirmed breaches of QleanAir Holding AB's CSR policy will lead to immediate disciplinary action, including, after consultation with labour legislation, dismissal in cases of more serious departure from the guidelines.

3. Employees

The QleanAir Holding AB Group endeavours to be a respected employer – both for current and potential employees. QleanAir Holding AB shall provide a good working environment from a physical and psychosocial perspective. QleanAir Holding AB shall also endeavour to be an attractive employer with regard to the professional and personal development of its employees. This policy does not focus on commercial issues relating to each company's human resources function but provides rules of a character representing the minimum requirements. The relationship with and between employees shall be based on mutual respect and dignity, as well as a reasonable degree of influence in areas that affect the individual's work situation.

- The conditions of employment, including pay and working hours, offered to the Group's employees and its subcontractors shall meet at the least the minimum requirements of national legislation or industry standards.
- QleanAir Holding AB does not accept forced labour, bonded labour or other forms of involuntary labour at the Group's workplaces. Neither does the Group allow practices that limit the employees' freedom of movement.
- QleanAir Holding AB does not employ any person below 15 years of age and, where local legislation stipulates a higher age limit, no persons under this age limit are recruited.
- QleanAir Holding AB treats all Group employees equally irrespective of race, colour, sex, age, nationality, religion, ethnic origin or other distinguishing characteristics. The Group does not allow discrimination or harassment of any kind. ➤

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- QleanAir Holding AB recognises the right of employees to form or join trade unions.
- The working environment offered by QleanAir Holding AB shall be safe and healthy. Each company within the Group is responsible for ensuring that work is carried out in such a way that injuries and ill health are prevented. Written health and safety instructions shall be put into practice in all workplaces within the Group.

4. Market, customers and suppliers

QleanAir Holding AB's operations are based on close and long-term relationships with customers and other business partners. QleanAir Holding AB shall be perceived as a credible, long-term and reliable partner and shall act professionally, honestly and in an ethically sound manner. The Group does not accept corruption, bribery and unfair anti-competitive practices. All sales and marketing of QleanAir Holding AB products and services shall be in accordance with relevant laws and regulations in each country.

- QleanAir Holding AB shall not act in contravention of the applicable competition legislation in each country. The Group is not involved in cartels or other forms of unauthorised collaboration with competitors, customers or suppliers that restrict or distort competition. If any company within the Group is approached with a proposal for such form of cooperation, or has reason to believe that such collaboration exists between any of its partners, this must be reported to Group management and notification sent to the competition authority in the country concerned.
- QleanAir Holding AB shall not offer or provide any improper payment or other remuneration to any person or organisation for the purpose of inducing the person or organisation to act contrary to prescribed obligations to engage QleanAir Holding AB or retain the commission for the Group.
- QleanAir Holding AB shall not – either directly or indirectly – request or accept any form of improper payment or other remuneration for the purpose of inducing the Group to act contrary to QleanAir Holding AB's prescribed obligations. In order to avoid conflicts of interest, employees within the QleanAir Holding AB Group shall only give or accept gifts or services that are in line with common business practices, do not contravene relevant laws, do not have any significant economic value and cannot

reasonably be regarded as bribery.

- QleanAir Holding AB respects other companies' assets and protects the Group's tangible and intangible assets from loss, theft, infringement or misuse.

Suppliers/partners

In areas where QleanAir Holding AB has an influence, the Group shall endeavour to ensure that suppliers and subcontractors comply with the relevant principles contained in the QleanAir Holding AB CSR policy and, for example, offer their employees a safe and healthy working environment. QleanAir Holding AB does not buy products from suppliers who, when requested to do so, cannot submit a written declaration saying that child labour is not permitted in their production.

QleanAir Holding AB shall maintain appropriate processes for evaluating and selecting priority suppliers and partners. This evaluation process also takes into account the capacity to meet the requirements contained in this CSR policy. A follow-up of larger suppliers' ethical, social and environmental commitments shall be made annually and immediate action taken in cases where any guideline contained in QleanAir Holding AB's CSR policy have been breached. In accordance with QleanAir Holding AB's aim for transparency and trust, the Group reserves the right, pursuant to agreement with suppliers, to conduct independent audits of suppliers' operations and physical facilities with the help of its own employees and/or external partners. The results of completed follow-up audits are discussed with each supplier in order to assist them with any improvements to their work and reported annually to Group management.

5. Environment

QleanAir Holding AB's impact on the environment and the preventive measures it takes to reduce its impact on the environment are important issues for the Group. QleanAir Holding AB's "Environmental policy" expresses an ambition for the Group to take its share of responsibility for reducing its impact on the environment and to contribute to sustainable development. QleanAir Holding AB shall encourage the development and distribution of environmentally-friendly technology. The Group's environmental work shall be structured and, where justified, comply with internationally-recognised environmental management systems (e.g. ISO 14001). Environmental measures shall be taken as far as it is technically feasible, economically reasonable and environmentally justified to do so. (See also QleanAir Holding AB "Environmental policy".) ➤

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6. Social commitment

Each individual company within the QleanAir Holding AB Group shall endeavour to establish good relationships in the local communities where they operate. Business decisions likely to affect the community as a whole must, as far as possible, be preceded by, or as soon as possible be followed by, discussions with community representatives in order to identify any need for joint action.

QleanAir Holding AB shall be politically independent and not make any direct financial contributions to political parties or candidates.

7. Whistleblower

All employees of QleanAir have the right and the responsibility to report violations of the CSR policy and concerns that may threaten QleanAir's operations, finances or reputation, or actions that could be considered to be unethical or illegal in relation to QleanAir's stakeholders in areas such as, but not limited to; people and labour standards, discrimination and racism, environmental issues, financial integrity, accounting offences, conflict of interest, fraud, bribery and corruption and fair dealing. Suppliers and customers to QleanAir and external parties are encouraged to report concerns.

The person reporting decides what information is to be reported. To ensure adequate follow-up actions, the report should include as much detail as possible, and if possible, supporting evidence.

Concerns are to be reported to QleanAir's Chairman of the Board, Rolf Classon, chairman@qleanair.com.

The identity of the person reporting shall be protected during and after the initial evaluation and possible investiga-

tion. All investigations will be conducted in a confidential manner, so that information will be disclosed only as needed to facilitate review of the investigation or otherwise as required by law.

The principle for handling reports is that all reports are taken seriously with an adequate follow-up and timely feedback and information about the process to the person reporting. The Chairman of the Board is responsible for confidentiality and information security and that an adequate follow-up is made in a timely manner.

Reporters, who notify in good faith, will not face any risk of retaliation or other unfavourable treatment, even if it is later discovered that they were mistaken.

However, appropriate disciplinary or legal action will be taken against any person who is found to have made a disclosure maliciously, which they know to be untrue, or without reasonable grounds for believing that the information supplied was accurate.

8. Adoption and compliance

QleanAir Holding AB's CSR policy is adopted by the Board of QleanAir Holding AB once a year. The date and version of the policy is shown on the first page of the document. The latest updated version/edition of the policy shall be available at all times on QleanAir Holding AB's intranet along with relevant links to principles and guidelines adopted by the Group from the UN, the ILO and other organisations concerned with CSR. All employees within the Group are responsible for keeping themselves updated regarding the latest revised edition of the policy. This CSR policy shall be included in the induction training for all new employees within the Group.



Andreas Göth
CEO, QleanAir Scandinavia
Adopted December 4, 2018.