Scandinavian Enviro Systems AB (Publ)

Code Of Conduct

2020





Document Title	Document Number	Version
Code of Conduct SES	DRAFT	0.1
Author	Released By	Date
Thomas Sörensson		2020-03-02
Pictures: Maria Tellblom and SES		

Contents

Introduction	1
Society	2
Employees	3
Customers	4
Business partners	5
Owners	6
Environment	7
Communication	8
Compliance	9
Reference list	10





Document Title	Document Number	Version
Code of Conduct SES	DRAFT	0.1
Author	Released By	Date
Thomas Sörensson		2020-03-02
Pictures: Maria Tellblom and SES		

Introduction

With first-class technology, materials and innovative solutions, we at Enviro want to be seen as the natural partner for recovery and supply of valuable resources. Our ambition makes high demands on our most important resource, all our employees. It is you who transform our vision into reality and, with your commitment and know-how, keep us at the forefront of the global material recovery market. We will build the good company; one we are proud of. A company that makes a big difference to society and where people enjoy working. I am convinced that good forces are created from within and that the values that permeate our business are also communicated to our customers. That is why it is important that we have a number of guidelines that describe how we act and what demands we make on our partners. The code of conduct, which you are now holding in your hand, contains our rules. I would ask you to read through it carefully and to see it as a guide in our every-day work. When we are guided by our core values, we build the foundation for a strong Enviro. Together, we are creating a world-class company.

Being businesslike is essential for long-term profitability. At the same time, we need to have the courage to open up and show our human side. It is the company that makes the deals, but it is we as individuals who build relationships.



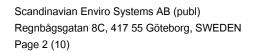
Create Confidence

At a time when competition is tightening every market it is not always hard facts that decide which company gains the customer's trust. Often it is our emotions that guide us. If differences in price and delivery time are small, we will usually buy from the company we like. By listening to customers, providing good service and being professional, we demonstrate that we are a supplier to be trusted.

The brand is built from within

The core of a brand is the corporate culture. It is often abstract and not easy to put your finger on. Corporate culture is built up over a long period of time through the interaction of many different individuals and aspects of business. With a positive atmosphere in the company that is based on consideration and respect, we build up our brand and ensure that our customers enjoy our company.

Rights and obligations Regardless of what job we have at Enviro, we all play an important part in creating a strong company. And just as employer and employee have a personal responsibility with obligations, we also have rights. If we ever find ourselves in an ambiguous situation, we should ask ourselves three questions. If we can answer yes to them, it will help us to act in the right way. Are my actions ethical and legal, and do they show respect for the surrounding world and the environment? Do my actions benefit Enviro? Would I accept these actions if I were a colleague, supplier, customer, shareholder or other concerned party?





Document Title	Document Number	Version
Code of Conduct SES	DRAFT	0.1
Author	Released By	Date
Thomas Sörensson		2020-03-02
Pictures: Maria Tellblom and SES		

2 Society

Enviro is a responsible company that complies with laws and regulations in the countries where we operate. We are working to achieve long-term, sustainable and positive development of both our company and society as a whole

An important local player

In some of the locations where we have production facilities, Enviro is the one of the larger private employers. This means that we have a responsibility for society's long-term wellbeing. By prioritizing and valuing close relations with inhabitants, politicians, schools, local media and authorities, we will create trust in Enviro. This also means that we do not make any political donations.

Striving for a sustainable society

Enviro's activities contribute locally by means of both tax revenues and jobs, and by active participation in the development of society. In a larger perspective, Enviro contributes with products based on a renewable material that is well suited to a sustainable society. By offering products which are not based on fossil raw materials and energy, Enviro's products make a difference for the next generation.

Human rights

For us, it is a matter of course to respect and comply with the UN Declaration of Human Rights. With our ambition to support the UN's Global Compact, we undertake to follow the ethical guidelines prescribed for global companies. This means, among other things, that we will always fight corruption, safeguard the environment and ensure the rights of our employees.



There is a mutual dependence between Enviro and our surroundings. For us, creating and maintaining good relations is a pleasant necessity





Document Title	Document Number	Version
Code of Conduct SES	DRAFT	0.1
Author	Released By	Date
Thomas Sörensson		2020-03-02
Pictures: Maria Tellblom and SES		

3 Employees

By stimulating wellbeing and personal development in a professional environment, we will be the company that well-qualified and competent personnel choose.

Equality and diversity

We do not permit discrimination in our activities. Regardless of ethnicity, nationality, sex, religion, sexual orientation, age, disabilities and trade union or political affiliation, everybody's equal rights and obligations must be emphasized. We believe that diversity enriches our business; it benefits our employees and our organization as well as our external relations. To ensure that our workplaces are pleasant to work in, bullying and inappropriate behavior are completely unacceptable. In our company, everybody has the same worth.

Child labor and forced labor

Forced labor or any other child exploitation is not permitted and we do not employ anybody under the age of 15. We comply with any local regulations that stipulate a higher minimum age. These elementary ethical rules for our workforce must be followed by our subcontractors and business partners.

Freedom of speech and association

Our employees have the right to join, and become involved in, the trade union of their choice. Our employees are also free to be politically involved and have the right of association.

Our integrity

Enviro's employees should avoid situations where their personal or economic interests could conflict with Enviro's interests. Together we must take responsibility for ensuring that information that could harm a person or the company is not disseminated and that the company's assets are protected from loss, theft or abuse.

Development and promotion

We believe in the importance of promoting personal development and conduct annual performance reviews together with all our employees. We want to encourage employees to think new and we reward good performance. We promote and recruit in accordance with the commercial requirements our company has and on the basis of the qualifications required for the work to be performed.

A secure working environment

Our goal is that our working environment should be so safe that occupational accidents do not occur. To reach this goal, all stoppages, mishaps or events that could negatively affect the working environment are documented. Incidents are followed up with action plans to ensure that they are not repeated.

A drug-free workplace

For our common safety and the individual employee's health, alcohol and drugs are banned from our workplaces. If an employee is suffering from addiction, we want to help by providing support measures leading to a lasting recovery.





Document Title	Document Number	Version
Code of Conduct SES	DRAFT	0.1
Author	Released By	Date
Thomas Sörensson		2020-03-02
Pictures: Maria Tellblom and SES		

4 Customers

Our customers are the basis of our whole existence. We respect each customer's unique requirements and prerequisites. With innovative thinking, drive and commitment, we want to create value and contribute to our customers' success.

Professionalism and availability

Enviro's deep knowledge and long experience are a result of many years of product development. And today, we have products we can be proud of. But we could not have achieved this completely on our own – close collaboration with customers and brand owners characterized by openness and professionalism has formed the basis of our knowledge bank. For us, listening to views, wishes and requirements expressed is a matter of course and has been very valuable in our innovation work. In return, we are more than happy to share our knowledge and help our customers to make commercial and wise decisions.

Our product responsibility

The products and services we supply must be of high quality and contribute to success at every stage in our industry. We have a common responsibility to live up to our promises. We are responsible for assessing chemicals, management systems, product safety and transport documentation as well as ensuring that laws and directives covering our line of business and production are being followed. Enviro's management and employees are attentive to that laws, regulations and other requirements are satisfied.

With first-class service and a high level of availability, we will constantly strive to improve ourselves and generate high customer satisfaction.

Enviro wants to build close and long-term relations partners who, like us, share their experience and know-how.



5 Business Partners

Development and innovative thinking form the basis of Enviros relations with suppliers, machine manufacturers, engineering firms, government bodies and other partners of importance to our business.

With trust and respect

Good and close relations with our business partners are very important for Enviro. We treat them with respect and we value openness and honesty. By demonstrating good results and a confidence-inspiring approach, Enviro will reinforce its image as an attractive partner and customer.

Common values

Enviro always complies with relevant laws and regulations in the countries where we are active. It is thus natural for us to choose business partners who apply similar principles in ethical, social and





Document Title	Document Number	Version
Code of Conduct SES	DRAFT	0.1
Author	Released By	Date
Thomas Sörensson		2020-03-02
Pictures: Maria Tellblom and SES		

environment-related issues. Enviro expects the companies who have chosen to collaborate with us to adhere to the values expressed in our business code.

Integrity

Enviro's employees may not accept bribes, engage in bribery or participate in any form of corrupt business activity. We also do not give or accept gifts with more than a symbolic value or participate in activities that could affect our objectivity in business decisions.



We shall always strive to be a company that attracts shareholders. Our goal is that Enviro should generate a long-term, stable and sustainable increase in value.

A true picture

Enviro places a high value on openness and accessibility. We talk openly about our results and the investments we are planning and hold a constructive dialogue with interested parties. It is our responsibility to continuously provide our owners with correct and truthful information.

We follow regulations

We follow the regulations governing listed companies. Our financial results are published in quarterly reports and annual reports. Additionally, we provide news about our achievements and other relevant information as it can be shared in public.

Accessibility

We endeavor to make it as simple as possible to quickly find information about Enviro. Our financial statements and sustainability reports are easily accessible on our website www.envirosystems.se along with other documents that describe our business activities.

By formulating sustainable strategies and making the right decisions, we take responsibility for developing the company in a positive direction.







Document Title	Document Number	Version
Code of Conduct SES	DRAFT	0.1
Author	Released By	Date
Thomas Sörensson		2020-03-02
Pictures: Maria Tellblom and SES		

T Environment

In the recovery of materials and manufacture of our products, we mainly use the resources of consumed by humans (waste), energy and water. Consequently, we are responsible for minimizing the environmental impact at every stage of the recovery process.

Our valuable raw material

Enviro only uses End of Life Tires (ELT) collected and supplied in accordance with applicable laws and regulations.

Sustainability through Producer responsibility

Enviro' raw material is sourced from approved and audited suppliers. Most of it currently comes from Sweden under the Producer responsibility act. We work in cooperation with the parties appointed by the industry where such acts are in place.

With tires as a source of energy

Enviro is working actively to reduce the impact of fossil fuels. All our production units are environmentally certified in accordance with ISO 14001. The majority of the energy consumption in our production is originating from the recovered energy from ELT.



Products for the future

Enviro' products are based of several renewable raw materials that can be recycled or potentially used to decrease the CO-footprint of fuels. We report our products' impact on the environment openly and impartially. When the CO2 footprint of recovered Carbon black (rCB) is compare to virgin Carbon black, originating from fossil resources, external life cycle analyses* show that our products account for about 80% less CO2 impact.

* IVL, 2019.





Document Title	Document Number	Version
Code of Conduct SES	DRAFT	0.1
Author	Released By	Date
Thomas Sörensson		2020-03-02
Pictures: Maria Tellblom and SES		

8 Communication

Communicating and sharing information are necessary for efficiency, progress and wellbeing. Enviro should always conduct an open, constructive dialog – both internally with its employees and externally with the outside world

Dialog with the market

We are convinced that fruitful discussions with our customers and partners lead to better results for everybody. Accordingly, we want to promote a constructive dialog based on mutuality and respect. We also welcome views and information from the market regarding its wishes, needs and demands.

A communicative work environment

Motivating and learning from each other, showing openness and responsiveness are vital when it comes to building a well-functioning workplace. The more we share, the better we can carry out our work. Enviro' employees thus have a duty to contribute to a constructive and respectful dialog with their colleagues and should give each other feedback.

Group management's responsibility

As employees, we all have the right to information about Enviro' overall goals, strategies and how our own work contributes to the company as a whole. Every manager in the company is responsible for employees being given the information needed to be able to carry out his or her work efficiently and safely. We can keep ourselves updated about other issues involving the company via Enviros web page www.envirosystems.se and attending internal meetings. The management team will also be available welcoming questions and dialogue.

Our external information

It is important that the company's communication with the outside world is correct, consistent and coordinated in time. Market reports or other major events are thus the responsibility of Enviro's PR/IR communication partners on the instructions of group management. If radio, TV and newspapers request a statement from the company, they should first and foremost turn to the CEO, CFO or the PR/IR partners. Information on press contacts can be found on our website.

Enviro in social media

Today, social media are part of everyday life and are becoming increasingly important for communication. Accordingly, we want to emphasize the personal responsibility we have as employees to be loyal to our employer. What is written in social media should also be possible to communicate in person to group management and be in line with the company's values laid down in this code of conduct. As a private enterprise, Enviro is not subject to the principle of public access to information and employees may not reveal trade secrets.



We are all individuals in a complex and changing world. Individuals who work in groups and in a social context. Together, we are building a company for the future.





Document Title	Document Number	Version
Code of Conduct SES	DRAFT	0.1
Author	Released By	Date
Thomas Sörensson		2020-03-02
Pictures: Maria Tellblom and SES		

9 Compliance

This code of conduct applies to all employees at Enviro, regardless of function or position. All managers and persons in leading positions are responsible for ensuring compliance with the code.

Our management

Enviro' CEO has the ultimate responsibility for ensuring compliance with the code of conduct. It is, however, up to managers and employees to be acquainted with and take responsibility for the application of the code. Every year, group management follows up the work on the code.

Handling deviations

Reporting of deviations from the code are first handled by the management team.

Reporting and measures are documented.

How to report

Enviro does not yet have a whistleblower function but encourages employees to report, either openly or anonymously, suspected irregularities in the company to the management team or in applicable case to members of the board.

If conflicts of interest arise

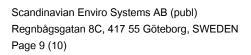
Employees must inform the company if they have a commitment that could constitute a conflict of interest with the company. The employee's immediate superior then takes responsibility for arriving at a solution, together with the employee, that is satisfactory for both parties.

An accessible code of business practice

Enviro' employees will attend information meetings to become acquainted with the code of conduct. It is available on each site and on our website where business partners, suppliers and owners can read the ethical rules and values that permeate Enviro.



Enviro has policies and guidelines for many situations that can arise in the company. When in doubt, it is always a good idea to search for information in these documents.





Document Title	Document Number	Version
Code of Conduct SES	DRAFT	0.1
Author	Released By	Date
Thomas Sörensson		2020-03-02
Pictures: Maria Tellblom and SES		

Reference list

The Universal Declaration of Human Rights http://www.un.org/en/universal-declaration-human-rights/

ILO Declaration on Fundamental Principles and Rights at Work http://www.ilo.org/declaration/lang--en/index.htm

Rio Declaration on Environment and Development http://www.un.org/documents/ga/conf151/aconf15126-1annex1.htm United Nations Convention against Corruption https://www.unodc.org/unodc/en/treaties/CAC/

UN Global Compact www.unglobalcompact.org

