

# SONO

## GROUP



## Code of Conduct

The Code of Conduct is Sono Group's policy regarding human rights, working conditions, work environment, environment, and anti-corruption.



## Preface

Sono Group places high demands on its own operations and takes great responsibility for the impact it has on the environment, society, and Sono Group's customers' operations in a longer perspective.

Our business shall be conducted in a professional, safe, and environmentally friendly manner that meets all requirements set by applicable legislation, applicable industry regulations and agreements. To ensure sustainability, both qualities, the environment and the social dimension are considered.

Sono Group's business shall be characterized by a high ethical and moral standard. Sono Group also strives to be a responsible and developing employer. Sono Group places the same high demands on suppliers and their potential subcontractors.

Tore Skedsmo

CEO

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## 1. General principles

For us to be a leader in our industry and run a successful and healthy business, it is crucial to ensure a shared set of values and common principles. As a support for all employees in their daily work, there is our Code of Conduct. This Code of Conduct shall be known and applied by all employees within Sono Group's companies.

Each of our employees contributes to Sono Group being perceived as a reliable and responsible group that always lives up to its commitments. Sono Group has long-term business relationships as a foundation for creating customer and ownership value. We will interact with the environments in which we operate, with our employees, with our business partners and with society at large.

## 2. Social responsibility

Sono Group's operations are based on long-term and strong relationships with customers and suppliers. Sono Group contributes to local development through a long-term presence and profitable operations that will be constantly strengthened and further developed.

The employee's motivation and drive to perform well and to interact with our business partners and with the world around us in general is crucial to our success. Our business must be based on good ethics and great respect for all individuals both inside and outside the company.

Good business ethics and clear values are central to maintaining the trust of the market and stakeholders. We will reflect our customers and markets in the company's composition. Diversity and equality are important to maintain the competitiveness and dynamism of our organization. Sono Group is and will continue to be an attractive employer.



### 2.1 Human rights and labour law

The Sono Group respects and adheres to the United Nations Universal Declaration of Human Rights (1948). Sono Group respects and complies with the International Labour Organization's (ILO) eight core conventions on fundamental principles and rights at work and the UN Convention on the Rights of the Child.

**Child labour is prohibited (ILO 138 and 182, UN Child Rights Convention, Article 32)**

Child labour refers to any economic activity carried out by a person of compulsory school age or younger. No worker may be under 15 years of age (or 14 if national law permits), or younger than the minimum age for work, if this age exceeds 15 years.

Young people between the ages of 15 and 18 may work in non-hazardous work, provided that they have reached the legal age to work and have fulfilled national compulsory schooling.

If child labour is detected, Sono Group must act in the best interests of the child and find appropriate solutions in consultation with the child and the child's family.

**Forced labour is prohibited (ILO 29 and 105)**

Forced labour refers to work or services performed through the threat of punishment or the like and not performed on a voluntary basis. Forced labor, including slave labor, contract labor, or involuntary prison labor must not occur. All work must be voluntary, and the employee must have the right to quit his or her job after a reasonable period of notice.

**Discrimination and harassment are prohibited (ILO 100 and 111)**

Discrimination refers to the separation of workers that is not based on merit or qualities but involves unequal treatment on inappropriate grounds. Sono Group shall work for diversity and equal opportunities in its operations. Discrimination based on ethnicity, sex, marital status, pregnancy, religion, social or ethnic origin, nationality, disability, political opinions, trade union involvement or sexual orientation must not occur.

Harassment refers to when workers are subjected to harsh or inhumane treatment, including sexual harassment or any form of mental or physical punishment. There must be no conduct, including gestures, speech, or physical touch, that is sexual, coercive, threatening, exploitation or exploitative within Sono Group.

**Freedom of association and collective bargaining (ILO 87 and 98)**

Freedom of association and collective bargaining refer to formalised and/or non-formalised cooperation to promote and defend one's own interests in working life and in the relationship between employer and employee. The Sono Group is expected to recognize and respect the right of workers (and employers) to organize, join organizations they wish to participate in, as well as the right to bargain collectively. Every employee should be aware of the possibility of influencing their work situation.

## 2.2 Terms of employment, wages and working hours

Sono Group must at least comply with local laws and regulations in the countries in which it conducts its business.

Salary must be paid directly to the employee at the agreed time and in full. The Sono Group shall provide fair wage and guarantee minimum wages in accordance with applicable national provisions or collective agreements. In cases where overtime compensation is included in the employment contract, compensation must be paid and clearly specified in the payslip.

Workers must have at least one rest day a week. Weekly working hours may not exceed the legal limits or 60 hours per week, including overtime. Leave, including holidays, public holidays, sick leave, and parental leave shall be reimbursed in accordance with national law.

### 3. Working environment

Sono Group strives to provide and continuously improve a safe and healthy workplace by ensuring safety in work processes, preventing and addressing unsanitary conditions, and taking measures to promote health and well-being.

Sono Group is committed to offering every employee a drug- and alcohol-free workplace and does not tolerate any form of harassment, revenge, violence, foul language or bullying. All employees must be treated fairly and equally.

#### **Safe and hygienic work environment (ILO 155 and 170)**

A safe and hygienic working environment means that the worker, when in a place under the direct or indirect control of the Sono Group, must be guaranteed to be free from or protected from conditions which may endanger the worker's physical and/or psychological health.

Employees should receive training on the possible health risks that the work may entail, including fire safety, hazardous operations and first aid. The Sono Group shall, as far as possible, provide relevant protective equipment and ensure that health and safety information is readily available at the workplace. Emergency exits must be clearly marked and illuminated and must not be blocked. Evacuation exercises and fire alarm testing should be carried out regularly.



#### 3.1 Environment

The goal is to continuously reduce Sono Group's environmental impact with systematic improvement work throughout the chain. Sono Group strives to make the use of energy and natural resources more efficient. Sono Group promotes systems for the reuse and recycling of materials and prevents and limits pollution of the environment. Sono Group applies a life cycle perspective regarding the environmental impact of products and services.

The ambition is to have a great sensitivity to customers and suppliers wishes and thus be able to meet the market's environmental requirements.

Transparent reporting on both successes and challenges in the environmental field is a matter of course for Sono Group.



The business's impact on the local and global environment shall be minimized. Sono Group must systematically work together with suppliers for sustainable development. Sono Group does this through education, comply with legislation, work preventively and constantly conduct improvement work.

The majority of Sono Groups sales companies are certified according to ISO 9001 and ISO 14001. The certification processes are carried out in cases where it is justified based on requirements from customers or suppliers. The companies within the Sono Group, that are not certified, conduct systematic quality and environmental work with the pursuit of continuous improvement. Quality and environmental goals must be measurable and both goals and plans must be followed up within the framework of each company.

#### 4. Anti-corruption

Sono Group respects the laws and regulations regarding business ethics in the countries where the companies operate and requires suppliers and partners to act in the same way.

Sono Group does not accept bribes or other payments that may influence decisions or extortion in any form, either as a donor/initiator or recipient.

Purchases and sales must be handled with the utmost integrity. Therefore, neither Sono Group nor the Group's employees must make or receive offers of gifts, benefits or entertainment that may influence the employee's or customer's decision-making. Offers of smaller gifts, hospitality and payment of overheads are commonplace and a natural feature of business relationships. After careful consideration, this can be accepted, if it is of little value, except in cases where it could unduly affect the outcome of a commercial transaction.

Good ethics – Sono Group's ambition is to conduct its business with good ethics and must in all respects conduct legally correct business operations.

Close stakeholder dialogue – Sono Group's ambition is to conduct a business in close dialogue with employees, business partners and with other actors who influence and are affected by the business.

Responsibility of employees - employees must follow Sono Group's principles and feel responsible for their own actions and for Sono Group's products and services.

All employees must take special care to prevent unauthorized disclosure or misuse of confidential company information. However, employees should strive for transparency and encourage the exchange of knowledge within the framework of confidentiality.

Sono Group employees shall avoid any contact that could lead to or indicate a conflict of interest between personal activities and Sono Group's business.

Sono Group does not accept any fraudulent conduct, bribery or corruption whatsoever. Business gifts or hospitality shall only be offered or accepted in accordance with local laws and business practices as well as in accordance with the Sono Group's ethical guidelines.

If these principles are not considered, the Sono Group will act immediately and consistently towards the person(s) concerned.

## 5. Continuous improvement

The work on improvements and development of the business and the organization must take place continuously. Sono Group plans, implements, evaluates, improves and then continues the work of planning, implementing, etc. Business development and continuous improvement are of crucial importance for the ability to follow the changes in the world around us, meet ever-increasing demands and streamline one's own processes.

## 6. Compliance

The Code of Conduct sets out the basic principles of Sono Group's operations. Each manager, within his area of responsibility, is obliged to ensure that both employees and business partners are informed about the content of the Code of Conduct and the requirement for its compliance.

The Code of Conduct shall always be included as part of contract documents entered with business partners.

Violations of the Code of Conduct, if not remedied within the time frame determined by the Sono Group's CEO, may lead to a decision to terminate the business cooperation.

Violation or suspicion of a violation of the Code of Conduct shall be notified immediately.

Notifiers are guaranteed anonymity if desired.

Notifications must be processed as soon as possible by the receiving person (HR Manager or CEO) and, if desired, reporting back to the notifier must be made.

Violation of the Code of Conduct leads to corrective action and, in the case of serious violations, to disciplinary action.

Questions about this Code of Conduct can be addressed to the immediate manager, HR manager or to the company's management team.





## 7. Review

The work of this Code of Conduct is dynamic and is continuously updated so that it is constantly adapted to the situation in which Sono Group and Sono Group's suppliers find themselves. The latest updated version is available on the intranet. If you do not have access to the intranet, you can get the latest version from your immediate manager.

