

Stena Metall Group Code of Conduct

Background

The family owned Stena Metall Group creates jobs and provides value by offering competitive sustainable business solutions in the area of industrial recycling, raw material management and recovery, supply of bunker oil, finance operations, processing and distribution of steel and aluminium.

Since its start in 1939, the Stena Metall Group has developed from being a local operator to an international company with subsidiaries and business partners all over the world.

Today the Stena Metall Group is acknowledged and perceived, as a leader in the business areas and geographical areas where it operates. This position is reached on the base of using sound business principles, reliability, simplicity and development when interacting with interested parties.

However, no matter where the Stena Metall Group operates, in order to be consistently successful it is vital that, each and every one of us performs his or her duties in such a way that the Stena Metall Group is perceived and acknowledged as economically, socially and ethically responsible.

As expressed by Dan Sten Olsson, majority owner of the Stena Metall Group: "Every day, our customers, employees, suppliers and financiers as well as society and other interested parties expect us to keep our promises and satisfy the expectations that we, directly or indirectly, may have given them. *The world around us invests in us because we invest in it. In the final analysis, we live in a partnership; our productivity is determined by the confidence we inspire by the way we act in our relations.*"

The Stena Metall Group will only achieve long-term business success by acting in an ethically, environmentally and socially responsible way, which in turn can only be secured if the business is based on constant achievement of good economic results.

This is the very heart of the Stena Metall Group Code of Conduct as regards sustainable development, employee relations, health and safety, environmental protection and community relations. The Stena Metall Group shall follow this Code of Conduct as well as the applicable legislation. It is our responsibility to ensure that we are conversant with all applicable laws and current practices.

The Stena Metall Group Commitments

Business and External Relations

1. All activities within the Stena Metall group aim at creating value by offering competitive services and products on the national and international markets.
2. We shall conduct our business observing good business practices.
3. We do not accept extortion and we shall not – neither directly nor indirectly – offer, promise, ask for, demand or accept bribery or other improper benefits.
4. We strive for mutual openness and proactiveness when communicating with all company stakeholders, providing essential, consistent and correct information within the limits of commercial confidentiality.
5. We honour open markets and fair competition and do not enter into discussions or agreements with competitors on pricing, market sharing or any other fair competition limiting activities.
6. We set the same high requirements and standards on our suppliers, subcontractors, customers and partners (further called business partners) as on our own operations. When we evaluate and select business partners we shall also assess their ability to meet the requirements of our Code of Conduct.
7. Any business partner who does not meet these standards runs an increased risk of being excluded from our value chain, including cancelling of existing contracts
8. Our Commitments shall be communicated to all our business partners.
9. We encourage all our business partners to impose social and environmental requirements in their value chain.

Relation to employees

10. We shall guarantee fair employment conditions and opportunities (depending on local praxis and conditions) for everybody, without distinction or discrimination on the grounds of race gender, age, national or ethnic origin, pregnancy, disease or disability, religion, sexual orientation, union membership or political affiliation.
11. We support and respect the right for all employees to enjoy the freedom of association of their choice and their right to bargain collectively.

12. Our employees shall have access to a workplace free of harassment or abuse and condemn any use of forced labour. We do not accept any form of violence, threats or destructive behavior in the work place.
13. We do not accept any form of political, religious or other propaganda in the workplace.
14. We provide a safe and healthy work environment for all employees, contractors, visitors and suppliers. All accidents and occupational injuries can be prevented.
15. Employees shall get necessary information and training in order always to have the knowledge and skills to perform their work safely and correctly. Stena Metall Group strives to give the employees good opportunities to train for job enrichment and wider responsibilities.
16. All of Stena Metall Groups employees shall confirm that they understand the Code of Conduct in its entirety and its meaning in practice and that they will later cooperate in the follow up of the compliance with the code or any conflicts. The Code of Conduct shall be an integral part of the employment contract.

Human rights

17. We shall support and respect international agreements on Human Rights, and we make sure we are not complicit in Human Rights violations.
18. We support the ILO:s guidelines on child labour with the aim of the abolition of child labour in our sphere of influence.
19. We do not accept any form of bonded or forced labour and we do not accept the use of prison labour or illegal labour in the production of goods or services for us.

Export and trade

20. We see to that trade of waste and oil is handled, in a safe and responsible way in accordance with international agreements and local laws.
21. We make sure the Receiver of waste has got the knowledge and competence of, and is committed to, handling waste in a legally correct and ethical way.

Environment

22. We promote the sustainable and ecologically sound use of resources respecting precautionary principles for the protection of the environment, preventing pollution, enhancing the effective use of energy, minimizing waste and emissions of greenhouse gases.
23. We encourage the development and diffusion of environmentally friendly technologies.
24. In all our different business activities we shall always be helpful in offering our partners advice or help in collection, treatment and recycling of waste into new valuable resources or energy.
25. Besides the positive effect of the Stena Metall Groups recycling business activities, we always strive to minimize the impact our operations in themselves might have through emissions and other environmental effects.

Actions in the event of deviations from the Code of Conduct

Reports of behavior conflicting with the Code of Conduct within the Stena Metall Group shall be submitted to the closest manager, or where there is reason to believe that this will not have any effect, to this person's superior or to the HR Department of the Stena Metall Group.

All reports shall be taken seriously and shall be investigated. There must not be any type of reprisal whatsoever for the reporting of conflicts with the Code of Conduct, or for participating in the investigation of a complaint.

As a last resort, if anyone would wish to report anonymously, and other channels for reporting are excluded, reporting can be done to an Internal Whistle Blowing Function. Receiver of the information is Lennart Jeansson, one of the Stena Metall Group board members.

Reporting anonymously to a Whistle-Blowing function is however subject to legal limitations. Therefore, attention will only be given to claims with a minimum materiality in accordance with the Law. Other complaints will be disregarded.

Follow-up and reporting

We will follow-up on compliance with the Code of Conduct once a year. The follow up will be in the form of a written report.

All of the Stena Metall Groups employees shall confirm that they understand the Code of Conduct in its entirety and its meaning in practice and that they will later cooperate in the follow up of the compliance with the Code or any conflicts.

We reserve ourselves the right to make unannounced inspections at the premises of our business partners. Briefing on the Code of Conduct is a natural part of our introduction for new employees and business partners.

The Code of Conduct's guidelines are to be incorporated in the Stena Metall Group no later than two years from the adoption of the Code.