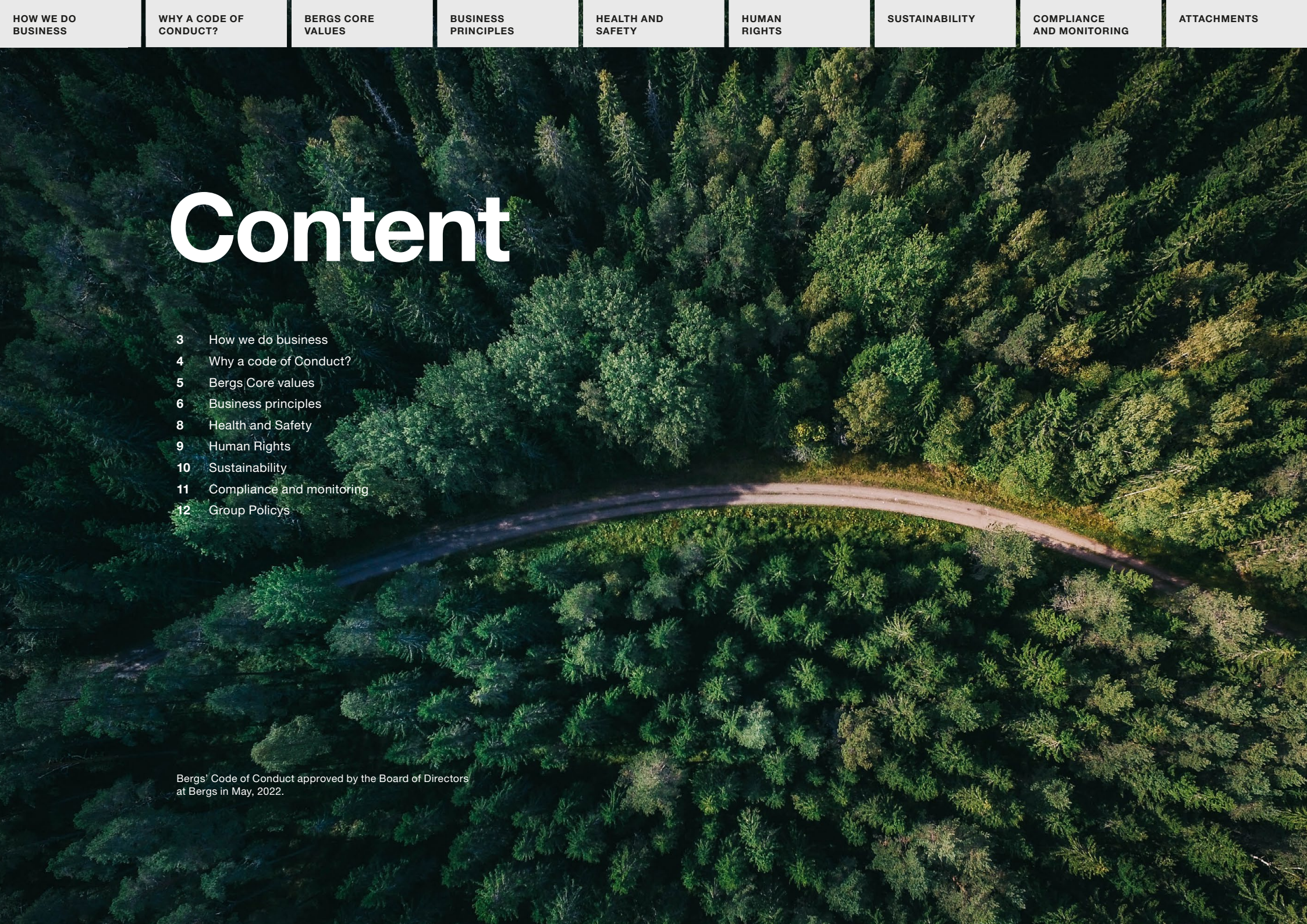


Code of Conduct

– or how we do business

BERGS



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Bergs' Code of Conduct approved by the Board of Directors at Bergs in May, 2022.



How we do business

For many of you, working at one of our companies with an already established brand name, the Bergs Group perspective perhaps isn't always on top of the agenda. However in the eyes of our investors, customers, suppliers and different stakeholders, this is what we are measured on.

Bergs has a history of more than 100 years as a company and a lot has been accomplished. We are clearly focusing on building a profitable, sustainable and growing group of companies with the aim to further process and increase the value of wood. For that reason, we must raise our views and see us as a part of something bigger and also that what we do, say and act has a real meaning.

All companies in the group have always had a strong commitment to customer service, product quality, employees and development – and we deliver, thanks to the effort and dedication you put forth, day in and day out.

Key to our performance in these areas is an equally strong commitment to doing business ethically and with integrity. Our reputation and continued success depend largely on our support – yours and mine – to this commitment. No success is meaningful if it's not achieved the right way.

This Code of Conduct, which has been decided by our Board of Directors, is the cornerstone of our culture and explains the principles that define our Group. Read the Code thoughtfully and reflect on its meaning.

Our Code of Conduct is effectively the essential how-to guide for doing business at Bergs Group. Our leaders have a special responsibility to lead with integrity and in ways that protect and enhance the reputation of our team and our company.

Every employee, director, and manager, regardless of location or position in the Company, has an obligation to read this Code, understand it, and follow it every day. Everyone who works at or with Bergs should feel confident about our high ethical standards, our honesty and our integrity. That starts and ends with each of us.

If you have questions about the Code – or if you have concerns about possible ethical violations in the workplace – I urge you to talk immediately with your supervisor or your Human Resources Manager if applicable at your company. At any time, you can also use the Whistleblower function, now operational and with contact information on the Groups web. All communications will be treated confidentially and without risk of retaliation.

Peter Nilsson
CEO of Bergs

Why a Code of Conduct?

- Bergs Code of Conduct sets out the values represented by the company and provides guidelines for how employees and those representing Bergs in various contexts are expected to behave.
- The Code of Conduct contains guidelines for the rights, the duties and responsibilities of Bergs employees in relation to business principles, health, safety, working conditions, respect for human rights, the environment and sustainable forestry and material supply. The guidelines are minimum requirements and should not be considered a complete list.

Our code applies to everyone!

The Code of Conduct applies to all of us, from our Board of Directors to each of our colleagues world-wide. As a manager/supervisor or leader, you have a particular responsibility to lead by example and conduct our business in accordance with this Code. You make sure people on your team are provided with the training necessary to understand the Code and the policies related to it.

We shall always comply with the local laws, regulations and rules in each of the countries where we operate. Our Code sets the minimum requirements. If any local, national or international laws, regulations or rules take a more demanding position on matters contained in the Code, they shall be observed and complied with. In the case of conflict between this Code and mandatory local laws or regulations, the local laws or regulations shall prevail.

We all need to commit to the code!

As a company, we are committed to conducting our business with honesty, integrity and high ethical standards. It is important for each and every one of us to understand this, to act accordingly, be accountable, and follow these principles and our core values in our daily work.

We are all part of building the continued long-term success of our company independent of what roles we are in. Failure to follow the principles outlined in our Code of Conduct will be taken seriously and could result in disciplinary action, ranging up to and including dismissal





Bergs’ core values

Commitment, Quality and Responsibility in everything we do!

Our core values describe how we should act towards each other and towards our customers, suppliers and other partners.

→ Quality

We are thorough!
 For us, quality means having a good working environment, that we treat each other, our customers and partners kindly and respectfully, and that we have a high quality of our products we leave behind. Accuracy, good planning, order and structure, pride, sustainability, respect for each other, functioning equipment and the right deliveries are things that are often mentioned when we employees describe what we mean by quality.

→ Commitment

We care!
 For many of us, commitment means showing interest and caring, doing our best. We are helpful and take our own initiatives and we try to find solutions to problems that may arise. We come up with suggestions for improvements and we dare to think in new directions. We can take and give constructive criticism in a professional way, without offending or feeling offended.

→ Responsibility

Our actions are of importance!
 Taking responsibility means that we understand that what we do – or choose not to do – matters. It can be about treatment and language use, work environment and safety, or to complete our work tasks in a professional manner. As employees, we are ambassadors for our brand. When we employees describe responsibility, we mention obvious things such as being on time, following rules, greeting everyone kindly, respecting co-workers, or “sounding the alarm” when we discover risks and report an incident or a risk observation.

Business principles

→ Our conduct in all situations, regardless of country or market, shall be characterized by responsibility as well as respect for customers, suppliers, business partners and the local communities in which we operate.

We shall exercise good judgment when representing Bergs.

We keep accurate and complete records. This includes both financial and non-financial records such as meeting minutes, memoranda, contracts, financial statements, payrolls, expenditures, human resource records and other records containing personal data, safety and environmental records, product information, and accounting source documents.

We make systematic improvements to develop the business and reduce environmental impact throughout the value chain. We are based on a life cycle perspective and bio-based circular economy.

Laws, rules and regulations

Bergs complies with applicable laws, rules and regulations. Bergs respects and complies with competition rules, environmental legislation, labour market laws, agreements and other provisions that provide a framework for Bergs operations. If there are any differences between the Code of Conduct and the above named regulatory frameworks, the regulation with the highest standard is to apply.

Integrity and anti-corruption

All forms of corruption, violation of competition laws, bribery and money laundering are prohibited, Bergs does not tolerate any form of corruption or fraud. We oppose all unlawful restriction of competition. Bergs employees shall not give or accept personal gifts, services, trips, entertainment or other benefits of any significant value to or from suppliers or other business partners that conflict with



applicable laws and good business practice or which may affect or be considered to affect the objectivity of decision-making.

All benefits and business entertainment shall be characterized by moderation and openness. An employee who receives a benefit or an offer of a benefit that he or she believes to be contrary to the Code of Conduct shall immediately return the gift to the donor and report the incident to their immediate superior.

Conflicts of interest

Employees must act in Bergs best interests and avoid conflicts of interest.

A conflict of interest arises when an employee's private interests and personal relationships interfere, or may be considered to interfere, with the interests of Bergs.

When performing their duties or assignments, Bergs employees must not favour their own personal or financial interests, or those of a related party. A "related party" refers to a closely related person, including family members, relatives, close friends or associates.

Information security

Information security has high priority. All employees are required to process information in accordance with applicable policies, guidelines and legislation.

Confidential information about Bergs strategies, activities, and business operations shall be protected and not disclosed to any unauthorized parties. Confidential information that Bergs receives from a third party shall be processed and protected in the same way as our internal confidential information.

We work continuously to protect our information systems and reduce risks associated with information processing.

Responsible business

We are a part of a global challenge to supplying sustainable wood products to a growing population, while also protecting biodiversity and mitigating climate change. Bergs strategy for sustainable business development is to work with customers, business partners and suppliers to implement measures that promote long-term responsibility.

We shall be viewed as an attractive workplace for by both existing and new employees. Everyone shall contribute to achieving the business goals, which is why we constantly develop our leadership and focus on employee engagement and skills development.

We follow international conventions for corporate responsibility.

Tax and money laundering

In countries in which Bergs operates, applicable law and regulations regarding tax and anti-money laundering measures must be complied with. Bergs employees must not accept, support or facilitate breach of regulations regarding taxation and money laundering.

Stakeholder dialogue

We engage in social issues, participate in debate and maintain active dialogue with our owners, employees, customers, suppliers consumers, trade organizations, governmental and non-governmental organizations.

We shall always provide accurate and transparent reporting of our business.

Brand and Market communication

In our product labelling, marketing and advertising, we provide information that is ethically correct and not misleading. Our marketing is aimed at increasing our brand value and sales, and shall not conflict with the brand promise. We do not sponsor any political parties or religious activities.

Safety and risk management

Bergs shall be well prepared for handling crises and emergencies. We work actively on risk management and are observant to changes and developments that may pose a threat to the company.

Society

Bergs shall be a responsible and credible company. We shall actively contribute to positive market development in the markets where we operate.

We engage in constructive dialog with all stakeholders that are affected by our operations.

Our communication is characterized by honesty, openness, accessibility and speed. It also aims to create relevant and credible dialogues with our target groups.

» Bergs strategy for sustainable business development is to work with customers, business partners and suppliers to implement measures that promote long-term responsibility. «



Health and safety

→ A safe and healthy work environment is a priority at Bergs and we work systematically to continuously identify and reduce risks. We consider a proactive health program to be an essential enabler for sustainable performance and a profitable business.

Our health and safety work shall be characterized by close collaboration between management, employees, the safety organization, occupational health and other partners.

Health and safety means the provision of leadership, workplace environments and work practices that result in a culture where every person is committed to preventing injury and occupational illness, and where we actively promote psychological and physical health and well-being for all our people.

Risks must be constantly evaluated such that protective measures can be taken. Bergs must provide protective equipment and safety training for carrying out tasks. In the event of process disturbances, priority must be given to work safety rather than production.

Bergs employees must contribute to their own and their colleagues' healthy and safe working environment, by acting in a safe manner and complying with existing instructions and procedures and also by addressing risks and incidents.

Work environment and safety

We work actively on continuous improvements to the work environment. We promote high safety standards and the prevention of accidents and injuries.

Our work is based on the national legislation of each country where we operate. It is however in Bergs interests to maintain higher standards, through internal policies and instructions, in order to ensure safe workplaces.

Health and wellness

Ensuring good health and wellness of our employees is an integral part of our way of working. We invest in health promotion activities to contribute to healthy working lives of our employees.

Bergs employees must not be affected by alcohol or drugs at the work place.



Human rights

Bergs must support and respect protection of internationally recognised human rights, including rights under the UN Convention on the Rights of the Child. Where Bergs identifies a risk that Bergs, through its operations, is contributing towards breach of human rights and children’s rights, appropriate action must be taken.

Child labour

Child labour must not occur at any Bergs facilities, or in activities conducted by Bergs business partners.

Forced labour

Bergs must not use, support or benefit from any form of forced labour. Employees must be able to move freely during their employment and be free to leave their employment following termination in line with applicable legislation and agreements.

No form of penalty is permitted and no employee shall be forced to hand over valuables or identity papers to the employer.

Freedom of association

The right of workers to form or join trade unions and bargain collectively must be respected.

Trade union representatives must be able to carry out their functions, and discrimination against elected representatives or unionised employees is not accepted.

Working conditions

Obligations to employees under national laws and social security system must be respected and followed. Working hours, salary and other remuneration must comply with applicable laws and agreements, and generally accepted industry standards.

Wages must be paid regularly. Bergs employees must have the right to paid overtime, annual leave, sick leave and parental leave, in line with applicable legislation and agreements. Bergs employees must have a written, comprehensible and legally binding contract of employment.

GDPR

Bergs must respect employees’ privacy and handle personal data confidentially and in line with applicable legislation and GDPR. Each unit must follow the rules regarding GDPR. Berg’s appointed Data Protection Officer will follow up compliance on an ongoing basis.

Gender equality, diversity and equal opportunities

Diversity encompasses personal, cultural and cognitive differences, as well as different work and life experiences. Inclusion is how we allow all employees to contribute, enhance our daily business and reach their full potential. We believe that the combination of diversity and inclusion leads to innovation, motivation and high performance.

All decisions concerning employment must be based on relevant and objective criteria such as competence, experience and performance.

- Bergs employees must have fair and equal development opportunities irrespective of their gender, gender identity or expression, ethnicity, religion or other belief, age, disability, sexual orientation, nationality, political opinion, union membership, social background, health status, family responsibilities or any other status protected by applicable laws.
- Bergs supports and respects internationally recognised human rights.
- Bergs employees must be treated with dignity and respect.
- Bergs does not accept any form of mental or physical abuse, threat of abuse, discrimination, bullying, sexual harassment, intimidation, oppression or other forms of harassment. We expect our suppliers and business partners to act in the same way towards their employees.

Sustainability

→ Bergs operations are based on a renewable, recyclable and biodegradable raw material that is neutral in terms of the climate.

Bergs is to purchase certified wood raw material, or to otherwise verify that the wood raw material does not come from forest areas where traditional or civil rights are violated, high conservation values are threatened, natural forests are logged to make room for plantations or non-forest land uses, illegal logging has taken place or there are genetically modified trees.

Bergs works continuously to improve the operation's resource use efficiency and energy performance and, in particular, to minimise the use of non-renewable resources and energy sources and minimize our carbon footprint.

Air and water emissions and other disruptions are reduced as far as possible within a reasonable framework in terms of technology, benefit and cost. Bergs also works continuously to minimise the amount of waste generated by the company, and prioritises materials and energy recycling.

In our business we must apply the precautionary principle, so as to prevent, hinder or combat damage or detriment to human health and the environment. In the event of process disturbances, priority must be given to environmental considerations rather than production. The environmental impact of current as well as discontinued operations must be acceptable to individuals and the environment.

When developing products and making investments, profitable production must be combined with efficient use of resources and consideration for the environment and sustainability. Efforts must be determined by what is technically possible, economically feasible, and justifiable in environmental and sustainability terms.

Environmental considerations in purchasing

Bergs must require that suppliers of products and services, logistic services, wood and electricity take energy, environmental and sustainability aspects into account in their business activities. In order to reduce our climate and environmental impacts, in all stages, we continuously improve knowledge of our products and raw materials.

We analyse risks associated with the raw materials we use and impose sustainability requirements. All wood must be traceable back to its origin. At the same time, we have an impact on the environment on which we are dependent.

We engage in systematic efforts to continuously improve operations and reduce our environmental impact. Our measures are based on the precautionary principle and life cycle thinking.

In areas where we have a significant impact, on the environment, natural resources or the ecosystems, we use stakeholder dialogue to find appropriate solutions that address both business and environmental concerns. We are continuously working on reducing the environmental impact of our transports and switching to more environmentally-friendly logistics solutions, fuels and transport modes.



Compliance and monitoring

→ The Code of Conduct is based on our core values and the Groups policy documents (see page12) and provides guidance in day-to-day work, clarifying what each employee can expect of their colleagues.

The Code of Conduc is also based on the content of the following international frameworks.

→ Bergs works to contribute to the achievement of UN's 17 Global Goals for Sustainable Development.

→ Bergs support the ten principles of the UN Global Compact, the eight fundamental conventions of the International Labour Organization (ILO) and OECD's guidelines for multinational companies.

The Code of Conduct is a wide-ranging but not exhaustive document. Bergs policies together with guidelines and instructions provide further guidance on how the different areas are to be handled. Every employee is personally responsible for understanding and acting in accordance with the Code of Conduct and Bergs policy documents. The Code of Conduct is available in printed form at all sites, and on the group webbsite, bergstimmer.com. All managers are responsible for ensuring that their employees are familiar with the Code.

Within their area of responsibility, each manager is responsible for ensuring that employees, representatives and business partners are informed about the contents of the Code of Conduct and the requirement for their compliance. Managers at Bergs must always lead by example.

All employees are personally responsible for applying the guidelines to their daily activities. Violations of Bergs Code of Conduct will always be taken seriously and, in addition to legal sanctions, may also result in disciplinary action, including termination.

Breaches of the Code of Conduct or suspected irregularities should be reported:

1. to an immediate supervisor, another person in a senior position, or union representative, or
2. via Bergs whistle-blower function, in the event of serious wrongdoing. www.bergstimmer.com/contact/whistleblowing

Bergs does not tolerate any form of reprisals against any reports made in good faith.



Relevant and binding Group Policys decided by the Board of Directors

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- Anti-corruption policy
 - Authorisation policy
 - Competition law compliance manual
 - Financial policy
 - Information policy
 - Investment policy

The management of each subsidiary in the Bergs Group is responsible for compliance to these policies and also to inform relevant functions about its content.

www.bergstimber.com

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