

# CODE OF CONDUCT FOR THOMAS CONCRETE GROUP

## 1. Background and basic principles

Thomas Concrete Group (“TCG”), including all subsidiaries, is an international group carrying on business within the concrete trade.

TCG has established this Code of Conduct as a manifestation of its basic values regarding lawful and ethical business activities.

We describe the requirements we have established for the actions and behaviours of our board members, management and employees, which we also assume are respected by all of our business partners.

In Team Thomas we all care for our colleagues, company and customers. Employees in managerial positions shall exercise an extra degree of care and act as role models for others.

All employees within TCG shall continuously assess their work and their acts in relation to this set of rules. In the assessment of potential and current suppliers, customers or any other parties this document shall be applied.

We encourage all employees to report findings or suspicions that we are not living up to our standards of this Code-of-Conduct.

This Code of Conduct should to be considered as our common minimum standard within the group.

## 2. Business principles

We respect and comply with competition laws, environmental legislation, labour market laws, agreements and safety requirements in every country in which TCG operates.

All employees must act in accordance with good business practices and in furtherance of the interests and objectives of TCG.

A TCG employee shall refrain from ending up in a relationship with a customer, a distributor, a supplier or other relations to TCG that may prevent or impair the employee from acting unbiased.

The employee shall refrain from private commercial contractual relations with businesses or persons that the employee has a commercial relationship with through the employment by TCG.

TCG employees in managerial, purchasing or sales positions are obligated to inform their immediate superior of any business activity that the employee conducts outside TCG. Or any activity she/he thinks is outside this policy.

An employee may not subject her- or himself to a situation where his or her actions, or personal interests, may be in conflict with the interests of TCG.

We only work with suppliers that can guarantee that there is no child labour in their supply chain.

All financial transactions by TCG must be reported in accordance with generally accepted accounting principles.

### 3. Employee Relations

In Team Thomas we set safety first and provide a safe and healthy working environment.

We strongly value the equal rights and values of all employees. We provide equal opportunities to people without regard to nationality, skin colour, gender, religion, sexual orientation, social or ethnic origin. We do not allow any form of discrimination or harassment.

All employees must abide by the ethical rules of their industry role if such rules exist. Furthermore, all employees must adhere to the internal rules, instructions and policies of TCG.

Company property and equipment cannot be used for private use, if not regulated otherwise in our policies.

We provide training and education opportunities for employees that support their current and future work plans.

Family relationships in the company must be handled with care, to avoid dependencies or conflicts of interests.