



# Code of Conduct

Beckers



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## Owner's vision for Beckers

*"I want Beckers to set the standard in our industry segments – to leverage our outstanding customer relationships, to secure a leading innovative edge and foster a culture always striving for the best solutions for our customers, our group and the environment."*



Jenny Lindén Urnes  
Chairman



# The basis of our Code of Conduct

Beckers develops, manufactures and markets high quality colour and coatings, providing optimal and innovative solutions for our customers and end-users. We do this with Drive and Passion – in innovation, setting the standard and building our future; with Trust and Integrity – showing respect for our employees, our customers and our environment as well as integrity in all our actions; by being Business-minded – having a strong commercial approach, and being open to new ideas and results driven; with Customer Focus – for long-term mutually profitable relationships; and by being Unified and Working Together – having a transparent and integrated approach and recognising our efforts and successes.

Those values shall reflect the spirit in which we conduct our day-to-day activities. Hence, they form the basis of our Code of Conduct; the purpose of which is to clarify their significance to the way in which we conduct our daily business. Let's be honest, we are not perfect but we will do our utmost to continuously narrow the gap between the promise of our ideals and the realities in which we operate.

## Our commitment

We shall adhere to high standards of ethics and business morals in all our operations and relations. Furthermore, we shall conduct our business in an environmentally and socially responsible manner and behave appropriately towards all of our stakeholders – our customers, suppliers, employees, shareholders, governments and non-governmental organizations (NGOs), the communities in which we operate and other parties that have influence over or are influenced by Beckers.

In particular, we embrace, support and enact – within the sphere of our influence – the core values in the areas of human rights, labour standards, the environment and anti-corruption as expressed in the Ten Principles of the United Nations Global Compact, Appendix 1.

We review our Code of Conduct periodically and are committed to making changes in its content and implementation when circumstances so demand.

## Scope

Our Code of Conduct is applicable to all locations and units within Beckers and applies to all employees, officers and directors of the group.

## Legal compliance

With production and sales facilities in more than thirty countries around the world, Beckers is subject to a wide range of legal requirements. We shall comply with all applicable laws and regulations that relate to our activities in the countries in which we operate. It is the responsibility of each employee, officer and director to make sure that they are aware of and abide by the laws and regulations that apply to them in their position as representatives of Beckers.

Naturally, legal systems are often highly complex and change over time. Therefore each manager has to do his or her utmost to keep track of laws and regulations that relate to their areas of responsibility. In case of uncertainty, it is the responsibility of each employee to seek appropriate advice on relevant legal requirements and other legal issues.



## Human rights

We support and respect the protection of internationally proclaimed human rights, such as the Universal Declaration of Human Rights, within the sphere of our influence. We promote diversity and equality and shall not be complicit in human rights abuses.

All employees must be treated equally, have equal opportunities and not be subjected to discrimination based on for example ethnic or national origin, creed, skin colour, gender, marital status, sexual orientation, religion, political opinion, nationality, social origin, disability or union membership.

We do not use child labour. Employees and other personnel must be at least 16 years of age or have reached national school-leaving age upon completion of compulsory schooling, whichever is higher. The minimum age for hazardous work is 18 years of age.

We do not accept any form of forced labour or any other forms of involuntary labour. Neither do we tolerate working conditions or treatment that are in conflict with international laws and practices.

## Accounting and reporting

All business transactions and payments within each unit in Beckers must be recorded in a timely and accurate manner. We follow strict accounting principles and standards and have appropriate internal controls and processes to ensure that accounting and financial reporting comply with Beckers' reporting manual together with all applicable laws and regulations.

## Conflicts of interest, gifts and bribes

Business decisions must be based on the best interest of Beckers rather than personal considerations or relationships. All employees must avoid engaging in activities that could lead to conflicts of interests.

A conflict of interest occurs when an employee's personal interests interfere with his or her ability to use

his or her judgment objectively in the best interests of Beckers. Such a conflict can for example arise where an employee or member of his or her family has a financial interest that could affect such employee's judgment or where an employee gains personal enrichment through access to confidential information. A conflict of interest can also arise when an employee or a member of his or her family has a personal interest, directly or indirectly, in any supplier or customer of the group. If an employee believes that he or she may have direct or indirect conflicts of interest, he or she must disclose such potential conflicts to management.

No one may, directly or indirectly, demand or accept, offer or give any kind of bribe, kickback or any other unlawful or unethical benefit to employees or other representatives or associates of Beckers or any third party. Any such offer or proposed arrangement must be reported immediately to management.

We discourage facilitation payments – small payments in money or kind to officials in order to expedite the performance of routine government actions to which the person making the payment has legal or other entitlement. In countries where facilitation payments are not prohibited by law, we should strive to minimize and if possible eliminate them.

Gifts of other than nominal value may not be accepted without full disclosure to and prior relevant clearance from the employee's line manager.

## Confidentiality

All information obtained at work should be considered confidential unless it is freely and publicly available. Confidential information should only be used for its intended purpose and never be disclosed to anyone other than colleagues or other authorized people who have a need-to-know. The obligation to keep information confidential continues even after an employee leaves the Beckers group.



## Workplace practices

All our activities must be conducted with respect for employee health and safety. All employees shall be provided with a safe and healthy working environment. We should take appropriate action to prevent workplace accidents or illnesses.

All employees shall be free to join associations of their own choice and shall have the right to collective bargaining. In countries where these practices are legally restricted, we strive to have parallel means in place to allow concerns to be brought to management attention.

All employees should know the basic terms and conditions of their employment. Salaries, including overtime and benefits, shall equal or exceed local legal and industry minimum standard.

All employees should be treated with respect and dignity and not be subjected to any discrimination, abuse or harassment.

## Business ethics

Beckers shall compete vigorously but honestly for business and uphold the highest standards in business ethics. We respect antitrust and fair competition laws that prohibit certain actions that unfairly and dishonestly harm competitors. Across the board we act in accordance with fair business, marketing and advertising practices.

## Environment

Environmental issues are an integral part of our business. We support long term sustainable development, life-cycle thinking and a precautionary approach to environmental challenges. We further strive to minimize negative environmental impact from our operations and products and to apply the substitution principle.

We will fulfil or exceed environmental demands in laws, regulations and international conventions appli-

cable to countries in which we operate.

All our subsidiaries are required to operate an appropriate environmental management system.

## Community involvement

All our activities must be conducted with respect for the well being of the local communities in which we operate. Beckers maintains a neutral position with respect to political parties. Our employees are however encouraged to play an active role in society, including through activities in political parties. We also encourage our employees to actively participate in the communities in which they live and work and to propose community involvement projects to management.

## Suppliers

We will do our utmost to contract only those subcontractors and suppliers who themselves adhere to international human rights and environmental laws and practices, monitor their ethical performance and take immediate and thorough steps in cases where this ethical performance comes into question.

## Compliance

Our policy is to support open and fair discussion of issues and worries. Employees are encouraged and expected to report any and all incidents of non-compliance with this Code of Conduct. Failure to comply may result in civil and criminal liability and /or disciplinary action, including termination of employment.

Advice or guidance on the interpretation of this Code of Conduct is available from Beckers. Any employee who suspects any breach of this Code of Conduct should immediately bring this to the attention of Beckers.

Employees can use our confidential "whistle blowing" telephone or fax service. Beckers has also established an electronic "whistle blowing" channel and a physical mailing address. These can be used to bring



concerns and issues to the attention of the Beckers management or the Beckers Group board, who will in turn make every effort to maintain the anonymity and confidentiality of those reporting.

Telephone numbers and addresses for these purposes are shown below and are also available on our website [www.becker.se](http://www.becker.se)

**Telephone numbers**

Chief Executive Officer	+46 42 338523
Chief Financial Officer	+46 42 338505
Chief Legal Officer	+46 42 338527
Chairman of the board	+46 42 338502

**Fax**

Management/Board	+46 42 338519
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**Email addresses**

[codeofconduct\\_management@becker.se](mailto:codeofconduct_management@becker.se)  
[codeofconduct\\_board@becker.se](mailto:codeofconduct_board@becker.se)

**Mailing address**

AB Wilh. Becker  
Att. <name of board member/management>  
263 83 Höganäs  
Sweden

Management will not be held accountable for any loss of business resulting from compliance with this Code of Conduct. There shall be no retaliation or other negative consequences for persons reporting in good faith.

## THE BECKERS GROUP

[www.becker.se](http://www.becker.se)

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### Business Areas

[www.becker-bic.com](http://www.becker-bic.com)  
[www.beckeracroma.com](http://www.beckeracroma.com)  
[www.colart.com](http://www.colart.com)

### *Brands within ColArt*

[www.winsornewton.com](http://www.winsornewton.com)  
[www.lefranc-bourgeois.com](http://www.lefranc-bourgeois.com)  
[www.liquitex.com](http://www.liquitex.com)  
[www.reeves-art.com](http://www.reeves-art.com)  
[www.snazaroo.co.uk](http://www.snazaroo.co.uk)

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Beckers



Becker Industrial Coatings

ColArt

Beckers



Becker Acroma

