

Envirotainer – Code of Conduct



Introduction to Envirotainer's Code of Conduct

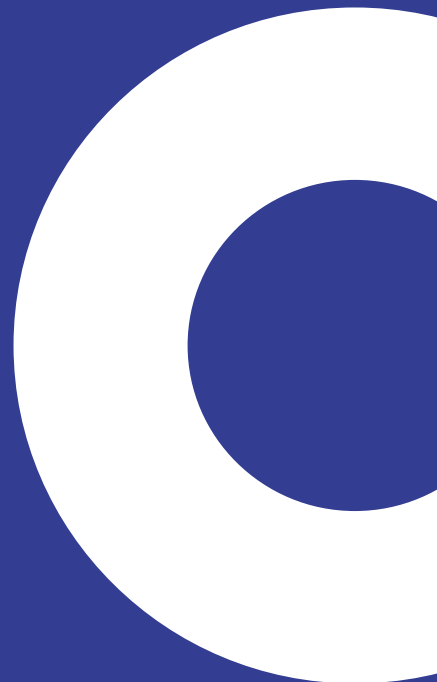
The Envirotainer Code of Conduct outlines the main principles of Envirotainer's corporate responsibility, as well as the personal, ethical and professional principles which all Envirotainer employees should adhere to, and which guide our relations with other employees, customers, suppliers, society and shareholders.

All Envirotainer managers have the responsibility to inform employees about the Code, and all employees have the responsibility to keep informed about the Code.

The Envirotainer Code of Conduct rests on the principle that all employees are individuals responsible for their own professional behavior.

The guiding principles for Envirotainer's Code of Conduct are based on the "United Nations Code of Conduct for Suppliers" and United Nations Nations Global Compact initiative.

Michael Berg
CEO, Envirotainer
January, 2018



Employees

Professional behavior

Envirotainer employees are expected to undertake their duties in a professional, responsible, conscientious and ethical manner, and to act into the best interest of Envirotainer.

All of us are ambassadors for Envirotainer. Together, we are Envirotainer. We are role models in meetings with customers, colleagues and partners. Professional empowerment means that you act in accordance with our values and contribute to achieving our company goals and a positive work environment for those around you.

Leadership

The aim of Envirotainers leaders is to achieve results through professional leadership with our values in mind. All our employees are important and thus our leadership should strive to engage, develop and coach every individual and team to achieve their goals. Everyone in the company needs to know the company's and their own individual goals and performance.

Diversity & Equal opportunities

We take pride in being a global company that believes diversity improves our enterprise. At Envirotainer all are of equal value; we strive for everyone to feel respected for who they are and we show tolerance for differences.

Employees are recruited and promoted solely on the basis of their qualifications for the job, regardless of race, religion, age, national origin, gender, sexual orientation, political opinion, union membership, marital status or disability unrelated to the task in question

Working Environment, Health & Safety

Envirotainer strives to be an attractive employer by creating a working environment based on collaboration, responsibility and transparency. The company is committed to provide safe and healthy working conditions in compliance with

internationally recognized standards. Envirotainer does not accept any form of discrimination or bullying, e.g. sexual or other harassment, verbal or physical abuse.

Alcohol and drugs

We do not tolerate use of alcohol, narcotics or misuse of medication during work. It is strictly forbidden to use, sell, buy or possess alcohol or narcotics within Envirotainers premises, and to be under the influence of alcohol or other drugs during work.

Compensation

Each employee shall be rewarded in a correct and fair manner in accordance with their individual performance and contribution to the success of the company.

Conflicts of interest

No employee may be involved in any activity that is in conflict with the company's interests. Such conflicts of interest may include e.g. receiving gifts where there is an expectation of a return favor, decisions regarding employment or promotion of relatives or friends, or holding external positions in conflict with Envirotainer's interest.

Social media

All Envirotainer employees must follow Envirotainers Code of Conduct and Core Values when acting on social media channels as an Envirotainer employee – meaning to have a friendly, yet professional tonality. Never be condescending or offensive.

Confidentiality

As an employee of Envirotainer, you have a duty of loyalty to the company. Documents and other internal information are to be used for Envirotainer's purposes only and treated confidentially.

Relations to Customers, Partners and Suppliers



Business Ethics

Envirotainer strives for good business ethics in all our operations. We are competing fairly, and we take a long term view of our business and of our relationships with our customers, partners and suppliers.

Honesty & Integrity

Loyal customers are the basis of our business. Honesty and integrity in our dealings with our customers, partners and suppliers are prerequisites for good and profitable business relations. We will provide our customers, partners and suppliers with accurate information, and only make commitments that we believe we can fulfill.

This is especially important when accepting orders and providing service to our customers, since accurate timing and availability of our solutions is of key importance to them.

Suppliers legal & regulatory compliance

Envirotainer will inform suppliers and partners of our Code of Conduct. We will not do business with suppliers that fail to comply with applicable laws and regulations.

Gifts and favors

Offering gifts; Gifts, entertainment and personal favors may be offered to a third party only if they are modest in value and consistent with customary business practice.

Receiving gifts; No employee should seek or accept any gift, entertainment, or personal favor that might reasonably be believed to have an influence on business transactions.

No gifts, entertainment or personal favors may be offered or received in contravention of any applicable law or code of practice.

Sustainability

Sustainability & Environmental impact

Envirotainer is proud to contribute to efficient healthcare by supplying logistic cold chain solutions that minimize product waste, cost and time in the transportation of drugs. This way, we help bring critical, often lifesaving, drugs to more people in the world.

Our containers are reusable, in contrast to most simple passive packaging, and our active heating/cooling technology is highly efficient and dependable in protecting sensitive drugs.

We are committed to reducing impact on the environment from our operations. Our factory is complying with comprehensive Swedish environmental regulations, and we strive for high transportation efficiency and minimized use of resources in our logistic solutions.

Treating people well

Envirotainer offer a safe work environment and do not accept any kind of discrimination or harassment in the work place. We adhere to UN Supplier Code of Conduct. See the “Employee” section.

Bribery and corruption

Envirotainer do not accept any form of bribery, corruption or extortion.

Legal compliance and local customs

Envirotainer and all employees shall comply with applicable laws and regulations within which the company operates. In case a conflict exists between more restrictive laws and this Code's principles and values, the law shall prevail. Envirotainer respects the local traditions and customs of each country. In cases conflict exists between local customs and this Code's principles, the Code shall guide the employee's course of action.

Accurate reporting

Envirotainer will provide accurate and timely information on the company's performance and metrics regarding our financial, regulatory and sustainability status to our owners, relevant authorities and other stakeholders.



Implementation of the Code

This code of Conduct applies to all employees and all Envirotainer business activities, regardless of location

The Code sets out the main principles of corporate and individual employee responsibility, but cannot address all possible ethical dilemmas that may arise. It is intended to guide employees in how to act with integrity and good judgement at all times. Observance of the Code will be regularly reviewed and amended as necessary by Envirotainers Chief HR Officer.

Breaches of the Code, reporting and whistleblowing

A breach of the Code will result in an investigation which may result in disciplinary action, termination of employment, or criminal charges. Employees who identify breaches of the Code should as soon as possible report the breach to their immediate manager, or to the Chief HR Officer. There is also the possibility to report breaches of the Code via whistleblower@envirotainer.com, where the reporting employee may be anonymous. It should however be noted that an anonymous report may be more difficult to investigate. False allegations or misuse of the whistleblowing channel is in itself a violation of the Code.

IF YOU ARE IN DOUBT – CHECKLIST

Always take the following things into consideration if in doubt when making a decision:

- What are the possible consequences of my action or failure to act?
- Will my action or failure to act build confidence in Envirotainer?
- Is my action or failure to act lawful?
- Is my action or failure to act consistent with the spirit of the Code and with our Core Values?
- Might my action or failure to act be affected by personal interests or any other conflict of interest?
- Will my action or failure to act stand up to public scrutiny?
- Is my action or failure to act in accordance with maintaining strict business ethics?



Core values

Envirotainers company values describe how we interact with each other, with our customers and partners. These values form the strong foundation on which we perform work and conduct ourselves.

They are imbedded in our history and are critical to Envirotainers long term success. As a company we take great pride in being trustworthy, passionate, agile and to work as a strong team together with our partners.



Trustworthiness

We are professional, act with integrity and take responsibility for our work and our actions. We are open, honest and transparent in our communication.

Passion

We are passionate about our business and walk the extra mile to contribute to our customers' success. We are proud of our company and ultimately how we help bring critical medical supplies to people.

Agility

We strive to be agile and to act fast. We have a pragmatic, creative and solution oriented approach to how we do business.

Team Spirit

We are a strong team working together with our partners towards common goals, across functions and borders. We treat each other with respect and trust.





Envirotainer^o

The Active Cold Chain

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