



## TORRAKA CODE OF CONDUCT

### APPLICABLE TO ALL TORRAKA EMPLOYEES, SUPPLIERS AND PARTNERS.

We are humbly aware of the fact that our businesses has an impact on society, people and the environment. We consider it crucial to act responsibly, generate safety and security and promote positive and sustainable social development. We expect all Torrika's employees, suppliers and partners to share our values and take the same responsibility for promoting environmental and social sustainability.

It is absolutely imperative for Torrika's own employees, as well as those of Torrika's suppliers, subcontractors and partners, to work under safe and secure conditions. Moreover, since all production and transport has a negative climate impact, we expect all parties to share our goal of minimising this impact.

#### THE TORRAKA CODE OF CONDUCT:

The Torrika Code of Conduct is based on trust, respect, transparency and cooperation. We expect all Torrika's employees, suppliers and partners to respect fundamental requirements concerning human rights, labour rights, environmental protection and anti-corruption throughout the supply chain. If a supplier uses a subcontractor, the supplier is responsible for ensuring that the subcontractor complies with the same requirements.

All suppliers involved in the production and delivery of Torrika's products agree to follow the Torrika Code of Conduct and communicate it to all their employees and subcontractors.

All Torrika employees are responsible for reading, understanding, respecting and complying with Torrika's Code of Conduct, internal policies, etc.

Torrika's Code of Conduct is based on the UN and ILO Core Conventions as well as on national laws in our operating and production countries. The Torrika Code of Conduct sets out minimum standards. In the event of conflict between international and national regulations, the highest standard shall prevail. If any requirement in this Code of Conduct is in conflict with national laws in any country or territory, the law should always be followed. In such cases, the supplier must inform Torrika immediately after receiving this Code of Conduct, or when the relevant mandatory national law is enacted.

By accepting the Torrika Code of Conduct, Torrika's employees, suppliers and partners undertake to operate in compliance with fundamental requirements concerning:

- The UN Universal Declaration of Human Rights (1948)
- The eight ILO Core Conventions covering forced labour, child labour, discrimination, and freedom of association and the right to organise (nos. 29, 87, 98, 100, 105, 111, 138 and 182)
- The UN Convention on the Rights of the Child (Article 32)
- Labour laws and occupational health and safety laws in our operating and production countries,
- and the labour laws, including laws on wages and social insurance, applicable in our operating and production countries.
- Environmental laws in our operating and production countries.
- The UN Declaration against Corruption and Bribery.

#### 1. RIGHTS OF WORKERS – (ILO CORE CONVENTIONS)

1.1 Elimination of child labour (UN Convention on the Rights of the Child Article 32, ILO Convention nos. 138 and 182)

Children shall be protected from economic exploitation and from performing any work that could interfere with their education or development. Children under 18 shall not carry out work which endangers their health or safety, including night work. The minimum age must not be below 15 (14 or 16 in certain countries). In cases

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where child labour occurs, it must immediately be phased out. Moreover, steps shall be taken to ensure that the children are able to pursue an education until they are no longer of school age. All applicable national laws regarding child labour, including those relating to employment, wages, working hours, overtime and working conditions, must be respected and complied with.

#### 1.2 Ban on forced labour/slave labour (ILO Convention nos. 29 and 105)

No form of forced or involuntary labour shall be permitted. Workers must not be required to hand over their identity documents to the employer, and must be free to terminate their employment with reasonable notice.

#### 1.3 Ban on discrimination and harassment (ILO Convention nos. 100 and 111)

No discrimination shall be permitted in working life on the basis of gender, ethnic origin, religious or other beliefs, disability, sexual orientation, gender identity or gender expression, age, civil status, pregnancy, trade union membership or political affiliation. The employer's decisions regarding employment, wages, benefits, promotion, dismissal and pension shall be based on the employee's individual skills and work abilities. It is forbidden to use any form whatsoever of physical or mental coercion such as threats, violence, sexual harassment or other brutal actions.

#### 1.4 Freedom of association and collective bargaining (ILO Convention nos. 87 and 98)

All employees have a right to form and join trade unions, and shall be given opportunities for collective bargaining. If these rights are restricted or under development, the employer shall facilitate meetings between the employees and management to discuss wages and working conditions, and the workers shall not suffer negative consequences as a result.

#### 1.5 Provisions in national legislation – labour laws

Labour laws and regulations shall be complied with, both in the employer's own operations and in the operations of the employer's subcontractors. This means complying with laws and regulations regarding: 1) wages and working hours 2) environment, health and safety 3) regular employment 4) brutal treatment (such as harassment, discrimination and all other forms of demeaning or humiliating treatment) and 5) statutory insurance and social systems.

### 1.6 PAY AND WORKING HOURS

#### 1.6.1 Employment contracts

All Torraka employees, as well as employees of Torraka's suppliers and subcontractors, shall be employed according to applicable laws and are entitled to an employment contract. The contract must include all the content required under local legislation, and at least the following: Employer, employee, date of birth, position, pay, working hours, overtime compensation, benefits and notice period.

#### 1.6.2 Work duties and pay

Attendance registers and payroll lists shall always be provided documenting the working hours of, and all wage payouts to, all employees, pieceworkers and temporary workers. These registers shall always be made accessible to auditors examining Torraka's operations.

All employees shall be provided with a wage specification for each period, which shall include the date of payment, number of days worked, daily wage and/or piece wage, overtime and overtime compensation, bonuses and any deductions.

#### 1.6.3 Working hours and leave

Working hours and overtime shall comply with applicable national laws and industry standards. However, the time worked may not exceed 60 hours per week including overtime. Overtime must always be voluntary.

Employees shall be granted adequate time off for meals and breaks, as well as at least one day off per seven-day week. Employees shall be granted time off work in accordance with laws, local traditions or industry standards (e.g. sick leave, annual leave, parental leave, weekends). The employer shall apply the principle that benefits the employee the most.



#### 1.6.4 Pay and benefits

Torraka's suppliers shall aim to pay living wages and shall, at the least, pay the legal minimum wage. All employees shall be paid for all overtime hours worked in accordance with legal requirements. Wages shall be paid regularly and on time to all employees. Wages shall be paid at least once per month. The employer may not withhold any employee's wages.

All employees shall be granted all statutory benefits (e.g. sickness insurance, social insurance, pensions, parental leave).

## 2. OCCUPATIONAL SAFETY AND HEALTH – WORK ENVIRONMENT – (ILO Convention nos. 155 and 170)

It is absolutely imperative for Torraka's own employees, as well as those of Torraka's suppliers, subcontractors and partners, to work under safe and secure conditions. This means that their workplace must be safe and healthy, both from a physical and mental perspective. Requirements 2.1–2.3 shall be complied with, as well as all applicable local laws and regulations regarding working conditions, including worker health and safety, sanitation, fire safety, risk protection and electrical, mechanical and structural safety.

All employees shall receive information and training regarding safety and procedures that promote a safe and healthy workplace. A safe and healthy workplace is defined as follows:

### 2.1 Building and fire safety

All buildings shall be inspected and approved by the fire authorities. The employer shall train an adequate number of staff in each work area/department, covering all shifts, in how to use the fire fighting equipment. Appropriate fire fighting equipment shall be supplied. It shall be regularly maintained and kept visible and accessible for all workers. The positioning and maximum distance shall comply with applicable laws. There shall be at least two independent emergency exits per working area. All emergency exits shall be clearly marked with lights. They shall not be blocked and shall remain accessible/unlocked during all working hours. All workplaces/factories must have evacuation plans and fire alarms. The alarm must also function during power cuts. Fire drills should be carried out in accordance with local laws, or at least once per year. Records of the regular evacuation and fire drills must be maintained.

### 2.2 First aid

At least one first aid kit should be available on each floor and work area, and in each factory. At least one person in each department, covering all shifts, should be trained in first aid. A doctor or nurse should be available at short notice in the event of an accident in the workplace/factory. Any costs of medical care arising as a result of injury in the factory shall be paid by the employer.

### 2.3 Health and safety

A safe work environment must be maintained to minimise risk of workers suffering accidents and ill health. The employer shall provide personal safety equipment as well as information on how to use it and about the risks that may be present in the workplace. This applies both to work equipment and to the handling of chemicals, etc.

Clean and hygienic sanitary facilities, such as toilets and showers, shall be available and separate for both women and men. Other rooms shall have acceptable levels of temperature, lighting and ventilation necessary for a healthy work environment. There must be windows, fans or air conditioners/heaters in all work areas for adequate circulation, ventilation and temperature control.

The supplier shall ensure that all employees are aware of the safety risks in their production area, and that they receive appropriate safety training in handling their machines and other equipment. All machines and other equipment in the workplace shall be equipped with necessary safety devices, safety instructions and warnings. The employer shall provide personal protective equipment to all workers operating in harmful or hazardous work areas. The supplier shall ensure that the personal protective equipment is used and maintained.



The supplier shall ensure that other hazards and risks are avoided, e.g. damaged staircases, dangerous electrical wires, unsafe storage of gas and other flammable products, baths containing hazardous chemicals that could easily spill into the work place, unsafe places where workers could fall from a height, etc. Also see – 3.2 Handling of chemicals – chapter 3. Environment

#### 2.4 Accommodation and dormitories

If the employer provides accommodation and dormitories, the requirements under Occupational safety and health – work environment, chapter 2, also apply to these facilities, as do the requirements regarding fire safety, sanitation, risk protection and electrical, mechanical and structural safety.

### 3. ENVIRONMENT

We expect all Torraka's employees, suppliers and partners to share our values by adopting sustainable work procedures and taking strong environmental responsibility in their daily work. This includes the following requirements:

#### 3.1 Environmental protection, laws and regulations

Comply with the environmental laws applicable in our operating and production countries, and meet or exceed the requirements in laws and regulations. Meet all applicable national laws and regulations regarding air, noise, water and ground pollution. To ensure compliance, the employer/factory shall be inspected and approved by the environmental authorities.

All factories with dyeing, printing and/or other water processing facilities shall have a waste water treatment plant. The waste water treatment plant shall always be used when production is running, and must be properly operated and maintained. The sludge from the waste water treatment plant may not be landfilled or burned by the supplier. The sludge must be stored safely to prevent leakage.

Taking strong responsibility in the course of daily work also includes:

- Involving and regularly training all employees in their environmental strategy.
- Striving to make environmentally responsible transport choices. We require our hauliers to be compliant with Euro 5 or equivalent or higher standards.
- Collaborate to minimise unnecessary transport and split deliveries.
- To economise on raw materials and avoid waste.
- Separate and recycle their waste.
- Safely destroy hazardous waste.
- Minimise their energy and water use.
- Measure and monitor their environmental efforts and environmental impact.

#### 3.2 Handling of chemicals

A list of all chemicals used in production shall be maintained and kept in the workplace. The list shall include the name of the chemical product, the purpose of use and a reference to a Material Safety Data Sheet.

All chemical containers must be marked with chemical names and hazard symbols. The supplier must have safe procedures in place for handling, storage and use of chemicals. The supplier shall provide safety training to employees who handle chemicals, and shall ensure that they use suitable personal protective equipment. Clear safety rules, safety instructions and cautions regarding the safe handling and risks of each chemical shall be provided and clearly displayed in each production area and in the storage area.

Health checks shall be carried out regularly on all employees who handle chemicals.

The employer shall prevent chemicals from leaking into the ground and water. Chemicals and hazardous waste must be stored in a way that prevents any risk of leakage. Hazardous waste shall be handled by a licensed waste contractor. Hazardous waste may not be landfilled or burned by the employer.

### 4. DATA PROTECTION

Torraka's employees, suppliers and partners shall ensure that they do not publicly disclose confidential information regarding Torraka's business, either intentionally or through negligence. This includes, among other things, technical and financial information and information about Torraka's customers. Furthermore, we encourage our employees, suppliers and partners to respect personal privacy and comply with applicable data protection laws, including the EU General Data Protection Regulation (GDPR), to ensure the protection and secure processing of personal data.

### 5. ANTI-CORRUPTION



Torraka does not accept any form of corruption, including extortion and bribery, and we also expect our employees, suppliers, subcontractors and partners to follow and promote ethical business standards. Bribery and other forms of corruption are strictly forbidden.

Neither Torraka as a company nor any party acting on Torraka's behalf is permitted to authorise, offer or endorse payments, gifts or other benefits that could influence or be perceived to influence the objectivity of business decisions or government decisions.

#### 6. VIOLATIONS, MONITORING

Torraka expects all its employees, suppliers and subcontractors to carefully comply with the Torraka Code of Conduct, and agrees to take part in social audits, inspections, etc. to ensure that the terms of the Code of Conduct are met.

All suppliers are obliged to inform Torraka of where a product is produced. Torraka reserves the right to make pre-announced or unannounced visits to all production sites at any time, including subcontractors' sites. Torraka also reserves the right to commission independent third parties to perform inspections in order to ensure that Torraka's Code of Conduct is complied with. Torraka, or a third party representing Torraka, shall have free access to all relevant documents.

The Torraka Code of Conduct is based on trust, respect and cooperation. All observations, discussions and written information obtained from the supplier shall be treated confidentially by Torraka and third parties representing Torraka.

Torraka's suppliers must be able to demonstrate adequate processes for ensuring compliance with the Code of Conduct, for monitoring compliance, and for handling violations. Moreover, Torraka encourages all employees, suppliers, suppliers' subcontractors and partners to report any incidents and violations of the Code of Conduct.

Suppliers or partners that fail to comply with the Code of Conduct must undertake appropriate improvements based on an action plan within an agreed time frame. If the improvement is not made within the agreed time frame, this shall be considered a violation of the Code of Conduct and the partnership/contract may be terminated.

#### 7. TORRAKA WHISTLEBLOWING SYSTEM

Through Torraka's whistleblowing system [www.Torraka.se/whistleblow](http://www.Torraka.se/whistleblow) we encourage all employees involved in the production or delivery of products to Torraka, Torraka's employees, partners, etc. to report any irregularities, misconduct and incidents that violate fundamental requirements, Torraka's Code of Conduct, policies, etc.

If you have any questions regarding the Torraka Code of Conduct, please contact [maria.larsson@Torraka.se](mailto:maria.larsson@Torraka.se)

We hereby acknowledge and accept the Torraka Code of Conduct.

Date .....

Name .....

Signature .....

Company name .....

Company stamp .....