



OPTI GROUP 

Code of Conduct

November 2021



## Our way of doing business

As a leading European distribution Group offering customised supply solutions of a wide range of business essentials, we aim to be the first choice for our customers and business partners.

Responsibility and good reputation for corporate trustworthiness are fundamental to the success of OptiGroup and its ability to create long-term value. This means that sustainability is an integral part of the work in the entire Group's operations and our subsidiaries are committed to fair and ethical business practices, which is a cornerstone of our way of doing business.

OptiGroup's Code of Conduct policy and policies for good business ethics apply to all subsidiaries and are the same in all markets served by the Group.

Sören Gaardboe

President and CEO  
OptiGroup

## Comprehensive Code of Conduct

The Code of Conduct applies to all employees of the company. OptiGroup also ask all suppliers and business partners to adhere to similar standards by signing the Code of Conduct for Suppliers.

The Code of Conduct does not replace legislation and OptiGroup must always comply with legal requirements and regulations in the countries in which OptiGroup operate.

The same requirements apply to our suppliers and business partners. If there is a conflict between the Code of Conduct and the law, the law shall prevail. However, if the Code of Conduct sets a higher standard than existing legislation, the Code of Conduct shall apply.

## Business ethics

### Anti-corruption, fraud and bribery

Representatives of OptiGroup shall never give bribes, rewards or benefits in violation of anti-bribery laws applicable to the countries OptiGroup operates, in order to obtain business or any other improper advantage. OptiGroup employees shall never accept gifts, payments, hospitality or other kind of compensation that could inappropriately affect or appear to affect the outcome of business decisions.

### Conflict of interest

OptiGroup employees must avoid conflicts of interest and not let their private financial and other activities interfere. We always place OptiGroups interest ahead of personal interest.

### Money laundering

OptiGroup shall not accept, support or facilitate money laundering and is committed to fully comply with all anti-money laundering laws throughout the world.

### Confidentiality

All unpublished information relating to OptiGroup present and future business operations shall be kept strictly confidential. This obligation continues even after termination of employment.

### Political involvement

OptiGroup observes strict neutrality with regard to political parties and candidates. Neither the names nor resources of OptiGroup shall be used to promote the interest of political parties or candidates.

### Company property and resources

OptiGroup property, products and resources shall be responsibly and appropriately dealt with. The Company's assets, both tangible and intangible, shall be used to achieve OptiGroup business goals and be protected to preserve their value.

### Accounting and reporting

OptiGroup and its employees are committed to provide full, fair, accurate, timely and understandable information in the companies' public reports and other communications. We reflect our business transactions, openly, accurately and fairly in the accounts of the Company.

OptiGroup shall comply with the tax legislations and regulations of each country in which it operates.



## Principles of human right and workspace

### Human rights

OptiGroup actively works to treat our employees fairly, equally and with respect. OptiGroup shall support and respect the protection of the UN's Universal Declaration of Human Rights and the Core Conventions of the International Labour Organization (ILO).

### Discrimination

We recognise diversity as a strength. Discrimination against any employee in respect of race, ethnic background, gender, disability, sexual orientation, religion, political opinion, maternity, social origin or similar characteristic is prohibited.

OptiGroup shall work to ensure that all measures are taken to achieve equal rights and equal opportunities at work.

### Forced or child labour

Every child shall be protected from economic exploitation and performing any work that may be harmful to the child's physical or mental health or adversely affect the child's right to education. The minimum age for employment shall be in accordance with the ILO Convention or the age specified by local legislation if higher. The employment of young persons shall not jeopardise their education or their development. No form of forced labour or work connected with any form of punishment is permitted.

### Workplace practice

Our employees are entitled to safe and healthy workplaces.

### Freedom of association

OptiGroup respects the right of all employees to organise, join associations and bargain collectively or individually, if they wish to.

### Working hours and compensation

OptiGroup shall comply with applicable laws, agreements and industry standards on working hours and compensation.

### Community involvement

We shall be a responsible member of the communities in which we operate through focused partnerships at local and national levels. We encourage our employees to take part in local community work.

## Environmental

We strive to minimise and prevent our own negative impact on the environment – from heating of buildings, consumption of electricity, and waste management to handling of goods, distribution services and other activities associated with the Company's merchandising business.

We also encourage manufacturers and suppliers, through agreements and other means, to push such issues as sustainable practice emission reduction and proactive environmental protection further up on the agenda.

In our ongoing dialogue with our customers, we provide them with open and objective information about our offer in order to help them to do informed decisions regarding eco-friendly products and environmentally sound logistics solutions.

## Implementation and compliance monitoring

OptiGroup's CEO has the overall responsibility for implementation and compliance with OptiGroup Code of Conduct.

Managing Directors of OptiGroup companies are responsible for implementation and compliance in each business area and country.

It is the responsibility of employees to ensure that they understand and comply with the content of the Code of Conduct and the related documents. Managers are also responsible for ensuring that each employee is updated on current policies during the annual employee dialogue.

We continuously monitor compliance of our operations with our obligations under the Code of Conduct. The Code of Conduct is also part of the introduction programme for new employees.

### **About OptiGroup**

OptiGroup is a leading European distribution Group offering customised supply solutions to B2B customers. We acquire and develop companies specialising in providing customers, primarily within Facility Management, hotel & restaurant, healthcare, manufacturing & industry and the graphical sector, with products and services that enhance efficiency and contribute to a more successful business.

OptiGroup AB  
P.O. Box 1004  
SE-431 26 Mölndal  
Sweden

[www.optigroup.com](http://www.optigroup.com)

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