

# Code of Conduct

ASSA ABLOY

Business Partner

Experience a safer  
and more open world





# Business Partner Code of Conduct

## Introduction

ASSA ABLOY BELIEVES IN responsible social and ethical behavior and has a responsibility to the employees serving the company worldwide. Our core values Empowerment, Innovation and Integrity guide us in our actions and daily business decisions. Furthermore, ASSA ABLOY and its business partners have an obligation to all stakeholders to observe high standards of integrity and fair dealing. This is the foundation for and the reason why ASSA ABLOY has created the Business Partner Code of Conduct. Our policies and the Business Partner Code of Conduct are further based on:

- UN Universal Declaration of Human Rights and connected UN Conventions
- ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- OECD Guidelines on the Protection of Privacy and Transborder Flows of Personal Data
- OECD Guidelines for Multinational Enterprises
- UN Global Compact
- ISO 14001

## Who does the Business Partner Code of Conduct apply to?

The Business Partner Code of Conduct applies to all our business partners that provide products or services to ASSA ABLOY, or that are engaged or instructed to act for or on behalf of ASSA ABLOY, such as e.g. suppliers (and subcontractors if used while engaging with ASSA ABLOY), consultants, distributors, agents and other representatives.

## Legal compliance

ASSA ABLOY requires all our business partners to operate in accordance with the principles in the Business Partner Code of Conduct and in full compliance with all applicable laws and regulations. The Business Partner Code of Conduct does not replace legislation and if the two are in conflict, legislation takes precedence. If the Business Partner Code of Conduct sets a higher standard than the existing legislation, the reverse applies. The Business Partner Code of Conduct is valid in the English language. Where there are different language versions of this document, these shall be considered translations only. The form in Appendix II can be used in order to sign the Business Partner Code of Conduct.

## Raising concerns

Should you or your employees believe that the terms of the Business Partner Code of Conduct are not adhered to or that ASSA ABLOY is not acting in accordance with its own ASSA ABLOY Code of Conduct then we encourage you to raise your concerns to ASSA ABLOY Head Office Code of Conduct whistleblowing function or through any of your contacts within ASSA ABLOY. The form provided in Appendix I can also be used.

## Implementation and monitoring

ASSA ABLOY monitors the implementation and adherence of the Business Partner Code of Conduct. ASSA ABLOY will assess its business partners' compliance with the Business Partner Code of Conduct. Violations will be handled immediately, and any violations of the Business Partner Code of Conduct may jeopardize the business partner's business relationship with ASSA ABLOY, up to and including termination.

# 1. Business Ethics

## 1.1 General

ASSA ABLOY respects the laws and regulations in the countries in which it operates and requires that its business partners do the same. ASSA ABLOY does not accept any corrupt activities, including but not limited to bribery, conflicts of interest, fraud, extortion, embezzlement, self-enrichment, and unlawful kickbacks, and its business partners shall not engage in, or cause ASSA ABLOY to engage in, any form of corrupt activities.

## 1.2 Competition and antitrust laws

ASSA ABLOY's business partners shall comply with applicable competition and antitrust laws and regulations. This means, among other things, to not engage in price fixing, market sharing, bid rigging or customer allocation.

## 1.3 Anti-bribery

ASSA ABLOY does not accept bribes or facilitation payments in any form.

## 1.4 Data protection

ASSA ABLOY's business partners shall follow applicable data protection laws and regulations.

## 1.5 Conflict of interest

Conflict of interest between a business partner and ASSA ABLOY must be avoided. Conflicts of interest may include outside business activities, personal financial interest, inside information, employment of, buying from, or selling to family members and close personal friends. Furthermore, ASSA ABLOY expects you in your business interaction with ASSA ABLOY to protect all confidential information provided by ASSA ABLOY and respect the intellectual property of ASSA ABLOY and others.

## 1.6 Export Control Regulations

It is crucial to ASSA ABLOY that applicable Export Control Regulations are complied with since these regulations often are aimed at limiting activities that ASSA ABLOY does not support, e.g. terrorism.

# 2. Human Rights & Labor Standards

## 2.1 Child labor

ASSA ABLOY recognizes the rights of every child to be protected from economic exploitation and from doing work that is likely to be hazardous to their physical, mental or spiritual health, harmful to their moral or social development, or to interfere with their education.

A child in this context is a person younger than 15 years of age, or 14 years of age in accordance with the exceptions for developing countries as set out in Article 2.4 in the ILO Convention No. 138 on Minimum Age. If relevant national legislation has set a higher age, this age will apply.

Some countries apply the definition of "young workers" to persons above the minimum age and below 18, which means that there might be legal restrictions regarding the type of work that they are allowed to perform.

ASSA ABLOY does not accept child labor, and expects the same from its business partners. However, ASSA ABLOY acknowledges that it exists and realizes that it cannot be eradicated by simply setting up rules or inspections. If a child is found producing products or providing services for ASSA ABLOY, it is requested that the employer acts in accordance with the overall best interest of the child. Business partners are expected to cooperate in seeking a satisfactory solution that will improve the individual child's overall situation, and the child's age, social situation and education shall always be taken into account before a decision is made.

## 2.2 Forced or bonded labor

ASSA ABLOY does not employ or accept any form of forced or bonded labor, prisoners or illegal workers, and expects its business partners to do the same. ASSA ABLOY acknowledges that means to force people to work can include a deposit of payment or demand to deposit identity documentation or other personal belongings, all of which is prohibited. If business partners employs foreign workers on a contract basis, they must not be required to remain in employment against their will, and they shall further have the same rights as the local workers. The employer will pay for commissions and recruitment agency fees in connection with the employment where applicable.

All workers shall have the right to leave their workplace and accommodation (if provided) freely during the hours when they are not working.

## 2.3 Freedom of association and collective bargaining

ASSA ABLOY expects its business partners to respect the rights of its employees to have the freedom to join, or not to join, an association of free choice as well as establish an association of free choice, to organize and to bargain collectively and individually in accordance with local laws and regulations. No employee should risk being harassed or retaliated against for exercising these rights.

#### **2.4 Workers' contracts, working hours and compensation**

ASSA ABLOY expects its business partners to comply with local laws and regulations regarding workers' contracts, working hours, including overtime and overtime compensation. Salaries should be paid regularly and comply with the applicable local legislation and the local market situation. Workers should be entitled to a minimum of one day off in seven and to take time off for established national and local holidays. Workers should be granted the stipulated annual leave, sick leave and maternity/paternity leave without any negative repercussions.

#### **2.5 Discrimination, harassment and diversity**

ASSA ABLOY values and promotes diversity and gender balance. ASSA ABLOY expects its business partners to provide a work environment where everybody should be treated with respect and dignity and be given fair and equal opportunities for development. ASSA ABLOY does not tolerate any form of discrimination or harassment in the workplace, and our business partners shall not discriminate against any worker based on race, ethnicity, sexual orientation, gender, religion, age, disability, political opinion, nationality or any other potentially discriminatory factor.

#### **2.6 Alcohol and/or drug abuse**

ASSA ABLOY works proactively to remove any workplace hazards. Individuals producing products or providing services for ASSA ABLOY should not be on company premises or in the workplace if they are under the influence of, or adversely affected by, alcohol, to the extent this impairs the individual's ability to perform his or her work duties. ASSA ABLOY has zero tolerance on drugs, and does not allow individuals producing products or providing services for ASSA ABLOY to be on company premises or in the workplace if they are under the influence of drugs.

#### **2.7 Consumer interest**

ASSA ABLOY requires that applicable health and safety requirements are met for its products and services, and our business partners shall take this into account when producing goods or providing services for ASSA ABLOY.

#### **2.8 Responsible sourcing of minerals**

ASSA ABLOY is committed to comply with relevant laws and regulations requiring disclosure of the use of conflict minerals. Conflict minerals are minerals from high risk and conflict-affected areas that have directly or indirectly contributed to financing of armed groups, where some groups are believed to be responsible for serious human rights violations. Goods provided to ASSA ABLOY shall be in compliance with relevant laws and regulations regarding conflict minerals.

## **3. Environment**

#### **3.1 Environment and sustainability**

ASSA ABLOY shall meet legal environmental requirements and expects its business partners to obtain, keep current, and comply with all required environmental permits and licenses needed for their operations. ASSA ABLOY encourages the development and diffusion of environmentally friendly technologies. ASSA ABLOY recommends all business partners with significant environmental impact to implement certifiable environmental management systems or similar systems that facilitate the business partners' work with the environment.

ASSA ABLOY continuously seeks ways to reduce the consumption of resources. ASSA ABLOY expects its business partners to strive to reduce its consumption of resources, including energy, waste and water, prevent pollution, have noise levels at acceptable levels and improve the overall environmental impact of its operations and products along the value chain. Further, chemicals and hazardous materials shall be labeled properly and safely stored, and recycled, reused and disposed of correctly.

## 4. Health & Safety

### 4.1 Work environment

ASSA ABLOY works systematically with health and safety and is committed to provide a safe work environment, and expects its business partners to do the same. Risks that can cause accidents or impair the health and well-being of individuals while working for ASSA ABLOY shall be reduced. Therefore, occupational health and safety hazards shall be identified, evaluated and managed through a prioritized process of hazard elimination, engineering controls, and/or administrative controls.

For ASSA ABLOY a safe work environment means, for example, that work areas are kept clean and free from pollution, machines used in production are safe and do not risk the health of the workers, and instructions regarding the use of personal protection and work equipment are adhered to. Personal protective equipment and work equipment shall be provided to the workers. Further, the work environment shall be well lit, and have temperature and noise at acceptable levels. When noise is above acceptable levels, personal protective equipment such as ear protection shall be used. All units should provide adequate and clean changing rooms, washrooms and toilets, separate for men and women. ASSA ABLOY also expects the above from its business partners.

### 4.2 Building and fire safety

Hazardous material and equipment must be stored according to applicable law. There should be clearly marked emergency exits. Exits must not be blocked and should be well lit. All workers shall receive information about the safety arrangements such as emergency exits, fire extinguishers, first aid equipment, etc. An evacuation plan should be displayed on each floor of a building. The fire alarm should be tested and evacuation drills carried out on a regular basis.

### 4.3 First aid and medical care

First aid equipment must be available at appropriate locations, and at least one person in each location should be trained in basic first aid. The business partner should cover the costs of medical care for injuries incurred on its premises if they are not covered by social security or insurance, provided safety rules have not been violated.

## Appendix I: Report of non-compliance

I am aware of a situation that may not be in compliance with the ASSA ABLOY Business Partner Code of Conduct. Description of potential or actual conflict under the Business Partner Code of Conduct:

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**Name and contact details:**

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Please send this report to:  
Code of Conduct function  
ASSA ABLOY AB  
Box 70340  
SE-107 23 Stockholm, Sweden

or to:  
[code@assaabloy.com](mailto:code@assaabloy.com)

ASSA ABLOY is committed to protecting your personal data. In the Code of Conduct – Privacy Notice (which you can find at <https://www.assaabloy.com/en/com/menu/code-of-conduct-privacy-notice/>) you can read about how ASSA ABLOY processes and uses the personal data that we receive in connection with a Code of Conduct concern and how you can contact us if you have additional questions regarding our processing of your personal data.

## Appendix II: Certification

ASSA ABLOY requests the Authorized Signatory/Legal Representative of your company reads through the ASSA ABLOY Business Partner Code of Conduct and by signing below and affixing company seal, if applicable, confirms you have understood, and will comply with the ASSA ABLOY Business Partner Code of Conduct.

I, the undersigned, Authorized Signatory/Legal Representative of the company set out below, confirm that the company has understood and will comply with the ASSA ABLOY Business Partner Code of Conduct.

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Place, date

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Company name

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Signature

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Name

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Title

The ASSA ABLOY Group is the  
global leader in access solutions.  
Every day we help people feel  
safe, secure and experience  
a more open world.

**ASSA ABLOY**

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