



Code of Conduct Business Relations

Blinkfyrrar is a specialist on products and services for traffic solutions that will guide you who are "on your way". We are a partner within infrastructure. By enabling efficient and safe flows in traffic we are an active part in the development of the modern and sustainable society.

AB Blinkfyrrar is fully aware of the responsibility of our business and have therefore created a strict set of ethical values, a code of conduct, for business relations (CoCBR), to guide us in our daily work life.

This CoCBR are aligned with the international minimum standard based on the United Nations Guiding Principles on Business & Human Rights (UNGPs) and OECD Guidelines for Multinational Enterprises (OECD).

Blinkfyrrar expects all suppliers, including sub suppliers, i.e. all companies that conducts business with Blinkfyrrar (hereafter called BR), to embrace this CoCBR, that sets the minimum standards for doing business with Blinkfyrrar. It is the responsibility of our supplier to inform and follow up on sub suppliers' alignment of this Code of Conduct.

Business principles

All co-operations shall be conducted in such a way that agreed demands on the product is met.

Agreements shall be unambiguous and documented. All information related to the agreements shall be regarded as confidential

Relations shall be treated with professionalism and respect.

Environmental and work environment principles

Blinkfyrrar' s staff and other stakeholders who work for Blinkfyrrar shall:

Apply precautionary principles to minimize environmental risks.

Strive to use technology that is as environmentally friendly as possible and economize on raw materials and energy.

Carry out preventive work to limit polluting emissions and take into account natural and cultural values.

Follow the environmental protection legislation that applies in the country where all or part of the goods are produced.

Label, handle, store and transport dangerous goods and chemicals and other dangerous products or materials in the prescribed manner and ensure that information on safe handling is available. Apply substitution so that products with the least possible environmental impact are used.

Handle waste in the prescribed manner and, as far as possible, sort waste at source to promote recycling.



Follow the worker protection and work environment legislation that applies in the country where all or parts of the goods are produced.

Production and office premises must have functioning fire equipment, evacuation alarms, emergency exits and first aid equipment easily accessible and well signposted. Employees must be informed of the risks involved in their work, have access to personal protective equipment if necessary, and receive the necessary training in the field

Machinery and equipment must be safety equipped and maintained in the prescribed manner so that the risk of injury and ill health is minimized. Information on safe handling shall be available.

Social principles

To be followed:

- United Nations Declaration on Human Rights
- The ten core conventions of ILO regarding forced labor, child labor, discrimination, freedom of association, the right to collective bargaining, health and safety (no. 29, 87, 98, 100, 105, 111, 138, 155, 182 and 187)
- United Nations Convention on the Rights of the Child, article 32
- Labor law, including rules on wage conditions, and the social insurance protection that applies in the country where all or parts of the goods are produced

To meet the minimum requirements (UNGPs/OECD) all BRs shall take the following actions:

- **Establish systems of due diligence** by conducting regular impact risk assessments of potential and actual adverse impacts on own operations.
- **Prevent and mitigate** both potential and actual impacts.
- **Measure and track** effectiveness of actions implemented.
- **Communicate** to all impacted stakeholders and BRs on findings, actions taken and ongoing procedures.

Any known adverse impacts, caused by, contributed-, or linked to BRs must be communicated to AB Blinkfyrrar as soon as BRs have gotten aware of it.

Precautionary Principle

AB Blinkfyrrar also expect BR to always apply the precautionary principle, which means that they are expected to always take precautionary measures whenever there is reason to believe that a potential action may negatively impact the health or safety of a person, society or the environment.

Bribery and corruption

The BR shall comply with all applicable national and international anti-corruption laws and regulations. BRs shall not, directly or indirectly offer, provide or receive anything of value to improperly influence an official act or to secure an improper advantage to obtain or retain business but shall follow United Nations Convention on Corruption.



Conflict of Interest

Any situation that may involve a conflict of interest, or the appearance of a conflict of interest, between AB Blinkfyrar and its BRs must be avoided: the professional judgement, performance or decision making ability of an employee of AB Blinkfyrar or of the BRs must remain independent from considerations that do not involve the business at hand and cannot be (or seem to be) influenced by private interests.

Fair Competition and Business Practices

AB Blinkfyrar strives to act, at all times, as a fair and responsible market participant and expects the same from its BRs. Thus, BRs are required to comply with applicable competition laws and regulations (also referred to as anti-trust laws).

Should a Business Partner have interactions with a competitor of AB Blinkfyrar, Business Partner must not share any of AB Blinkfyrar' sensitive information with the competitor and vice versa, even via third parties. BRs are also expected to compete fairly and ethically for all business opportunities. They must ensure that all statements, communications, and representations to AB Blinkfyrar are accurate and truthful.

Trade Sanctions and Export Control

When conducting business with AB Blinkfyrar, BRs are required to comply with all trade sanctions that are applicable to AB Blinkfyrar and with all relevant export control laws and regulations. Trade sanctions restrict trade and financial transactions with certain countries, companies, organizations, and individuals, while export controls restrict the export and re-export of certain "controlled" goods, software, and technology without the required licenses or other authorization from the relevant authority. Violation of these rules may expose AB Blinkfyrar to significant penalties and other adverse consequences.

Protecting AB Blinkfyrar' Confidential Information and Intellectual Property

AB Blinkfyrar may share confidential information and/ or intellectual property elements with its BRs during their business relationship. BRs are required to handle AB Blinkfyrar' confidential information in accordance with the confidentiality provisions in place and in particular: - protect AB Blinkfyrar' s confidential information from improper disclosure, theft or misuse by taking all adequate steps to safeguard such confidential information; - only disclose AB Blinkfyrar confidential information to their directors, officers and employees with a legitimate "need to know"; - not to share AB Blinkfyrar' confidential information with a competitor of AB Blinkfyrar, unless AB Blinkfyrar has given prior written consent; - report in our grievance mechanism any loss of, or unauthorized access (by a director, officer or employee who does not have a 'need-to-know' or a third party) to AB Blinkfyrar' confidential information; and - at the end of the business relationship, handle confidential information in accordance with the confidentiality provision in place.

Audits

In addition to any audit right set out in any agreement entered with AB Blinkfyrar, BR agree:

- that AB Blinkfyrar (either directly or through an independent third party appointed for that purpose) may verify and assess their compliance with this CoCBR by conducting an audit at any time, subject to prior written notice. If AB Blinkfyrar believes that prior notice will interfere with AB Blinkfyrar verifying whether the Business Partner has complied with its obligations or undertakings under the CoCBR, BRs will permit an audit without prior notice.



BR shall be able to show AB Blinkfyrar all relevant information and allow AB Blinkfyrar and its representatives access to their premises for the purpose of performing such audit. We expect the following documentation to be available for review in such audit;

- List of employees, including their names and ages
- Payroll documents, such as time sheets, pay stubs and overtime records
- Safety documentation, including material safety data sheets, accident logs, and necessary health and safety certificates and permits
- Environmental records, such as data on major environmental impacts and the corresponding permits mentioned above
- Documentation of any non-compliance issues with this Code, along with a summary of corrective actions implemented

Grievance & Cooperation

AB Blinkfyrar encourage BR to ask questions regarding this CoCBR and are required to promptly raise concerns in case of suspicion of non-compliance with applicable legislation and regulations, or with the requirements under this Code.

Concerns may be reported via the whistle-blower mechanism if severe adverse impacts are noticed, we recommend that all other concerns be reported through BRs regular contact at AB Blinkfyrar.

The identity of the reporter, if known to AB Blinkfyrar, will be fully kept confidential and anonymous if requested. BRs are expected to collaborate with AB Blinkfyrar in case of investigation and must not retaliate against anyone who reports suspected business misconduct.

Consequences of violations

We expect our BRs to be transparent regarding non-compliance and take relevant actions when discovered.

BRs that demonstrate lack of willingness to implement a management system to meet the minimum international standards or neglect to inform AB Blinkfyrar about known severe adverse impacts, AB Blinkfyrar reserves the right to end the business relationship immediately.

Niklas Wisén
CEO – AB Blinkfyrar