

Responsible/owner: CEO	Approved by: Management team	Approval date: 2026-04-30	Updated: Annually
Type of document: Policy	Classification: Public	Concerns: All employees	Replaces: 2025-05-14

Biobase Sweden AB

Code of Conduct



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Background

Biobase Sweden AB's goal is to be the obvious choice for customers and suppliers when purchasing high-quality biobased and biodegradable functional fluids. Biobase Sweden AB aims to have the industry's most satisfied customers, the highest level of employee engagement, and create sustainable and profitable growth.

Biobase Sweden AB's goal is to be an industry leader in environmental and sustainability matters and to take clear economic and social responsibility. Sustainable business involves work in multiple dimensions, including efforts to develop more sustainable products, make responsible purchases, and minimize our own environmental footprint.

Our values - responsibility, transparency, and simplicity - guide us in our daily work. Together with our code of conduct, which summarizes our overall guidelines for responsible behaviour, it provides a framework for how we should conduct ourselves in our daily operations. Since our business partners are a vital part of our operations, we also expect them to respect and endorse our values and our code of conduct.

Biobase Sweden AB's code of conduct is based on:

- The United Nations Universal Declaration of Human Rights and its related UN conventions, such as the Convention on the Rights of the Child.
- The International Labour Organization's core conventions on principles for international business and social policy
- The OECD Guidelines for Multinational Enterprises
- The UN's Global Compact

3/4/2026

Erik Josephsson

CEO, Biobase Sweden AB



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Scope and application

Our code of conduct applies to all employees at Biobase Sweden AB and all business partners. Our code of conduct is used in the evaluation of business partners.

Legal compliance

The code of conduct does not replace legislation, and Biobase Sweden AB must always comply with the legal requirements and regulations in the countries where we operate. We place the same requirements on our business partners. If the code of conduct and legislation should conflict with each other, the legislation takes precedence. However, if the code of conduct sets a higher standard than existing laws, the code of conduct applies.



Implementation and monitoring of compliance

The CEO of Biobase Sweden AB has the overall responsibility for the implementation and compliance with Biobase Sweden AB's code of conduct.

It is the responsibility of each employee to ensure that they understand and follow the content of the code of conduct and related documents. The responsible manager is also accountable for ensuring, as a part of annual employee dialogues, that the employee is up to date on current policies. We continuously monitor that the organization adheres to our commitments in this code and it is also part of the onboarding process for new employees.

Reporting of misconduct

If you believe that Biobase Sweden AB is not acting in accordance with this code of conduct or that Biobase Sweden AB's business partners are not complying with the terms of the code, we encourage you to report this to Biobase Sweden AB by using the anonymous form available at the website bioba.se together with Biobase policy document.

Monitoring of suppliers

By accepting Biobase Sweden AB's code of conduct, the supplier commits to following all of its relevant and applicable parts. The supplier is also responsible for ensuring that their subcontractors adhere to this code of conduct. The supplier also grants Biobase Sweden AB the right to investigate compliance with this code of conduct through various types of site inspections, or other means. Biobase Sweden AB applies a risk-based approach to supplier monitoring and may require corrective action plans in the event of deviations. Suspected deviations from Biobase Sweden AB's code of conduct should be addressed immediately. Suppliers who enter into agreements with Biobase Sweden AB are responsible for implementing and monitoring compliance with Biobase Sweden AB's code of conduct in applicable parts.

Sanctions for violations of the Code of conduct

Violations of this Code of Conduct may result in disciplinary action, including termination of employment, as well as termination of contracts with business partners.

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Business ethics

Biobase Sweden AB's actions should, in all circumstances, regardless of the country or market, be characterized by responsibility and respect for customers, suppliers, business partners, and the local communities where we operate. Ethical behaviour and good business practices are of vital importance to our development and profitability. We should convince our business partners solely with commercial arguments. The goal is to develop long-term and stable business relationships where Biobase Sweden AB is seen as a responsible and professional partner.

Fair competition

We never enter into agreements or understandings – whether explicit, implied, oral, or written – with a competitor regarding matters such as pricing, discounts, promotions, bids, sales terms, or sales areas. We do not exchange sensitive market information with our competitors, either directly or through trade associations, suppliers or customers. Uncertainty should always lead to seeking legal advice before contacting a competitor.



Bribery

Bribery, kickbacks, and any other form of corrupt behaviour is strictly prohibited. Neither Biobase Sweden AB as a company, nor anyone acting on behalf of Biobase Sweden AB, may grant, offer or promote payments, gifts or other benefits that can influence or may be perceived to influence the objectivity of a business decision or a public authority decision. Minor tokens of hospitality of nominal value may be accepted, provided they are consistent with good business practice and do not influence decision-making.

Likewise, neither Biobase Sweden AB as a company nor anyone acting on behalf of Biobase Sweden AB is allowed to accept, receive, or request gifts or other benefits.

Conflicts of interest

Conflicts of interest between Biobase Sweden AB and its business partners should be avoided. Examples of conflicts of interest include personal financial interests, purchases from or sales to family members or close friends. We always prioritize the interests of Biobase Sweden AB over personal interests. All potential conflicts of interest must be reported immediately to the manager.

Confidentiality

Biobase Sweden AB is committed to maintaining high standards regarding information security, integrity and transparency. Protecting and managing information in accordance with

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current legal requirements is of high priority for Biobase Sweden AB. We may collect and process personal data, for example contact details for personnel within a company, for business purposes. Confidential staff information is kept secure. We will not disclose any information to any company outside of Biobase Sweden AB unless required by law.

Human rights

Human rights must be safeguarded throughout the value chain. Employees must be treated fairly, on equal terms and with respect.



Child labour

Every child should be protected from economic exploitation and from performing work that may be harmful to the child's physical or mental health or negatively impact the child's ability to receive an education.

Biobase Sweden AB does not accept child labour. If, despite Biobase Sweden AB's efforts to avoid this, it is found that a child is involved in the production of products, the employer must act in the best interests of the child. Biobase Sweden AB's business partners are expected to collaborate in finding a satisfactory solution that is in the best interest of the child.

Forced labour

No form of forced labour is permitted, nor should any work be linked to any form of

punishment. Employees must have freedom of movement during their employment. The employer may not confiscate identity cards, travel documents and other important personal documents from their employees, thereby preventing employees from terminating their employment.

Freedom of association and collective negotiation

Biobase Sweden AB respects employees' rights to organize or not to organize, in trade unions and to engage in collective or individual negotiations in accordance with local laws. No employee shall risk harassment or retaliation for exercising these rights.

Employment Contracts, Terms, and Compensation

Working hours must comply with national legislation. Employees must receive minimum wage according to local laws and regulations. Overtime should be compensated at a premium rate. Salaries should be paid regularly. Deduction from salaries must be transparent and must never be used as a disciplinary measure.

All employees must have a written, understandable and legally binding employment contract. Employers should not engage in the systematic use of part-time, short-term, or temporary workers, interns, or false apprenticeship contracts for the purpose of paying lower wages and providing fewer benefits. Employees on parental leave should not be terminated or threatened with termination and must have the opportunity to return to their previous employment with the same terms and benefits.

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Diversity and equality

Biobase Sweden AB values and promotes diversity and equality. We are committed to maintaining an environment based on respect for the unique and equal worth of each person, realizing everyone's full potential by fostering an inclusive culture. Where necessary, measures must be taken to achieve equal rights and equal opportunities in the workplace, regardless of ethnicity, gender, gender identity, disability, religion or belief, sexual orientation and age.

Discrimination and harassment

Biobase Sweden AB opposes all forms of discrimination, harassment, victimization or offensive treatment and will take measures to combat discrimination on these grounds. All forms of discrimination and harassment must be addressed and remedied promptly and with consideration for the victim.

Work environment and safety

Biobase Sweden AB works systematically for a safe and healthy work environment. Risks that can lead to accidents or impaired health should be addressed immediately.

Work environment

Our work environment work is based on national legislation in the countries where we operate. For Biobase Sweden AB, a safe work environment includes proactive risk management, competence to perform tasks safely, open dialogue, continuous improvement, clean workplaces, that all machines used in production are safe, and an adherence to equipment and personal safety instructions. Biobase Sweden AB works on attitudes and behaviours to achieve a strong safety culture.



All handling of chemicals must be carried out in accordance with the safety data sheets and CLP and REACH regulations. Spills, releases, and improper handling must be reported immediately. Hazardous materials and equipment must be stored, handled, and transported in accordance with applicable legislation. Emergency exits must be clearly marked, unobstructed, and well-lit. All workers must be informed about safety measures, such as emergency exits, fire extinguishers, first aid equipment and other life-saving measures.

Alcohol and/or Substance Abuse

Biobase Sweden AB works to avoid exclusion from employment and takes responsibility in helping to create a drug- and alcohol abuse- free society. In the process of creating safe and secure workplaces, it is necessary to take measures to prevent and counteract the negative consequences of substance abuse. Biobase Sweden AB has a zero-tolerance policy for alcohol and other drugs during working hours. The aim is to prevent ill health, accidents, and harmful use.

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Environment and quality

Biobase Sweden AB works actively to reduce the environmental impact of our operations, with a focus on products, transport, energy use and recycling. Biobase Sweden AB takes quality and environment into consideration throughout our operations. Adhering to the statutory environmental requirements in each operating country is a minimum requirement.

To meet customer expectations, Biobase Sweden AB supports and encourages sustainable innovation. Stakeholder expectations are included in quality and environmental considerations. This means that dialogue with customers, suppliers and other partners is a source of innovation and continuous improvement. Systematiskt kvalitets- och miljöarbete Biobase Sweden AB implementerar miljö- och kvalitetsledningssystem.

Systematic Quality and Environmental Work

Biobase Sweden AB implements environmental and quality management systems.

Product Contents

Monitoring Swedish and European legislation for permitted substances or the use of hazardous substances is a given. Biobase Sweden AB expects, and works actively for, products and services to comply with established legal and safety requirements.



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Communication

Biobase Sweden AB's main external communication channel is the website www.bioba.se. To some extent, communication also takes place through LinkedIn and Facebook.

Internally, the company's management communicates through regular check-ins and meetings with employees. Both internal and external communication are transparent and accurate. Necessary information, unless considered company confidentiality, is openly disclosed on the website and is continuously updated to build trust with customers, authorities, and partners.

External communication of strategic importance is verified and communicated by the CEO, the company's spokesperson. If the CEO is unavailable, the chairman takes that role. Responsibility for the communication required for day-to-day operations, including via social media, can be delegated to employees. In these cases, the communication should only pertain to company-specific matters.

