SANDVIK

# Code of Conduct – it's in our hands



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# We make the difference

Sandvik puts ethics and sustainable business practices first. These standards are part of everything we do, both in our own operations and in our customer and supplier partnerships. Sandvik always applies these practices, even in challenging situations. We adhere to our Code of Conduct and evaluate our progress, taking prompt action if necessary. This proves how deeply rooted this behavior is in our culture. A culture of doing things right.

**Our everyday guide**

The Code of Conduct is a cornerstone of our operations. We are a trusted business partner to our customers and suppliers, which is a key success factor for us both now and in the future. Therefore, our ethical business conduct is crucial. We should never circumvent our Code of Conduct.

Sandvik acts in a global business environment. This can be challenging because of complex market conditions. In such cases, we should always turn to our Code of Conduct for guidance on how to handle difficult situations and maintain our high standards of ethical business.

**Living by our Code of Conduct**

Our Code of Conduct sets the principles for how we must act and which business decisions we must make as individuals and as a company.

A commitment to the Code of Conduct empowers each individual to express concerns and raise questions regarding any behavior that is or could be perceived as contradictory to our corporate values. Everyone who works at Sandvik or is a customer, supplier or partner is encouraged to raise concerns regarding violations of the Code with their manager or by using our confidential reporting tool, Speak Up. We have built our strong reputation together and we will maintain it together.

**Our Code of Conduct defines our company**

Both the Code and Sandvik's core values are part of our DNA and together with our commitment to sustainable business, they help build our great company.

Our strong ethical culture is created jointly by all employees and leaders across the businesses. The daily choices that we make define Sandvik and we are all obliged to follow the Code of Conduct. Every single day we should act accordingly, live by its principles and by our core values. A key factor in achieving this is to take part in the mandatory Code of Conduct training.

Each and every one of us is responsible to ensure we do things right. Together, we make the difference.



**Stefan Widing**
President and CEO

# We make the shift

Our purpose is our guide. We are forward thinkers, driven by our passion to continuously innovate smarter solutions and enable important shifts. We aim to advance society and the planet, creating benefits for all our stakeholders – our customers, our employees, our communities – ultimately leading to shareholder value. From big, shift-making advancements to small, everyday improvements – we apply our expert minds and collaborative ways of working with customers and partners to build more resilient and stronger businesses.

We drive innovation and digitalization to unlock largescale value, improve operations, create safer operating conditions and achieve more with less.

Through our diverse teams, strong culture and leading-edge skills we enhance productivity, efficiency and sustainability in a world that needs to evolve.

Our role is clear – through every action, every day, we make the shift and advance the world through engineering.




## Sustainability at Sandvik

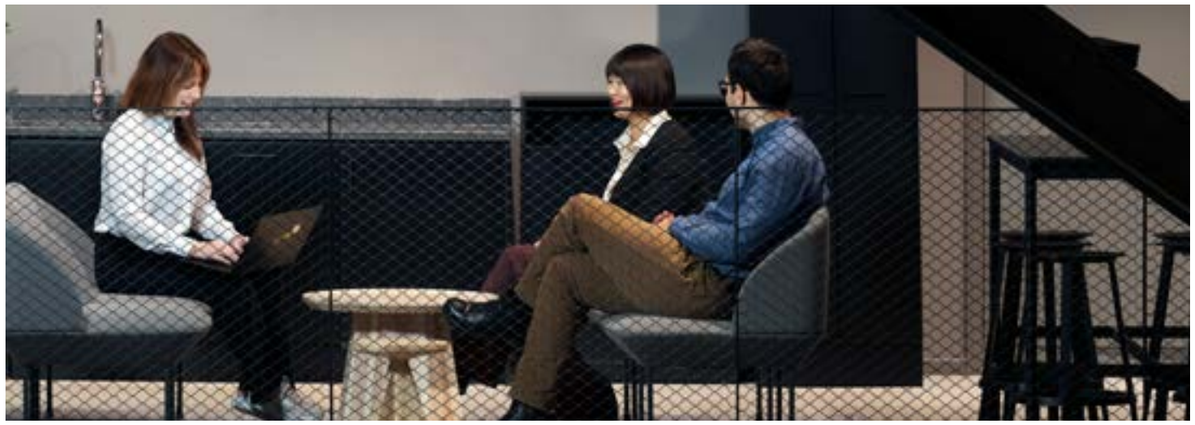
We strive towards sustainability in everything we do.

Our Sustainability Goals take a holistic approach that includes customers, suppliers and our own operations in its scope and will help us make the shift to a more sustainable business. This will help our planet and bring greater value to the company, our customers and other stakeholders. Our main contribution to sustainability is through our products and solutions.

# Our core values

Our company is privileged to have a long and rich history, which has been made possible by generations of employees dedicated to Sandvik's success.

Since Sandvik was founded in 1862, an intense Customer Focus has enabled the Group to create solutions that address the needs of our customers. When industrializing the Bessemer process, Sandvik's founder Göran Fredrik Göransson was driven by Innovation, a value that has been part of the company's heritage ever since. Fair Play has been equally important to the success of the company. Fair Play drives Sandvik employees to conduct business according to high ethical standards and with a strong commitment to sustainability and the community. Finally, Göran Fredrik Göransson and his team would never have succeeded without a Passion to Win – the passion to make Sandvik a leading global company. These four values have generated success for Sandvik in the past and will continue to do so into the future.



## Customer focus

We are agile, decentralized and make decisions close to customers.

**What the core values mean for us as an organization**

- We run our business in a decentralized manner with decisions and accountability close to customers.
- We quickly respond to customer demands and adjust to changed market conditions.
- We are customer-centric and constantly strive to exceed our customers' expectations and enable them to excel in their business.

**What the core values mean for us as an individuals**

- I ensure that my daily work adds value for our customers.
- I am proactive and always have the expectations of our customers in mind.
- I seek and respond to the true needs of our customers.

## Innovation

We are technology leaders, through innovation.

**What the core values mean for us as an organization**

- We always strive for technology leadership through innovation and successful partnerships.
- We apply our expert minds and collaborative ways of working to enable both everyday improvements and innovative shifts.

**What the core values mean for us as an individuals**

- I have the courage to think in completely new ways and I embrace new perspectives.
- I proactively share knowledge and experience.
- I constantly seek to improve our ways of working.

## Fair play

We are ethical and compliant, dedicated to health, safety and sustainability.

**What the core values mean for us as an organization**

- We put health and safety first.
- We are ethical and compliant and conduct business in a sustainable and responsible manner.
- We are guided by our Code of Conduct and the Sandvik Way.

**What the core values mean for us as an individuals**

- I always act in line with our high ethical standards and put safety first.
- I always show consideration for the environment and the communities in which we operate.
- I care about others and build relationships based on honesty, respect and trust. and sustainability.

## Passion to win

We establish market leadership through empowered people, strong performance management and continuous improvements.

**What the core values mean for us as an organization**

- We have a culture of execution and continuous improvements.
- We are a transparent, high-performing organization with strong performance management.
- We push boundaries and are passionate about ensuring our market leadership – aiming to be no 1 or no 2.

**What the core values mean for us as an individuals**

- I am courageous, enjoy taking the lead.
- I am determined to walk the extra mile.
- I set ambitious targets, deliver on my promises and collaborate when that is beneficial to improve efficiency and results.

# Why we have this Code

We want to be a competitive, fair, respectful and trusted partner to our customers, our current and future colleagues and our suppliers and other stakeholders. We also want to be a good corporate citizen wherever we conduct business.



Sandvik's Code of Conduct ('Code') sets the principles for how we do this by turning our purpose and values into everyday behaviors. It tells us how we are expected to interact with our stakeholders and the surrounding world. It serves as a set of principles to apply in our daily work and is a description of our common culture worldwide. We are convinced that high ethical standards and strong values build pride and create long-term value that are beneficial for our customers, the company and society. This means that we all must take the time to read and understand this Code, apply it consistently, and ask questions if something is unclear.

## Our Code applies to everyone

The Code of Conduct applies to all of us, from our Board of Directors to each of our colleagues worldwide. As a manager/supervisor or leader, you have a particular responsibility to lead by example and conduct our business in accordance with this Code. You make sure people on your team are provided with the training necessary to understand the Code and the policies related to it.

We shall always comply with the local laws, regulations and rules in each of the countries where we operate. Our Code sets the minimum requirements. If any local, national or international laws, regulations or rules take a more demanding position on matters contained in the Code, they shall be observed and complied with. In the case of conflict between this Code and mandatory local laws or regulations, the local laws or regulations shall prevail.

We also have a separate Supplier Code of Conduct in which we outline our requirements for our suppliers. Supplier evaluations are based upon the Supplier Code of Conduct.

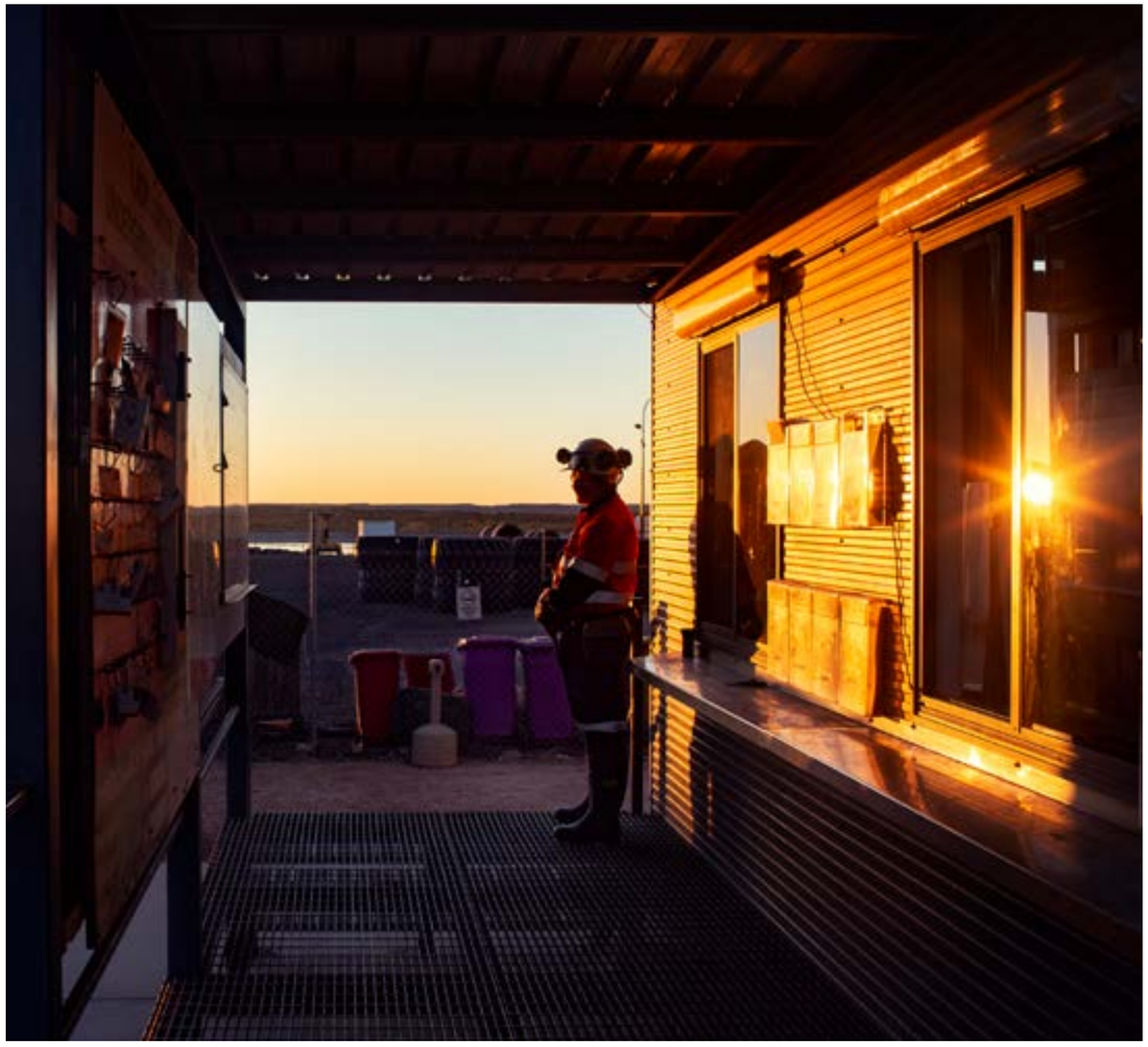
## We all need to commit to the Code

As a company, we are committed to conducting our business with honesty, integrity and high ethical standards. It is important for each and every one of us to understand this, to act accordingly, be accountable, and follow these principles and our core values in our daily work.

We are all part of building the continued long-term success of our company independent of what roles we are in. Failure to follow the principles outlined in our Code of Conduct will be taken seriously and could result in disciplinary action, ranging up to and including dismissal.

## Foundation of our Code

Performance from a responsible and sustainable perspective is central to a successful company. Sandvik has a long history of working in accordance with applicable laws and internationally recognized principles, as well as in partnership with our local communities. The foundation of our Code of Conduct is therefore, together with our core values, built on the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention against Corruption as outlined in the ten principles of the United Nations Global Compact, in which we participate. We are committed to adhering to the principles, to the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. We believe that by doing so we are providing a solid foundation that supports a more sustainable future for Sandvik and for our stakeholders.



# Speak Up!

You may come across a situation that does not appear to conform with our principles as set out in our Code of Conduct, our policies, or the law. In such an instance, we expect you to bring your concern to the company's attention so that we can improve our work environment and reduce risks for Sandvik, so that we can continue to be an ethical and sustainable company.



## How you can Speak Up

If you are an employee, we expect you to report any non-conforming incidents or concerns directly to your manager. However, if you do not feel comfortable going to your manager, or if you are not an employee, you can use our Speak Up system.

Speak Up is available through our intranet or internet portals and through country-specific telephone hotlines 24 hours a day, 7 days a week, and in all countries where Sandvik has operations. In addition to reporting incidents, the system can be used to ask questions related to the Code.

Speak Up

**Online**
home.sandvik/speakup

**By phone**
See your country's hotline number on the Speak Up portal

**QR-code**
Scan the QR-code to leave a report or follow up

## The Speak Up process

All reports that are received will be evaluated and an internal investigation will be conducted if required. Relevant case details that you (the reporter) provide are recorded in a case management database and an investigator may contact you for further details. The information you provide is kept confidential. The reporter can be anonymous if local laws permit, however, all reporters are strongly encouraged to identify themselves to help facilitate an investigation.

All reports that are submitted into Speak Up are kept in a highly secure system and only a small team of trained investigators have access to the reports. The Speak Up process follows all applicable whistleblowing and data privacy laws and personal data is deleted in accordance with GDPR (General Data Protection Regulation), all to ensure the reporter's personal data is kept safe.

**More details about the process can be found at:** home.sandvik/speakup or on the Sandvik intranet

## Non-retaliation policy

Your privacy and integrity are of the greatest importance to us at all times. This is particularly relevant when you or one of your colleagues step forward to report a concern or suspected breach of our Code, policies, or the law.

As outlined in our Speak Up Policy, there will be no retaliation taken against an employee or business partner who, in good faith, voices their concern. Reports that are found to be malicious or frivolous, however, may lead to disciplinary action.



# 1 At our workplace

Working terms and conditions are at the core of employment relationships. They cover a broad range of topics, from working time to remuneration, as well as physical conditions and psychological safety in the workplace. Sandvik strives for a fair, safe and inclusive environment that allows everyone to perform at their best throughout our company and wherever we operate.

## 1.1 We believe in fair working terms and conditions



### Our principles

As a company, we understand our responsibility to our employees and will promote safe and healthy labor practices.

We have zero tolerance for any form of child, forced, or compulsory labor.

We will not permit working hours that are not in compliance with national laws and industry standards.

We will pay wages and provide benefits that are market competitive and consistent with industry standards in the countries in which we operate.

We recognize and respect our employees' right to freedom of association and collective bargaining.

### For you this means

- You have a responsibility to understand your own employment conditions.
- Your manager/supervisor has a particular responsibility to lead by example and promote fair working conditions.
- You are entitled to a written employment contract or offer of employment stating the terms and conditions of your employment.
- You can expect clear and regular communication regarding your wages and benefits.
- You have the right to appoint worker representatives and form workers' associations or join trade unions of your own choosing.
- Your decision on whether or not to join a trade union or form workers associations or appoint worker representatives is an individual choice; you will be respected regardless of which decision you make.
- In situations in which the right to freedom of association and collective bargaining are restricted under law, Sandvik can facilitate means of independent and free association and bargaining if you request it.
- You will be treated with respect and will not be subjected to physical, verbal or financial punishment.

### What should I do?

**Throughout this document there are references to "we". Who are "we"?**

The term "we" is used to describe all the employees of Sandvik regardless of business area, division, function, or role. It applies to all our subsidiaries worldwide and joint ventures that Sandvik controls. We all share a responsibility to follow our Code, our policies and the laws and regulations that apply in our daily work.

**We have a large customer order that requires many of us to work the maximum overtime for several months in a row. Although I understand the business need, it is putting a strain on my family. Is there anyone I can talk to in order to find a workable solution?**

Of course you should always start by speaking with your manager. Be sure he/she clearly understands the strain you and your family are experiencing. In most cases, an appropriate solution can be reached with open and honest dialogue. If it is not possible to reach an acceptable agreement, contact either your Human Resources or work representative, if applicable, for further advice.

### For more information

**Relevant policies, procedures and guidelines:**
People Policy

**Contacts:**
Relevant manager/supervisor and Human Resources team





# 1.2 We are committed to health and safety

Health and safety means the provision of leadership, workplace environments and work practices that result in a culture where every person is committed to preventing injury and occupational illness, and where we actively promote psychological and physical health and well-being for all our people.

### For more information

**Relevant policies, procedures and guidelines:**
Environment, Health and Safety Policy. Site/local health and safety rules/procedures.

**Contacts:**
Your manager/supervisor
BA/Division or site EHS managers

## What should I do?

**I'm working on a maintenance task with a colleague who has done this many more times than I have and is seen around here as "the expert". We have a Safe Work Instruction which I was trained in but my colleague is insisting that we do it "their way" which I think introduces some safety risks that I'm not comfortable with. What should I do?**

Your colleague may well have come up with a "better way" of doing the task but any new method should be discussed with the supervisor/ engineering manager, especially given your concern about the additional risks this may introduce. You don't need to have manager or supervisor in your job title to be a leader, especially a safety leader. While it can take genuine courage to speak up against a colleague who has long experience, you should first raise the question of the additional risk with him or her and, if they refuse to discuss this with you and/or change the way of working, then you should refuse to do the task until the issue has been resolved with your supervisor.

**My partner and I have a new baby and we're not getting very many full nights of sleep. We're also struggling a bit financially and I'm concerned that because of these issues I'm stressed, distracted and tired when I'm at work. I'm not sure if I should I tell anyone at work as these are really my own personal issues – what should I do?**

Although the issues causing the problem are personal, being psychologically stressed, tired and distracted at work can result in increased risk of injury or illness for you and maybe for your work colleagues. Sandvik takes your psychological and physical health and safety very seriously so you should have a discussion with your supervisor about this, even if you don't feel comfortable disclosing all the personal details. Your work location may have health and well-being programs that could help and most Sandvik locations provide access to confidential employee assistance programs where you can get some professional advice.

## Our principles

When conducting our business, we are committed to our vision of Zero Harm to our employees, our contractors, our suppliers and our customers.

We integrate both physical and psychological health and safety into every aspect of our daily business and believe a fully embedded health and safety culture is necessary to achieve our sustainable business ambitions.

We believe that a critical success factor is having proactive and visible health and safety leadership regardless of one's role.

We recognize, promote and share good health and safety practices throughout our business.

## For you this means

- You take the time to understand the health and safety risks present in your daily work as well as the actions you can take to prevent them.
- You always comply with the Sandvik Environment, Health & Safety Policy and Procedures, all local health and safety legislation, rules and procedures, and you share your ideas if you identify ways to minimize risks.
- You do a personal risk assessment immediately before starting a task to ensure that the procedures, personal protective equipment and emergency provisions are adequate and in place.
- You stop work and immediately report any issue to your manager/ supervisor if you believe a task may cause an injury or illness to you or your colleagues.
- Regardless of your role, you demonstrate proactive and visible leadership in health and safety matters.
- You take personal actions to ensure that your psychological and physical health and well-being are not negatively affected by your work and you participate in the health and safety activities/programs offered at your location.
- When conducting company business and during business travel you have the responsibility to exercise sound judgment for safe conduct.
- You ensure that you are always "fit for work". This means you are free from any adverse effects due to medical or physical conditions, drug or alcohol use, fatigue or stress.

# 1.3 We offer continuous learning and career opportunities

The individual performance management process aims to offer conditions that support employees to perform successfully, to assume personal responsibility and to continuously develop their personal and professional competence.

## Our principles

We have a culture in which employees feel empowered to set tomorrow's standards by creating, acquiring and transferring competence.

We offer development opportunities that enable our people to turn their ambition into sustainable development for the individual, the team, and the business.

Regardless of our location or organization, we all have the right to participate in the individual performance management process.

All employees should have an individual performance plan with clear goals and development activities.

We act as role models when it comes to goal-setting and conducting the individual performance dialogue and follow-up.

## For you this means

- You are responsible for your own learning and to continuously develop the skills and competencies required to succeed in your daily work.
- You contribute to the goal-setting process, the performance dialogue and the follow-up process.
- You are up-to-date with the latest business developments and the impact they have on your daily work.
- As a manager, you ensure that the business strategy is broken down into Specific, Measurable, Achievable, Relevant and Time-bound (SMART) goals that are clear to everyone on the team.
- As a manager, you must review progress and coach employees by requesting and giving feedback.

### For more information

**Relevant policies, procedures and guidelines:**
Sandvik Leadership Model and People Policy

**Contacts:**
Your manager/supervisor and Local Human Resources

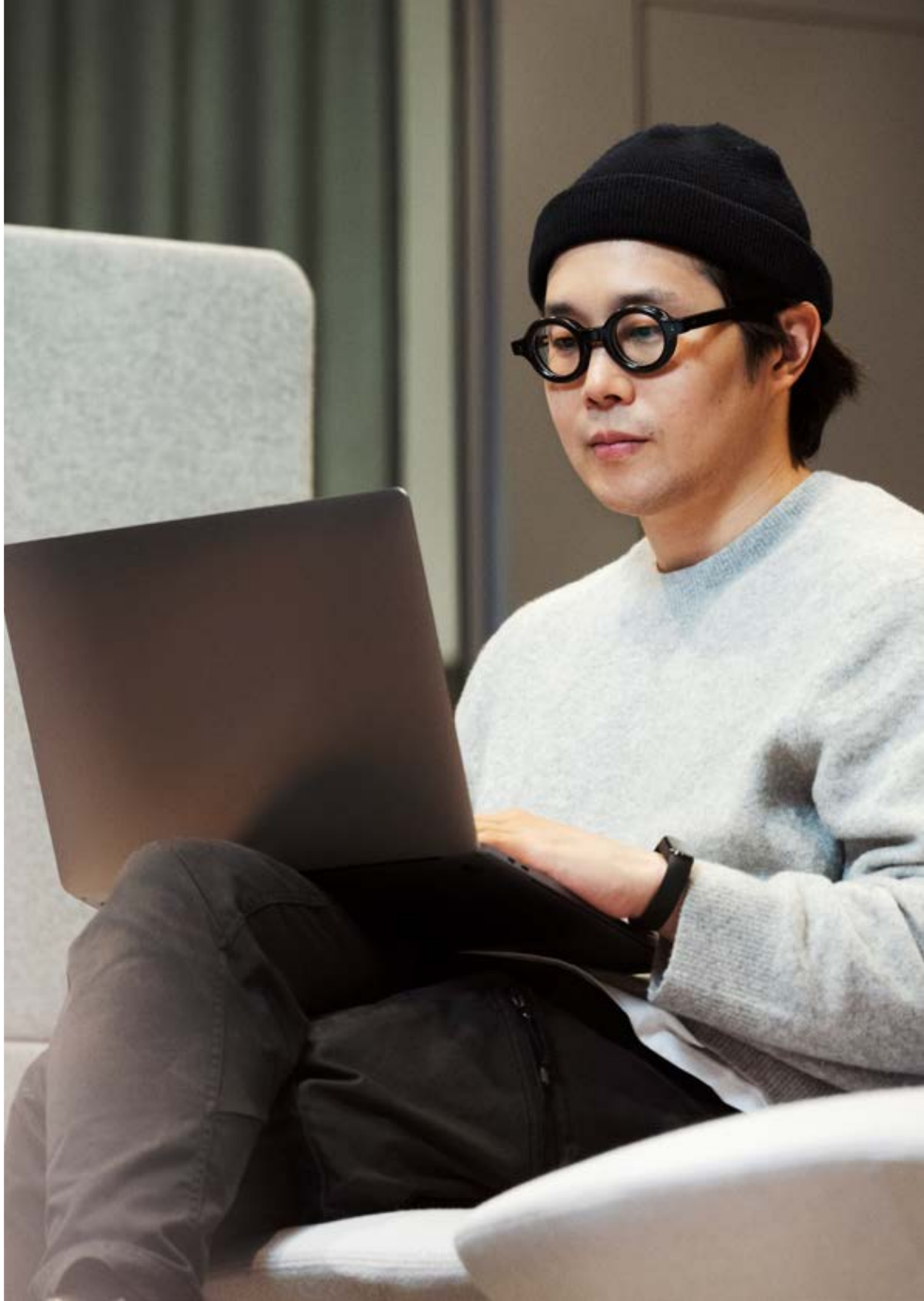
### What should I do?

**I recently transferred to a new department and it is not clear to me which specific development opportunities I have in my new role. Whom should I turn to?**

Begin by speaking with your immediate supervisor/manager. If the supervisor/manager is unable to assist you, reach out to your local human resource.

**It's time for the individual performance dialog. What is expected of me as an employee?**

Prepare yourself by reviewing your job description and your goals. Reflect on your overall performance and goal fulfillment. Think about your development needs and career aspirations and also explore Workday Learning and the Learning portal on the intranet to find support and development options.





# 1.4 We believe in diversity and inclusion

Diversity encompasses personal, cultural and cognitive differences, as well as different work and life experiences. Inclusion is how we allow all employees to contribute, enhance our daily business and reach their full potential. We believe that the combination of diversity and inclusion leads to innovation, motivation and high performance.

## Our principles

We believe diversity and inclusion helps to attract, develop and retain talent, generate innovation and help fulfill and exceed customer expectations.

Working together as a team and utilizing unique competencies and everyone's know-how is crucial to our success. In order to benefit from all of our diverse perspectives, we are committed to a culture of inclusion in our workplace.

We are committed to providing equal opportunities regardless of race, ethnicity, national origin, religion or belief, gender, sexual orientation, gender identity or expression, age, disability, marital or family status, or any other characteristic.

We do not accept any form of intimidating or disrespectful behavior, bullying, harassment, unwanted sexual advances or unlawful discrimination.

## For you this means

- You always encourage a positive work environment, where everyone is appreciated, respected and valued for their differences and you stimulate a culture of inclusion.
- You are open-minded, promote team spirit, encourage new ideas and learn from others.
- You include people in opportunities for development, discussion or employment within your organization.
- You encourage and promote development of diverse teams at all levels and in all functions.

### What should I do?

**José is new to our team. As his manager, I know he has a lot of experience that would be of value to us, however, he rarely speaks in meetings to share ideas. I'm thinking this may be because we hold our meetings in his second language. Should I leave him alone and hope that he starts contributing more in the future?**

When the opportunity arises in meetings, ask direct questions to José about his perspectives or experience. Facilitate his participation, just as you would do with any team member who may seem reluctant to speak. José might find it easier if you speak to him outside of the meeting. This might make him feel more comfortable and willing to contribute.

**I have noticed that one of my colleagues is not being treated well at work. Managers and colleagues are talking about this person in a judgmental way and at lunch breaks the person is always left eating lunch alone. One morning I also noticed that my colleague's working tools have been destroyed. What should I do?**

All employees are strongly encouraged to report any concern of perceived bullying, harassment or unlawful discrimination to management or human resources. Alternatively, you can report your concerns through the company's confidential Speak Up reporting mechanism. You can also talk to your colleague about their view of the situation.

### For more information

**Relevant policies, procedures and guidelines:**
People Policy

**Contacts:**
Your manager/supervisor and Local Human Resources

# 1.5 We keep accurate and complete records

This includes both financial and non-financial records such as meeting minutes, memoranda, contracts, financial statements, payrolls, expenditures, human resource records and other records containing personal data, safety and environmental records, product information, and accounting source documents.

## Our principles

We believe that the integrity and accuracy of our business records are of the utmost importance.

We maintain well-managed, accurate and transparent records consistent with all applicable legal requirements and industry standards. This applies to every detail of our business.

We prepare our financial records in a timely manner. They are fact-based and accurately reflect our business dealings.

We maintain a system of control of the business records' accuracy at all times.

## For you this means

- You are responsible for maintaining accurate records of your business dealings every day.
- You retain and maintain documents and records in accordance with applicable customer and legal requirements.
- You comply with the delegated authority levels for approval of financial and other business decisions.
- You ensure that every entry in all reports or records is accurate and is not false or misleading.
- You record your working hours and business expenditures accurately and according to local procedures.
- You are responsible for documenting and maintaining accurate and honest records of product and process verification.
- You use the correct security classification, for example when sending emails.



### What should I do?

**It's the last week of the first quarter. In order to stay within our budget, I'm thinking about booking certain expenses for supplies and other materials that we received earlier this month in the second quarter. Can I do this?**

Absolutely not. All expenses and revenues must be recorded in the period that they are incurred or realized.

**I was on a business trip and misplaced a few receipts for taxis and meals. Can I still get reimbursed if I don't have anything to document my expenses?**

Possibly. It is the traveler's responsibility to always use Sandvik's corporate card for all business travel expenditures and the bank statement can potentially be used as proof of an expense. If you accidentally lose your receipts, you should contact your manager/supervisor to find out whether you can be reimbursed. For expenses in excess of a particular amount, your manager/supervisor may refuse reimbursement without receipts. Even if you are allowed to be reimbursed, any documentation that you are required to produce must accurately reflect your expenses. It is never acceptable to create a false, misleading or inaccurate expense for reimbursement.

### For more information

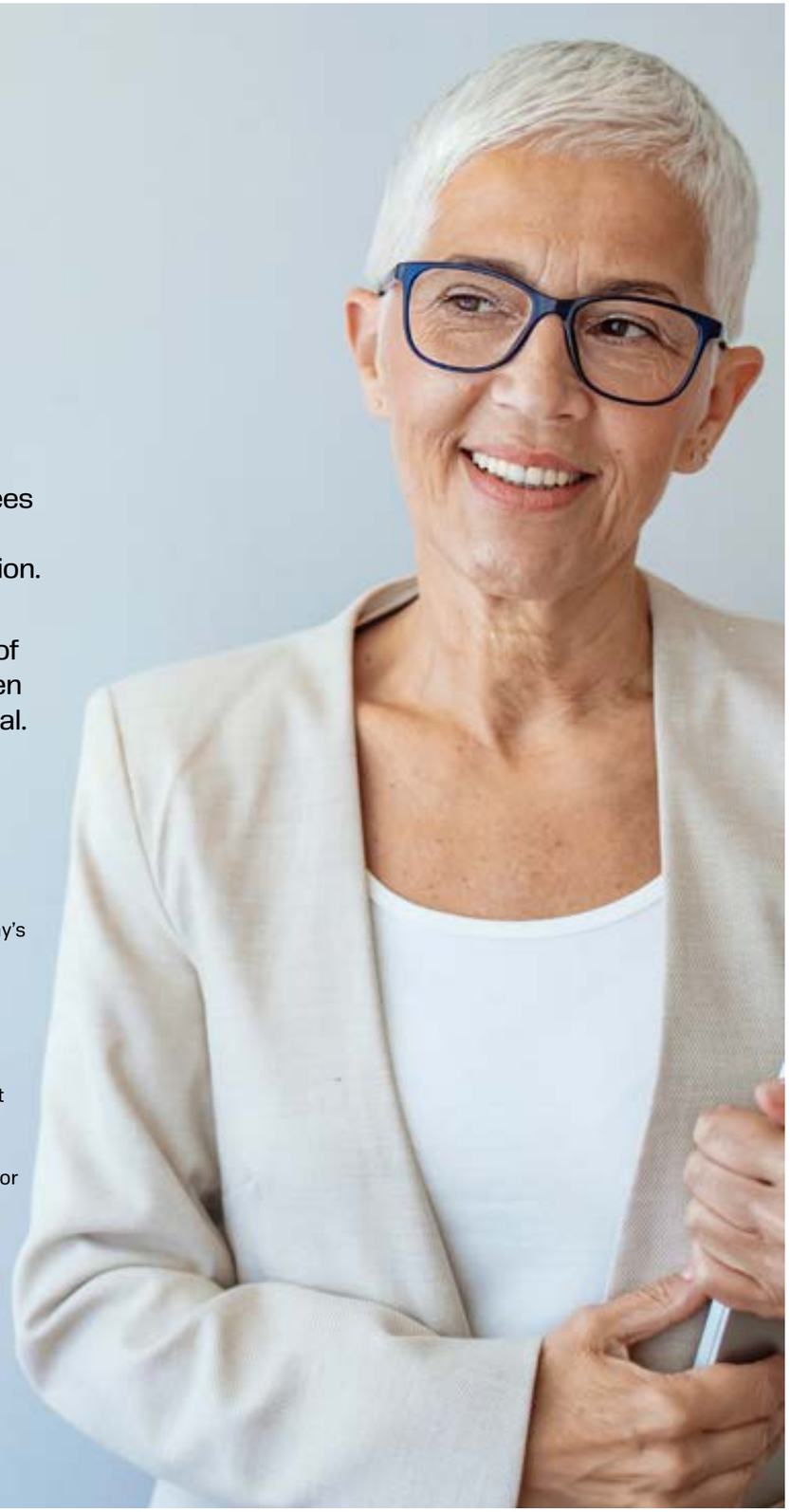
**Relevant policies, procedures and guidelines:**
Financial Steering and Control Policy and Procedures and IT Security Policy

**Contacts:**
Group Finance, Group Legal and Local Human Resources

# 1.6 We protect our company´s assets

Assets can be tangible or intangible. Examples of tangible assets are real estate, raw materials, products, machines or personal equipment, including our computers and other mobile devices that store important and confidential company information and personal data of our employees and stakeholders. Examples of intangible assets are brands, patents, trademarks, know-how, trade secrets, copyrights, goodwill and information.

Fraud includes any intentional or deliberate act to deprive the company of property or money by deception or other unfair means. Theft occurs when property belonging to the company is taken without the required approval.



## Our principles

We are mindful and protect our company's assets from damage, loss and criminal acts, as they are vital to our business.

We comply with internal controls designed to safeguard and protect our assets.

We only use assets for business purposes unless otherwise authorized by appropriate management.

We never use company assets for personal gain or for illegal activities.

## For you this means

- You have a responsibility to use appropriate means to safeguard our company's assets from loss, theft, damage and/or misuse.
- You comply with and adhere to the company's internal controls and procedures.
- You use our brand, patents, trademarks, know-how, and copyrights responsibly and as instructed.
- You do not use our company's computers, phones or IT systems to view materials that are inappropriate, illegal, sexually explicit, or otherwise offensive.
- If you become aware of theft, damage and/or misuse of our company assets, or have any questions about appropriate use of them, speak with your manager.
- You have a responsibility to report suspicions or concerns of fraudulent behavior, theft, money laundering, or other irregular activity.

## What should I do?

**A customer contacted me and indicated that a product they purchased is of very poor quality and they suspect it is not a genuine product from our company, but a copy with our company's brand.**

You should immediately contact the trademark team, so they can start an investigation in order to find the source of the product and take legal measures. For contact details, please visit the intellectual property organization's portal on the Sandvik Group intranet.

**When printing a document at the office, I found a copy of a purchase order that appears similar to an order that I know was finalized a few days ago. I read the scope of supply and noted that items appear to have been added to the original order. I suspect that the original purchase order has been altered. What should I do?**

You are strongly encouraged to report your concerns or suspicions to your manager, or alternatively you should report your concerns through the company's confidential Speak Up reporting mechanism.

### For more information

**Relevant policies, procedures and guidelines:**
Intellectual Property Policy - Technology, IT Security Policy, Brand Policy, External Communication Policy and Internal Communications Policy and related procedures

**Contacts:**
Business area patent organization, Group Trademark Group Communications and Local IT organization

# 2 In our marketplace

Our quality and continuous improvement culture is based on our attitude and commitment to meet or exceed customer expectations and to continually develop and improve all aspects of our operations, every hour and every day.

## 2.1 We are commited to quality and continuous improvements



### Our principles

Our efforts and activities are driven by continuous improvements and an understanding of our customers and their business needs.

We are committed to providing our customers with safe and sustainable products and services that meet or exceed their expectations.

Leadership, attitudes, relentless efforts to improve and a service mindset are crucial for building long-term relationships with our customers.

Our technology leadership and innovative mindset strengthens our brand reputation as a trusted business partner that supplies superior products and services.

Continuous developments and improvements are the cornerstones for meeting our sustainability targets.

### For you this means

- With your attitude and mindset, you continuously strive to meet or exceed requirements and improve your processes.
- You have a responsibility to understand our quality principles, objectives and Key Performance Indicators (KPIs), and you clearly support our business needs and strengthen our customer focus.
- You listen to our customers (both internal and external) and understand their needs and challenges before agreeing on requirements.
- You always act if you discover unclear requirements, suspected deficiencies or non-conforming products or services.
- You are proactive in learning and improving every day and sharing what you learn.
- You actively support new technology and product development, thereby enabling continuous improvement of customers' (internal and external) processes and facilitating achievement of their sustainability targets.

### What should I do?

**If we have time, we do it right. However, at the end of a quarter we feel the pressure to "make the numbers" and there may not be enough time. Then we ship whatever comes out.**

Quality and safety go hand in hand. If we start to deliver products and services that do not conform to agreed requirements, we put our customers and our brand at risk. This is not allowed. If you are feeling pushed in this direction, talk to your manager.

**I find it hard in my daily work to be sure that I have done everything right – what can I do to improve?**

Having the attitude and mindset of doing everything right should be our top priority. To do this, you must make sure that you understand all requirements related to your operation or task. If you work in a team, discuss these requirements with them and make sure everyone has a common understanding. Also, make sure you have a way of meeting each requirement. If there is any uncertainty, discuss and clarify this with the person or function that is on the receiving end of your work (this is your "customer"). It may be possible to change a requirement so it fits you and your customer, but any change must be done formally, by following the rules in your organization (documentation, approvals and so on). Consult your manager for guidance.

### For more information

**Relevant policies, procedures and guidelines:**
Business Area policies on quality

**Contacts:**
Relevant manager and Local quality department



# 2.2 We respect competition laws

Competition and antitrust laws prohibit anti-competitive agreements, abuse of market power and anti-competitive mergers and acquisitions.

## Our principles

We believe that free competition is in the best interest of our company, our shareholders, our customers, our employees, and society at large, as it drives efficiency and innovation, which are the basis of a well-functioning market economy.

We respect competition laws in all markets in which we are active.

We train our employees to ensure that they are knowledgeable regarding competition law and to make sure they can identify situations where competition law considerations are relevant.

We ensure that expert in-house legal advice is available to assist employees in navigating competition laws.

## For you this means

- You have a responsibility to understand our company's competition law policy and requirements related to your daily work.
- You do not make any arrangements with competitors that could restrict competition.
- You do not discuss or exchange sensitive commercial information with competitors.
- You must be aware of the special rules that apply to companies with market power if you work with products or services in a market where Sandvik has a market share in excess of 40% (20% in Brazil).
- You must seek timely legal advice from your business area legal team or from Group Legal if you are in doubt as to whether competition law might be relevant in a particular circumstance, or whether a possible arrangement would achieve a business objective in a legitimate way.
- You must always contact your Business Area legal team or Group Legal if you become aware or suspect that competition law has been breached.
- You must regularly attend or complete training if you are exposed to competition law risks and especially if you participate in trade or industry associations or otherwise meet competitors, for example at trade shows or conferences.

## What should I do?

**I am considering attending a meeting where competitors will also be present. What should I be aware of?**

You can only participate in a meeting with competitors if you are sure that the purpose of the meeting is legitimate. For example, it is generally acceptable to participate in a trade association meeting or to meet a competitor who is also our supplier or customer to discuss the terms of supply. If you are in doubt as to whether the purpose of a meeting is legitimate, you must seek advice from your business area legal team or from Group Legal. If you attend the meeting, you need to have in-depth understanding of the issues that are prohibited under competition law related to contacts between competitors and the procedures for how to handle such contacts. For more information, please read the Global Competition Law Guideline.

**I want to collect information on our competitors' strategies and prices. Which sources can I use?**

Information about competitors' commercial behavior can be gathered from all public sources, such as websites, brochures, annual reports and trade publications. You are also allowed to accept and use information about competitors that you receive from a customer if the information is offered voluntarily by the customer in a legitimate negotiation. Remember that it is always illegal to obtain any form of commercially sensitive information directly or indirectly from our competitors.

**For more information**

**Relevant policies, procedures and guidelines:**
Competition Law Policy and Competition law intranet pages

**Contacts:**
Business Area Legal, Compliance teams and Group Legal and Compliance

# 2.3 We ensure responsible trade

Customs and export control laws and regulations determine the requirements for importing and exporting both physical goods and non-physical goods (e.g. software and technology). These rules must be followed to ensure responsible and legal international trade. Trade laws and regulations cover areas such as rules of origin, customs classification of goods, customs valuation, export control classification, export license management, restricted party screening, embargos and sanctions.

## Our principles

We deliver products and services to countries worldwide and we are committed to ensuring compliance with all applicable import and export laws and regulations.

We train our employees to ensure awareness of and knowledge in trade compliance and we incorporate trade compliance in all daily operations.

We believe that a well-functioning trade compliance structure facilitates new business opportunities. We aim to create a culture where knowledge-sharing and cooperation is encouraged, which leads to a widespread application of best practice.

We want to be a leader when it comes to responsible trade and we contribute to the development of appropriate trade measures in the world trading community.

## For you this means

- You have a responsibility to understand the trade compliance requirements and regulations related to the daily work in your country. To succeed, make use of the local instructions and processes that describe requirements to stay compliant.
- When conducting trade, you always need to consider the following factors, this also applies when you hand-carry goods:

**What** – You must know what your product is and be able to describe its application and technical parameters. This applies for both physical and non-physical products.

**From** – You must know the origin of the products and the legislation applicable for the country of shipment.

**To** – You must know the sanctions and legislation applicable for the country of destination.

**Who** – You must know that your business partner, and the end user when applicable, is a party with whom you are allowed to do business.

**Why** – You must know the end-use of the products.

Due to the complexity of regulations and required controls, special attention should be given to the transfer of non-physical products, e.g. software, technology and service.





### For more information

**Relevant policies, procedures and guidelines:**
Trade Compliance Policy, Customs Procedure, Export Control Procedure and Business Area/Divisional internal processes. Trade compliance intranet pages.

**Contacts in following order:**
1. Local Trade Compliance representatives
2. Business Area Trade Compliance representative
3. Group Trade Compliance team

### What should I do?

**I have a prospective customer that I would like to bring on board. Is there something I need to consider before I reach out to them?**

Engaging with a sanctioned party is an unacceptable risk for our company, therefore it is important that all prospective business partners (e.g. customers and suppliers) pass the restricted party screening process prior to any business activities. When the business partner becomes active, it is equally important to include them in the continuous screening process within your business area. For details, reach out to your local trade compliance contact. If you do not know who that person is, contact the trade compliance representative within your business area/division. They are listed on the intranet.

**I have noticed that some product-related data on import/export declarations and supporting documents do not match (e.g. country of origin, HS tariff code, customs value) and sometimes this causes delays and extra checks for our shipments when they pass through customs. Is there anything that I can do?**

It is very important to use correct and consistent information on all customs declarations. Whenever you have reason to believe that the product-related data is incorrect or there may be an inconsistency, you shall address this to the local trade compliance representative for your unit to ensure that this issue is managed properly. If you do not know who that person is, contact the trade compliance representative within your business area/division. They are listed on the intranet.

**My customer has, at the last minute, requested a different delivery address and this raises questions and uncertainties, what should I do?**

This is a red flag situation and relates to Know Your Customer (KYC). If this raises suspicion, you should dig deeper into the reasons for the last-minute change. Common red-flag behaviors that should be given special attention include; odd reasons for the purchase of a product, suggesting a higher price than “normal”, no knowledge of the items being purchased, ordering a much higher amount than normal or the billing party being different than the buyer. These are some of the indicators that raise a red flag and where the four-eyes principle should be applied. Find more red-flag situations on the intranet.

# 2.4 We work towards a sustainable supply chain

Suppliers are all companies and entities that deliver goods or services to Sandvik. These may be tangible goods, such as materials, components or machines, or intangible goods such as software, drawings, intellectual property, or know-how. Services may, for example, include assembly, cleaning, security, consulting, sales, or engineering.

## Our principles

We cooperate and expect the same level of integrity, honesty and ethical behavior from our suppliers that they can expect from us.

We partner with suppliers with whom we can build mutually beneficial relationships.

We are committed to the fundamental principles on human rights, labor rights, the environment and the fight against corruption throughout our operations, which also includes our suppliers.

We will collaborate with our key suppliers in different areas so they can reach our 2030 targets of 90% circularity, halve the CO2 footprint and, where needed, develop our key suppliers to operate with the same level of health and safety standards as Sandvik.

## For you this means

- As an employee in procurement you have the responsibility to ensure that compliance with the Supplier Code of Conduct is always part of the contractual agreement with suppliers.
- As an employee at Sandvik you need to perform all procurement activities in accordance with Sandvik Procurement Policy and its adhering procedures.
- If you are aware of any non-compliance with our Supplier Code of Conduct, contact your procurement organization.





### What should I do?

**I have discovered that one of our suppliers is not complying with the Sandvik Supplier Code of Conduct. What should I do?**

Contact your procurement organization for guidance. Depending on the nature of the non-compliance, there are alternative measures to assist in the development of a corrective action plan with the supplier. If this is not effective, an alternative supplier. or other solution should be considered. You can also consider reporting a non-compliant behavior within a procurement activity in Speak Up.

**I need a new supplier, what is required of me?**

Contact your local procurement organization, which will conduct a risk assessment and approval of the supplier. Depending on the outcome of the risk assessment, the compliance monitoring may include an onsite audit.

### For more information

**Relevant policies, procedures and guidelines:**
Sandvik Procurement Policy and Sandvik Supplier Code of Conduct

**Contacts:**
Relevant division's procurement organization

# 2.5 We ensure protection of personal and business-critical information

Personal information (or data) is any information that directly or indirectly identifies an individual. Business-critical information is information such as business plans, strategic documents, planned mergers and acquisitions, manufacturing information, sales information, sourcing information, intellectual property, research and development information and financial information. Personal and business-critical information exists in many forms, such as paper-based or on digital devices. The unauthorized use or dissemination of personal and/or business-critical information can cause significant harm to our company's business or reputation, in addition to the individuals whose personal data we are responsible for safeguarding.



## Our principles

We make sure that information is reliable and available to those who need it, when they need it.

We are committed to ensure the protection of the personal information of our employees and stakeholders with whom we engage.

We handle personal information responsibly and in compliance with laws and regulations in the countries where we operate.

We handle information about our company and related parties with caution and take measures needed to ensure protection of business-critical information.

## For you this means

- You make sure that information is trustworthy, reliable and available for those who need it, when they need it, but only on a need-to-know basis.
- You do not access, collect, store, use, or share personal or business-critical information without proper authorization.
- If you have been authorized to share personal or business-critical information with anyone inside or outside the organization, you make sure it is in line with company policies and procedures, as well as applicable laws of the country in which you operate.
- You ensure the protection of personal or business-critical information related to our employees, customers, suppliers, joint ventures and any other individuals whose data we process.
- You use only the minimum amount of personal data necessary to fulfill your legitimate business purpose or legal requirement.
- You implement technical and organizational measures proportionate to the sensitivity of the personal and business-critical information.
- You store personal data only as long as necessary to fulfill a legitimate business purpose or legal obligation.

## What should I do?

**How can I help to protect personal or business-critical information?**

By classifying information according to the Sandvik Information Classification System (SICS) and making people aware of when they need to take extra precautions.

By reading and following the Acceptable Use of IT Procedure.

By reading and following the Data Privacy Policy and Data Privacy Procedure.

By reporting any security breach of personal data to your local IT Service Desk.

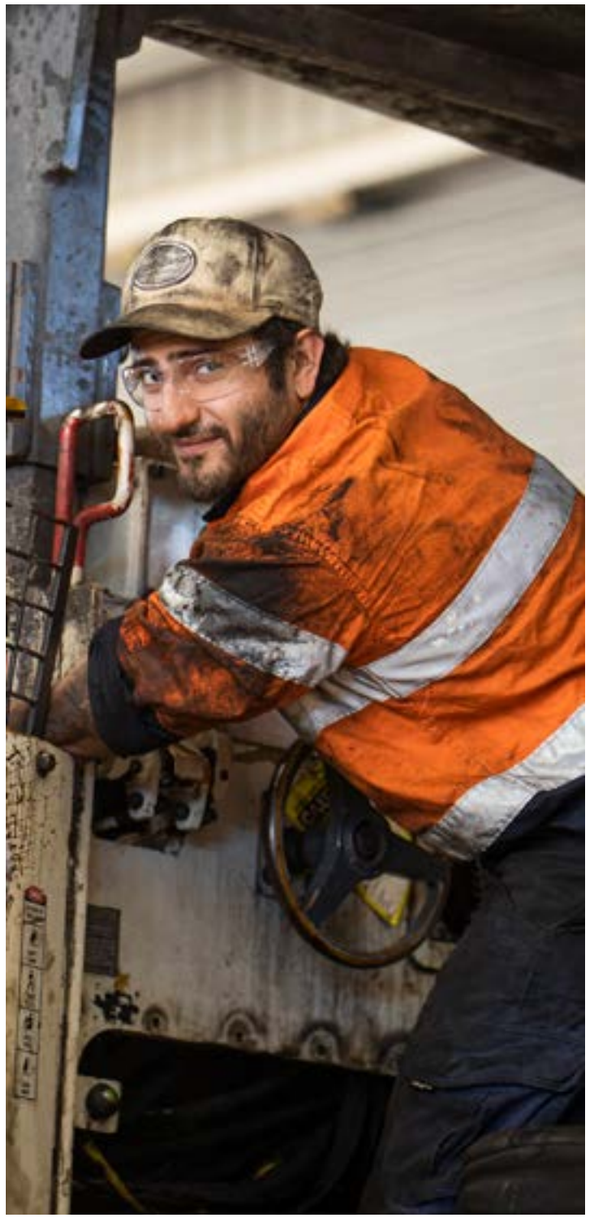
If you handle personal or business-critical information, you must make sure that it is accurate and available for those who need it and reasonably secured, depending on the sensitivity of the data, from unauthorized use or disclosure.

**Why can't I have access to all information that is available?**

To ensure confidentiality of business-critical and personal information, access to such information must always be on a need-to-know basis.

**What should I do with the personal data in my work email account?**

Apply the Code's principles and read the Data Privacy Procedure for more best practice tips, such as avoid using email to send sensitive personal data unless the data is properly encrypted.



### For more information

**Relevant policies, procedures and guidelines:**
Acceptable use of IT Procedure, Information Security Procedure, IT Security Policy, IT Security Procedure, Data Privacy Policy and the Data Privacy Procedure

**Contacts:**
Business Area Legal, Compliance Group Legal, Compliance Chief Information Security Officer and Business Area Information Security

# 3 Sandvik in the world

## 3.1 We have zero tolerance for bribery and corruption



Bribery is the offering, giving, receiving, or soliciting of something of value for the purpose of influencing the action of an official or private company in the discharge of their duties. Corruption means abuse of entrusted power for private gain, which could include conflicts of interest, embezzlement, kickbacks, extortion, or nepotism/cronyism.

### Our principles

We are committed to conducting business with high integrity and we have zero tolerance for all forms of bribery and corruption.

We do not directly, or indirectly through third-parties acting on our behalf, pay or offer to pay bribes.

We do not offer or accept gifts that will improperly influence our business decisions or those of our partners.

We always make business decisions in the best interest of our company.

We disclose conflict of interest situations in accordance with applicable policies, procedures and guidelines.

We are committed to and comply with all anti-money laundering legislation, including reporting obligations.

We follow internal procedures and implement effective controls.

### For you this means

- You have a responsibility to understand the company's position regarding bribery and corruption.
- You do not make facilitation payments or permit others to make them on your behalf.
- You do not engage in activities that create any type of conflict between your personal interest and the interest of our company.
- When using third parties, such as distributors or agents, you require that they conduct business with the same level of integrity and honesty that is consistent with our high ethical values.
- In your relationship with customers, competitors, suppliers and distributors, you avoid activities that limit the ability to compete fairly or that could influence you or your counterpart's judgment (such as excessive gifts or entertainment).

### What should I do?

→ **I was asked by a senior representative of a customer to help "get a visa" for his son who is traveling to Germany for holidays. This is a very important customer and I am afraid that I will upset him if I refuse. I also know that it would be easy to get an invitation letter from our German office and that on this basis his son could obtain a business visa. What should I do?**

Our anti-bribery and corruption rules prohibit the giving of any advantage in return for an illegal benefit. Our business cannot depend on favors we give to customers and the absence of cost does not make the favor acceptable. In addition, visa fraud is a very serious criminal offense in the European Union and you could put your European colleagues in jeopardy by accepting the request. You must politely refuse the request by explaining that it is our company's policy not to assist with visa procedures except for business trips organized by our company.

→ **My brother owns a construction company. Since I have been appointed property manager for our company, I have the final say on which construction companies should be contracted to build new plants or buildings for the company. I know that my brother's company would benefit from such contracts, but I am concerned that my personal relationship with him might jeopardize our reputation or endanger our job. What should I do?**

You should not contract a company with which you have a direct or indirect personal interest. Potential conflict of interest situations should be avoided by disclosing any direct or indirect interests held.

### For more information

**Relevant policies, procedures and guidelines:**
Antibribery and Corruption Policy and supporting procedures

**Contacts:**
Business Area compliance team, Group Legal and Compliance



# 3.2 We are comitted to enviromental responsibility

Environmental responsibility means operating our business and providing products and services in a way that minimizes environmental impact and contributes to a more sustainable future.

## Our principles

We create a culture where our overall business objectives lessen the impact on the environment while facilitating our vision of Zero Harm.

We set long-term environmental ambitions and targets and actively work to improve our year on year environmental performance in our own operations, in our offerings to the market and do our utmost to influence the performance of our suppliers.

We use a risk-based and sustainable business perspective when identifying environmental factors and determining ways to reduce or minimize the impact of our business on the environment.

We take positive, precautionary actions if we identify that our operational activities may harm the environment.

We practice the “polluter pays principle” – a commonly accepted principle that those who produce pollution should bear the costs of managing it to prevent damage to human health or the environment.

## For you this means

- You have a responsibility to understand the environmental requirements of your role.
- You take the time to understand the environmental risks and hazards present in your daily work and the preventative actions you can take to eliminate or reduce them.
- You consider the environmental consequences of the energy, water and other resources you use when doing your work and make improvements where you can.
- You seek to re-use and/or recycle materials as much as you can and you follow your local procedure on waste separation to minimize environmental harm.
- You follow applicable requirements and your local procedures for use, storage, labeling, transport and disposal of chemicals.
- You report, and investigate environmental incidents, near misses and hazards and share relevant information that may help others prevent a similar incident.
- You consider the environmental impacts of any business travel you do and when you are making decisions about how we either transport supplies to our locations or when we send our goods to our customers.

## What should I do?

**I have noticed that where I work, we generate unnecessary waste, for example single-use packaging for both materials and food. What can I do to change this?**

You should share your thoughts with colleagues and bring it up with your manager and EHS representative. They should support you in identifying actions to address the inefficient use of packaging materials.

**In the place where I work, we sometimes miss routines to switch equipment off when not in use, for example lights and computers. I have also seen that machines and other equipment are often left idle. What should I do?**

You should contact your supervisor, manager or EHS representative and let them know that you have found a possibility for improvement. If the equipment can be set up to be switched on only when needed, energy use and environmental impact can be reduced and money can be saved.

**In my workplace we conduct many meetings with colleagues in other Sandvik locations, and I have realized that we tend to travel to have these meetings face-to-face on most occasions. I’ve started to think a bit more about this recently and am wondering what sort of impact this has on our environmental footprint, and whether there is anything I could do to minimize our environmental impact from these trips.**

You should always consider alternatives to face-to-face meetings. There are alternative solutions available today, e.g. digital meetings, which will not only minimize environmental impact but also save time and cost. In cases where meeting face- to- face is essential, you should always consult the travel agency for the best available modes of transportation.

### For more information

**Relevant policies, procedures and guidelines:**
Environmental, Health and Safety Policy.
Site/local environmental rules and procedures.

**Contacts:**
Your manager/supervisor and Site/local EHS representatives



# 3.3 We ensure efficient and accurate tax management



Taxes consist of direct taxes, indirect taxes and payroll taxes. Direct taxes include corporate income tax, real estate taxes and withholding tax paid in foreign countries. Indirect taxes include VAT (Value Added Tax), GST (Goods and Services Tax), sales tax and excise duties on energy. Payroll tax is income tax withheld by the employer from the employee's gross salary or wages, as well as income tax paid on fringe benefits such as company car, house allowance and medical insurance.

## Our principles

Efficient and accurate tax management means that we conduct our business and supporting tax processes with demonstrable integrity, in a manner that produces correct tax outcomes at accurate cost.

We are committed to our social and legal obligation to pay the amount of tax legally due in each jurisdiction, as required by country legislation.

We are also committed to the obligation to our shareholders to administer supporting tax processes as efficiently as possible and to produce efficient and correct tax outcomes.

We believe in an open and transparent dialogue related to tax issues.

## For you this means

- You apply care when administering your activities from a tax perspective and understand the tax touchpoints of your activities.
- You involve Group Tax at an early stage when assessing/implementing any change to the way we operate.
- You always comply with relevant tax laws, regulations and company procedures in your business.
- You hold yourself and others accountable for addressing tax-related issues promptly.
- You proactively work with other groups to secure tax opportunities, mitigate tax risks and share solutions.
- You follow relevant policies and procedures when seeking tax advice internally or externally.
- You consider the local and global tax consequences of your actions.
- You are mindful in your tax-related communications with third parties.

## What should I do?

→ **I am considering establishing a sales hub in your region. Starting next year, sales that are now are invoiced from a sales unit in country A would be invoiced from a sales unit in country B. The sales staff currently engaged in the sales activities would remain employed by the sales unit in country A and continue performing their sales activities as usual. The main objective with the restructuring is to find synergies between the two sales units and to benefit from economies of scale.**

Consider whether the proposed arrangement could give rise to direct tax consequences such as exit tax and permanent establishment in country A. Consider also how the sales unit in country A should be remunerated for the services provided and whether the sales unit in country B needs to register for VAT in country A. If you decide to proceed with the plan, contact Group Tax for advice.

→ **I am involved in negotiating and preparing a major contract with a customer. The contract has a global aspect in several ways, since the goods will be delivered to another country and the customer is a foreign entity.**

There is often a delicate balance between the tax interests of the customer and Sandvik. Unless you are confident that you understand how tax applies (because you are a tax expert or because you very recently undertook an identical transaction and sought advice), confirm the tax consequences of the transaction as early as possible with your local Finance group. If they cannot assist, seek support from Group Tax. Ensure that the tax treatment is reflected appropriately in the contract and seek additional support with this if required.

### For more information

**Relevant policies, procedures and guidelines:**
Tax Policy, Transfer Pricing Procedure and Interactions with Tax Authorities Procedure

**Contacts:**
Group Tax

# 3.4 We communicate honestly, transparently and in a timely manner

Communication is about increasing engagement for our company, building a strong brand and managing our reputation to help achieve our business objectives. It can be verbal, written or visual, internal and external, and it occurs in multiple channels such as the intranet, the internet, internal collaboration platforms and meetings, social media, publications, as well as in news media such as newspapers, television or radio.

## Our principles

We have officially designated spokespersons to communicate publicly on behalf of our company in order to ensure professional, consistent, legally compliant, and honest responses to requests from the media, analysts and investors.

We ensure that we fulfill the obligations we have as a listed company.

We engage in public policy issues vital to our company's success and related to our business. When engaging in public policy issues or lobbying, we always follow all applicable laws, act with integrity and honesty, and show respect.

We act and talk in a way that reflects our core values and code and that builds trust for our brand at all times.

We keep our customers and other external stakeholders, as well as internal stakeholders, well-informed in a timely manner, assisting them in understanding our business developments.

We keep confidential information to ourselves at all times, but openly share other information, best practices and feedback throughout the whole organization to promote engagement and transparency.

We always make sure that information is accurate and not misleading.

We are politically and religiously neutral. Employees are free to participate in public, religious and political matters in their free time and in their capacity as private citizens.

We communicate in an inclusive way that encourages diversity.

## For you this means

- You only speak to the media, analysts or investors, or engage in social media on behalf of our company if you have authorization to do so.
- You do not share non-public information that may have an impact on our share price with unauthorized persons.
- You act with care and integrity, use good judgment and are consistent with our core values and Code when using social media and in all your communication.
- You make sure to maintain a clear distinction between you and the company when you communicate about Sandvik and you make sure your content is consistent with how you wish to present yourself to colleagues and customers, and that it is consistent with our Code of Conduct.
- You avoid all rumors, and are cautious with unconfirmed information, yet promote open and constructive dialogues.

## What should I do?

**A journalist called me directly with questions about an accident that recently occurred at one of our production sites.**

Only authorized spokespersons are entitled to answer questions from and speak with the media on behalf of our company. You should therefore inform the journalist and put them in contact with our spokespersons or Group Communications if you are not sure of who to direct them to.

**I am on a train and hear someone in the row behind me talk about matters related to our company that are inappropriate to share openly in a public setting or be disclosed to persons outside the organization.**

You should remind the person about our principle of acting and talking in a way that reflects our core values and that builds trust for our brand, while keeping proprietary information confidential at all times.

**My neighbor is politically engaged and asks to visit my workplace. Can I allow this?**

The first thing to do is talk to your manager and together evaluate the purpose of the proposed visit. If it is solely for political reasons, it is probably inappropriate. However, if the purpose is to learn about our company it may be an opportunity to explain our role in society.

**I have noticed that a Sandvik colleague is active on social media, expressing views and opinions clearly against Sandvik values and/or Code. Is this acceptable?**

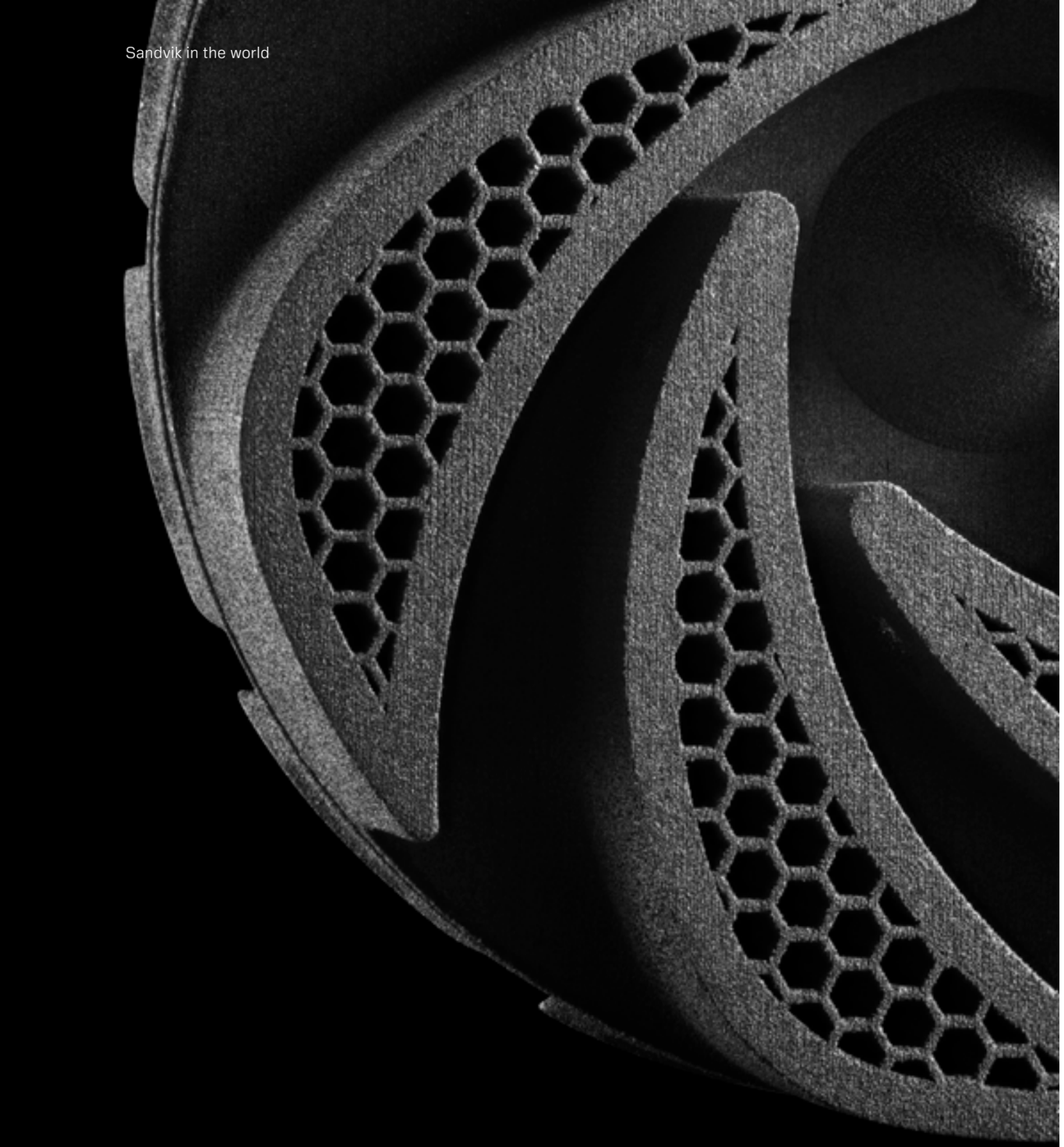
All Sandvik employees are of course entitled to private opinions, however, as a Sandvik employee you should keep in mind that you're expected to act and talk in a way that reflects our core values and Code. You can always discuss what you have noticed with your communications representative.



**For more information**

**Relevant policies, procedures and guidelines:**
Brand Policy, Risk Management Policy, External Communication Policy, Internal Communications Policy, Sponsoring and Community Involvement Procedure and Political Visits Procedure

**Contacts:**
Your communications representative, Group Communications, Investor Relations and Group Legal



# 3.5 We are active members of the communities in which we operate

Active membership of the community includes activities such as raising money for selected charities, supporting volunteering in a community, sponsoring training and employing people from a community, supporting a community's economic growth and supporting universities, research and other charitable institutions. The activities we engage in should support our business objectives, long-term strategy and our ambition within sustainable business. All employees should be offered the opportunity to participate in our community involvement agenda with the objective of having a positive effect on society.

## Our principles

We believe that our long-term success is tied to the development of healthy and thriving communities.

We encourage community investment activities that support our strategy, purpose and core values and that are of mutual benefit to our company and society.

We contribute to the successful development of the communities in which we operate.

We view community investments as an important factor to help us recruit, retain, engage and develop our people, and also enhance the reputation of our company as a good corporate citizen.

We make sure that resources and time spent on charitable contributions are appropriate, reasonable and authorized.

We do not make contributions, directly or indirectly, to any candidate for public office, political parties, or other political organizations except through industry organizations.

As a general rule, we shall not make any donations at all. This is valid for all types of causes. The only exceptions are extraordinary circumstances such as major natural disasters.

## For you this means

- You only respond to funding requests from a community on behalf of our company if you have authorization to do so.
- You are mindful in your choice of sponsorship activities and community projects and you make sure that the resources and time invested benefit all parties involved with clear goals, measurable outcomes and visible results.
- You have a responsibility to know which activities we sponsor, as defined in the Sponsoring and Community involvement Procedure.
- When you participate in community volunteer activities on behalf of the company, you make sure they are in line with global and local company policies.
- You respond to requests for contributions from our communities in a timely and respectful manner.

### What should I do?

**I've received a request from our community to partner with an organization investing in the development of a school. What is the right procedure to follow?**

Every sponsorship or community involvement project in which our company participates must be viewed as a business contract and include a written agreement on obligations for both parties and a budget. All our engagements must follow our Code of Conduct. The investment or sponsorship engagement needs to be measured and monitored, and project goals and targets must be created in accordance with our normal criteria. You can read more about this in our Sponsoring and Community Involvement Procedure available on the intranet.

**Where can I find information on which activities and projects the company will not sponsor?**

Some examples of activities and projects that our company will not sponsor are those activities that in any way are in conflict with our Code of Conduct, are personal hobbies or interests of decision- makers or employees, or risky sport events, projects or other events. To find the complete list please read our Sponsoring and Community Involvement Procedure available on the intranet.

### For more information

**Relevant policies, procedures and guidelines:**
Brand Policy, External Communication Policy, Sponsoring and Community Involvement Procedure

**Contacts:**
Group Communications

# Our Code of Conduct going forward

The Code applies to all of us and should guide our daily work.

As an employee, it is your responsibility to read the Code of Conduct, regularly use it for reference and react to any breaches of it that you witness. You are also responsible for following any Group policies relevant for your position and work. Sandvik core values, policies and procedures and leadership model can be found on the intranet in The Sandvik Way menu.

The Code cannot cover all situations that you may face and sometimes the right way to act is not obvious. Whenever you have questions, don't hesitate to ask for help.

## How to handle a difficult situation

If you are in a situation and you are not sure of what to do, ask yourself the following questions:

- Is the decision or action considered legal?
- Is the decision or action in compliance with Group policies and this Code?
- If my family, friends and others outside Sandvik became aware of this, would I feel comfortable?
- If my action was reported on the front page of the newspaper, would I still feel comfortable with my decision or action?

## If you have concerns or witness a breach of this Code

If you have concerns about possible violations of this Code of Conduct you have a responsibility to:

- Discuss your concern with your immediate manager as soon as possible.
- If you are uncomfortable doing that, speak to another manager or contact Human Resources.
- If neither of these approaches feel right, or if you wish to be anonymous, report your concern via Speak Up: **home.sandvik/speakup**

It's important for Sandvik that concerns about possible breaches of our Code of Conduct are reported, so that we can take corrective action, improve our work environment and reduce risks for Sandvik and thereby continue being an ethical and sustainable company.

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