

Saferoad Code of Conduct

Key Principles

This Code of Conduct sets out the fundamental principles of how Saferoad operates its business. Saferoad shall operate in accordance with sound, ethical business practices, setting high standards for ourselves and our impact on the environment and society at large. We act with integrity, and in accordance with our ethical principles.

We shall:

- Keep our promises.
- Act as good ambassadors for Saferoad, both on and off the job.
- Treat everyone with respect and as equals, in a professional and open manner.
- Respect and comply with the laws, regulations and guidelines of the countries in which we operate.
- Engage in an open dialogue with regard to difficult issues and ethical dilemmas.
Neither pass on, nor misuse, confidential information.
- Neither give nor ask for gifts or benefits which may influence our own integrity and decisions.
- Work to avoid accidents and personal injuries.
- Work to reduce the environmental impact of our activities.

Our commitment to comply with applicable laws and regulations shall always prevail over our business goals and needs.

Our behavior must stand up to public scrutiny without damaging the reputation of Saferoad. Irrespective of which Saferoad entity stakeholders come into contact with, they should experience the same integrity of conduct.

Application – Who must follow the Code

Our Code applies to all permanent and temporary employees of Saferoad as well as hired personnel, consultants and any other party that have authority to act on our behalf regardless of location. In addition, the Code also applies to all members of our Board of Directors and Executive Advisors.

Roles and Responsibilities

All Saferoad personnel are each accountable for making a personal commitment to follow our Code. As the Code may not answer every questionable situation, all are expected to exercise good judgement, promptly seek advice and report concerns about possible violations of the Code. Individuals who fail to comply with the Code, including those who fail to report Code violations, may face disciplinary action up to and including termination.

Where differences exist between applicable laws, regulations and our Code and underlying policies, the highest standard of behavior shall always prevail.

All leaders and managers within Saferoad, regardless of country or location, are responsible for setting the right tone at the top to cultivate a strong corporate culture for ethics and compliance. They are expected to act as role models for ethical conduct, educate and support employees in complying with the Code and underlying policies, perform oversight to detect violations, identify and mitigate compliance risks, and finally yet importantly, promote a culture of speaking up in good faith without fear for retaliation.

Principles of ethics & integrity

The principles of ethics and integrity guide how we behave. Saferoad operates its business with professionalism, showing respect and due care for customers, employees, shareholders, suppliers and other stakeholders. Furthermore, Saferoad wishes to be perceived as a sound, reliable, long-term partner with a high degree of integrity and high ethical standards, and more specifically:

- We keep our promises.
- We provide correct, clear and credible information.
- We neither pass on nor use confidential information in situations for which it was not intended.
- We put Saferoad's interests ahead of our own, and avoid situations where our duty of loyalty to Saferoad can be compromised.
- We should not give, receive or ask for gifts or benefits which may influence our own integrity and/or decisions of others. We are strictly opposed to all forms of corruption and fraud.
- We respect human rights.
- We treat everyone with respect and as equals, regardless of gender, race, religion or political convictions.
- We respect the cultures of all the countries in which Saferoad operates.
- We respect and comply with the laws and regulations of all the countries in which we are represented.
- We compete honestly and fairly.
- We do not handle any proceeds of crime.
- We do not trade in financial instruments based on inside information.
- We comply with Saferoad's internal guidelines.
- We seek advice from our superiors or colleagues.
- We engage in an open dialogue with regard to difficult issues and ethical dilemmas.
- We act as good ambassadors for Saferoad both on and off the job.

We are committed with engaging only with customers, suppliers, agents, merger & acquisition targets and other third parties (collectively known as "third parties") with standards of ethics and integrity that are consistent with our own. We do not engage in business relationships, where doing so would breach local and international sanctions laws. To achieve this, we adopt a risk-based third party risk management approach, which includes integrity due diligence and ongoing monitoring. Saferoad entities shall make their suppliers and sub-contractors acquainted¹ with Saferoad's Code of Conduct and the Saferoad Values. Reference is made to Saferoad Group Procurement Policy.

¹ To be amended to "adhere" if deemed to be of high risk

Saferoad plays an active role in the society. Therefore:

- We treat public authorities and organizations in a professional, correct and open manner.
- We make no financial contributions to political candidates or parties.
- We work to achieve transparency and support efforts to combat corruption and bribery.
- We make sure that all transactions are recorded and documented correctly in accordance with local and international accounting principles.
- We give internal and external auditors access to any and all information.

Employees

The knowledge, competence and capacity of our employees make them our most important asset.

Consequently:

- Saferoad takes its employees' interests seriously and respects the rights of the individual.
- The UN Declaration of Human Rights and International Labour Organization (ILO) standards are respected.
- All workers shall have a written contract setting out working hours and wages.
- Wages shall be equal to, or higher than, the minimum required by law in the countries in question.
- We do not tolerate child or forced labour.
- We have zero tolerance for harassment, discrimination or similar behaviour.
- We respect the right to form and be a member of trade unions.
- We maintain high standards of Health, Safety and Environment (HSE).
- Employees shall be informed about any risks pertaining to their duties.
- The working environment shall be safe and secure.
- Employees shall have access to and use necessary personal protection equipment.
- We do our utmost to avoid accidents and personal injury.
- We endeavour to create an enjoyable and fulfilling atmosphere where employees experience job satisfaction.
- We ensure communication with all employees regarding matters that concern them.

Environment

Saferoad contributes to a sustainable environment to the best of our ability.

Therefore, Saferoad:

- Works to preserve the environment by showing consideration for our surroundings
- Will comply with all relevant environmental legislation and regulations in the countries in which Saferoad operates.
- Works to make our production and products environment-friendly.

- Chooses sustainable products and resources.
- Prefers suppliers and sub-contractors with environment-friendly production and products.
- Makes strenuous efforts to avoid pollution.
- Handles and transports hazardous goods in an environmentally safe and secure way.
- Stores and treats waste in a secure manner.
- Sorts waste materials at sites for recycling.

Violation

Violation of Saferoad's Code of Conduct will not be tolerated and may result in internal disciplinary proceedings, dismissal or even prosecution

Should an employee become aware of any circumstance in their own or another group company that may violate our Code of Conduct, they should report the issue to their immediate supervisor or directly to a management representative, without undue delay.

If an employee finds it difficult to raise the matter within their own company, they may contact the VP Legal at Saferoad Group.

Such reporting will be treated confidentially.

Employees (whistle-blowers) who report an alleged violation of the Group's Code of Conduct will suffer no reprisals of any kind. Reference is also made to Saferoad Whistleblower Policy.

The Saferoad Values

Care

A caring culture makes a strong company. Through humility, support and a constructive response we can all contribute. We care about our customers business and want them to prosper.

Colleagues at all levels have the right to be seen and heard. The free exchange of views and ideas is crucial if we are to make the best use of our available resources.

Integrity

Integrity and credibility can only be earned through the behavior, competence and performance of each and every one of us.

We deal with people in a professional way, whether they are customers, partners, colleagues or other stakeholders.

Drive

Enthusiasm and drive are essential to achieve results and success.

These qualities release the necessary creativity, courage and will that it takes to build a winning team and a great company. Drive attracts the most demanding customers and the brightest colleagues. We need them both

