

# THE B&B TOOLS GROUP SUPPLIER CODE OF CONDUCT

#### 1. Introduction

Much like other companies, the B&B TOOLS Group operates in a world that expects companies to be aware of their impact on the community based on environmental, economic and social factors. For this purpose the Board of Directors of B&B TOOLS AB has adopted a Code of Conduct which describes the B&B TOOLS Group's desired position with respect to such factors. All Group companies, including Luna AB and its subsidiaries, adhere to this Code of Conduct.

In order to fulfill the requirements set out in this Code of Conduct, all suppliers to B&B TOOLS Group companies are requested to take this into consideration and to confirm their intent of adhering to the principles and requirements set out in this document.

This document is an excerpt from the original Code of Conduct as adopted by the Board of Directors in B&B TOOLS AB on 15 February 2006, and remain valid until a new Code of Conduct is adopted.

## 2. Values and business principles

The B&B TOOLS Group shall conduct its business according to the principle of long-term, sound development, etc. In addition to all business-economic requirements, goals and guidelines, the business shall also be conducted at a high level of integrity and ethics.

The B&B TOOLS Group, its companies and employees shall observe the following guidelines:

- B&B TOOLS complies with all laws and regulations that apply in the countries in which the Group is active as well as with the Group's Code of Conduct.
- B&B TOOLS respects The United Nations Declaration on Human Rights (www.un.org)
  and ILO's core conventions (International Labour Organization) and accepts its
  responsibility to respect the rights of employees and society to the extent they are affected
  by the Group's activities.
- B&B TOOLS strives to adhere to OECD's Guidelines for Multinational Companies (www.oecd.org).
- B&B TOOLS has an open attitude in the dialogue with those who are affected by the Group's business. B&B TOOLS responds to inquiries from external parties and communicates with affected parties in a timely and effective manner.

In the areas in which B&B TOOLS has influence, the Group shall strive to ensure that suppliers and sub-suppliers adhere to the principles of the Code of Conduct.

### 3. Market, customers and suppliers

B&B TOOLS's business is based on close, long-term relationships with customers and other business partners. The B&B TOOLS Group aims to be perceived as a trustworthy, long-term and reliable collaboration partner and will act professionally, honestly and ethically correct. The Group does not tolerate corruption, bribes and unfair practices that may limit competition. All sales activities and marketing of the B&B TOOLS Group's products and services shall be conducted in compliance with relevant laws and regulations in each respective country.

- B&B TOOLS will not act in breach of applicable competition legislation in each respective country. The Group does not participate in cartels or other unlawful collaboration with competitors, customers or suppliers which limits or distorts competition. In the event any company in the Group is approached with proposals for such collaboration, or has reason to believe that such activity is occurring with any of its cooperation partners, it must be reported to Group management and a report must be filed with the competition authority in the country in question.
- B&B TOOLS shall not offer or make undue payments or give other compensation to any person or any organization for the purpose of inducing such person or organization to act in breach of prescribed obligations in order to engage B&B TOOLS or to retain assignments for the Group.
- B&B TOOLS shall not directly or indirectly request or accept any form of undue payment or other compensation given for the purpose of inducing the Group to act in breach of B&B TOOLS's prescribed obligations.
- For the purpose of avoiding conflicts of interest, employees of the B&B TOOLS Group may only give or accept gifts or services that are in compliance with general business practice, do not breach applicable law, do not represent any major financial gain and cannot reasonably be regarded as constituting bribes.
- B&B TOOLS respects other companies' assets, and protects all of the Group's tangible and intangible assets from loss, theft, encroachment or abuse.

#### **Suppliers/collaboration partners**

The Group shall strive to ensure that suppliers and sub-suppliers adhere to the principles of B&B TOOLS's Code of Conduct and for example offer their employees a safe and sound work environment. B&B TOOLS's companies do not buy products from suppliers who, upon request, are unable provide an assurance in writing that child labor is not permitted in its production.

B&B TOOLS shall maintain suitable processes to evaluate and select prioritized suppliers and cooperation partners. Such evaluation processes shall also take into account the ability to meet the requirements of the Group's Code of Conduct. A follow-up of the ethical, social and environmental obligations of major suppliers shall be performed on an annual basis and actions shall be taken immediately in the case of breach of the guidelines of B&B TOOLS's Code of Conduct. (See also the B&B TOOLS Group's Factory Audit Form.) The results of such follow-ups are reported to Group management on an annual basis.

#### 4. Environment

B&B TOOLS's impact on the environment, and its preemptive efforts to limit such
environmental impact, are important issues for the Group. B&B TOOLS's Environmental
Policy is an expression of the Group's willingness to assume its part of the responsibility to
reduce environmental impact and to contribute towards sustainable development. The
environmental work must be well structured, and in cases where it is warranted, adhere to
internationally recognized environmental management systems (e.g. ISO 14001).
Environmental measures will be implemented to the greatest extent technically feasible,
economically reasonable and environmentally warranted.

# Confirmation

We hereby confirm that we have taken the principles and requirements set out in this document into consideration, and that we, and any sub-suppliers hired by us, will strive to adhere to these principles and requirements. We also confirm that child labor is not permitted in the production.

[Supplier / Company Name]
Signature
Title
Title
Name
Date