



Code of Conduct for the Bilia Group

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Responsible: CEO, Bilia AB

Area of use: internal

Code of Conduct

Bilia is the leading company in sales and service of cars and transport vehicles plus supplementary services in northern Europe. Success carries with it responsibility, and Bilia strives to adhere to a strict code of conduct at all times. A responsible enterprise maintains strong relationships with customers, suppliers, employees and the rest of society. The purpose of establishing broad ethical guidelines in a single document is to clarify, for those of you who represent Bilia, our values and what we stand for. This code of conduct applies to all employees and board members in the Bilia Group.

Vision, customer promise and values

Bilia's vision is to be "The best service company in the business" – through consideration for our customers and colleagues. Bilia's guiding principles, which we use to guide us towards our vision, are Pride and Consideration. Bilia's promise is "A better experience". All employees should work towards achieving our vision and our promise.

Bilia's core values – Dedication, Competence, Genuine and Respect – describe how we behave towards our customers and colleagues, what we represent and how we want to be perceived by the wider world. Bilia works actively with its core values in all parts of the operation:

- Dedication – you show this by being genuinely interested with a genuine presence, by being a role model and highlighting good examples that encourage initiative and creativity, and when you work concertedly towards set goals and have the company's best interests in mind.
- Competence – you demonstrate this by learning from the best, contributing to the business's development, and valuing experience and training.
- Genuine – you are genuine when you live as you learn, keep your promises, show honesty and sincerity, and give constructive feedback.
- Respect – you show this by meeting all people with joy and respect, greeting and paying attention to all customers and co-workers, and by complying with the set frameworks and showing loyalty to agreed decisions.

As an employee, you have a duty to show care and diligence in all matters relating to Bilia, our customers, our suppliers and other stakeholders. When you represent Bilia, you should always conduct yourself professionally and show sound judgement. All employees should help to create a workplace in which everyone can thrive.

Human rights

The Bilia Group supports internationally recognised human rights and does its utmost to ensure that the company does not violate them. All forced and

child labour is condemned. The Bilia Group respects freedom of association and collective bargaining via trade unions.

Fighting discrimination and promoting gender equality

Active measures are taken to combat all forms of discrimination. Bullying and harassment are not tolerated. All people must be treated with respect regardless of age, gender, sexual orientation, disability, ethnic affiliation, nationality or religious belief. All employees must be afforded the same opportunities for personal development. Bilia strives to ensure that both men and women are represented in all professional areas within the Group. *For more information see Bilia's Equal Treatment Policy.*

Equality of treatment

Bilia embraces diversity and equality of treatment, and this should be known – and noticeable – to employees and customer alike. Social aspects are vital components in a good working environment.

All employees at Bilia should therefore, in their words and actions, work for a healthy working environment that is free of discrimination, bullying, harassment and degrading treatment. All employees should be able to thrive and feel safe and secure in Bilia's social landscape.

For us at Bilia, the social working environment has to do with the conduct of each manager and each employee, and also with our values: as people, we are each other's working environment.

We treat each other with dedication, competence and respect, and are genuine in our relationships with one another. We talk to, not about, each other, and we do so with a friendly, respectful attitude. At Bilia all people are of equal value, and we see our differences as valuable assets.

Bilia aims to be a role model in the industry in terms of good working environment, diversity and equality of treatment.

Conflicts of interest

Employees shall always act in the best interests of the Bilia Group. If a situation should arise when your own financial interests could conflict with Bilia's, notify your immediate superior. *For more information see Bilia's Conflicts of Interest Policy.*

Business entertainment, gifts and benefits

Business entertainment for Bilia shall remain within the confines of what is reasonable and defensible. Employees may not participate in business entertainment that is excessively lavish.

Employees may not give or receive inappropriate gifts, benefits or favours. What constitutes an inappropriate gift may be difficult to determine and there is a large grey zone. A gift or favour that could conceivably

influence the recipient's decision is to be regarded as inappropriate.

Work meals, modest get-well or birthday presents, small product samples or items with a small market value are examples of appropriate gifts or benefits. Examples of inappropriate and therefore prohibited gifts or benefits are cash gifts, loans on favourable terms, large discounts or side deliveries of goods or services from one of Bilia's suppliers.

Events such as conferences, customer activities and so on, which include a significant aspect of luxury, leisure or entertainment, must always be approved by the immediate manager, whoever the organiser is. They may also be subject to benefit taxation under national tax regulations.

Great restraint shall always be observed in connection with public procurements and other contacts with authorities.

If you are unsure how to proceed, consult your immediate superior. Remember that a gift does not necessarily have to influence the recipient to be considered inappropriate; sometimes suspicion of undue influence is enough, so it is better to refrain in doubtful situations. Receiving or giving an inappropriate gift may constitute a criminal bribe, which is punishable by law.

Competition rules

Employees in the Bilia Group may not under any circumstances cooperate with other companies for the purpose of hindering, restraining or distorting competition on the market. Examples of illicit anti-competitive practices are: setting of prices or other terms of business, division of markets, and restraint or control of production. Do not assume that something is permitted based on the actions of others. If you are unsure, always contact your superior or Bilia AB's Legal Counsel. *For more information, see Bilia's Code of Competitive Conduct.*

Sales competitions and similar arrangements

All sales competitions, regardless of organiser, must be approved by the management group for the region in question and by the local company's accounting manager. To obtain approval, the arrangement must be of benefit to Bilia and may not entail any negative effects, such as higher inventories or lower gross profit margins.

If a reward for sales performance takes the form of a gift rather than extra pay, it may be regarded as a benefit unless it is of low value. See "Entertainment, gifts and benefits" above.

Conveyance and use of information

The Bilia Group strives for open and direct communication with shareholders, employees, customers, suppliers, public authorities and other stakeholders.

To ensure the correctness of the information furnished by the Group, it is very important that all information be conveyed via the proper channels. *For more information, see Bilia's Public Information Policy.*

Employees in the Bilia Group have a responsibility to the company and its stakeholders (customers, suppliers, shareholders, public authorities, etc.) to handle information in a secure manner and not disclose it to outsiders. Examples of confidential information are: customer registers, customer information, business plans, marketing plans, lists of suppliers, price quotations, calculation data and other sensitive financial or business-related information.

Persons who are privy to insider information may not disclose it or make use of it themselves for trades on the stock exchange. By "insider information" is meant information that is not public or generally known and that could materially affect the price of financial instruments such as shares. This prohibition applies to everyone regardless of position within the Group and is not limited to persons in a management position.

People with managerial responsibility may not trade in Bilia shares for 30 days before publication of the next financial report, excluding the date of publication provided that trading takes place after the report has been published. Employees who have been informed of their inclusion in the log book for compilation of interim reports may not trade in Bilia shares on the days they are listed in the log book, excluding the date of publication provided that trading takes place after the report has been published. Bilia's recommendation is that trading not take place for at least one hour after publication.

Anyone who violates the above rules may be held criminally liable. When in doubt, contact Bilia's CFO. *For more information, see Bilia's Insider Policy.*

Personal data

Bilia is considerate of its customers' and employees' personal privacy, and processes personal data in accordance with applicable legislation and regulations relating to data protection. *For further information, see Bilia's policies on dealing with customers' and employees' personal data.*

Social media

It is primarily Bilia's marketing department who is authorised to represent Bilia in social media such as Facebook, Twitter, blogs and the like. Bear in mind that you as an employee may influence not only your own image, but also Bilia's image when you participate in various social media. *For more information, see Bilia's Social Media Policy.*

IT use

Procedures for information security have been established and shall be followed by all users. Bilia's computers and networks shall be used with good judgement. Programs shall be used in keeping with

existing licences. Copyrighted materials may not be downloaded without permission. Handling files and visiting websites with pornographic, racist, illegal or other unsuitable content that could cause offence to fellow employees, customers or suppliers is not permitted. *For more information, see Bilia's IT Security Policy.*

Environmental consideration

Bilia shall act in a way that promotes a good environment. Environmental consideration shall permeate all of Bilia's activities. All employees shall comply with relevant environmental laws and ordinances. For the sake of a good environment, recyclable and environmentally-friendly materials shall be used wherever possible. Working methods and techniques that minimise environmental impact shall be prioritised. Environmental aspects shall be taken into account in connection with both large investments and daily purchases of goods and services. Marketed products shall conform to a good environmental standard. By making demands on suppliers and other business partners, the Bilia Group shall work actively for a good environment and increased environmental awareness.

Laws and ordinances

The Bilia Group shall comply with relevant laws and ordinances in all countries where Bilia operates. All employees shall comply with industry codes of ethics where such exist. In addition, employees shall comply with Bilia's in-house rules, instructions and policies. It is each employee's responsibility to keep updated on Bilia's different policies. *For more information see Bilia's intranet.*

Compliance and enforcement

All policies, rules and guidelines issued within different areas in Bilia shall comply with the Code of Conduct and reflect the values embodied in the Code. Subsidiaries may make additions to the Code, but may not delete text.

Anyone who suspects any irregularities that are in conflict with Bilia's values, business ethics policy or legislation shall have the opportunity to voice their concerns without fear of reprisals.

Concerns regarding infringements of the Code of Conduct or any other irregularities in the Group can be reported anonymously via an external digital whistleblower system via the following link: wb.2secure.se/wbui/ using the code ndl302.

This enables employees to submit information while their anonymity is guaranteed. All reports are received and dealt with by an external party called 2-secure.

For more information, see Bilia's Whistleblower Policy.

Bilia's Managing Director is responsible for implementation, enforcement and revision of the code. Viewpoints on the Code are welcome and will be considered when making revisions.