

Björcks Resor

CODE OF CONDUCT

Ethical rules and guidelines



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INTRODUCTION

Björcks Code of Conduct - corporate ethics for all of us

All units and employees within Björcks shall comply with laws and agreements that apply to their operations and employment in the countries where they work. It also means that all employees must know and follow the laws that govern their individual tasks.

Compliance with laws and regulations is an obvious and absolute requirement. This Code of Conduct, which contains rules for our business conduct and our responsibility to colleagues, customers, suppliers, shareholders, authorities and the world in general, in some cases goes further and must be applied entirely throughout Björcks.

The code is the result of Björcks' following the United Nations Global Compact. This is a program for companies and organizations that wish to contribute to the international work of ten universal principles related to human rights, labour, environmental challenges and anti-corruption.

By getting involved in social issues and by following the United Nations Global Compact, Björcks has committed itself in all its activities to protect and support human rights and to fight against corruption, discrimination and all forms of forced labour. More information is available at www.unglobalcompact.org.



This Code of Conduct is approved by the board of Björcks Resor AB. The code will be reviewed annually and revised if needed.

The board has the overall responsibility for the implementation of the Code of Conduct and for monitoring its compliance.

All employees are required to understand and comply with this Code of Conduct. Violations may result in disciplinary action including termination of employment and in legal action for serious infringements.

Björcks has established a system for reporting suspected non-compliance. Where normal reporting methods cannot be used, everyone has the right and obligation to notify the company's person responsible for the code of any illegal or serious non-compliance. This "whistleblowing" function can be used via e-mail to:
[Code of Conduct@bjorcks.se](mailto:Code_of_Conduct@bjorcks.se). Read more about this on page 21.

The latest version of the Code of Conduct is always published on the company's official notice board and is available in the Book of Björcks. It is complemented by a course for employees that is held in January, every year.



OUR CUSTOMERS

Björcks is a very important part of Stockholms travel market and society in general. We are here for our frequent travelers who value punctuality, high service and regularity.

It is easy to see our customers as being either young or elderly travelers but they are actually all in it for comfort and safety. Travel needs may, however, vary depending on the purpose of their trip.

Our Customers are not always our travelers or guests however we enjoy caring for all just like they all were Customers.

The customers are always our starting point and they must feel that they are getting the best possible value for their time and their money spent with us. We truly enjoy caring for the travelers.



Safety. Safety is always the top priority in all Björcks operations. When it comes to safety, all trips must be made using safe busses, safe equipment and qualified personnel and in accordance with the applicable laws and regulations. All employees have a responsibility to report deviations from the specified standards, rules and procedures in order to ensure that necessary action is taken and to contribute to the continual improvement of our safety work.

Punctuality. All staff in each relevant Björcks function have a duty to contribute actively to achieving the targets set for punctuality and reliability.

Care. Every promise made to a customer is a commitment that we must deliver on in all situations. Care broadens the issue of our customers' experience to include more care, affection and concern. You should always protect the integrity of our customers. Björcks has an ongoing dialog with our customers and we continuously measure and monitor customer satisfaction.



EMPLOYEES

Our employees are our most valuable resource and we want to realize the potential of all our staff through good leadership and cooperation towards common goals. It is also essential that all our employees and managers are aware of and strive towards our vision to deliver on the expectations of our stakeholders.

The Björcks employee and leadership model describes the behaviors that create a company culture and ensures that we reach our overall goals. All employees and managers are always expected to act in accordance with the Björcks employee and leadership model.

It is the leader's responsibility to make available and to ensure that you as an employee participate in the Code of Conduct. It is your responsibility as an employee to understand and act in accordance with the Code of Conduct.



Diversity. Björcks aims to reflect the diversity of society. The basis for all recruitment, skills development, promotion and other cooperation is that all people are equal. All employees and applicants must be treated according to formal and objective criteria. Björcks recruits on the basis of competence. No one who works at Björcks should be subject to discrimination or favoritism because of age, sex, ethnic background, nationality, religion, sexual orientation, disability, political beliefs or social status. Neither do we accept physical, psychological, verbal or sexual harassment.

Right of association. Björcks respects the right of employees to join associations and organizations, to organize themselves in trade unions and, in line with national law and practice, to sign collective agreements. An effective cooperation model between management, employees and trade unions shall ensure a common understanding of the future challenges and objectives for Björcks.

Working environment. The health and safety of staff is a high priority in all activities at Björcks. The concern for safety applies to all forms of the working environment. No employee should have to suffer from physical or psychological injuries at their work- place. All managers are responsible for their team, group or department, but everyone has the responsibility to work together and to strive for continuous improvements, and to prevent all kinds of injuries.



THE WORLD AROUND US

Responsible member of the society. Björcks strives to demonstrate that it takes responsibility in all countries and areas of operation. This means, among other things, that we are always interested to enter into a dialog and to cooperate with stakeholders and the society.

Sustainability work. In addition to your contribution to the company's economic development and in order to ensure a sustainable development in the daily work, all employees must take into account our impact on the environment and society in general. Better resource management and reduced environmental impact lead to a greater profitability in the long term and to increased competitiveness.



Responsibility at work. Björcks shall be an alcohol- and drug-free workplace. That means it is absolutely forbidden for you as an employee to be under the influence of, possess, sell, distribute or use alcohol or drugs at or in relation to your workplace.

In connection with official professional and festive gatherings organized by Björcks, alcohol can be accepted to a limited extent. Alcohol consumption must then be handled with care and alcohol-free alternatives must always be offered.

Responsibility when traveling. During business trips or leisure travel, where our travel benefits are used, we neither permit nor accept our employees being involved in or associated with any form of activity involving:

- Exploitation of people, such as buying sexual services
- Import or export through the sale or distribution of illegal items (e.g. pirate copies or forgeries) or goods that are subject to customs duty or tax

You must, at all times, avoid actions or conduct that may compromise, be detrimental to or threaten your own or Björcks' goodwill and image. The use of private travel benefits for commercial activities is against our rules and regulations.



COMMUNICATION & DIALOG

A productive dialog is built on openness between the company and its employees. Communication is a strategic management tool that shall help to ensure that Björcks' strategies and goals are spread, accepted and realized throughout the entire company. Communication and dialog with the company's stakeholders are therefore key aspects of our business.

Communication work must take place on a highly professional level and comply with the laws and rules that apply to our company. At Björcks, management has the overall responsibility for communication.

Individual employees at Björcks may not make statements on behalf of Björcks about Björcks or our business to the media, investors, financial or industry analysts or in social media or other public fora or contexts without the prior approval of the management.

You may not publicly denigrate competitors, colleagues, partners or other Björcks stakeholders.



The way how you as an Björcks employee express yourself about Björcks on social media is important. The digital world is changing quickly, and social media are increasingly becoming part of our everyday lives - both at home and at work.

All employees are valuable ambassadors for Björcks. You should be aware of what you write or express can never be considered private but can be spread throughout the entire Internet. The overall approach should be characterized by common sense, respect and tolerance. A simple rule of conduct is never to write anything that would not be acceptable to express at your workplace.

The complete Social Media Policy is available in the Book of Björcks. Your immediate superior can provide further information.



SECURITY, THEFT & LOSS

The aim of our security work is to protect Björcks' property, the content and use of our systems and to minimize the risk of illegal entry, sabotage, damage, disruption, unauthorized data access or other actions that may result in losses of any kind.

IT security. The security aspects refer to material and equipment as well as IT and specialist knowledge. All employees have the responsibility to maintain high security standards, which, among others, include safeguarding and handling passwords and PIN codes for computers and mobile devices. Work tools, such as computers, cell phones or our communication system, must not be used to process, send, receive, store, print or otherwise spread information that is false, illegal, constitutes harassment or is otherwise incompatible with this Code of Conduct or professional acting in general.

All employees are responsible to ensure that the company's information and communication system is used correctly and in accordance with our IT policy. Personal use must not prevent or reduce our ability or capability to carry out our work or must not have a negative impact on the company or its reputation. Remember that information about our customers must never be communicated to any persons or companies outside Björcks other than in order to perform the services that customers expect of us.



Theft and loss. Crime in all its forms such as theft, loss, embezzlement or fraud, is unacceptable and will lead to disciplinary action, which may result in a dismissal. Such actions are also reported to the police.

There are many aspects of crime. That is why we actively work to provide information about, prevent, expose and denounce all types of crime in our company. Björcks' rules and guidelines about this subject have been elaborated based on domestic and international legislation in this area.



ENVIRONMENT

Consideration for the environment. Our goal is to generate responsible and sustainable traffic growth, while at the same time reducing the environmental damage.

We shall monitor the leading companies working with the sustainable development of people's transportation and thereby learn how to contribute to a sustainable development of society. Björcks has an long-term environmental ambition, and the environmental targets are monitored continuously within the framework of the established environmental policy.

Our biggest environmental impact is through the consumption of non-renewable energy.

We strive to minimize our environmental impact, in the air, sea and on the ground, and to optimize our resource management through, among other things, reduced emissions, reduced consumption of energy and water, reduced noise pollution and effective waste management.

We are also working actively to create a culture based on a commitment to environmental efforts among all employees. All employees are expected to take consideration for the environment in their daily work by following the working methods and procedures that are established. These are aiming for minimal resource consumption and environmental impact. Any discrepancies and extraordinary occurrences must always be reported through the established reporting tools.



REPORTING

Björcks publishes financial information (annual report and interim reports) that contains financial results, data and information about the company's activities (Annual report).

Market-sensitive information. Björcks is a privately owned business and reports according to Swedish small companies rules. Björcks has no specific procedures for how market-sensitive information is published and by whom. However it shall always be done by our Managing Director or Chairman of the Board. There will be consequences for any individual who does not comply with these procedures.

Accounting policies. Björcks has strict rules and policies for the reporting of financial information and audit procedures.

Sustainability reporting. Björcks does not publish sustainability reporting.

For further information concerning the financial statements, contact the Managing Director.



DOING BUSINESS

All employees must comply with all laws and regulations applicable to the work in their operation. Our employees have the responsibility to obtain information about legal requirements and other legal issues related to their own work.

Competition. Björcks supports free competition as the basis for all business development and innovation, and has a strict compliance program for the competition law that all employees must adhere to. Björcks must compete within the legal framework of the respective country. Employees must never engage in anti-competitive activities, such as illegal price fixing, market division, abuse of dominant position, or in other situations where free competition is unlawfully prevented, restricted or weakened. Consult with your supervisor or Managing Director if you are in doubt.

Procurement. All kinds of procurement must take place while keeping costs as low as possible and must be done in the best interests of Björcks. The choice of suppliers and ensuring the best commercial conditions for procurement are factors that affect Björcks' profitability and competitiveness. All kinds of procurement must be done professionally, according to sound ethical principles and with great integrity, and must comply with applicable laws and Björcks policies. Savings must be achieved through standardization, binding comprehensive agreements and close cooperation with selected suppliers.

Priority shall be given to suppliers that are certified according to ISO 14001 or that can demonstrate that they follow similar environmental management systems and are working in accordance with the United Nations Global Compact as well as sharing Björcks' ambitions in the area of sustainability.

Björcks works in accordance with the United Nations Convention on the Rights of the Child and Save the Children's guidelines for dealing with children's rights, and places the same requirements on its suppliers. Information regarding ongoing procurement negotiations and possible suppliers must be treated confidentially.

Bribery and improper benefits. Employee integrity helps to maintain Björcks' good reputation and trustworthiness in the market. We must, under no circumstances, promise, offer or accept payments, compensation, loans or other financial benefits to, through or from persons or companies in contravention of applicable laws and Björcks policies. Employees may also not use intermediaries, agents or other brokers to circumvent the above prohibition on giving or receiving payments or other benefits.

Gifts and entertainment. Our Employees must not promise, offer or accept gifts, entertainment or other personal benefits to or from persons in contravention of applicable laws and Björcks policies, or where this may, or could be construed to, affect their work performance or the outcome of a business agreement.

Consult your supervisor or Managing Director if you are in any doubt.



CONFLICTS OF INTEREST

Conflicts of interest arise when your own objectives do not match with those of Björcks or when your decisions may be to the company's disadvantage. You must therefore report situations or transactions that could lead to a conflict of interest. Consult with your manager if you suspect that you are, or in the risk of becoming involved in such a conflict. If your manager is unwilling or unable to make a decision, you need to contact Code_of_Conduct@bjorcks.se. Conflicts of interest may also arise when a close relative has a financial or other interest that may affect the employee's judgement to the detriment of Björcks.

Business opportunities. You may not, neither for yourself nor on behalf of an associate, take advantage of business opportunities that rightfully belong to Björcks, nor may you use Björcks' information, property or your position within Björcks for personal gain.

Other employment. You may not have any employer other than Björcks or engage in business activities outside the company if this may have a negative impact on your work for Björcks. Always consult your manager before accepting other employment or an increase in external work.

Board appointments and other external positions. If you hold, or are asked to assign for, a position at the Board of Directors or other body outside Björcks, you must ensure that this cannot lead to conflicts of interest. A formal approval from your supervisor is required for such appointments.

Political activities. Björcks does not provide any contributions or other support, directly nor indirectly, either to political parties or to individual politicians. You must also not provide contributions on behalf of Björcks or assistance in the form of funds or resources from Björcks.

INSIDER TRADING

The Börcks Board of Directors has established rules for insiders and the trading of Björcks shares. The company is not listed on any stock market so there is no need for it to be official.

Insider information. Insider information refers to information that has not been published and that may affect the share price or other financial instruments. It is possible for you to have access to insider information even if you are not registered as an insider. Björcks is not a listed company, however our Customers and Suppliers are. We choose to act responsibly with financial information.



NON-COMPLIANCE & REPORTING

Conduct or actions that are, or may reasonably be considered as, being an infringement of the law or this Code of Conduct, must be reported. Depending on what shall be reported, established reporting tools shall be used. If such a tool does not exist, you are requested to report such infringements to your supervisor, or if that person is involved or fails to act, to the supervisor's superior. We expect managers to treat reported matters seriously and in accordance with Björcks' policies and values.

Reporting non-compliance ("whistleblowing" function). Björcks has established procedures for reporting non-compliance. Reports of a breach of law or a serious breach of this Code of Conduct, relating for example to competition legislation, criminality, accountancy and financial reporting, insider trading or conflicts of interest or situations where managers are involved or fail to take appropriate action following reports, can be reported at [Code of Conduct@bjorcks.se](mailto:Code_of_Conduct@bjorcks.se).

There will be no discrimination or punishment against anyone for making a report in good faith of actual or suspected non-compliance. Reports will be treated confidentially and anonymously if requested.



