



Elof Hansson

Partner Code of Conduct



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Elof Hansson's core values are Trust, Commitment and Professionalism.

Elof Hansson is a leading trading house since 1897, thanks to the hard work of our employees and all our Partners. We are fully committed to continue growing and to add value and exceed expectations of all our Partners.

Being a global leading trader for pulp, paper and timber, Elof Hansson is subject to a significant amount of regulatory authorities worldwide (covering health and safety, environment, financial crime, international trade and sanctions etc). To ensure compliance with our own values but also within a constantly evolving regulatory environment, we have our internal Elof Hansson Policies. As it is our shared responsibility that values and legislation are reflected in all our actions, this Partner Code of Conduct, sets out our expectations. We encourage our Partners to establish similar Code of Conduct and we will support actions by our Partners to increase awareness and compliance within all areas of this Policy.

1 Compliance with laws and tax

Partners shall comply with applicable laws and regulations as well as avoid criminal tax evasion.

2 Corruption

Corruption is when bribes of any kind is offered, expected or taken, regardless of form, method or purpose. Elof Hansson does not accept corruption or any other kind of unauthorized influence. Whereas we acknowledge local customs may differ, our Partners must ensure that they have appropriate Anti-Corruption policies and procedures in place to ensure that relevant laws are complied with.

3. Anti-Money Laundering (AML)

Money laundering is any arrangement where the proceeds of crime are disguised or made to appear legitimate. Elof Hansson must never, and we expect the same from our Partners, be part of, or facilitate money laundering, terrorism financing and/or other financial crimes and shall perform reasonable due diligence to detect potential money laundering and terrorist financing in the value chain.

4 Trade Compliance

- Our Partners must ensure to fully comply with applicable export and trade sanctions laws, regulations rules and licenses including without limit those of the U.S., the UN and the EU ("Export Laws"). In no event shall a transaction be structured, or documentation be altered to circumvent any Export Laws. In transactions involving Elof Hansson, we represent and warrant that:
 - We shall not engage, directly or indirectly, and shall ensure that none of our Partners engage in, dealings with any person or entity in violation of Export Laws or in violation of any prohibited end-use pursuant to Export Laws. In case of purchases this means that we are the true purchaser of the goods from Elof Hansson, and the goods shall not, in violation of Export Laws, be sold, re-transferred or made available to any party listed on any applicable list of prohibited parties or subject to sanctions imposed by the UN, EU, U.S. or other countries.
 - We shall not do anything which would cause Elof Hansson to be in breach of Export Laws.
- We might ask for reasonable amount of information to be provided to us, for our KYC (know-your-customer) requirements.



5 Human Rights and Labor

Human rights are basic freedoms to which all people are entitled. We are committed to respect and promote international human rights in the entire value chain:

- Safe and secure work place – Elof Hansson requires Partners to be dedicated to providing a safe and healthy work environment and work to minimize risks for accidents and other exposure to health risks.
- Forced labor and child labor – Elof Hansson does not accept any form of child labor or all forms of forced labor (including prison labor, military labor, modern forms of slavery or any form of human trafficking).
- Respect - We encourage our Partners to always treat people with respect and not to allow any form of discrimination of employees. We believe in equal opportunity and fair remuneration.

6 Fair Competition

Our Partners shall comply with regulations on fair competition (also called "anti-trust" laws) and will not enter into agreements with competitors that restricts competition, including but not limited to price fixing, allocation of customers, bid rigging etc.

7 Environment

Elof Hansson assigns the highest priority to comply with environmental regulation, and to preserve the environment. We expect our Partners to adopt similar standards, at the minimum according to legislation.

8 Confidentiality

Both Elof Hansson and our Partner agree to protect confidential and sensitive information from loss, and unauthorized access, use, modification, disclosure or destruction. Both parties agree to use the protected information pursuant to applicable laws.

Compliance adherence

A cornerstone for our business relationship is mutual values. A breach of this Code of Conduct is therefore a serious event and risk leading to the termination of trust between Elof Hansson and the Partner, and with legal consequences, including but not limited to, termination of agreement and/or action for damages. Concerns related to this Code of Conduct should be reported immediately to the Compliance Department at compliance@elofhansson.com.

I confirm that I have read Elof Hansson Partner Code of Conduct and I am aware of and understand its principles. I agree to abide by the principles.

Company name:

Place and Date:

Authorized Signature: