

Ethics Policy Nilfisk

Nilfisk

Ethics Policy

Compliance with the law

Nilfisk will comply fully with all relevant national and international laws and will act in accordance with local guidelines and regulations, including those which are industry specific, governing our operations.

It is the responsibility of all managers to ensure, by taking legal or other expert advice where appropriate, that they are aware of all local laws and regulations which may affect the part of the business in which they are engaged.

Even where the law does not apply, applicable standards of ethics and morality relate to our activities and require the same diligence and attention to good conduct and citizenship. Employees must avoid situations where appearance of impropriety exists, even though the circumstances might not otherwise specifically violate this code of conduct.

Confidential information

Employees must not make use of confidential information obtained through their employment for personal gain, nor disclose such information to any third party during or after their employment. 'Confidential information' is either information that has been specifically described as being confidential or is otherwise obviously confidential from the surrounding circumstances.

The term "confidential information" does not include information already in the public domain, information that was already known to the Recipient at the time of its disclosure, or information that is required by law to be disclosed

Conflicts of interest

Sales of the Company's services and products and purchases of products and services from suppliers will be made solely on the basis of quality, performance, price and value, and never on the basis of giving or receiving inducements in the form of payments, gifts, entertainment or favours or in any other form.

Every employee has a duty to avoid business, financial or other direct or indirect interests or relationships which conflict with the interests of the Company, or which divides his or her loyalty to the Company. Any activity which even appears to present such a conflict must be avoided or terminated unless, after disclosure to the appropriate level of management, it is determined that the activity is not unethical or improper, does not compromise integrity and is not detrimental to the reputation and standing of the company.

Ethics Policy Nilfisk

Business practice and entertainment

Nilfisk is resolutely opposed to bribery and corruption in whatever form it may take. Gifts or entertainment may only be offered to a third party if they are consistent with customary business practice in the relevant territory and are modest in value and cannot be interpreted as inducements to trade. Where there is doubt, guidance should be sought from a Director. No financial or other inducements should be given to third party organisations or to individuals from such organisations in any circumstances. This includes government agencies and representatives.

Employees should not accept gifts, money or entertainment from third party organisations or individuals, where these might reasonably be considered likely to influence business transactions. Unsolicited gifts, other than trivial ones with a low value, should be returned. In a culture where such an action might cause offence, the gift should be declared to the company and, if practical, donated to an appropriate charity.

Accounting standards and records

All accounting documentation must clearly identify the true nature of business transactions, assets and liabilities in conformity with generally accepted accounting principles. No record or entry must be false, distorted, incomplete or suppressed.

External reporting

Nilfisk businesses may be required to make statements or provide reports to regulatory bodies, government agencies or other government departments. Care should be taken to ensure that such statements or reports are correct, timely and not misleading. Senior management must be made aware of any sensitive disclosure before it is made.

Care must also be taken when making statements to the media that information given is correct and not misleading. Enquiries from the media should be referred to company media relations experts and statements should only be made by designated spokespersons.

Employees

In dealing with our employees, we will act in compliance with national regulatory requirements and government guidelines. We will not discriminate on the basis of age, gender, colour, ethnicity, culture, religion, sexual orientation or disability.

We value all our employees for their contribution to our business and their opportunities for advancement will be equal and not influenced by considerations other than their performance, ability and aptitude.

Customers

Mutual trust and confidence between Nilfisk and its customers is vital. All employees should strive to consistently deliver service excellence and value for money, meeting customers' expectations and anticipating their changing requirements.

Suppliers

Ethics Policy Nilfisk

All suppliers are entitled to fair treatment and all potential suppliers should have a reasonable opportunity to win Nilfisk business. Nilfisk sets high standards for its suppliers in the context of its own ethical policy.

Competitors

Nilfisk will always compete vigorously, but in a fair and ethical way. Competitive success is built on providing good value and service excellence. Competitors should not be disparaged. When in contact with competitors, employees will avoid discussing confidential information and no attempt will be made to improperly acquire competitors' trade secrets or any other confidential information. Employees must not discuss pricing strategies or undertake any arrangements which would conflict with the laws of the territory concerned.

Community

Nilfisk is fully committed to supporting and assisting the communities in which the company operates through a variety of means. Nilfisk will also serve local communities by providing good employment opportunities and effective services and products which safeguard the public good.

Environment

We will conduct our business with respect and consideration for the communities in which we operate and for the environment. We will take steps to minimise any disturbance to communities as a result of our operations. In each of our operations we will strive to minimise our impact on the environment through reduction of waste, vehicle emissions and energy consumption.

Staff complaints, whistleblowing and suggestions

Staff can expect that the Company will give due consideration to their constructive suggestions and will provide a considered and objective review of genuine concerns and complaints. Such concerns include fraud, misrepresentation, theft, harassment, discrimination and non-compliance with regulations, legislation, policies and procedures.

Concerns must be investigated impartially so that the employee's rights are protected. Employees who have concerns about potential unethical behaviour should advise their Director in the first instance. Employees may do this anonymously if they so wish. To ensure that confidentiality is maintained, employees should not discuss such concerns with colleagues or other third parties, unless specifically authorised or unless it is a legal requirement.

If the whistleblower is dissatisfied with the response to the concern which he has raised, or if the concern relates to a matter of exceptional gravity or sensitivity, he can contact the Managing Director