

GCE GROUP SOCIAL RESPONSIBILITY POLICY

This policy is valid for all companies, employees and temporary workers of GCE. This is also a requirement for suppliers, subcontractors and contractors.

GCE Group participates, to the extent we can, in building a sustainable society built on three pillars:

- » Environment,
- » Social,
- » Economic.

GCE uses the definition of sustainability stated by the Brundtland Commission of the United Nations:

“Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.”

GCE Group promotes an ethical business practice and fair competition free from corruption, in accordance with local, regional and international laws. GCE supports internationally recognized principles such as UN declarations on human rights, the OECD guidelines for Multinational Enterprises and the ILO Core conventions on Labour standards.

GCE Group is committed to a work environment promoting personal and organizational efficiency and growth. We believe such work environment is based on respect for all people and free from discrimination, abuse, monetary or physical punishment of any kind.

GCE follows up and continuously improves our internal performance in accordance with this policy, and require our suppliers to follow the same principles.

1. Policy

1.1 Security

GCE products and solutions shall be safe to handle and use and the safety of the products is always a top priority. For all products an initial risk assessment shall be done and this shall be kept up to date. Anyone who identifies a new risk, or a reason to reclassify a risk, shall report this immediately!

No employee, temporary worker or contractor should risk their current or future health by working for GCE. This requirement is valid for all types of work related to GCE Group regardless if it is done by subcontractors or by our own employees. The requirement is valid in all work locations, as well as canteens, dormitories etc if provided. Risk assessment of work hazards shall be done and reviewed regularly. The risks shall be continuously reduced and eliminated if possible.

For work involving special risks, for example chemicals, or work in hot or cold or noisy environment, special care shall be taken to ensure that employees are aware of the risks and how to reduce the risks. Proper protective equipment shall always be available and must be used. For all used chemicals MSDS (Material Safety Data Sheet) shall be available at the workplace in the language(s) of workers and shall be implemented, i.e. training of everybody handling, using or working in close proximity of the chemical, protective- and spill equipment as well as emergency equipment.

Working under the influence of alcohol or drugs is not allowed. If an employee needs to use or is prescribed to use medicine by a medical doctor that influences the ability to perform certain tasks other tasks shall be given to the employee. The employee is responsible to notify manager or HR immediately. Emergency evacuation routes shall be

clearly marked and easy to follow also in case of power outage and smoke. Alarms shall be tested and emergency evacuation drills shall be done on regular basis.

1.2 Integrity

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Openness and honesty, as well as the ability to keep sensitive or confidential information are vital for cooperation, fact based decisions and mutual success. Thus integrity is a key value in GCE. Social media enables simple ways to build and maintain personal as well as professional relationships, however news can travel very fast and is impossible to erase once spread. Employees are allowed to associate themselves with GCE in their accounts on social media if they wish to do so, but if posts can be interpreted as views or opinions of GCE they must clearly state posts as personal and their own. Sharing company internal information or, worse, confidential information is not allowed in social media or in any other way.

Employees as well as temporary workers shall be treated fairly and in line with international conventions. Personnel files are strictly confidential. IT systems shall ensure that the personal integrity is protected at all times and that actions which can be traced to a user cannot appear to be done by another user or person.

Financial or physical punishment or threat of such punishment is not allowed.

No form of harassment or bullying, is accepted nor any discrimination in hiring, promotion, awards, assignment of tasks and responsibilities, participation in training, dismissal etc. Regardless of colour, race, religion, gender, marital status, sexual orientation, disability or age, all employees and temporary workers have the same rights to a fair and honest treatment in the workplace.

GCE does not accept child labour. Children, as defined by local law and international conventions, are not allowed to work for GCE or our suppliers. If allowed according to local laws, apprentice programs and work during school holidays may occur for young persons in the age between 15 and 18. If this is used it shall not in any way negatively affect the time or energy for school and no tasks that may or potentially may cause physical or mental harm are to be performed. A principle of caution shall always be used.

As far as allowed in local law, employees are free to join, or choose not to join, unions and other organization without risking any consequences in their work place. They have the right to collective negotiations of salaries and other areas of common interest.

All GCE units as well as all suppliers shall comply with applicable laws, rules, directives and regulations in the countries and regions where they operate, including local, national, regional as well as international laws. As needed it is our policy to co-operate fully with public authorities and regulatory bodies.

Corruption is identified as one of the main hampers for sustainable development. GCE support promotion of fair competition. Giving or receiving inducements or other payments, gifts or services to influence a business decision is not allowed. Special care must be taken in giving and accepting gifts and entertainment. Copyright, licenses and trademark shall be honored. Copy, pirate or gray market products and software is not used in GCE.

Conflicts of interest, as well as risk situations of conflict of interest, for employees must be avoided.

1.3 Environmental impact

Material usage, and especially waste, is the key to enable an environmental sustainable society. GCE promotes reduce-reuse-recycle principle for all materials. This means:

- » Reduce material usage, for example forging close to final shape.
- » Reuse material where possible, for example clean and reuse boxes to move material internally and from suppliers.
- » Recycle material, for example ensure paper, plastics and scrap metals are sold to recyclers and not to landfill.

This also includes ensuring that our products are possible to recycle at end of their life time.

The environmental impact should be continuously reduced including emissions to air and water to meet or exceed legal requirements. Environmental impact assessment shall be part of major investments and decisions regarding localization.

2. Validity and responsibility

This policy is valid for all companies, employees and temporary workers on all levels of GCE. These Social Responsibility requirements also apply to all suppliers, forwarders, subcontractors and contractors.

If the policy is violated it is everybody's responsibility to bring this to the attention of higher management directly or through gcewhistle@gmail.com. This includes also temporary employees, customers and suppliers. Reporting of violations, also known as whistle blowing, shall never be punished as that in itself is a violation of the code. An employee who violates our ethical standards is subject to disciplinary action which can include oral reprimand, written reprimand, suspension or termination of employment.

The Group Chief Executive has lead responsibility for policy implementation within the Group, but each manager is responsible to know and communicate the policy within his or her team.

3. Guidelines and references

[ILO core conventions](#)

[OECD guideline](#)

[UN norms on the responsibilities of transnational corporations...with regards to human rights](#)

[UN declaration on Human rights](#)