



Code of Conduct

The foundation for Höganäs' Code of Conduct

Höganäs AB enjoys a world-wide, invaluable reputation for quality, know-how and good relations. It is based on our consistency in conducting business with the aim of creating profitability for not only ourselves, but also our customers and suppliers. We firmly believe in a bright future for metal powder solutions and are determined to explore them, together with customers and partners.

As a global company our employees interact with many different people and professions, in changing arenas and cultural environments. No matter where and with whom, all employees should strive to act according to Höganäs corporate values – Active, Brave and Caring.

We are active in the sense that we make things happen and pay close attention to needs, be it customers', colleagues' or any other stakeholders'. We are brave as we dare to challenge old truths and believe we can contribute to better solutions with the help of metal powder. Last, but not least, we are caring in the sense that we are committed. To the company. To our colleagues. To our customers.

This is the foundation for Höganäs' Code of Conduct, which we will continue to reflect, promote and implement in Group policies, decisions and actions. For the good of Höganäs and our stakeholders.

Scope of Application

The Höganäs Group Code of Conduct has been adopted to state the principles by which the Group conducts its relations with business partners, shareholders, employees and the community.

It applies to members of the Board of Directors and all employees within the Höganäs Group.

In the assessment of potential and current suppliers, the principles described in this document shall be applied.

Business Ethic

The Höganäs Group corporate values and commitment to sustainable development are, and will continue to be, reflected, promoted and implemented in Group policies, decisions and actions.

To conduct business as a responsible member of the community, the Höganäs Group shall abide by the laws and regulations of the countries where it is active. Each employee is responsible for following the laws and regulations applicable to them in their position as representative for Höganäs. When in doubt, each and every one of us must seek appropriate advice on legal issues.

Business relations

The working relations between the Höganäs Group and its business partners are characterized by fairness. Höganäs demands honesty and integrity in all business areas and expects the same from its business associates such as customers, suppliers, partners and agents.

Höganäs has taken a position on non-acceptance of bribery and will in no way use illegal, unfair or unethical measures in order to obtain or retain a business advantage. We do not accept improper rewards or benefits nor do we offer, promise, grant or authorize the giving of improper rewards or





benefits. The Höganäs Group is convinced of the true value of compliance with anti-bribery regulations and is committed to grow using nothing but fair business methods. The Höganäs Anti-Bribery Policy forms an integral part of Höganäs' Code of Conduct.

Financial reporting

All business transactions of a Höganäs company shall be clearly reported in the accounts of the company. All financial transactions by the Höganäs Group are reported in accordance with generally accepted accounting practices. The Höganäs Group will provide information to the market that is trustworthy, relevant and timely and that gives a balanced view of the business.

Political involvement

The Höganäs Group observes neutrality with regard to political parties. Companies in the Höganäs Group may not give financial support to political parties or politicians or engage in political activities.

However, Höganäs Group wishes to play an active role in the communities where we operate. Therefore employees and regional managements are encouraged to propose community involvement projects that Höganäs could support.

Social Ethic and Human Rights

Within its sphere of influence, the Höganäs Group respects and supports the protection of internationally proclaimed human rights.

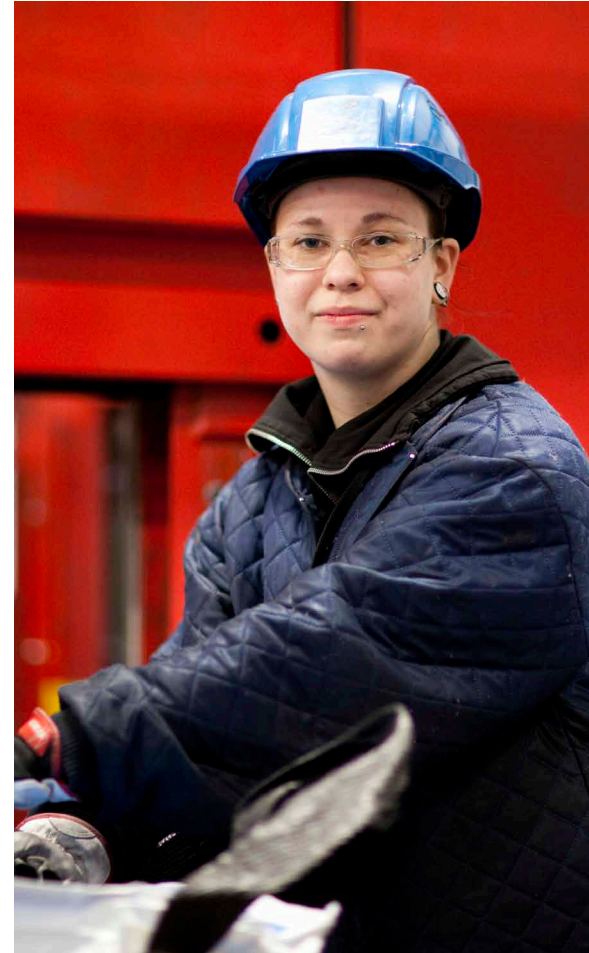
Labour

The Höganäs Group hires and treats all its employees equally, fairly and with respect, irrespective of ethnic origin, sex, age, national origin, disability, caste, religion, sexual disposition or political ideology.

Höganäs respects the right of all employees to form and join a trade union of their own choice and to participate in collective bargaining.

The Höganäs Group does not tolerate forced or child labour. The minimum employment age is the age of completion of compulsory schooling. We do not accept any form of mental or physical punishment, threats of punishment, sexual or other harassment or abuse. As Höganäs values a healthy balance between work and private life we strive to help employees to reach the same.

Employees shall avoid any conflict of interests between their private activities and the activities and financial interests of the Group. If such a conflict of interests or any uncertainty in this regard should arise, the matter shall be referred to the management immediately.





Work environment

The Höganäs Group is committed to doing its utmost to provide all employees safe and healthy working places. We strive to eliminate work related accidents and injuries. Safety requirements according to local regulations must be respected and abided to.

Environment

The Höganäs Group adheres to an approach that results in long-term sustainable development. Consequently, the Group strives for high efficiency in the use of energy and natural resources, promotes systems for the recovery and recycling of materials and works to prevent and minimize pollution.

The Höganäs Group audits, follows up and reports on our environmental performance. We shall comply with or exceed environmental requirements set by applicable laws, ordinances and international agreements in countries where we are active.



Confidentiality

Employees within the Höganäs Group must never disclose confidential company information to any person outside the company. All information obtained at work should be considered confidential as long as it is not publicly available. Each employee must only use confidential information that is naturally associated with his or her duties at work.

Confidential information includes, but is not limited to;

Höganäs' financial and commercial relationships, innovations, buying, offers, strategies, supplier information, information on suppliers' capacity, IT solutions, analyses and sensitive personnel data, information concerning Höganäs and/or the business carried on within Höganäs.

Application

All managers within the Höganäs Group have a responsibility to ensure that every employee not only is fully informed about the spirit and contents of this Code of Conduct, but also acts in compliance with it. Violations of the Code of Conduct will not be tolerated.

All employees are encouraged to reveal behaviour that may not comply with the principles stated in this document. Reports of violations of this code may be done anonymously and confidentially through Höganäs' electronic "whistle-blower" address to external lawyer Ragnar Lindqvist at rl@msa.se. It is also available for all employees on the intranet start page.

The Höganäs Group board will make every effort to maintain the anonymity and confidentiality of those reporting.



Sweden Höganäs AB
Höganäs
Phone +46 42 33 80 00
Email info@hoganas.com

Brazil Höganäs Brasil Ltda
Mogi das Cruzes
Phone +55 11 4793 7711
Email brazil@hoganas.com

China Höganäs (China) Co. Ltd
Shanghai
Phone +86 21 670 010 00
Email china@hoganas.com

France Höganäs France S.A.S.
Villefranche-sur-Saône Cedex
Phone +33 474 02 97 50
Email france@hoganas.com

Germany Höganäs GmbH.
Düsseldorf
Phone +49 211 99 17 80
Email germany@hoganas.com

India Höganäs India Pvt Ltd.
Pune
Phone +91 20 66 03 01 71
Email india@hoganas.com

Italy Höganäs Italia S.r.l.
Rapallo (Genoa)
Phone +39 0185 23 00 33
Email italy@hoganas.com

Japan Höganäs Japan K.K.
Tokyo
Phone +81 3 3582 8280
Email japan@hoganas.com

Rep. of Korea Höganäs Korea Ltd
Seoul
Phone +82 2 511 43 44
Email korea@hoganas.com

Russia Höganäs East Europe LLC
Saint Petersburg
Phone +7 812 334 42 72
Email russia@hoganas.com

Spain Höganäs Ibérica S.A.
Madrid
Phone +34 91 708 05 95
Email spain@hoganas.com

Taiwan Höganäs Taiwan Ltd
Taipei
Phone +886 2 2543 1618
Email taiwan@hoganas.com

United Kingdom Höganäs (Great Britain) Ltd
Tonbridge, Kent
Phone +44 1732 377 726
Email uk@hoganas.com

United States North American Höganäs, Inc.
Hollsopple, PA
Phone +1 814 479 3500
Email info@nah.com