

COP REPORT

(Communication on Progress)

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TRAMO ETV AB

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- TRAMO ETV -

Statement of support – TRAMO ETV AB

As a company we have shown that we have the strength to back our commitments in all the areas of endeavour that we have committed ourselves to- In the marketplace, environment, workplace and our communities.

We are leading by example and are displaying our commitment to the principles of the UN Global Compact and we believe that, even as we strive for progress, our drive will be in the direction of reaching out to our coworkers and to all of the people that we are doing business with.

We expect to touch them in our own small way to ensure that they understand the importance of the Global Compact and also abide by these principles. We do not want to stand alone in this commitment and we want to focus our endeavours on making our goals known in our business sphere as well as our location.

"We have the strength to commit ourselves to the Global Compact and we shall use that strength to reach out to all our coworkers and business partners."

Marcus Löfgren, CEO TRAMO ETV AB

A background image of a large crowd of people at a protest or demonstration, with a teal vertical overlay on the left side.

HUMAN RIGHTS – Principle 1

Business should support and respect the protection of internationally proclaimed human rights

TRAMO ETV AB supports the United Nations Universal Declaration of Human Rights and we see it as an important part of our commitment to continued social responsibility and incorporating human rights considerations into our daily business.

At TRAMO ETV we have implemented a system designed to give our employees the possibility to, with full confidentiality, report failures and non-compliance identified by the employee.

TRAMO ETV is actively cooperating with labor unions as well as governmental and regulatory bodies to ensure working conditions that meets the highest possible health and safety standards. We are also providing health care through affiliated specialists to all employees.

A high number of women are working at TRAMO ETV in comparison with other companies in the same field. The salary differences have been erased with regard to gender and age at time of entry. Salary scales are harmonized for the workforce.

HUMAN RIGHTS – Principle 2

Business should make sure that they are not complicit in human right abuses

TRAMO ETV AB has implemented a Code of Conduct, which is a non-negotiable requirement from our side. We expect all our employees, suppliers and their subcontractors to follow this code in regard to deprivation of human rights.

TRAMO ETV are adhering to the RoHS3 directive, the DODD FRANK Act Section 1502, the REACH Directive as well as different directives and regulations stipulated by the European Union. Our Code of Conduct expresses our support for the UN Declaration of Human Rights and we also encourage our suppliers to sign up to the UN Global Compact.

At TRAMO ETV an open dialogue with our employees, suppliers and customers about human rights and human right abuse are of importance. We strive to inform and encourage human rights issues to all our stakeholders.

As part of our commitment to the UN Global Compact we are planning internal information sessions or workshops about our efforts to support these issues.



LABOUR – Principle 3

Business should uphold the freedom of association and the effective recognition of the right to collective bargaining

All personnel at TRAMO ETV are entitled to, and are also recommended to, join trade unions to protect both individual and collective interests at their workplace. The company acknowledge the role of union representatives and we are also ensuring that no form of discrimination for union activities are imposed.

The communication link between the union and the company is ensured through meetings at regular intervals or when called for by either party. The minutes of these meetings are recorded and posted on the notice board and jointly signed by the management and union representatives.

All Swedish trade unions have very high standards and requirements in regard to equality between genders and together with the company's union representatives TRAMO ETV is trying to lead as example in negotiations with the different trade unions.

At TRAMO ETV all our employees are members of local trade unions and are as members taking benefit from the collective bargaining agreements made with the Swedish Metal workers Union and the Unionen trade workers union.



LABOUR – Principle 4

Business should uphold the elimination of all forms of forced and compulsory labor.

TRAMO ETV has always been and will always be committed not to resort to any form of forced and compulsory labor.

The company is monitoring and requesting that both suppliers and subcontractors keeps the highest standards in regard to forced labor and provides regular information about factory conditions if these are situated outside of the European Union.

All employees at TRAMO ETV have a current and agreed upon job description as well as an employment contract stating the terms and conditions of the employment. The Employment conditions and salaries are also regulated by the trade unions that all employees are represented by.

TRAMO ETV have never been accused of, charged with, indicted for or in any other way whatsoever involved with the use of forced or compulsory labor not agreed upon with the involved trade unions.

LABOUR – Principle 5

Business should uphold the effective abolition of child labor.

TRAMO ETV is actively working against the illegal use of child labor, exploitation of the work of children and all other unacceptable forms in the treatment of workers according to international standards, i.e. ILO Convention No 138 and 182.

TRAMO ETV is trying to make sure that suppliers and subcontractors are not using workers under the legal age of employment in any country or local jurisdiction where the supplier performs work for TRAMO ETV. This is done through own investigations and requests to the suppliers to sign a code of conduct covering and including child labor.

At TRAMO ETV the national and trade union agreed minimum legal working age is 16 years. We have at present no employees under the age of 25 years.

LABOUR – Principle 6

Business should uphold the elimination of discrimination in respect of employment and occupation.

TRAMO ETV has in the company's workplace regulations included a permanent concern to respect and promote the principle of nondiscrimination on all levels in the company. The instructions are not only valid for the employees but also for the management and we are committed not to practice any form of discrimination that is founded on age, sex, religion, origins and political or trade-union membership.

Compliance with TRAMO ETV:s Code of Conduct and workplace regulations are required and also agreed upon with each and every employee in the company.

The Code of Conduct and workplace regulations are included in information sessions held within the company at regular intervals.

TRAMO ETV has a larger than average proportion of female employees for being in the metal industry.

ENVIRONMENT – Principle 7

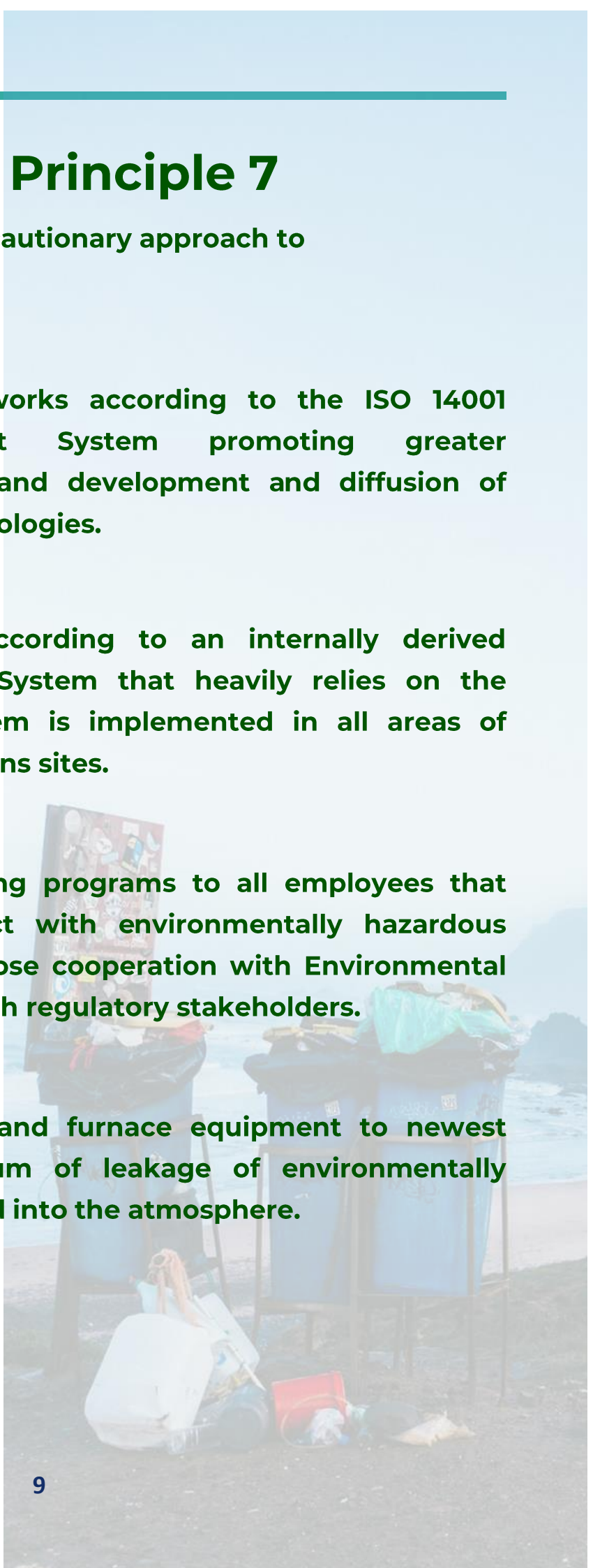
Business should support a precautionary approach to environmental challenges.

TRAMO ETV supports and works according to the ISO 14001 Environmental Management System promoting greater environmental responsibility and development and diffusion of environmentally friendly technologies.

TRAMO ETV is operating according to an internally derived Environmental Management System that heavily relies on the ISO14001 Standard. The system is implemented in all areas of production and at all productions sites.

We have implemented training programs to all employees that handles or comes in contact with environmentally hazardous substances. This is done in close cooperation with Environmental specialists and with the Swedish regulatory stakeholders.

We have upgraded heating and furnace equipment to newest standards so that a minimum of leakage of environmentally hazardous aerosols are injected into the atmosphere.



ENVIRONMENT – Principle 8

Business should undertake initiatives to promote greater environmental responsibility.

TRAMO ETV commits itself to adopt a growth strategy based on saving the earth's resources and environmental protection. We will actively participate and support ecological protection and development of our business.

The environmental management program at TRAMO ETV is a part of our company core and is well described in our Environmental Management System which is in line with the ISO 14001 Standard.

We have been installing earth heating equipment with heat exchangers so that our manufacturing and office facilities are self-sufficient on heating and cooling.

We have reduced our indirect greenhouse gas emissions by over 26% through the installation of earth heating equipment and other energy saving measures.

ENVIRONMENT – Principle 9

Business should encourage the development and diffusion of environmentally friendly technologies

TRAMO ETV is constantly trying to develop its products as to be more energy efficient and long lasting. We strive to use innovative technologies to reduce the environmental impact in all of the company's operations.

The development team are through our Environmental Management System involved in encouraging new product developments to be made with the environment in mind.

By using the latest development software and machinery together with optimal product recycling schedules our development team are evaluating the environmental effects on components over the whole lifecycle.

TRAMO ETV has held training sessions and workshops in order to increase environmental impact thinking in special product development for different customers and have included this as a standard issue when communicating with prospective customers.



ANTI CORRUPTION – Principle 10

Business should work against corruption in all of its forms, including extortion and bribery

TRAMO ETV will not condone any violation of the law or unethical behavior by any of its employees, including any payment for, or other participation in, any illegal act such as bribery, fraud, theft or money-laundering.

Our Code of Conduct explicitly forbids the involvement in areas that can be seen as corruption and it is enforced by notations in each employee's employment contract.

A formal fraud prevention workshop has been developed and implemented in the management team at TRAMO ETV

No concerns regarding fraud or corruption has been raised since the company was founded.