

Codes of Conduct

Expand International Group AB

Expand's codes of conduct are based on international regulations, standards and codes of conduct.

Expand's ethical guidelines are based on codes developed by the Swedish Trade Council, which in turn is based on the universal instruments in the field of business ethics:

- The OECD guidelines for multinational companies (appendix 1)
- The UN Global Compact (appendix 2)

The principles laid down in these guidelines, in turn, are footed in a number of broad-based, internationally agreed instruments, notably:

- The United Nations Universal Declaration on Human Rights
- The International Labor Organization Declaration on Fundamental Principles and Rights at Work
- The Rio Declaration on Environment and Development

National legislation in Sweden and other comparable countries in the industrialized world are generally more than adequately in line with the core values of these instruments.

More specific standards on business ethics have been developed and accepted within agreements of the OECD and the concept of Corporate Social Responsibility (CSR). The fundamental principles and guidelines for multinational companies (attached), laid down in these instruments and covering standards for corporate performance in the fields of human rights, labor standards, environment and anti-corruption, form the basis for Expand's business ethics.

Expand's approach and commitment

On a yearly basis, Expand trades with thousands of authorized distributors, resellers and dealers selling hundreds of thousands of displays to a very large number of end users. Expand trades in over 65 countries on an ongoing basis, currently with nine corporate offices in six countries spread over Europe, Asia and North America. Within such multitude of customer relations, Expand acts as supplier of products and provider of expertise based on professionalism and on awareness and high standards as regards to business ethics and social corporate responsibility:

- In all endeavors, Expand supports and respects the set of values on human rights, labor standards, environment and anti-corruption laid down in the principles and recommendations of the internationally accepted instruments referred to.
- Accordingly, every Expand employee is expected and instructed to act with high ethical standards.
- On the understanding that the individual Expand resellers assume the ultimate responsibility for its own actions on markets, Expand will work to inspire our resellers to adopt and practice relevant principles and values.
- Recognizing that good practices within corporate social responsibility is of growing importance for our resellers and their corporate customers in their competition for market shares, Expand will strive to develop new products and services, and strive to supply our resellers with education why it is important to live up to high ethical standards and how it may, or may not, impact pricing, availability, service and other competitive components negatively or positively in the short run, but should contribute to reinforcing their competitive edge in the long run.

This approach and commitment is being applied throughout the Expand Group offices representing Expand in direct customer relations. In cases of doubt and need of interpretation, issues shall be referred to Management, primarily the relevant Managing Director. The President of Expand is ultimately responsible for Expand's ethical guidelines and for the actions undertaken by the organization to foster and implement them.

From words to action

In order to implement our objectives, Expand will - within the limits of available resources - take the following steps:

- Appoint one member of Management as especially designated Coordinator for supervision and surveillance of Expand's ethical performance.
- Specifically include orientation of the Expand Group's ethical guidelines into our staff development and training to underscore and disseminate, at all levels, know-how on these adopted ethical guidelines.

Per-Anders Ekstrom
CEO

Appendix 1

OECD's guidelines for multinational companies - General Policies

Enterprises should take fully into account established policies in the countries in which they operate, and consider the views of other stakeholders. In this regard, enterprises should:

- 1.** Contribute to economic, social and environmental progress with a view to achieving sustainable development.
 - 2.** Respect the human rights of those affected by their activities consistent with the host Government's international obligations and commitments.
 - 3.** Encourage local capacity building through close co-operation with the local community, including business interests, as well as developing the enterprise's activities in domestic and foreign markets, consistent with the need for sound commercial practice.
 - 4.** Encourage human capital formation, in particular by creating employment opportunities and facilitating training opportunities for employees.
 - 5.** Refrain from seeking or accepting exemptions not contemplated in the statutory or regulatory framework related to environmental, health, safety, labor, taxation, financial incentives, or other issues.
 - 6.** Support and uphold good corporate governance principles and develop and apply good corporate governance practices.
 - 7.** Develop and apply effective self-regulatory practices and management systems that foster a relationship of confidence and mutual trust between enterprises and the societies in which they operate.
 - 8.** Promote employee awareness of, and compliance with, company policies through appropriate dissemination of these policies, including thorough training programs.
 - 9.** Refrain from discriminatory or disciplinary action against employees who make bona fide reports to management or, as appropriate, to the competent public authorities, on practices that contravene the law, the Guidelines or the enterprise's policies.
 - 10.** Encourage, where practicable, business partners, including suppliers and subcontractors, to apply principles of corporate conduct compatible with the Guidelines.
 - 11.** Abstain from any improper involvement in local political activities.
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Appendix 2

The Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labor standards, environment, and anti-corruption:

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights, and

Principle 2: Make sure that they are not complicit in human rights abuses.

Labor Standards

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labor;

Principle 5: the effective abolition of child labor; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies

Anti-Corruption

Principle 10: Businesses should work against all forms of corruption, including extortion and bribery.

On 24 June 2004, during the UN Global Compact Leaders Summit it was announced that the UN Global Compact henceforth includes a tenth principle against corruption. This was adopted after extensive consultations and all participants yielded overwhelming expressions of support, sending a strong worldwide signal that the private sector shares responsibility for the challenges of eliminating corruption. It also demonstrated a new willingness in the business community to play its part in the fight against corruption.

Underlying legal instrument

With the adoption of the United Nations Convention against Corruption in Merida, Mexico in the underlying legal instrument for the 10th principle against corruption and entered into force on 14 December 2005.

Objectives of the 10TH principle

The adoption of the tenth principle commits UN Global Compact participants not only to avoid bribery, extortion and other forms of corruption, but also to develop policies and concrete programs to address corruption. Companies are challenged to join governments, UN Agencies and civil society to realize a more transparent global economy.

How to define corruption?

Corruption can take many forms that vary in degree from the minor use of influence to institutionalized bribery. Transparency International's definition of corruption is "the abuse of entrusted power for private gain". This can mean not only financial gain but also non-financial advantages.

What is meant by extortion?

The OECD Guidelines for Multinational Enterprises define extortion in the following way: The solicitation of bribes is the act of asking or enticing another to commit bribery. It becomes extortion when this demand is accompanied by threats that endanger the personal integrity or the life of the private actors involved.

... and what about bribery?

Transparency International's Business Principles for Countering Bribery define "bribery" in the following way: "Bribery: An offer or receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of the enterprise's business."

Practical steps to fight corruption

The UN Global Compact suggests to participants to consider the following three elements when fighting corruption and implementing the 10th principle.

- Internal

As a first and basic step, introduce anti-corruption policies and programs within their organizations and their business operations;

- External

Report on the work against corruption in the annual Communication on Progress; and share experiences and best practices through the submission of examples and case stories;

- Collective

Join forces with industry peers and with other stakeholders
