

SVERIGES GUMMITEKNISKA FÖRENING'S POLICY ON COMPETITION LAW COMPLIANCE

The purpose of this Policy is to ensure that neither Sveriges Gummitekniska Förening nor its members are involved in any meetings, seminars or related workgroups initiated by Sveriges Gummitekniska Förening that infringe competition law (Articles 81 of the Treaty of the European Community TEC). Our members shall be aware that any kind of agreement or arrangement which are restricting competition are prohibited within the field of our activities and are asked to observe and follow the "Do and Do not's" listed in this Policy.

Every infringement of competition law not only damages Sveriges Gummitekniska Förening and our members, but under certain circumstances also entails a risk of personal liability for the company representatives involved in an illegal agreement. Also an industrial organization such as Sveriges Gummitekniska Förening may be held legally responsible for the unauthorized, as well as authorized, acts of its members.

Sveriges Gummitekniska Förening relies heavily on the judgment of our members to see that topics which may give an appearance of an agreement that would violate competition laws that those are not discussed at Sveriges Gummitekniska Förening's meetings, seminars or other gathering.

Prior to every meeting, the participants shall receive an official invitation including an agenda in as much detail as possible. At the beginning of a meeting, the participants must be instructed on the relevance of competition law and asked to behave in accordance. It is the responsibility of the chairman leading the meeting to prevent any unacceptable agreements or arrangements infringing competition law from being made. There may be no informal discussions "off the agenda" about topics of relevance from a competition law perspective. Resolutions taken at the meeting must be recorded in the minutes so that the discussions leading up to the resolution are verifiable.

The following Do's and Do Not's highlight only the most basic competition law principles.

DO

- Prior to joining the meeting, ensure you know that the meeting is for a legitimate purpose only. If not – do not attend.
- Read the “DO NOTs”.
- Make sure agendas for the meeting and minutes are produced, circulated to all attendees and accurately reflect the discussions that occur.
- If in doubt seek advice from legal counsel before attending any meetings with industry organizations or other organization where you would meet competitors.
- If in doubt seek advice from legal counsel also for the following sensitive areas:
 - Gathering and exchange of statistical information
 - Benchmarking
 - Creating industry standards
 - Adopting a common industry approach to any issue
 - Do object if an improper or questionable subject is raised, ensure that your objection is noted in the minutes. Leave the meeting if your objection is fruitless.

DO NOT

Do not discuss the following topics at meetings of industrial organizations or where competitors are present:

- Prices, price differentials or other terms and conditions of sale
- Margins, contribution levels or other elements of profitability
- Production capacity, efficiencies, utilization of installed capacity or plans for capacity adjustment
- Sales volumes/purchase volumes
- Cost or cost development
- Future business plans
- Matters relating to individual customers/ suppliers or categories of customer
- Employee compensation, remuneration etc.

In particular do not discuss or agree to:

- Fix sales or purchase prices or other terms of sales or purchase.
- Restrict or allocate capacity or output.
- Refrain from supplying a product/service.
- Limit competition, production, R&D, or marketing.

- Divide geographical or product markets or customers.
- Exclude competitors from a market or boycott customers or suppliers.

Adherence to these "Do and Do Not's" involves not only avoidance of competition law violations, but also avoidance of behavior which might be so construed. Bear in mind, however, that this policy only provides an overview of prohibited actions. If any member or a participant in a Sveriges Gummitekniska Förening meeting has a question as to the legality of a proposed course of action, the matter should be immediately referred to the chairman of Sveriges Gummitekniska Förening who will discuss it with legal counsel.

Gislaved March 4 2010

Accepted by the Board of Sveriges Gummitekniska Förening



Bo Thörn



Carl Cumming



Sven-Olof Fransson



Joakim Fritz



Alf Gustavsson



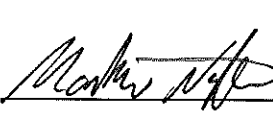
Ingemar Hedström



Björn Kjellberg



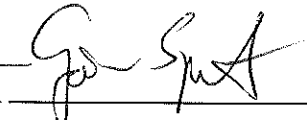
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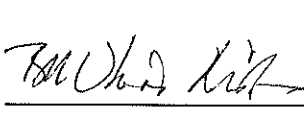
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