

Supplier Code of Conduct

Issue 2, January 2025



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At Concentric AB, our Supplier Code of Conduct is the foundation of the work we do in the interaction with our partners.

It defines our Values in Action – what we stand for and how we conduct ourselves with our customers, suppliers, and one another. While we conduct business within the framework of applicable laws and regulations, we also recognize we must set clear expectations, beyond the law, for ourselves and our business partners.

As a Concentric AB supplier, you are an extension of our extended value chain and our commitment to quality. We ask you to demonstrate strong values and commit to the principles outlined in this document. Simply put, we expect our partners to always follow the law and the sound business practices Concentric AB embraces, and to conduct activities in a manner that respects human rights.

Thank you for your commitment to Concentric AB, and for taking the time to read, understand and most important apply our Supplier Code of Conduct in all your business practices.

Riccardo Cavallari

Vice President Operational Excellence
Concentric AB

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1. Introduction

Concentric is committed to conducting business with the highest ethical standards and in full compliance with all applicable laws and regulations. We recognize human and social rights, take responsibility for our impact on the environment and adhere to the high standards that are expected of us in this regard.

Part of our commitment is to only work with actors who share our opinion and values in this regard. In this Supplier Code of Conduct, we have set out the standards that we expect all our Suppliers to follow.

2. Who is this code for?

This Code applies to all Concentric's Suppliers. The term Supplier include anyone, whether a natural or legal person, who provides products or services to Concentric, or who in any other way acts for or on behalf of Concentric, e.g., suppliers and their sub-contractors (for Concentric), distributors, consultants and other representatives.

Everyone subject to this Code has a personal responsibility to understand and comply with this Code, together with any other policies, standards, processes, and procedures applicable when acting for or on behalf of Concentric.

3. Compliance with laws, regulations and other applicable rules

Suppliers shall always act with integrity and comply with applicable laws, rules and regulations in all our course of business. If there is a conflict between local law and this Code, the stricter of them shall prevail and be complied with.

4. Social and human rights

4.1 Fair employment conditions

Supplier's employees should, at least, be granted terms of employment in accordance with statutory law or any applicable collective bargaining agreement (a "CBA"), including but not limited to annual leave, sick leave and other leave, fair working hours and a safe and sound work environment. Each employee shall be provided written information on the terms and conditions of their employment (such as form of employment, work place, benefits and overtime work). Salary and terms shall be reasonable and in line with applicable laws, CBAs or industry standards. The normal work week shall on an ordinary basis not exceed a normal work week according to local rules. Upon request, a Supplier must account its employees' terms of employment and how it complies with relevant legislation and CBAs.

4.2 Child labor and forced labor

Concentric does not accept child labor, and Suppliers shall work to prevent all forms of child labor. Minors shall be protected in a satisfactory manner and Suppliers shall, as a basic principle, refrain from hiring children unless it occurs in a government-approved training program for young people, e.g., practical work experience. If child labor is discovered in a Supplier's operations, the Supplier shall investigate the circumstances, implement an action plan and take immediate action as a matter of urgency. Suppliers shall immediately inform Concentric of its discovery, investigation and actions taken.

Suppliers shall not use any form of forced labor. Forced labor according to this Code includes, but is not limited to, deposit payment or demand to deposit personal belongings, confiscation of identity papers and personal documents, recruitment fees, mental and physical punishment. If Supplier discover the use of forced labor within its operations, the Supplier shall implement an action plan, and take immediate action. Suppliers shall immediately inform Concentric of its discovery, investigation and actions taken.

Suppliers shall take all reasonable steps to ensure that modern slavery and human trafficking do not take place within any part of their business, including the supply chain.

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4.3 Freedom of association and the right to organize

Suppliers shall respect its employees' right to form or join, or not to form or join, any association of their choice, to organize and bargain collectively in accordance with applicable law. No employee shall be subject to harassment or retaliation for exercising such right.

In situations where the right to freedom of association and collective bargaining is limited by applicable laws and regulations, Suppliers shall allow alternative and independent forms of worker representation.

4.4 Freedom of association and the right to organize

Suppliers shall ensure a zero-tolerance approach for all forms of discrimination, harassment and bullying, whether physical or verbal, against employees and other persons employed or contracted for the engagement for or on behalf of Concentric.

Suppliers shall offer all employees equal opportunities, rights and obligations, respect employees' opinions and difference, and refrain from discriminating, harassing or sexual harassing on the basis of ethnicity or national origin, religion or other religious belief, caste, disability, gender, transgender identity or expression, age, sexual orientation, union affiliation or membership in any political organization (e.g., in connection with recruitment of employees).

4.5 Women's rights

Suppliers shall respect and not violate womens' and girls' equal enjoyment of all human rights, including but not limited to freedom from violence, sexual and reproductive rights, access to justice, socio-economic equality, and participation in decision-making.

4.6 Rights of minorities, indigenous peoples and communities

Suppliers shall respect and not violate the rights, interests and developmental aspirations of minorities, indigenous peoples and other vulnerable groups and communities affected by their operations. Suppliers shall always uphold respect for land, forest, and water rights and never accept or be part of any forced evictions.

4.7 Rights of minorities, indigenous peoples and communities

Supplier shall ensure that any security forces, whether private or public, involved in their operations respect human rights and the dignity of all people and in case of any danger or threats, only use reasonable force proportionate to the threat and danger.

5. Health and safety

Suppliers shall ensure a safe and satisfactory working environment and a physically, psychologically, and socially healthy and stimulating workplace. Suppliers shall take all measures necessary to prevent accidents, incidents and occupational injuries and ill-health. The routines and measures taken to ensure occupational health and safety shall be in line with applicable laws, authority regulations and decisions, and the requirements in ISO 45001 and ILO Guidelines on Occupational Safety and Health.

Suppliers shall ensure that employees are given equal opportunities, treated fair and just, and free from discrimination, harassment or victimization of any kind. This includes but is not limited to, discrimination based on sex or gender, transgender identity or expression, sexual orientation, ethnicity, religion or other religious belief, disability, age, membership of trade unions or any other grounds for discrimination.

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6. Business ethics

6.1 Anti-corruption and anti-bribery

Suppliers shall always act with the highest standards of integrity and must never engage in or accept bribery, corruption, extortion or embezzlement.

Suppliers shall not offer, give or solicit gifts, favors, promises, payments, entertainment or other benefits of value to or from any individual at Concentric with the intent to improperly influence a decision or behavior.

Suppliers shall carry out risk-based due diligence of any third parties used in relation to the business relationship with Concentric. Third parties may never be used for channeling bribes or negligently financing corruption.

6.2 Conflict of interests

Suppliers shall avoid all situations that may cause a conflict of interest between the Supplier and Concentric. Suppliers shall have routines in place to detect and handle potential conflict of interests and immediately notify Concentric of any suspected or actual conflict of interests between Supplier and Concentric and any measures taken in relation to such conflict of interest.

6.3 Competition and antitrust law

Suppliers shall always comply with applicable competition and antitrust laws and regulations and thus may not engage in anticompetitive agreements or practices. Examples of actions that are not permissible in this regard is market sharing, price fixing, anti-competitive information sharing with competitors and abuse of dominant position.

6.4 Competition and antitrust law

Suppliers shall ensure that any trade secret or commercially sensitive or otherwise confidential information (e.g., financial, technical or commercial information) entrusted to them from Concentric is handled in a confidential and secure matter and protected against theft, modification and unauthorized disclosure and access. Suppliers shall immediately inform Concentric in the event of an actual or suspected loss, theft, unauthorized access or use of confidential information.

All personal data shall be treated in accordance with applicable laws and regulations regarding data protection, including the General Data Protection Regulation ("GDPR") and with respect for the fundamental human right of respect for privacy of individuals.

6.5 Product quality

Suppliers shall ensure that all products and services delivered to Concentric meet all required quality and, where applicable, safety standards. Suppliers shall have adequate controls in place for this purpose. Suppliers shall immediately inform Concentric of any errors and defects in products, or if any product does not meet safety standards.

6.6 Product quality

Suppliers shall not engage in money laundering, tax fraud, tax evasion or other illegal financial systems related to the use of tax havens and other jurisdictions prone to financial crimes.

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6.7 Export control and international sanctions

Suppliers shall comply with any applicable rules on export control as well as international sanctions. International sanctions mean regulatory restrictions to deal with certain countries/territories, governments, groups, entities, individuals or specified goods or services. Export control means regulatory restrictions on the export of certain goods.

6.8 Accurate books and records

Suppliers shall keep accurate books and records in compliance with all legislative and regulatory requirements as well as generally accepted principles of accounting.

7. Environment

7.1 General requirements

Suppliers shall carry out their business in accordance with all applicable environmental laws and regulations as well as industry standards and best practice. Suppliers shall maintain an environmental management system in accordance with ISO 14001 or other stipulated environmental policy accreditation as a minimum.

Suppliers shall adhere to and apply the internationally recognized precautionary principle. Accordingly, Suppliers shall always choose the option with the least environmental impact and, in case of uncertainty, assess and evaluate the options available.

7.2 Water and waste management, energy conservation and hazardous material

Suppliers shall manage water resources responsibly and implement water-efficient practices, monitor water usage, and actively work towards reduced water consumption. Additionally, Suppliers shall work to prevent water pollution and protect water quality through appropriate treatment and disposal measures, contributing to sustainable water management.

Suppliers shall manage waste generated throughout their operations in a responsible manner with the aim of minimizing waste and promoting an environmentally sound management of waste. This includes, for example, promoting recycling and reuse initiatives and ensuring proper disposal of hazardous materials, including responsible chemical management, in accordance with applicable regulations.

Suppliers shall strive to conserve energy throughout their operations including seeking ways to implement energy-efficient technology and promote energy-conscious behavior among their employees.

7.3 Air and soil quality

Suppliers shall implement measures to control and reduce emissions of pollutants. Examples of such measures include seeking ways to reduce volatile organic compounds (VOCs), and hazardous air pollutants (HAPs). Where Suppliers operations may affect soil quality, Suppliers shall implement measures to protect it.

7.4 Protection and conservation of biodiversity, responsible land use practices and prevention of deforestation

Suppliers shall implement measures to protect and preserve biodiversity in all areas where they operate and ensure sustainable land use, including the prevention of deforestation. All Supplier's operations shall be carried out to ensure the preservation of natural habitats and the protection of critical ecosystems.

Where noise levels from Supplier's operations may impact surrounding communities and wildlife, Supplier shall implement measures to minimize noise from its operations.

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7.5 Animal protection

Where animals are involved in, or could be affected by, the Supplier's operations, Suppliers shall ensure the highest degree of animal welfare and regard any legislative codes for animal welfare as a minimum standard.

7.6 Conflict minerals

Concentric recognizes the social and environmental risks associated with the extraction and trade of conflict minerals and are committed to avoiding the use of conflict minerals that directly or indirectly finance or benefit armed groups associated with human rights abuses or environmental harm. Accordingly, Suppliers shall take necessary steps, including adequate due diligence, to ensure that the materials and components delivered to Concentric do not contain conflict minerals.

8. Policies and management system

Suppliers shall have adopted adequate internal policies covering their obligations under this Code. Suppliers shall ensure that they have adequate management systems in place to ensure that their obligations under this Code are met and continuously followed up. The policies and management systems shall be adequate based on Supplier's risks and the complexity and size of business operations.

9. Policies and management system

Concentric has the right to monitor the adherence to this Code, including requesting relevant information and documentation from Suppliers and conducting audits at the Supplier's premises or sites.

Where non-compliance to this Code or applicable laws and regulations are detected, Suppliers shall take immediate action to inform and co-operate with Concentric to remedy the detected irregularity. Suppliers shall be aware that failure to comply with this Code or applicable laws and regulations may result in Concentric taking contractual actions and, ultimately, terminate, decrease or refrain from renewing the business relationship.

10. Whistleblowing, grievance and reporting system

Suppliers shall provide a whistleblowing or grievance system that ensures that their employees and external parties involved in the engagement for Concentric have the possibility to confidentially report any suspected or observed breach of this Code or applicable laws and regulations without risk of retaliation.

Any suspected or observed breach of this Code or non-compliance with laws and regulations may also be reported via Concentric's whistle-blower system in accordance with Concentric's Whistleblowing Policy.

11. Questions?

Questions regarding this Supplier Code of Conduct itself or its interpretation may be directed to the Supply Chain representative.