Arxada's Supplier Code of Conduct

Arxada's activities have broad global reach across a wide range of industries. Arxada promotes innovation and strives for economic, social, and environmental sustainability to ensure the longterm success of our company and its stakeholders. Arxada is committed to compliance with the law, sustainability and applying the highest ethical standards to its business activities. In support of this goal, Arxada expects strict adherence to its principles for ethics, labor and human rights, environment, health and safety as outlined in this Supplier Code of Conduct.

Arxada follows the Principles of the United Nations Global Compact as well as the International Labour Organization (ILO) Forced Labor Standards, the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and all applicable anti-bribery and anti-trust laws.

Arxada is dedicated to conducting its business in light of these principles.

In this document Arxada sets forth principles that reflect its commitment to integrity and compliance within its supply chain and are instrumental for dealings with suppliers and specifies applicable standards. Arxada expects its suppliers to strictly observe and comply with all the principles expressed herein, in all their activities and sites worldwide and to ensure that these standards are met within their supply chains.

1. Principles

a. All dealings by Arxada with its business partners are executed based on competitive prices, highest suitability and required quality. Suppliers with certifications such as ISO 14000 or similar and with a comparable sustainability commitment to Arxada shall be preferred.

- b. Arxada requires that its suppliers' business behavior must comply with all applicable international, national and local laws and regulations, as well as with generally accepted standards in relation to forced labor, child labor, safety, and anti-bribery. Suppliers must ensure that their operations, products and services meet all applicable legal and regulatory requirements. Arxada requires its suppliers to act in a socially responsible and ethical manner.
- c. The principles of this Supplier Code of Conduct shall also apply to third parties (subcontractors) if suppliers have outsourced parts of their contractual obligations.

2. Ethics

Suppliers will conduct their business in an ethical manner and act with integrity:

a. Fair Competition

Suppliers will be committed to working against corruption, including extortion and bribery. Suppliers shall conduct their business using fair business practices, consistent with fair competition and in compliance with all applicable laws, rules, and regulations.

b. Anti-Corruption and Anti-Bribery

Suppliers shall not give or offer anything of value, directly or indirectly, to any government official or any commercial party for the purpose of improperly obtaining or retaining a business advantage. "Anything of value" includes cash, gifts to family members, forgiveness of a debt, loans, personal favors, entertainment, meals and travel, political and charitable contributions, business opportunities and medical care, among other items. Similarly, suppliers shall not solicit or accept such payments.

Suppliers must always conduct their activities in full compliance with all applicable anticorruption laws, including the UK Bribery Act and the U.S. Foreign Corrupt Practices Act.

c. Conflict minerals

Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of conflict minerals to ensure that they are not sourced from conflict-affected and high-risk areas. Suppliers shall provide evidence of their due diligence measures upon request.

d. Trade Compliance

Suppliers shall comply with all applicable export control and sanctions laws, including but not limited to the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) sanctions regulations, the U.S. Export Administration Regulations (EAR), the UK Export Control Act of 2002, the State Secretariat for Economic Affairs (SECO) laws and regulations, and the E.U. sanctions and export control regulations. Suppliers shall not engage in any business or dealings with embargoed countries, blocked persons, or individuals or entities listed as sanctions target by applicable legislation; or facilitate transactions with third parties that involve embargoed countries, blocked persons, or individuals or entities listed as sanctions target by applicable legislation. Suppliers must obtain required export licenses, maintain records of transactions, and promptly notify Arxada of any concerns or violations. Suppliers must ensure that any subcontractor or third parties involved in providing goods or services adhere to the requirements of this section.

e. Business Integrity

Suppliers shall refrain from proposing to Arxada employees any sum of money, gifts, loans or valuable objects, except for presents or promotional gifts of an insignificant monetary value, which are in accordance with local customs and all applicable laws, rules, and regulations.

f. Conflicts of Interest

Suppliers shall avoid all conflicts of interest or circumstances that give the appearance of a conflict of interest. A conflict of interest typically occurs when personal interests interfere with a supplier's ability to perform its work without bias. Suppliers shall notify Arxada immediately of any actual or perceived conflicts of interest.

g. Identification of Concerns

Suppliers shall encourage their workers to report concerns or illegal activities within their workplace without threat of reprisal, intimidation or harassment. Suppliers shall investigate and take corrective action where needed. All reported cases will be officially recorded by suppliers.

h. Privacy

Suppliers shall secure and use properly any confidential information made available by Arxada in order to ensure that the privacy rights of the company, its employees, and its customers are protected.

3. Labor & human rights

a. Human rights

Inhumane treatment and physical punishment of workers are prohibited. Suppliers must respect and support the protection of internationally proclaimed human rights and ensure that they are not complicit in human rights abuses. Suppliers shall have policies and procedures in place to address human rights issues within their operations and supply chains.

b. Forced Labor and Human Trafficking

Suppliers shall not use or benefit from any form of human trafficking or forced or involuntary labor or labor that otherwise violates the ILO Standards on Forced Labor, whether bonded, indentured or involuntary prison. This includes the recruitment, transportation or harboring

of any persons by means of violence, coercion, deception, abduction or fraud.

c. Child Labor and Young Workers

Suppliers shall not use child labor below the age of 16 or the applicable minimum legal age, whichever is higher. The employment of young workers (workers above the minimum legal age of employment but under the age of 18) shall occur only in nonhazardous work and when young workers are above a country's legal age for employment.

d. Nondiscrimination

Any discrimination in hiring, training, promotion, compensation, etc. based on race, color, gender, age, sexual orientation, religion, political affiliation, union membership, marital status or any additional discriminatory characteristic is not acceptable.

Suppliers shall promote diversity and inclusion within their workforce. This includes providing equal employment opportunities for all employees and ensuring a workplace free from discrimination and harassment.

e. Wages and fringe benefits

Work hours, minimum wages and overtime hours paid to employees, as well as fringe benefits, must be in compliance with applicable regulations. Suppliers must notify their employees of the method used to calculate wages. Wages should be paid at regular intervals and with reasonable frequency in cash, by check or bank transfer, except in specific cases provided for by applicable regulations. Deductions from wages for disciplinary reasons or as part of debt bondage are prohibited.

f. Freedom of Association

Suppliers should encourage their employees to communicate freely with their superiors concerning working and other conditions of employment, without fear of reprisal, intimidation, or harassment. Employees should be free to join any trade union of their choice, to seek representation, and join workers' councils.

g. Community engagement

Suppliers should engage with local communities and contribute to their social and economic development. This includes respecting the human rights of local communities and minimizing any negative impacts of their operations.

4. Health and Safety

Suppliers must provide a safe and healthy working environment, including any company-provided living quarters. Suppliers should have a health & safety organization to define, implement, and administer policies and management systems that include compliance with applicable laws and regulations. The health and safety elements should include:

a. Workers' Health and Protection Suppliers shall protect workers from exposure to chemical, biological and physical hazards in the workplace as well as from risks associated with any infrastructure used by the workers.

b. Maintenance, Emergency Preparedness and Response

Suppliers shall have programs in place to operate and maintain all operations in the safest manner possible. Suppliers shall identify and assess possible emergency situations in the workplace and minimize their impact by implementing emergency response plans and procedures.

c. Process Safety and Quality

Suppliers shall have programs in place to prevent or mitigate catastrophic release of chemicals and ensure compliance with Arxada's quality requirements as updated from time to time.

d. Hazard Information and Training

Safety information shall be available to educate, train, and protect workers from hazards. This includes safety information about hazardous substances used, including raw materials, intermediates, chemicals and pharmaceuticals.

5. Environment

Suppliers shall ensure that their activities and products have a minimal impact on the environment. Suppliers must operate ลร environmentally responsibly and efficiently as possible. Suppliers are encouraged to use their best efforts to reduce or eliminate emissions generated by their activities, to preserve natural resources, to avoid or minimize the use of hazardous substances, and whenever possible, to promote waste recycling or reuse. With regards to their product, suppliers shall aim to reduce the environmental impacts generated from the direct use of their products. Additionally, and where applicable, suppliers shall have deforestation prevention policies and requirements as well as agroforestry requirements where it has been determined to be beneficial to the agricultural ecosystem.

a. Environmental Authorizations

Suppliers shall ensure compliance with all applicable laws, regulations and recommendations relating to environmental protection in force within the countries where they operate. All required environmental permits, licenses and registrations shall be obtained and their operational and reporting requirements followed.

b. Waste and Emissions

Suppliers shall have systems in place to ensure the safe handling, movement, storage, recycling, management of waste, air emissions, and wastewater discharge. Any waste, wastewater or emissions shall be measured, tested, controlled, and, if required, treated prior to release into the environment. Waste should be reused or recycled where possible.

c. Spills and Releases

Suppliers shall have systems in place to prevent and mitigate accidental spills and releases into the environment. Emergency procedures and personnel should be in place to treat any accidental event presenting an environmental risk.

6. Internal Measuring Procedures

Arxada reserves the right to conduct audits and assessments of its suppliers to ensure compliance with this Supplier Code of Conduct. Suppliers are expected to cooperate fully with such audits and provide access to relevant documentation and facilities.

Suppliers should possess internal measuring procedures, tools, and indicators required to guarantee adherence to the principles addressed in this policy. On occasion, Arxada may request the results of such internal reviews, request its suppliers undertake a review and provide such results to Arxada, or for any other information necessary to support Arxada's compliance with applicable laws.

Arxada also expects its suppliers to provide these guidelines or similar guidelines to their suppliers, including the internal measuring procedures, as well as include contractual requirements to follow such guidelines in their contracts with their suppliers.

Suppliers are encouraged to participate in training and capacity-building programs provided by Arxada to enhance their understanding and implementation of the principles outlined in this Supplier Code of Conduct.

7. Information

Suppliers shall not provide false information to Arxada, including, without limitation, during supplier screening and assessment and commercial negotiation.

8. Report to Arxada

Suppliers shall make all reasonable efforts to report to Arxada any violations of this Supplier Code of Conduct without undue delay.

Suppliers can report any potential violations by sending an e-mail to

<u>Arxada.Compliance@arxada.com</u> or by using Arxada's ethics reporting system that is located at www.convercent.com/report.

9. Termination of Agreement

If Arxada becomes aware of any actions or conditions not in compliance with this Supplier Code of Conduct, Arxada reserves the right to request corrective actions and to terminate any agreement with any supplier that does not comply with this Supplier Code of Conduct, as well as the right to pursue potential legal action.

Arxada's Supplier Code of Conduct Certificate

Please check one:

□ Supplier commits to follow the principles of Arxada's Supplier Code of Conduct.

□ Supplier acknowledges Arxada's Supplier Code of Conduct but plans to follow Supplier's Code of Conduct and will supply that Code of Conduct to Arxada.

□Supplier does not agree to and will not follow Arxada's Supplier Code of Conduct.

Company Name:_____

Signature: ______

Name: ______

Title: _____

Date: _____

Arxada's Supplier Code of Conduct (https://www.arxada.com/en/public/conditions/sup plier-code-of-conduct) illustrates the principles that reflect its commitment to integrity and compliance within its supply chain and are instrumental for dealings with suppliers. Arxada expects its suppliers to strictly observe and comply with all the principles expressed herein, in all of their activities and sites worldwide and to ensure that these standards are met within their supply chains.

Please return our Supplier Code of Conduct including this signature page.

If you provide your own Code of Conduct, please attach a copy of your Code of Conduct to this form.