

# Supplier Code of Conduct

GP2.11

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## CEO Comment

Dear Valued Supplier,

Gränges is an industrial group with global operations. Our values and culture of sustainability are an integrated part of our business today. We are committed to operating in accordance with responsible, ethical and sound corporate and business principles and in compliance with all applicable laws and public regulations, including but not limited to UN Global Compact and its ten principles.

The following Supplier Code of Conduct embodies your commitment to support Gränges' values and principles and is an essential element in our selection of suppliers. We kindly ask that you return a signed copy of the Supplier Code of Conduct to your authorized Gränges representative. By signing the Supplier Code of Conduct, you are confirming on behalf of your company that you accept the values and principles as stated and that your company is contractually bound to comply with all rules and requirements set forth.

Uncompromising adherence to these values and principles is critical to the success of our business relationship. We look forward to our continued business with your company.

Jörgen Rosengren

President & CEO, Gränges

# 1 Introduction

Gränges is committed to operating in accordance with responsible, ethical, and sound business principles and in compliance with all applicable laws and regulations. We aim to be a responsible and reliable business partner and expect our suppliers, contractors, and vendors ("Suppliers") to maintain similarly high sustainability standards and principles.

The intention of this Supplier Code of Conduct is to increase awareness and improve transparency of responsible and sustainable business practices in our supply chain.

Gränges holds the right to follow up on compliance with the requirements set in this Supplier Code of Conduct, as described in section 6, "Monitoring and Compliance".

## 2 General Principles

### 2.1 Compliance with laws

- Suppliers shall comply with all applicable laws and regulations. Should differences exist because of local customs, business practices, norms, laws, or regulations, either this Supplier Code of Conduct or local requirements must be applied, whichever sets out the strictest standard of conduct.

### 2.2 Selection of business partners, agents and other intermediaries

- Suppliers shall ensure the implementation of the principles set forth in this Supplier Code of Conduct to potential business partners, agents, and other intermediaries by including the principles in their respective procurement processes.

### 2.3 Standards toward own suppliers

- Suppliers shall monitor and evaluate their own supply chain, including partners, sub-suppliers, and sub-contractors, to ensure implementation of and compliance with the principles set forth in this Supplier Code of Conduct.

## 3 Business Ethics and Marketplace Principles

Gränges expects its suppliers to conduct business with high integrity in an ethical and responsible way.

### 3.1 Conflicts of interest

- Suppliers shall not take part in or seek to influence any decision in circumstances that could give rise to an actual or perceived conflict of interest. Such circumstances may be a business interest or a personal interest in the subject matter – economic or otherwise – directly or through someone closely related. If suppliers become aware of a potential conflict of interest, they shall notify Gränges immediately.

## 3.2 Prohibition of corruption, bribery, and improper payments

- Suppliers shall have zero-tolerance for corruption and ensure compliance with all governing anti-corruption laws, conventions, and regulations.
- Suppliers shall not, in order to obtain or retain business or other improper advantage in the conduct of business, offer, promise, or give any undue advantage to a public official (or a third party) to make the official act or refrain from acting in relation to the performance of his/her duties. This applies regardless of whether the advantage is offered directly or through an intermediary.

### 3.2.1 Gifts and hospitality

- Suppliers shall respect and comply with practices regarding gifts and hospitality.
- Gifts and other favors to Gränges or any of Gränges' employees, representatives, partners, or anyone closely related can only be given or granted provided that they are modest, both with respect to value and frequency, and provided that the time and place are appropriate.
- Gifts or other favors shall not be offered or received in connection with contract bidding, evaluation, or award.

## 3.3 Money laundering

- Suppliers shall comply with all applicable laws and regulations governing the prevention of money laundering and agree not to participate in any money laundering activities.

## 3.4 Fair competition

- Suppliers shall always compete in a fair manner and comply with applicable antitrust laws and regulations. Suppliers shall not enter into agreements with competitors that could potentially breach antitrust laws or regulations, nor take any advantage of any dominant market position.

## 3.5 Responsible trade

- Suppliers shall comply with all applicable international export, import and trade laws in all countries where Suppliers conduct business, including applicable trade restrictions, sanctions or other measures resolved by the EU or UN.

## 3.6 Personal information

- Suppliers shall observe all applicable privacy laws when collecting, using, and sharing personal information about individuals.

# 4 Employment and Workplace Principles

Gränges expects its suppliers to provide safe and healthy workplace conditions and treat employees with openness and respect.

## 4.1 Open and non-discriminatory workplace

- Suppliers shall treat their employees equally and fairly. Suppliers shall not accept or tolerate any form of harassment or discrimination related, but not limited to, gender (including pregnancy), transgender identity or expression, ethnical or cultural origin, race/color, religion or other beliefs, disability, sexual orientation, or age.
- Suppliers shall not tolerate retaliation relating to reporting, engaging in investigations, or rejecting any form of harassment.

## 4.2 Human rights and fair working conditions

- Gränges supports international standards regarding human rights and labor conditions, including but not limited to the ten principles from UN Global Compact. As a company, Gränges believe that fair working conditions enable our employees to realize their full potential. Suppliers shall respect and support internationally proclaimed human rights.

### 4.2.1 Responsible sourcing of raw materials and conflict minerals

- Suppliers shall comply with existing legal requirements concerning responsible sourcing and conflict minerals.
- Suppliers shall exercise adequate due diligence for metals and minerals sourcing, extraction and handling and make a reliable determination of the origin and source regarding any conflict minerals.

### 4.2.2 Respect for indigenous people and land/resource use

- Suppliers shall respect and promote the rights of indigenous peoples and their social, cultural, environmental, and economic interests, including their connection with lands and other natural resources.
- Suppliers shall respect the principles of free, prior, and informed consent, and participation, to obtain broad-based consent of indigenous peoples in their activities.

### 4.2.3 Forced labor

- Suppliers shall not engage in any form of forced labor, including all forms of modern slavery or employ people against their own free will, nor shall personnel be required to lodge "deposits" or identity papers upon commencing employment.

### 4.2.4 Minimum age

- Suppliers shall only employ workers who are at least 15 years of age or the applicable minimum legal age, whichever is higher.
- Suppliers shall protect young workers, who are between 15 and 18, by limiting their schedules and tasks including heavy work, hazardous work, and night shifts.

### 4.2.5 Freedom of association and right to collective bargaining

- Suppliers shall respect the rights of their employees, to the extent allowed by applicable laws and regulations, to form a workers' council, collective bargaining unit or other employee representations, and to enter into collective bargaining agreements.

#### 4.2.6 Working hours

- Suppliers shall comply with local law or agreements regarding working hours and shall not permit working hours that are not in compliance with local laws and industry standards.

#### 4.2.7 Wages

- Suppliers shall ensure that wages paid to employees and hired labor are considered fair and comply with local laws and regulations.

### 4.3 Healthy and safe work environment

- Suppliers shall work ambitiously, through continuous improvement, for a healthy, safe, and secure work environment, which as a minimum is in accordance with applicable law.
- Suppliers shall strive towards a safe and injury-free workplace that protects the health and fosters the well-being of employees and all persons directly or indirectly related to the company's operations, for example contracted workers or consultants. No employee or individual at Suppliers' workplace should be at risk of injury.
- Suppliers shall commit to training their employees and work to increase employees' health and safety awareness, skills, and knowledge for the purpose of preventing accidents and occupational illnesses as best as is feasible.

## 5 Environmental Principles

Gränges expects that its suppliers shall undertake their operations with due respect for the environment and a sustainable future.

### 5.1 Environmental impact

- Suppliers shall comply with relevant environmental laws, regulations, and environmental permits.
- Suppliers shall take into consideration the environmental impact of their sourcing and adhere to responsible sourcing practices.
- Suppliers shall strive to understand the environmental impact of their activities and operations including sourcing, and, wherever possible, proactively prevent and reduce the harmful effects that Suppliers' actions and activities can have on people and the environment.

#### 5.1.1 Biodiversity

- Suppliers shall exercise adequate due diligence in understanding and reducing their negative impact caused by operational processes on the natural environment and the ecosystems.

#### 5.1.2 Emissions and climate impact

- Suppliers shall work to minimize emissions from their own operations (Scope 1 and Scope 2) and from their own value chain (Scope 3).

- Upon request by Gränges, Suppliers are encouraged to provide their GHG-emissions related to Scope 1, 2, and if available Scope 3.

### 5.1.3 Energy

- Suppliers shall work to reduce energy consumption, improve energy intensity, and promote the use of fossil-free energy.

### 5.1.4 Pollution

- Suppliers shall work to prevent local pollution of soil, water, and air.

### 5.1.5 Water

- Suppliers shall work to reduce the impact on water usage by reducing water consumption and waste-water generation in operations.

### 5.1.6 Waste and hazardous materials

- Suppliers shall work to reduce process waste and phase out substances that are of very high concern.

## 6 Monitoring and Compliance

Any violation of the values and principles set forth in this Supplier Code of Conduct by Suppliers or any of the Suppliers' commonly owned or controlled affiliates may be regarded as a material violation of the contractual obligations towards Gränges.

Gränges holds the right to follow up on compliance with the requirements set in this Supplier Code of Conduct, and Suppliers shall, on demand, provide Gränges with relevant information concerning the requirements outlined in this Supplier Code of Conduct.

### 6.1 Global sustainability requirements

Gränges expects Suppliers to continuously monitor and ensure that they act in accordance with the expectations and requirements as set forth in this Supplier Code of Conduct. In the same way, Gränges' Suppliers are expected to evaluate their own supply chain to ensure and encourage implementation of and compliance with the expectations and requirements in this Supplier Code of Conduct.

If Suppliers suspect or conclude non-compliance with these principles and requirements, Suppliers shall without delay inform Gränges of this and of the work that has been done to resolve the situation. In such event, Suppliers agree to cooperate in good faith with Gränges to complete a self-assessment and to submit to a qualified third party to perform a sustainability audit at Suppliers' facilities, the results of which audit will be shared with Gränges.

Gränges reserves the right to immediately cease any business for cause with any Supplier who is in clear, verifiable violation of the values and principles set forth in this Supplier Code of Conduct.



## 6.2 Sustainability risk screening and assessments

Gränges annually screens all Suppliers for potential environmental, social and corruption risks. Depending on the Supplier's sustainability risk score and annual purchase value, Gränges assigns a third-party managed evidence-based desktop assessment or an on-site audit to evaluate sustainability performance and risk mitigation practices. Gränges expects that Suppliers complete the assigned assessments in a timely manner. The company sees this as a platform to enforce sustainable practices, ensure continuous improvements, develop collaboration, and build lasting relationships with Suppliers.

## 6.3 Speak up!

Gränges encourages all suppliers, subcontractors and their employees to promptly report any misconduct or irregularities involving Gränges' operations. Reports may be submitted through your direct contact at Gränges or via the company's external Whistleblower Function Whistleblower | Gränges . All reports – including any personal data you choose to provide – will be processed only to the extent necessary for investigating the issue and in strict compliance with the EU General Data Protection Regulation (GDPR) and our Privacy Policy. By submitting a report, you consent to the processing of any personal data contained in your disclosure in accordance with this clause.



## 6.4 Confirmation of compliance

We, the undersigned, hereby confirm on behalf of our company ("Supplier") that:

1. We have received and reviewed the values and principles set forth in this Supplier Code of Conduct.
2. By signing this document, we undertake to acknowledge and use our best efforts to comply with all requirements set forth herein and beyond any other contractual obligations that we might have entered with Gränges.
3. This document shall be solely governed by the same laws that govern the commercial relationship between Supplier and the Gränges affiliates with whom we transact business and if not specified, the laws of the domicile of the purchasing Gränges affiliate.

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Name of Company

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Place/Date

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Place/Date

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Authorized Signatory

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Authorized Signatory

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Name/Title

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Name/Title