#### Assemblin Caverion Group

# Supplier Code of Conduct

### Introduction

#### Purpose

The Assemblin Caverion Group (the 'Company') is committed to operating ethically and conducting business with integrity and honesty, as set out in in the Company's Code of Conduct. The Company treats its suppliers professionally, fairly, equally and with respect.

The Company expects and requires all of its suppliers and their suppliers to comply with the same ethical principles. This Supplier Code of Conduct (the 'SCoC') sets out the Company's minimum requirements for its suppliers to adhere to and to implement throughout their business and supply chain.

#### Applicability

This SCoC applies to all the Company's suppliers, including but not limited to suppliers of services (e.g. subcontractors and consultants) and suppliers of goods (e.g. wholesalers and manufacturers) (the 'Supplier').

# Compliance with laws, regulations and instructions

The Supplier shall operate in compliance with all applicable laws, rules and regulations in the countries where the Supplier operates.

In particular, the Supplier shall ensure that all its duties, obligations and undertakings in relation to the Company are performed in a manner that does not infringe any law or regulation applicable to the Supplier, the Company and the transactions between them. The Supplier shall observe and adhere to all instructions given by the Company for the delivery or task in question.

# Caring for people and respecting human rights

The Supplier is expected to **respect human rights** arising out of international treaties, in particular the UN Global Compact, the Universal Declaration of Human Rights and the Core Conventions of International Labour Organization (ILO).

The Supplier shall **not use child or forced labour** in any of its operations or in its supply chain and shall have a system in place to ensure compliance with this requirement. The Supplier shall also ensure that no forms of slavery or human trafficking take place in its operations or its supply chain. The Supplier is responsible for ensuring **adequate working conditions** throughout its operations and supply chain, including, for instance, limitation of working hours, paying a living wage, and ensuring freedom of association and the right to collective bargaining.

The Supplier shall **not tolerate any discrimination** of any kind, whether relating to, for instance, age, gender, national and social origin, religion, physical or mental disability, political opinion or sexual orientation. The Company also requires the Supplier to maintain a zero tolerance approach towards all forms of harassment and bullying. The Supplier shall ensure equal treatment of its employees and other stakeholders. We also encourage the Supplier to seek to increase diversity and inclusion in its operations.

## Safety of people

The Supplier is responsible for ensuring the health and safety of its employees and the employees of its suppliers and others who may be affected by its activities.

We require our suppliers to follow the same high standards for health and safety as we do. The Supplier is required to **provide training** and ensure that employees are educated in health and safety issues. The Supplier shall ensure the availability of the required and necessary protective equipment.

The Supplier shall **investigate and report** to the Company any health or safety related incidents relevant to its cooperation with the Company. If the Supplier is working at a worksite of the Company or one of its customers, the Supplier is required to comply with all health and safety instructions of the Company and its customer, or those applicable to the worksite.

## Environmental impact

The Supplier shall make all reasonable efforts to protect the environment and to minimise any harmful environmental impacts of its own activities and the activities of its supply chain.

The Supplier shall

- comply with or exceed the applicable laws and regulations and all the instructions related to protection of the environment as issued by the Company, its customer and the authorities;
- continuously strive to reduce the carbon footprint of its own operations and its value chain through actions such as improving energy, material and process efficiency and avoiding, reducing and recycling waste in order to limit global warming to 1.5 °C, in line with the Paris Agreement;
- obtain, maintain and comply with all necessary environmental impact assessments, environmental permits and licences needed for its operations;
- have an appropriate, structured and systematic approach to environmental impact management, for example by using a suitable environmental management system;

 comply with all of the Company's requirements regarding the provision of environmental information and data on its products and services.

The Supplier and its employees and subcontractors shall report to the Company any environmental concerns they notice while working for the Company.

### **Business integrity**

#### The Supplier shall conduct its business in an ethical and responsible manner and strictly in compliance with applicable laws. Corruption and bribery are not tolerated in any form.

The Supplier must

- never, directly or indirectly, engage in any activity that violates the anti-corruption laws applicable in its country or the country where the project or services are to be delivered;
- ensure that any hospitality or gifts given to the Company's employees or partners have a valid business purpose and are always of reasonable and appropriate type and value, and never provided to obtain an improper advantage;
- compete fairly by strictly complying with competition and anti-trust laws in all aspects of its business;
- ensure that sufficient procedures for potential conflict of interest situations are in place and always disclose any financial interest an employee of the Company may hold in the Supplier's business;
- maintain accurate and transparent accounts and records of its business transactions and financial figures;
- not be part of any arrangement related to fraud or money laundering;
- Comply fully with all applicable embargo and trade sanctions regimes.

## **Business conduct**

The Supplier must

- know its suppliers and the supply chain of its products or services, including the related risks, such as the use of conflict minerals or any other risk related to human rights, safety, environment or business ethics;
- comply with applicable data protection laws, and ensure proper and safe handling of personal data, confidential information and intellectual property rights related to the Company and others;
- immediately report any observations or suspicions of an information security incident related to its operations with the Company.

# Implementation of the requirements

The Supplier shall have appropriate management systems in place to ensure adherence to the SCoC and the applicable laws and regulations.

The Supplier is also expected to provide its employees and suppliers with **mechanisms to voice their compliance concerns** without fear of retaliation.

The Supplier shall promote equally high business ethics and standards in its supply chain and ascertain that its own suppliers have implemented and shall comply with requirements that meet or exceed the requirements set out in the SCoC.

## Audit and consequences of breaches

The Company shall have the right to conduct audits, investigations, site visits and other actions to verify the Supplier's compliance with this SCoC.

In the event of serious or repeated breaches of this SCoC, the Company is **entitled to terminate all contracts and business relationships** with the Supplier, and the Supplier may be liable for damages or costs incurred by the Company as a result of the breach. In cases of a less serious breach, such termination may be subsequent to a failed request to rectify the situation.

## Reporting of non-compliance and seeking advice

The Supplier shall report immediately to the Company any non-compliance with the SCoC and shall encourage its employees and suppliers to also do so.

The Supplier **shall not permit any retaliation** against any individual who, in good faith, seeks advice or reports a violation or a potential violation.

To enquire about the requirements of the SCoC, please contact <u>compliance@caverion.com</u> To report a violation or a potential violation of the SCoC, please contact https://whistleblowersoftware.com/secure/AssemblinCaverionGroup

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