

# Code of Conduct for Suppliers

October 2023

# Introduction

Combitech is committed to high standards of business ethics and sustainability. Combitech's Supplier Code of Conduct is based on the UN Global Compact's ten principles and expresses the expectations that we hold for our suppliers.

We encourage our suppliers to establish their own codes of conduct based on similar standards and to flow down these standards to all persons and entities supplying goods or services to Combitech.

We also expect that our suppliers will, upon receiving reasonable notice, give Combitech access to relevant premises and documentation to verify compliance with the Supplier Code of Conduct.

If a supplier fails to meet our expectations as set out in the Supplier Code of Conduct, Combitech's general approach is to encourage improvement. Critical deviations or repeated unwillingness to make improvement, however, may jeopardize the supplier's relationship with Combitech.





# 1. Compliance with laws

The supplier must operate in full compliance with all laws and regulations applicable to its business.

# 2. Labour standards

## **Minimum age requirements**

The supplier must not engage in, or benefit from, the use of child labour, in accordance with the ILO convention 138.

## **Non-discrimination**

Combitech expects the supplier to make decisions on hiring, promotion, development and compensation based on the employees' abilities and skills related to the job. These decisions must never be based on irrelevant factors such as gender, age, ethnic or national origin, religion, disability, sexual orientation, union membership or political affiliation.

## **Freedom of association and collective bargaining**

Combitech expects the supplier to respect the right of employees to freely associate and bargain collectively.

## **Wages and working hours**

Combitech expects the supplier to compensate employees fairly and, as a minimum, to comply with legal minimum standards. Working hours shall comply with national laws.

## **Modern slavery**

The supplier must not engage in modern slavery related activities, such as using force, threats or deception to get a person to work; destroying or otherwise denying access to an employee's identity or immigration documents; charging employees recruitment fees; and failing to provide an employment contract.

The supplier must: (a) comply with all applicable antislavery and human trafficking laws, statutes, regulations from time to time in force, including without limitation the Swedish Criminal Code; (b) ensure that there is no slavery or human trafficking in its supply chains; (c) notify Combitech as soon as it becomes aware of any actual or suspected slavery or human trafficking in a supply chain which has a connection with the engagement and delivery to Combitech.

## **Health and safety standards**

Combitech expects the supplier to ensure that its employees are offered a safe and healthy working environment. Adequate health and safety policies and procedures shall be established and followed.

## 3. Environment

### Management

Combitech expects the supplier to reduce negative environmental impact through a proactive and systematic approach and responsible management.

### Climate

If energy consumption or transportation is a significant environmental aspect of the supplier's operations, Combitech expects the supplier to measure greenhouse gases emissions and have targets and plans to reduce the emissions.

### Resource efficiency

Combitech expects the supplier to use energy efficient and recyclable design and strive to minimise waste of all types. In areas vulnerable

to a scarcity of freshwater, suppliers are expected to establish plans for how to reduce the use of freshwater in operations.

### Hazardous substances

Combitech expects the supplier to identify and phase out hazardous substances in products and operations and ensure proper treatment of emissions generated from operations.

### Sustainable technologies

Combitech expects the supplier to encourage the development and use of sustainable technologies, e.g., to choose sustainable effective technologies and components in their own production processes and strive to increase the use of technologies that reduce the environmental footprint.

## 4. Business ethics

### Anti-corruption

The supplier must refrain from all forms of corruption, extortion and bribery, and specifically ensure that all payments or other benefits offered or made to public officials, private sector employees or any other party comply with applicable anti-corruption laws and regulations.

### Business courtesies

Combitech expects the supplier to compete on the merits of its products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, the supplier must ensure that the offering or receipt of any gift or

business courtesy is permitted by law and regulations, does not violate the rules or standards of the recipient's organisation, and is consistent with reasonable marketplace customs.

### Conflict of interest

Combitech expects the supplier to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in its dealings with Combitech. Combitech expects the supplier to report to Combitech any situations of actual or potential conflicts of interest between the personal interests of those involved in the dealings and the interests of Combitech.

## 5. Information protection

Combitech expects the supplier to properly handle sensitive information, including confidential, proprietary and personal information. Information should not be used for any other purpose

than for which it was provided. The supplier must respect the intellectual property of Combitech and others.

## 6. Trade compliance

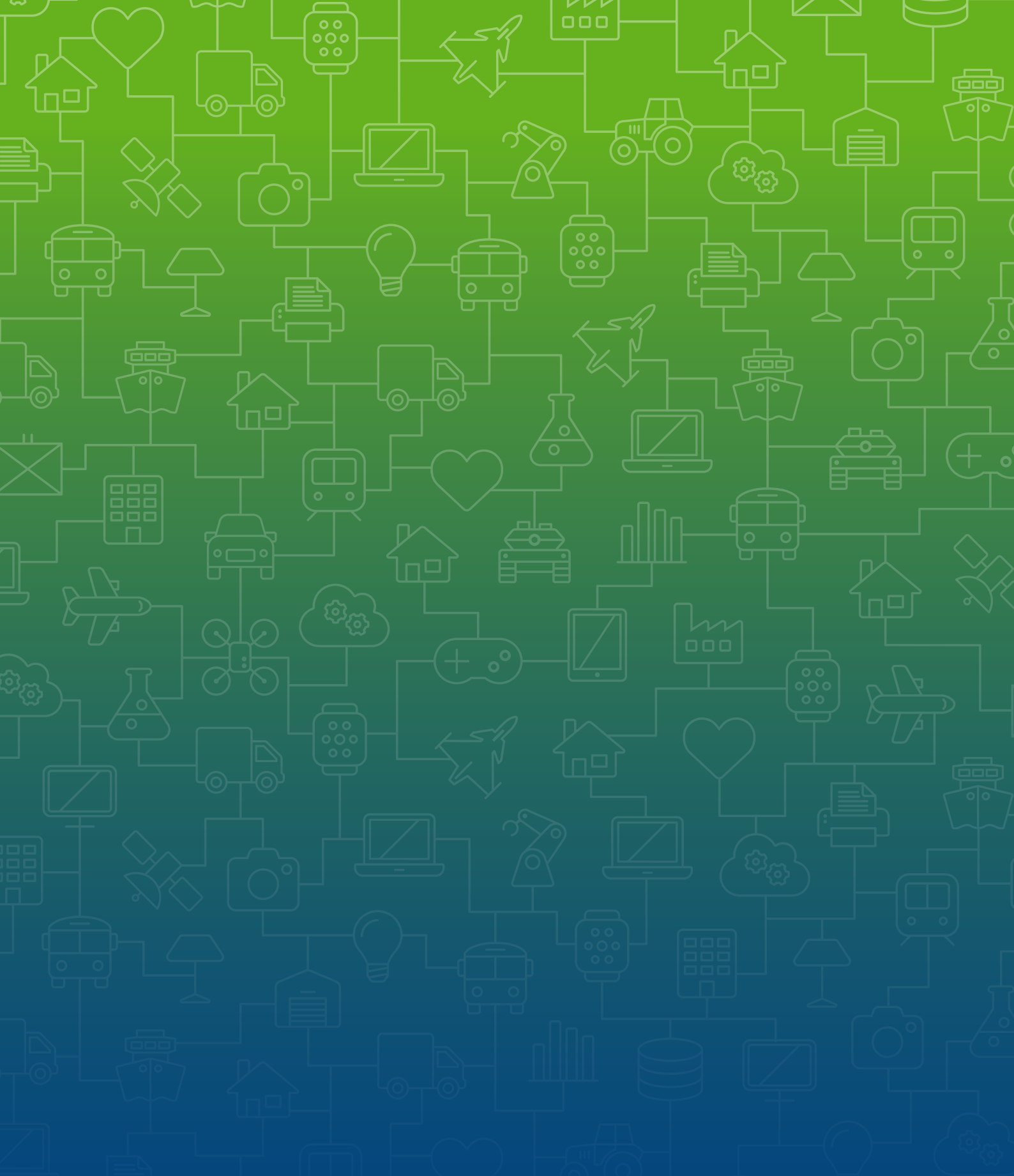
### Export control

The supplier must ensure that its business practices are in compliance with applicable laws and regulations governing the export, import and retransfer of products, components, software and technical data and assistance. The supplier shall provide truthful and correct restriction information and is expected to adhere to applicable embargoes and sanctions aimed at maintaining or restoring peace and security.

### Conflict minerals

Combitech expects the supplier, where applicable, to exercise reasonable due diligence concerning its use of conflict minerals and the source of these minerals and to respond in a timely manner to Combitech's request for information on these activities and findings.





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Shaping a smart and resilient society