

# SUPPLIER CODE OF CONDUCT POLICY

## 1. Introduction

At Bufab AB (publ), including its subsidiaries, ("Bufab"), we are committed to operational excellence, ethical and responsible conduct, fair and respectful treatment of all individuals, and practices that promote safety, health, and environmental protection.

Bufab's business is based on close, long-term relationships with customers, suppliers, and other business partners. With this Supplier Code of Conduct, we communicate to our suppliers that we expect them to operate as Bufab; in accordance with internationally recognized standards on Human Rights, Labour Rights, Environment and Anti-corruption.

The Bufab Supplier Code of Conduct or equal requirements must be required from all of the supplier's 1st tier sub-suppliers providing products or material to Bufab.

## 2. General Principles

### **Comply with the laws and regulations in each country in which the supplier operates**

Where there are differences between the provisions of this Supplier Code of Conduct and national laws or other applicable standards, suppliers shall adhere to the higher or more stringent requirements.

### **Demonstrate and promote its commitment to responsible business practice in policies, decisions and activities**

Supplier shall upon request by Bufab, provide evidence of its compliance with the obligations set out in this Supplier Code of Conduct.

### **Fair competition**

Bufab respects and is committed to the rules governing free and fair competition and to complying with applicable antitrust and other laws regulating competition. Our suppliers shall equally commit to competing in a fair manner in compliance with all applicable competition laws and regulations.

When conducting business with Bufab, our suppliers shall deal fairly with all individuals and entities with whom they interact and shall not take advantage of anyone through

manipulation, concealment, abuse of privileged information, misrepresentation of material acts, or any other unfair dealing or practice.

Our suppliers shall not engage in collusive binding, price fixing, price discrimination or other unfair trade practices in violation applicable antitrust and other laws regulation competition

### **Confidentiality**

Our suppliers shall not disclose nor use for their own purposes any other Bufab trade secrets, confidential information, knowledge, designs, data, skill, or any other information considered by Bufab as sensitive information.

Our suppliers shall respect the intellectual property rights of Bufab and of others, observe and respect all patents, trademarks, and copyrights, and comply with all requirements and terms of their use.

## **3. Anti – corruption**

Suppliers that Bufab does business with must not use illegal payments, bribes, kickbacks, or other questionable inducements to influence any business transaction. Bufab specifically prohibits bribery by any of its employees or agents. A practice that conflicts with this policy might be considered acceptable in a particular country, however it is not acceptable for Bufab.

## **4. Principles of Human rights and social justice**

Suppliers must support and respect the protection of internationally proclaimed human rights and make sure that they are not complicit in human rights abuses.

### **Non-discrimination**

All employees of the supplier shall have equal opportunities based on competencies, experience, and performance regardless of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social background, or ethnic origin. All employees should be treated with respect. Discrimination, physical or verbal harassment, or any illegal threats are not tolerated.

### **Forced labor**

Supplier will not engage in or support forced, bonded or compulsory labour, nor shall the Supplier require any form of deposit or confiscate identification papers from employees.

### **Child labor**

Bufab respects the children’s right to development and education. Suppliers must not engage in child labour. The supplier shall ensure that no employee is younger than the legally fixed age for employment. Minimum age is the age for completion of compulsory schooling, but not younger than 15 years, or not younger than 14 years, in countries where the education system is inadequately developed. The supplier should abide by

the United Nations Convention on the Rights of the Child (1989) and comply with all relevant national and international laws, regulations, and provisions applicable in their country of production or operation.

### **Freedom of association**

Suppliers must respect the right of employees to join any organized associations of their own choosing and to bargain collectively as permitted by local laws and regulations. Suppliers shall respect the recognized unions. The supplier should also equally respect an employee's right to refrain from joining a union.

### **Working hours and compensation**

The Supplier shall comply with applicable laws on working hours. Where such laws do not exist, a workweek should not be more than 60 hours including overtime. Employees shall be allowed at least one day off every seven days. Employees shall have a written employment contract specifying the terms and conditions of their employment in a language that they understand. Records must be kept about employees' working hours.

## **5. Health and Safety**

Suppliers to Bufab shall safeguard a healthy and safe working environment for all employees, in accordance with international standards and national legislation. Where the supplier provides its employees with accommodation such facilities must at a minimum be clean, safe, and meet the employees' basic needs.

A supplier must establish organizational structures and procedures for the effective management of health, safety, and environmental risks. Appropriate information and training on health and safety should also be offered to the employees.

## **6. Environment**

A supplier should take precautions to reduce environmental impact, undertake initiatives to promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies. A supplier's actions should be based on the relevant national and international laws, regulations, and standards in respect to a sustainable environment. Supplier shall minimize its environmental impact and continuously improve its environmental performance by focusing on Greenhouse Gas Emission, Energy & water consumption, Logistic, Product, Waste & Recycling. Bufab has signed the international Science-Based Targets Initiative (SBTi) as a part of its efforts to further reduce global greenhouse gas emissions. We have committed to set targets that are aligned with the Paris Agreement, intended to limit global warming to 1.5°C. We believe it's the right thing to do and we expect our suppliers to support Bufab in reaching those targets. Climate change affects everyone on the planet, and we all must do what we can to limit it by implementing environmental targets and monitoring activities in environmental focus areas.

## 7. Material compliance & Conflict minerals

In order to safeguard certain minimum material requirements for Bufab's products, suppliers shall ensure that the goods (including its individual components) provided to Bufab shall be in compliance with Directive 2011/65/EU, including amendment 2015/863/EU, on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS) and Regulation EC 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (Reach), updated and in force from time to time.

Suppliers shall assure that all goods supplied to Bufab is in compliance with Regulation (EU) 2019/1021 on persistent organic compounds (POPs)

Suppliers shall ensure materials in products, parts or components supplied to Bufab do not directly or indirectly contribute to armed conflicts.

Expectations on suppliers:

- Suppliers shall ensure that the goods (including its individual components) provided to Bufab is in compliance with Directive 2011/65/EU, including amendment 2015/863/EU and Regulation EC 1907/2006.
- Suppliers must agree to monitor updates of chemical compliance regulations, and without delay declare any inclusion of regulated substances to Bufab. This includes, but is not limited to, monitoring updates related to REACH Restriction Appendix XVII, REACH **Authorisation (Annex XIV)** and the REACH Candidate List.
- Exemptions must only be made if such are allowed under the applicable regulation/directive. For example, EU RoHS exemptions for lead as alloying element in galvanized steel. All exemptions shall be declared to Bufab. Even though the minimum requirement is to declare these substances they should be avoided (where possible) and phased out over time.
- Suppliers must declare all items containing Substances of Very High Concern (SVHCs) on the REACH Candidate List above 0,1% (w/w) to Bufab. Even though the minimum requirement is to declare these substances they should be avoided (where possible) and phased out over time.
- For EU suppliers an ECHA (European Chemicals Agency) SCIP IDs shall be provided for all articles containing SVHCs in a concentration above 0,1% (w/w). For non-EU suppliers, Bufab will require specific product information to fulfil the SCIP-registration requirement.
- Any presence of intentionally added biocides should be declared to Bufab.
- Suppliers should ensure that all the products and components provided to Bufab do not directly or indirectly contribute to armed conflict. Any presence of 3TG minerals (tin, tantalum, tungsten, and gold) or Cobalt/Mica should be declared to Bufab. Bufab requires suppliers to identify and disclose the source of 3TG minerals and Cobalt/Mica used in products supplied to Bufab upon request.
- Suppliers should upon request sign product specific compliance declarations for products supplied to Bufab.
- Suppliers are encouraged to share Full Material Declarations and Test protocols with Bufab upon request.

Further information on compliance and declaration requirements can be found at:

[Supply chain sustainability \(bufabgroup.com\)](https://www.bufab.com)

## 8. Auditing & Reporting

Bufab reserves the right to actively verify and audit the suppliers' compliance with Bufab Supplier Code of Conduct without announcement on premises. These audits may be performed either by Bufab employees or by a third-party auditor assigned by Bufab.

If Bufab finds that the Supplier is not meeting the requirements and expectations set out in this CoC, Bufab will offer guidance specifying which issues need to be corrected promptly. Bufab nevertheless reserves the right to cancel outstanding orders, suspend future orders or terminate the contract with the Suppliers in case of a material breach of this CoC.

The latest version of this document is always posted on, [www.bufab.com](https://www.bufab.com) and it is the responsibility of the supplier to stay updated on any changes.

<https://www.bufab.com/about-us-2/for-suppliers/supplier-code-of-conduct>

In case of any discrepancy or inconsistency between the English version and the local version, the English version shall always prevail.

## 9. Reporting of violations

Any violations of the principles set forth in this Code of Conduct shall promptly be reported to Bufab. Violations can be reported to your Bufab contact or Bufab "Compliance Line" at [compliance@bufab.com](mailto:compliance@bufab.com)

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