

# SUPPLIER CODE OF CONDUCT

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# COMMITMENT TO SUSTAINABILITY

Sustainability is a central part of Electro Center's strategy and values. We systematically develop our products, services and processes, and are firmly committed to promoting sustainability in everything we do. We also expect our suppliers to act responsibly and to clearly commit to the business practices defined in this document.

## INTRODUCTION AND SCOPE

This document, Electro Center Supplier Code of Conduct (later also referred to as, "Supplier Code of Conduct", "Code" and/or "Code of Conduct") forms the foundation for how we ensure responsibility throughout our entire value chain. This Supplier Code of Conduct becomes binding on the supplier only upon the supplier's express written acceptance, such as by signing this document. We encourage all our suppliers and subcontractors to commit to this Code and to promote its adoption among their own suppliers and subcontractors.

This Supplier Code of Conduct applies to all employees within the value chain, regardless of the country in which they work or the nature of their employment relationship. Our suppliers must comply with all applicable laws and international commitments, including labor, safety and environmental legislation, as well as anti-corruption regulations. Where the requirements of this Supplier Code of Conduct exceed local legal requirements, the stricter standard shall always apply.

Electro Center's suppliers are required to apply this Code of Conduct within their own supply chains and ensure that their suppliers and subcontractors adhere to these principles or to equivalent standards of this Supplier Code of Conduct.

# INTRODUCTION AND SCOPE

## **Due diligence principles**

Electro Center's suppliers must have a systematic and documented due diligence process in place to identify, prevent, mitigate and remedy any actual or potential adverse impacts on human rights, the environment and good governance arising from their own operations or within their value chain. If such a process is not yet established, the supplier must present Electro Center with a clear implementation plan and timeline.

The due diligence process must include, at a minimum, risk assessment, the prioritization of impacts, corrective and mitigating actions, continuous monitoring, and transparent reporting to Electro Center. If any adverse impacts are identified, the supplier must take prompt and appropriate remedial action and ensure that such actions extend throughout their supply chain in accordance with this Supplier Code of Conduct.

## **Sustainability governance**

The suppliers of Electro Center must establish clear responsibilities, roles and processes for managing sustainability matters. Senior management is expected to oversee compliance with the principles of this Code of Conduct and ensure that these principles are integrated into operations and decision making.

Each supplier must appoint a designated individual or team responsible for implementing this Code, reporting any deviations, and coordinating corrective actions in cooperation with Electro Center.

## **Risk assessment and prioritizations**

The suppliers of Electro Center must assess, on an annual basis, the risks related to their operations and value chain that may affect human rights, working conditions, the environment or ethical business conduct. This assessment must identify both actual and potential adverse impacts and prioritize them according to their severity and likelihood. Documentation and results of the risk assessment must be provided to Electro Center upon request.

## **Education and development**

The suppliers of Electro Center must ensure that their employees and subcontractors are familiar with the content of this Supplier Code of Conduct and understand how to comply with it in their daily work. Training on this Code must be provided regularly, with particular emphasis on occupational health and safety, human rights, environmental responsibility and ethical business conduct. Electro Center may request documentation of the training provided whenever necessary.

# HUMAN AND LABOR RIGHTS

Electro Center regards the respect for human rights throughout the value chain as a fundamental principle. Suppliers must demonstrate that human dignity and equality are upheld consistently in all their operations. This includes having practices and processes in place to prevent human trafficking, forced labor, prison labor and child labor, and ensuring that these principles are applied equally across their subcontracting chains. The suppliers must also adhere to the principle of non-discrimination and safeguard workers' rights to organize and to engage in collective bargaining.

Working conditions throughout the value chain must, at a minimum, comply with national legislation and the requirements of the ILO core conventions regarding working hours, wages and rest periods, and must always be safe and healthy for all workers. The essential terms of employment must be provided to workers in writing and in a language they can understand.

Electro Center requires suppliers to report annually on how these principles have been implemented in practice and on the outcomes of the measures taken.

## **Prevention of discrimination and harassment**

Electro Center's suppliers must ensure that workers are not subjected to discrimination, harassment, bullying or any other inappropriate treatment on the basis of, for example, gender, age, origin, language, religion, belief, disability, state of health, sexual orientation or any other personal characteristic.

Any incidents must be addressed promptly, handled confidentially and managed in a way that ensures the individuals concerned receive the support they need.

## **Prohibition of forced and prison labor**

Suppliers must not use forced or prison labor, nor any form of labor in which a worker's ability to freely terminate their employment is unlawfully restricted. Workers must not be required to surrender passports or identity documents as a condition of employment, nor may they be subjected to unreasonable or unlawful recruitment fees or other charges.

# OCCUPATIONAL HEALTH AND SAFETY

Electro Center's suppliers must ensure safe and healthy working conditions for their workers, where risks are identified and managed proactively. This includes conducting risk assessments, maintaining emergency preparedness, ensuring fire safety, providing appropriate protective equipment, and delivering training related to occupational health and safety.

# ENGAGEMENT AND STAKEHOLDER DIALOGUE

Electro Center considers it important that suppliers operate in a transparent and inclusive manner. Suppliers must establish practices that enable workers to provide feedback safely. This requires the organization of consultation and feedback mechanisms and ensuring that these mechanisms are accessible to all workers within the value chain.

# ENVIRONMENTAL SUSTAINABILITY

Electro Center expects suppliers to commit to reducing their environmental impacts and to supporting positive outcomes for the climate, biodiversity, and local communities.

## **Prevention of pollution**

Suppliers must manage hazardous substances and waste responsibly and minimize emissions to air, water and soil. They must also report significant emissions to Electro Center to the best of their abilities, provide information on the measures taken to reduce them, and respond to Electro Center's information requests concerning pollution and its prevention to the best of their abilities.

# ENVIRONMENTAL SUSTAINABILITY

## **Water and marine resources**

Suppliers must monitor their water consumption and ensure that their activities do not compromise the sustainability of local communities or ecosystems. They must also manage wastewater in a way that prevents harm to aquatic ecosystems, and report on their use of water and marine resources to the best of their abilities to Electro Center upon request.

## **Biodiversity and ecosystems**

Suppliers must identify the impacts of their operations on biodiversity and take action to minimize any adverse effects. They must inform Electro Center if their activities affect protected areas or pose biodiversity-related risks and participate in restoration or compensatory measures when necessary.

## **Circular economy and resource efficiency**

Suppliers must promote the reuse of materials, recycling and resource efficiency, and report their recycling rates and waste volumes to the best of their ability. In addition, suppliers are expected to respond to information requests related to circular economy and resource efficiency in accordance with Electro Center's requirements.

## **Climate and emissions**

Electro Center requires suppliers to develop their greenhouse gas emission accounting in line with Electro Center's requirements and to respond to information requests related to these topics to the best of their abilities. Suppliers are also encouraged to set science-based emission reduction targets and to collaborate with Electro Center to reduce emissions across the value chain.

## **REACH, RoHS and conflict minerals**

Suppliers must ensure that the products they supply comply with REACH and RoHS regulations and must avoid the use of minerals originating from conflict affected or high-risk areas in their supply chains. Documentation and evidence regarding the products and their origin must be provided upon request.

# ETHICAL BUSINESS CONDUCT

Suppliers are expected to uphold a high standard of ethical conduct in all aspects of their business operations. This includes the prohibition of bribery and corruption, compliance with competition laws, the protection of confidential information, and transparency and honesty in reporting.

## **Prevention of bribery and conflict of interest**

Suppliers must not offer, request or accept bribes, improper benefits, payments or hospitality that could influence business decisions. Conflicts of interest must be identified and disclosed openly, and any associated risks must be managed appropriately. All business activities must be conducted transparently and in compliance with applicable legislation.

## **Information security and data protection**

Suppliers must comply with the EU General Data Protection Regulation (GDPR) when processing personal data and must ensure the security of systems and information supporting their business operations. Suppliers must implement appropriate technical and organizational safeguards and ensure that confidential information is not disclosed or processed without a lawful basis. Any data breaches must be reported to Electro Center without delay.

## **Fair competition**

Suppliers must comply with all applicable competition laws. This means, among other things, that suppliers must not engage in practices that restrict competition, such as price-fixing, bid-rigging, market or customer allocation, or any other anti-competitive behavior. Particular caution must be exercised in interactions with competitors, and no trade secrets or pricing information may be exchanged.

# GRIEVANCE AND REMEDIATION MECHANISM

Electro Center requires suppliers to provide their workers with safe and confidential channels for reporting misconduct without fear of retaliation. Suppliers must also ensure that workers have access to Electro Center's anonymous whistleblowing channel, available via the following link: [Electro Center, anonymous whistleblowing channel](#).

All reports will be handled efficiently, and where violations are confirmed, appropriate corrective and remedial actions will be taken in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs). Such actions may include, for example, the repayment of withheld wages, the removal of recruitment fees, improvements to working conditions or the provision of necessary health services.

# MONITORING, COMPLIANCE AND AUDIT

Electro Center reserves the right to conduct audits of its suppliers' operations, either directly or through third parties. Suppliers may be required to carry out self-assessments and provide information related to working conditions, human rights, environmental performance and emissions.

If any non-compliances are identified, suppliers must implement corrective actions within the agreed timeframe. In cases of serious or repeated breaches, Electro Center reserves the right to suspend or terminate the cooperation.

## **Accuracy and verifiability of information**

Suppliers must ensure that all information provided to Electro Center is accurate, approved by management and, where necessary, externally verifiable. Environmental and human rights data must be based on documented sources and recognized measurement methods. If discrepancies or uncertainties arise, Electro Center has the right to request additional information or independent third-party verification.

## **Corrective action plan (CAP)**

If deficiencies are identified during Electro Center's assessments or audits, the supplier must prepare a written corrective action plan (CAP). The plan must specify the required actions, responsible persons and timelines, and its implementation will be monitored jointly with Electro Center. If agreed actions are not completed within the set timeframe, Electro Center may take further steps in accordance with contractual terms.

## **Information requirements**

Suppliers must provide Electro Center with up-to-date and verifiable information on their own operations and relevant parts of their supply chain upon request. This includes key indicators related to environmental and social responsibility, such as emission data, material flows, water use, biodiversity impacts and other value chain metrics.

Suppliers commit to responding to information requests as promptly as possible and to providing any additional data necessary for Electro Center to meet its EU Taxonomy and other regulatory reporting obligations.

# INTERNATIONAL FRAMEWORKS AND REPORTING

Suppliers' operations must be aligned with the UN Guiding Principles on Business and Human Rights (UNGPs), the ILO core conventions and the OECD Guidelines for Multinational Enterprises. If any breaches occur, suppliers must notify Electro Center immediately and cooperate fully in implementing appropriate corrective actions.

Suppliers are encouraged to obtain ISO 9001 and ISO 14001 certification or to adopt management practices aligned with these standards. Other recommended certifications include ISO 45001 for occupational health and safety and ISO/IEC 27001 for information security.

## COMMITMENT AND SIGNATURE

This Supplier Code of Conduct forms an integral part of the contractual relationship between Electro Center and the supplier. The supplier confirms its commitment to the Electro Center's Supplier Code of Conduct by signing this document.