

# Code of conduct for suppliers

Wihlborgs advocates for long-term sustainable growth in the Öresund region and, in collaboration with our suppliers and other important stakeholders, we strive to contribute to the region's development.

We want to conduct our operations responsibly and prioritise working with suppliers who share our values and who want to carry out transactions with us that are sustainable over the long term.

We have signed on to the UN's Global Compact initiative and have committed ourselves to following the ten principles regarding human rights, labour law, the environment and anti-corruption. We also support the human rights established by the UN in the Universal Declaration of Human Rights and in conventions adopted by the ILO, the UN's international labour organisation. We expect our business partners to abide by these principles and established human rights as well.

The Code of Conduct applies to all suppliers who supply Wihlborgs with products, personnel or services. Suppliers also have a responsibility to ensure that the subcontractors they hire understand and comply with Wihlborgs' Code of Conduct.

## **Responsible business, business ethics and anti-corruption**

Wihlborgs expects operations at its suppliers to be characterised by sound business ethics, impartiality, free competition and respect for contracted agreements.

Suppliers for Wihlborgs are to follow applicable laws, ordinances, regulations and standards. Price-fixing agreements, forming cartels and other forms of misuse of market position are not permitted. Our assumption is that suppliers actively combat money laundering and are knowledgeable about their business partners.

Official entertainment and customer events must always be characterised by openness, moderation and a clear connection to operations. Wihlborgs employees are not permitted to accept gifts, trips or other remuneration from suppliers that could, or could be perceived to, influence the objectivity of a business situation.

All permits, licenses and registrations required to conduct operations need to be up-to-date and submitted to us as requested when signing a contract.

## **Human rights and working conditions**

We work collectively to create a sound and safe business climate, where internationally recognised human rights and conventions concerning labour are respected in our own operations as well as the value chain.

Wihlborgs expects suppliers to ensure that all employees, and anyone who works on behalf of the supplier in an employment-like capacity, has labour conditions as described in relevant collective agreements.

All employees are to have written employment contracts translated into a language they understand, the right to statutory weekly rest periods and leave, including sick leave and parental leave. Working hours, including overtime, are not permitted to exceed the limits given by applicable legislation or agreements.

We pay salaries regularly, directly to employees, on time and in full, and deductions from salaries are not used as a disciplinary measure.

Suppliers are expected to promote diversity and equality in operations. No discrimination is permitted based on nationality, sex, race, religion, age, sexual orientation, political opinion, affiliation or social or ethnic origin.

In addition, child labour or forced or compulsory labour is not permitted. The minimum age for employment is the age for completing compulsory schooling. Exceptions can be made for holiday jobs and short-term employment. The minimum age is always 15 years.

Suppliers are to respect employees' freedom of association and the right to collective negotiations and agreements. Employee representatives must be able to perform their assignments.

## **Occupational health and safety**

Suppliers are responsible for ensuring that their workplaces are safe and meet national laws and agreements. Wihlborgs expects suppliers to engage in systematic and preventative efforts to continuously improve occupational health and safety.

Everyone who works for a supplier is to receive relevant information and training regarding work environment risks in a language that they understand. Suppliers must provide appropriate protective equipment and ensure that no alcohol or drugs are consumed during working hours.

Near-accidents and accidents that occur while carrying out work on behalf of Wihlborgs are to be reported immediately to the relevant Wihlborgs contact. Everyone working for our suppliers, irrespective of their form of employment or contract type, is to be covered by accident insurance.

## **Environmental and climate impact**

Wihlborgs works deliberately to limit its environmental and climate impact across the entire value chain and expects its suppliers to support Wihlborgs in prioritising this work.

Suppliers are to work systematically and preventatively, with robust controls and appropriate procedures to limit the environmental and climate impact of operations. This also includes setting requirements regarding suppliers' own environmental agenda.

Suppliers are to apply the "Precautionary Principle" as a foundation for preventing or mitigating damage to the environment and health. The products and materials used at Wihlborgs' properties are to have a minimal impact on the environment, which suppliers must demonstrate using relevant data and certificates.

Suppliers' environmental agendas are to be based on a lifecycle perspective. This includes an ambition to reduce the amount of waste from operations, and to reuse and recycle, to thereby reduce the amount of waste sent to landfill or incineration.

## **Information and communication**

Confidential information about Wihlborgs' operations or customers' operations may not be shared with unauthorised individuals. Personal data is to be processed with due care in accordance with applicable legislation (GDPR).

## **Collaboration and monitoring**

We regularly evaluate ourselves and our suppliers when it comes to sustainable development (as described by the UN's principles).

In these evaluations, suppliers report how they comply with the requirements in the Code of Conduct, using relevant certificates, documents and data for support. If any portion of this self-evaluation is not approved, we prefer measures to be taken before a contract is signed.

In addition to self-evaluation, Wihlborgs can initiate a separate review, including spot checks at suppliers, to investigate compliance with the Code of Conduct. Suppliers are expected to actively participate in the review and provide all of the relevant material requested.

If a supplier does not meet their obligations according to the Code of Conduct or demonstrates, on multiple occasions, no interest in improving, Wihlborgs may terminate the partnership.

Wihlborgs is dedicated to a relevant interpretation and application of the Code of Conduct in the supplier's operations and we are happy to share good examples and to take suppliers' ideas and suggestions on board.

We strive for an open and honest dialogue and prefer to receive any information about breaches of the Code of Conduct that suppliers detect in their operations or in the value chain as soon as possible. We also want feedback from suppliers if they think that Wihlborgs has failed to comply with the principles in the Code of Conduct in some way.

Ideally, suppliers should contact the responsible procurer at Wihlborgs, the Procurement Director or the CEO. If, for any reason, it would not be appropriate to report to any of these individuals, Wihlborgs also has an independent whistle-blower service to anonymously report suspected breaches of the Code of Conduct. The whistle-blower service is administered by an external party and is accessible via Wihlborgs' website as a last resort when it is not possible to contact any of the responsible individuals at Wihlborgs directly.