

# Supplier Code of Conduct

**EDGE Associates AB**

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[www.edgeassociates.se](http://www.edgeassociates.se)

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## From the Board

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Dear reader,

Welcome to ED GE Associates' Supplier Code.

ED GE Associates strives to obtain sustainable development in all of its operations. We aim to be an ethical forerunner in all countries which we operate. Respect for human rights and fair labour conditions are fundamental part of our values. ED GE Associates promotes ethical business practices and fair competition. ED GE Associates and its suppliers are expected to abide by all economical, ethical, and environmental laws and regulations.

ED GE Associates and its employees have undertaken to act in accordance with ED GE Associates' Code of Conduct.

The purpose of this Supplier Code is to communicate the common set of ethical and business principles to guide our daily work with our suppliers. Sustainability must be extended to our supplier's value chains.

We expect all our suppliers and other business partners to respect the principles of this Supplier Code. Furthermore, the Suppliers shall ensure that their subcontractors are informed and they comply with this principles set out in this Supplier Code.

Thank you for taking this journey with us to further improve sustainability in business.

Treshiya Palliyaguruge

Board Member

## Scope and applicability

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The Supplier shall at all times during the term of agreement(s) with ED GE Associates comply with this Supplier Code in all countries they operate. It is the responsibility of the Supplier to ensure that its employees, relevant affiliated companies and subcontractors are informed about the content and comply with the requirements.

The Supplier undertakes to comply with the UNGC principles as well as local regulations and legal practices. In cases of conflict between relevant laws and the principles described in this Code, the highest standard shall prevail to ensure sustainable operations.\*

\* United Nations Global Compact, ILO Declaration on Fundamental Principles and Rights at Work, the International Bill of Human Rights, UN Rio Declaration on Environment and Development, the UN Convention against Corruption.

## Human rights and labour conditions

### Non-discrimination and equal opportunities

In regard to the ILO convention No. 100 and 111, Employees are hired and treated in a manner that does not discriminate with regard to gender, nationality, religion, race, age, disability, sexual orientation, political opinion, union membership, or social or ethnic origin. The Supplier promotes the idea that all employees shall be treated with equal respect and dignity.

Furthermore, the Supplier promotes a culture of equal opportunities and diversity where appointments to jobs, rewarding and personal success depend on individual ability and performance. Fundamental human rights shall be known, understood and respected and applied equally to all employees whether temporarily or permanently hired, or contracted.

### Physical abuse and forced labour

In regard to the ILO convention No. 29 and 105, any employment relationship with Supplier shall be freely chosen and free from threats. Supplier opposes all forms of compulsory, bonded or forced labour, including trafficking. No employee shall ever be required to deposit identity papers during their employment. Employees are always free to leave their employment after the due notice period.

### Child labour

In regard to the ILO convention No. 138 and 182, Supplier upholds international and local child labour standards across all our businesses. No one under 15 years of age or below the country's legal minimum age is employed by ED GE Associates' subcontractors. Persons under the age of 18 shall not perform any hazardous work, including but not limited to exposure to physical or psychological stress.

### Freedom of association and the right to collective bargaining

In regard to the ILO convention 87 and 98, Supplier supports the freedom of association. All employees have the right to be a member of a trade union and to bargain collectively. Accordingly, no disciplinary action will be taken against employees that choose to organize or join an association. As employees of Supplier, Supplier must not interfere or in any way or obstruct other employees' freedom of association, or the right to be unorganized. Supplier's

employee representatives must be allowed to carry out their functions unhindered in the workplace.

### **Fair employment conditions**

In regard to the ILO convention 100 and 111, employment contracts and conditions at Supplier should be understandable for all employees, with equal pay for equal work regardless of gender or any other non-objective criteria. Payments and terms shall comply with applicable laws and/or industry standards, whichever is higher. Working hours must comply with applicable laws. Supplier respects employees' right to leisure time, including their right to family life and children's rights to their parents.

### **Health and safety**

All employees are provided with safe and healthy working conditions and environments. Adequate steps to prevent accidents and injury to health shall be taken by minimizing the causes of hazards inherent in the working environment and by providing appropriate safety equipment.

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## Environment

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The Supplier shall have a precautionary approach in order to minimize environmental impacts within its value chain. The Supplier shall have an environmental management system ensuring effective planning, operation and control of environmental aspects. The Supplier's environmental management system shall be equivalent to the requirements in the ISO14001. The environmental management system shall include a continuous improvement program.

## **Anti-corruption and fair business practices**

### **Anti-corruption**

No abuse of power, nepotism or bribery, including improper offers of payments to or from employees or organisations, shall be tolerated. Gifts or similar benefits may only be offered to, or accepted from, a third party if modest in value and if consistent with reasonable hospitality given in the ordinary course of business.

### **Fair competition**

ED GE Associates is firmly committed to fair competition and open markets. We require free and fair competition and expect the Supplier to compete as forcefully and constructively as possible while at all times complying with international and national competition law and regulations.

### **Conflict of interest**

Business decisions shall always be made in the best interest of the companies involved, i.e. the Supplier and ED GE Associates both. Personal relations or considerations will never influence decision-making. Should there be any risk, however small, of conflict of interest, our employees are instructed to immediately inform their leaders.

### **Fraud, extortion, money laundering and other related crimes**

The Supplier shall abide by all applicable national and international regulations aiming at preventing, detecting and remedying economic crime and, in particular, fraud, extortion, money laundering and other related crimes. ED GE Associates employees will refrain from any act or omission in connection to such criminal activities and shall actively cooperate with any inquiry in relation to such crimes.

### **Trade and sanctions compliance**

The Supplier shall ensure that their business practices are in accordance with applicable regulation governing the import/export of their deliverables. The Supplier shall provide truthful and accurate information and obtain export licences and consents, where necessary. The Supplier warrants that it or its shareholders are not subject to any economic or administrative sanctions.



### **Insurance coverage**

The Supplier is obliged to ensure that there are accurate and complete insurance schemes covering its operations, services and products.

### **Political involvement**

The ED GE Associates name, or any resources controlled by ED GE Associates, shall not be used to promote the interests of political parties or candidates.

### **Confidentiality**

By accepting this Code Supplier agrees on their respective confidentiality obligations with ED GE Associates. In no event shall the Supplier misuse or disclose any information that may qualify as sensitive personal data, insider information of ED GE Associates' present and future business operations, or other information the confidentiality of which is protected by law.

### **Privacy and Security**

Privacy is a human right, and with ED GE Associates is thus committed to respecting and safeguarding (individual) data privacy. with ED GE Associates' suppliers are expected to collect, use, hold and process data carefully, responsibly and according to applicable laws and regulations as well as to take adequate security measures.

### **Use of reference**

The Supplier shall not advertise or publish any information relating to ED GE Associates or business relationship between the Parties without prior written approval of ED GE Associates or unless explicitly agreed in the contract for the delivery.

## Compliance

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### Continuous improvement

Supplier shall adopt a systematic approach to the assessment, mitigation and management of risks, measurable performance targets and monitoring and follow up of them. In addition, adequate communication and training about the requirements should take place.

### Breach reporting

Should the Supplier find any obstacles in meeting the requirements or find any breaches, those shall be reported immediately to the Supplier's main contact in ED GE Associates or report anonymously and confidentially to [compliance@edgeassociates.se](mailto:compliance@edgeassociates.se).

Actions inconsistent with the Supplier Code must be promptly corrected and may be subject to sanctions. In event of material breach ED GE Associates is entitled to terminate the agreement with an immediate effect.

## Communication and auditing

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The Supplier shall provide ED GE Associates with necessary information and allow ED GE Associates or its representatives with an access to the Supplier's relevant premises and documentation in order to verify that the Supplier, its employees, relevant affiliated companies and subcontractors comply with this Supplier Code.

The Supplier undertakes to provide all necessary information of its management systems, environmental performance and all other relevant information to verify your compliance with this Supplier Code at a regular basis to ED GE Associates.

The Supplier and ED GE Associates state that they will actively seek ways for further improvement in the areas of sustainability.

The content of this Supplier Code shall be reviewed on an ongoing basis.