

## Supplier Sustainability Policy

### Intent

At ALIARO we consider sustainability to be an essential part in all our business operations. ALIARO is committed to a Code of Conduct (available at [www.aliaro.com](http://www.aliaro.com)) which describes how we do business.

We support and promote human rights throughout our operations, our communities in which we operate, and our global supply chain. We also embrace the international human rights principles expressed in the following conventions:

- The Ten Principles of the United Nations Global Compact of which ALIARO is a signatory partner;
- The Universal Declaration of Human Rights;
- The International Labour Organization's 1988 Declaration on Fundamental Principles and Rights at Work; and The United Nation's Sustainable Development Goals

### Applicability

The Supplier Sustainability Policy applies to all suppliers providing products and/or services to any ALIARO Group Company. Workers/employees are considered to be all people who are working for the supplier, whether directly employed, subcontracted or employed by other agency.

ALIARO expects the supplier to monitor its own suppliers in order to ensure commitment to environmental and social responsibility.

### Management System

Supplier shall establish and maintain adequate management systems to oversee all elements of this Supplier Code of Conduct, in proportion to the size, complexity and risk environment of the Supplier's business. It shall contain a policy commitment from the Suppliers' management as well as provide for effective due-diligence and risk assessment, assign responsibility to relevant personnel, and include monitoring and reporting mechanisms related to all areas of this Supplier Code of Conduct. Such management system shall be continuously reviewed, monitored and improved, preferably under 3RD party certification.

### Compliance

ALIARO has a process in place to follow-up compliance of suppliers' sustainability work. Suppliers may be asked to answer a selfassessment questionnaire regarding their social and environmental performance. ALIARO, or a third party assigned by ALIARO, reserves the right to conduct reviews and/or on-site audits of our suppliers to ensure compliance with this Supplier Sustainability Policy. Supplier agrees to cooperate in order to facilitate such reviews or audits.

More information about ALIARO's values, Code of Conduct and sustainability work can be found at [www.aliaro.com](http://www.aliaro.com) The supplier shall comply with applicable legislative and regulatory requirements.

## **Sustainable Principles for our Suppliers**

The supplier shall comply with applicable legislative and regulatory requirements.

### **Legal Compliance**

ALIARO is committed to complying with all applicable legal requirements. Suppliers are expected to comply with all applicable legal requirements and prevent incidents or conditions that might result in a violation of law.

### **Discrimination and harassment**

Our supplier must provide equal opportunity in employment and we do not tolerate any discrimination or harassment or any type from abuse. No direct or indirect discrimination shall take place based on any professionally non-relevant trait or circumstance, like gender, marital status, age, national or social or ethnic origin, colour, religion and political opinion, disability, sexual orientation, employee representation, property, birth or other status. Any kind of discriminatory behaviour, harassment, bullying or victimization is prohibited.

### **Health & Safety**

The suppliers shall provide a safe and healthy working environment and take all practicable steps to prevent incidents and injuries. Occupational hazards and injuries shall be documented, and necessary measures shall be taken to prevent accidents from reoccurring.

The suppliers shall ensure that all employees are provided with necessary instructions, training, and personal protective equipment free of charge necessary for facilitating safe work methods.

### **Fair Recruitment**

Our supplier must provide equal opportunity in employment and we do not tolerate any discrimination or harassment or any type from abuse when it comes to recruiting new employees. No direct or indirect discrimination shall take place based on any professionally non-relevant trait or circumstance, like gender, marital status, age, national or social or ethnic origin, colour, religion and political opinion, disability, sexual orientation, employee representation, property, birth or other status.

### **Human Rights and Working Conditions**

No person shall be employed who is below the minimum legal age for employment. It is forbidden to use children under the minimum legal working age or fifteen (15) years old; whichever is higher, as labour. Employees under eighteen (18) years of age shall not carry out hazardous work.

The Supplier shall not engage in or support the use of any form of forced, compulsory or illegal labor. Work must take place on a voluntary basis, and personal documents and possessions must not be confiscated in order to force somebody to work.

The Supplier shall apply the working hours according to the laws and regulations in the country where the work is performed.

As a minimum, statutory wages must be paid and applicable working time legislation must be followed.

Employees shall be free to form and join, or not to join, trade unions and to bargain collectively.

No employee shall be discriminated on grounds of their gender, marital or parental status, ethnic or national origin, sexual orientation, religious belief, political affiliation, age, or disability.

## **Use of private or public security forces**

ALIARO expect the supplier to follow the laws and regulations when it comes to protecting their employees and our products and company information.

## **Fair competition and business conduct**

Our relationships with business partners are built upon trust and mutual benefits compliant with competition law. We are dedicated to ethical and fair competition, as we sell products and services based on their quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities, nor will we engage or assist in unlawful boycotts of particular customers. We commit to comply with all applicable trade controls, restrictions, sanctions and import-export embargos.

We do not allow any violence of the fairness of any tendering process in any way. We refrain from damaging competition and the reputation of any business partners and any behaviour that harms competitor's creditability.

We do not hold back maliciously, unlawfully or unduly payments towards our partners, and we do not allow such practices in our supply chain, we fight the unethical practice of "debt chain".

Our staff is responsible for ensuring fair business during their job and adhere to every competition, consumer protection and fair marketing rule. Customers and business partners shall be treated fairly and equally, products and services shall be displayed in a manner that is fair and accurate (fair marketing and advertising), and that discloses all relevant information.

## **Confidentiality, information security, proprietary information and intellectual property**

We are committed to business information confidentiality, integrity and accessibility, we implement proper technical security measures this and it is our staff's obligation to uphold this. It also covers that, no one is entitled to trade with securities while in possession of non-public information or deliver non-public information to others that could have impact on the securities. Every rule ensuring information security must be followed all times.

We respect the property rights of others. We will not acquire or seek to acquire trade secrets or other proprietary or confidential information by improper means. We will not engage in

unauthorized use, copying, distribution or alteration of software or other protected intellectual property.

## **Disclosure of information**

Proprietary information includes all non-public information that might be harmful to the company or its customers, business partners if disclosed to unauthorised parties. All staff must handle any such information as secret.

## **Data protection and data security**

ALIARO expect from the supplier to see all information, data and agreements as strictly secret/confidential and treat this information with respect in their data systems. The data security must be compliant to the level of security needed to protect the data.

## **Renewable energy**

ALIARO are focused on conservation of natural resources and is expecting the supplier to follow this as well. We expect the supplier to use renewable energy and work with energy efficiency according to the laws and regulations for a sustainable environment.

## **Soil quality**

ALIARO do not work with any activities which will impact the soil and we are requesting our suppliers to follow the UN Global Compact and the local legal laws and regulations to protect the nature.

## **Conflict of Interests**

Our suppliers decisions shall be based on objective and fair assessments avoiding the possibility of any improper influence. A "conflict of interest" exists when a supplier employee's personal interest (that can be linked to e.g. friends, family, or customer, competitor, supplier, contractor entity, as well) interferes or potentially interferes with the best interests of ALIARO. Determining whether a conflict of interest exists is not always easy to do, thus anyone with a conflict of interest question should seek advice from management.

## **Bookkeeping, true reporting and financial integrity**

The Supplier's books, records, accounts and financial statements must be maintained in appropriate detail, must truly and properly reflect our transactions. We condemn all forms of money laundering, so we are committed to do business with partners involved in legitimate business activities with funds derived from legitimate sources.

## **Anti-Fraud**

Fraud – the act or intent to cheat, steal, copy deceive or lie – is both unethical and, in most cases, criminal. Fraud in every form, (including e.g. submitting false expense reports; forging or altering financial documents or certifications; misappropriating assets or misusing company property; making any untrue financial or non-financial entry on records or statements) is prohibited

## Counterfeit

Counterfeit - imitation of something valuable with the intention to deceive or defraud. We do not deal with any kind of steal or copy any other parts information, products or solutions and expecting our supplier to do the same. We expect the supplier to respect and follow laws and regulations to make sure that this will not damage ALIARO.

## Responsible Sourcing of Materials and Product Sustainability

We source responsibly and take steps to ensure that materials used in our products do not directly or indirectly provide funding to conflicts or human rights abuses. We expect the same from our suppliers.

We require our suppliers to comply with all applicable laws and regulations regarding ethical material sourcing, including those with respect to raw materials and production processes.

ALIARO recognizes the UN Declaration on the Rights of Indigenous Peoples and the value of Free, Prior and Informed Consent (FPIC) of indigenous peoples for property or land negotiations. No form of land grabbing is allowed.

We expect our suppliers to adopt best practices not only limited to production processes and securing the supply of materials and components, but also addressing environmental, social, and product safety aspects.

## Animal Welfare

ALIARO's commitment to the highest standards for ethical behavior extends to the treatment of animals. We require compliance with all legal requirements, as applicable, and we expect our suppliers to implement industry-leading policies and practices related to the ethical treatment of animals. ALIARO supports and expects its suppliers to promote a belief in the humane treatment of animals, including freedom from thirst and hunger, freedom from discomfort, pain, injury and disease, freedom to express normal behavior, and freedom from fear and distress.

## Environmental Sustainability

Suppliers are expected to align with ALIARO's commitments by developing and implementing their own environmental sustainability program focused on conservation of natural resources, including but not limited to:

- Carbon Reduction
- Energy Efficiency
- Reduced Water Usage
- Air Quality Improvement
- Recyclability and Waste Reduction
- Hazardous Material and Chemical Management and Control
- Protecting Biodiversity
- Employee and Supplier Training

## **Whistleblower protection**

The supplier must encourage their employees to speak up and bring their concerns to light so that problems can be resolved before any harm occurs. The purposes are intended to prevent and detect improper or illegal activities. The supplier is not only encouraged but required to report any violations or suspected integrity violations.

## **Trade compliance (exports, imports and sanctions)**

As a global company, we have policies and procedures in place to comply with applicable international trade rules, by which countries regulate the movement of products, technology, software and technical information across national borders. Violations can lead to criminal prosecution for the companies and individuals responsible, along with bad publicity, delayed shipments or loss of import and export privileges.

## **Resource Efficiency and Energy Consumption**

Supplier shall monitor, track and document its consumption of natural resources such as water and raw materials, as well as sources of energy in order to be able to identify aspects that supplier can control and can influence fostering opportunities for improvement and minimized consumption. Consumption shall be monitored, tracked and documented on both the site and corporate level and provided to the ALIARO Group upon request.

## **Emissions and Waste Management**

Supplier shall monitor, track and document its emissions to air, water and soil from its facilities and transports as well as the wastewater and solid waste generated by its operations in order to be able to identify aspects that Supplier can control and influence fostering opportunities for improvement and minimized emission. All output shall be monitored, tracked and documented on both the site and corporate level and be provided to the ALIARO Group upon request.

Supplier shall monitor, track and document the composition of their packaging material which becomes waste at the ALIARO Group in order to facilitate steps towards circular economy, e.g. utilizing non-complex materials and/or materials for which there are locally established recycling markets available.

## **Security, data protection and proper use of company assets**

The Supplier are responsible for the security, protection and for the economic use of company resources. Our resources, including time, material, equipment and information are provided for legitimate business use only. Occasional personal use is permissible as long as it is lawful, does not affect job performance or disrupts workplace morale.

All staff is obliged to follow appropriate security measures and they should treat company property, whether material or intangible, with respect and shouldn't misuse company assets or use it carelessly.

## Preventing Bribery and Corruption

ALIARO conducts business ethically throughout the world. ALIARO prohibits suppliers from giving or promising to give anything of value to any third party for the purpose of obtaining or retaining business, or to otherwise induce them to act improperly. Suppliers must conduct business with integrity and in full compliance with all applicable laws pertaining to bribery and corruption.

Möndal. 2023-02-10

A handwritten signature in black ink, reading "Mikael Bedemo", is written over a horizontal line.

Mikael Bedemo, CEO