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	Approved by: CEO	Approved: 2024-11-07

# Alimak Group Supplier Code of Conduct

## Introduction

At Alimak Group we are committed to conducting our business in an ethical manner and we support international conventions on human rights, labor conditions, the environment and anti-corruption such as the United Nations Global Compact.

Our global supplier network makes a major contribution to our value creation, and we count on your support to help us reach our sustainability targets in areas such as CO<sub>2</sub> reductions. We also expect all our suppliers to conduct their business in a responsible manner and ensure compliance with applicable laws and regulations as well as with the requirements set forth in this Supplier Code of Conduct.

## Purpose and scope


The purpose of the Alimak Group Supplier Code of Conduct is to define minimum sustainability requirements for all Alimak Group Suppliers, in the areas of:

1. Human Rights and Working Conditions
2. Environment, Health & Safety (“EHS”) Management
3. Business Ethics,
4. Material compliance and responsible minerals, and
5. Responsible Sourcing.

The Supplier Code of Conduct is an integral part of the agreement between the supplier and Alimak Group, and it applies to all suppliers delivering goods and/or services to a company in the Alimak Group.

The term employee used in this document covers everyone working for or on behalf of the supplier, including but not limited to full and part-time employees, consultants, trainees, temporary workers and contractors.

Suppliers are expected to comply with all requirements in this Code of Conduct and compliance is expected both within the supplier’s own operations as well as by its direct suppliers.

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## 1. Human Rights and Working Conditions


Alimak Group expects the supplier to ensure fair labor conditions. In particular, the supplier shall:

- Respect and comply with applicable laws and collective bargaining agreements, if applicable, on **working and resting hours**, including overtime working hours as well as annual sick and parental leave and any other applicable leave regulations.
- **Compensate employees fairly** and follow local wage regulations and collective bargaining agreements.
- Provide its employees with **information about their employment terms and conditions** in a format and language they can easily understand, such as written employment contracts and timely wage statements.
- Respect the rights of employees to **join or not join labor unions, bargain collectively** and join worker’s councils.
- Treat everyone with dignity and respect and refrain from employment **discrimination** based on characteristics such as gender, color, ethnicity, religion, disability, union membership, political affiliation, or sexual orientation.
- Not engage in or tolerate any type of **forced or compulsory labor** and give all employees the choice to leave their employment freely upon reasonable notice.
- Prevent all forms of **child labor** and ensure compliance with all applicable laws and regulations in this area.
- Prevent all forms of **violence and harassment** and ensure compliance with all applicable laws and regulations in this area.
- Provide employees with **relevant training** focused on enhancing their skills and expanding their knowledge.

## 2. Environment, Health & Safety (“EHS”) Management

The supplier shall provide a safe and healthy working environment for its employees and conduct its business in a resource efficient and environmentally sustainable way. In particular, the supplier is expected to:

- Operate an effective **EHS management system** (ISO14001, ISO9001, ISO 45001 or a system equivalent to such ISO standards).
- **Appoint a competent person** to manage EHS programs and improvements.
- Establish appropriate **procedures for the effective management of EHS risks**.

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- Ensure that all employees are sufficiently aware of these risks and **appropriately trained** in the implementation of control measures.
- Continuously strive towards **reducing the environmental footprint** of its production, products, and services.
- Provide transparency regarding **emissions data** as input for Alimak Group's CO<sub>2</sub> calculations.
- Ensure that the water, sanitation and, where applicable, accommodation provided to employees, are clean, safe and meet their basic needs.

### 3. Business Ethics


The supplier shall conduct its business in an ethical manner in accordance with applicable rules and regulations. In particular, the supplier shall:

- Refrain from all forms of **corruption and bribery**.
- Adhere to anti-trust and other **competition laws**, e.g. not participating in price fixing or bid-rigging.
- Adhere to international **trade regulations** and **export control regulations**.
- Disclose to Alimak Group information about potential **conflicts of interest** relating to your activities as an Alimak Supplier, including disclosure of any financial interest an Alimak employee may hold in your business.
- Protect all **confidential information** provided by Alimak Group and its respective business partners.
- Respect the **intellectual property** of others.
- Comply with applicable **data protection** legislation.

### 4. Material compliance and responsible minerals

Suppliers shall ensure that goods provided to Alimak Group comply with requirements covered under the scope of all relevant regulations and conventions. In particular, the supplier shall:


- Ensure that goods supplied to Alimak Group does not contain chemicals and materials prohibited by applicable law.
- Provide, where requested, full material disclosure of materials and substances used in a product that may be regulated in the country of origin or its destination, in accordance with applicable legislation.

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- Exercise due diligence to investigate the source of any conflict minerals (tin, tantalum, tungsten, and gold, collectively referred to as “3TG”) and any other minerals relevant to the scope of your supply to Alimak Group.
- Comply with the latest version of EU’s regulation concerning Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) [\(EC\) 1907/2006](#).
- Comply with the latest version of the Restriction of Hazardous Substances (RoHS) –[Directive 2011/65/EU](#)
- Comply with the latest version of Regulation [\(EU\) No 995/2010](#) laying down the obligations of operators who place timber and timber products on the market.
- Comply with the latest version of EU’s regulation [\(EU\) No 2019/1021](#) on Persistent Organic Pollutants
- Comply with the latest version of EU’s regulation [\(EC\) No 1272/2008](#) on Classification, Labelling and Packaging of substances and mixtures
- Comply with the latest version of the USA [Toxic Substances Control Act](#)

## 5. Responsible Sourcing

The supplier shall procure goods and services in a responsible manner. In particular, the supplier shall ensure that its suppliers adhere to standards comparable to those set forth in Alimak Group’s Supplier Code of Conduct.

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## Implementation and Compliance

Sustainability performance as outlined in this Code of Conduct is part of the supplier selection process. Alimak Group verifies compliance with the above requirements by means of a self-assessment questionnaire and reserves the right to conduct on-site audits at any time. Supplier shall operate honestly and be transparent with facts and data in relation to the requirements in this Code of Conduct. Alimak Group wants to maintain an open dialogue concerning compliance as well as possibilities for improvements in the areas covered by this Code of Conduct. Lack of cooperation in this area may result in a reduction in business and, ultimately, an end to the business relationship with Alimak.

## Report Concerns

Alimak Group strives to achieve transparency and a high level of business ethics. Our whistleblowing channel offers a possibility to alert the organization about suspicions of misconduct in a confidential way. The reporting channel is an important tool for reducing risks and to maintain trust in our operations by enabling us to detect and act on possible misconduct at an early stage. Whistleblowing can be done openly or anonymously.

To report potential breaches of this Code of Conduct or local laws and regulations, please submit a report via this link: <https://report.whistleb.com/en/alimakgroup>.

All received messages will be handled confidentially. The whistleblowing channel is provided by WhistleB, an external service provider. All messages are encrypted. Reporting may be done in 16 different languages.