

\_code**lab**

# SUPPLIER SUSTAINABILITY **POLICY**

**WE KNOW,  
WE CARE,  
WE DO**

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# 1

## SUPPLIER SUSTAINABILITY POLICY

Codelab believes that the way we operate as a company and as individuals is based on our core value to get results right. It drives our customers and business partners to do business with us, our shareholders to invest in us, our external stakeholders to respect us, and the best talent to join us at Codelab.

We believe that strong relationships with our suppliers are the key to ensuring our mutual success. This Supplier Sustainability Policy (the "Policy") sets out our supplier expectations, which must be followed in our business dealings with Codelab.

This Policy applies to any third party that provides Codelab goods or services.

Codelab suppliers and all supplier's own Tier 1 suppliers must comply with the mandatory requirements of this Policy (including identifying risks) in their supply chains and take appropriate action to address them and pass on standards along the supply chain.

## 1.1

### ENVIRONMENTAL RESPONSIBILITY

Codelab expects suppliers to support Codelab's environmental sustainability goals by complying with all applicable environmental laws, rules and regulations while using resources wisely. Codelab puts a strong focus on supplier's involvement in biodiversity, land use and deforestation activities.

Suppliers should comply with or be certified to all applicable environmental management system international standards. (e.g. ISO 14001 or equivalent) including, whenever possible, sustainable

resource management, air, and soil quality prevention activities in place.

Suppliers are expected to align with Codelab'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

#### 1.1.1 Reuse and recycling

Suppliers must implement systematic waste management processes in accordance with applicable law, in particular those resulting from their activities with Codelab, prioritizing reuse and recycling whenever possible to contribute to circular economy.

Wherever possible, suppliers should make an effort to limit the use of single-use plastics in their deliveries to Codelab and inside their operations.

#### 1.1.1 Decarbonization and greenhouse gas emissions

Codelab expects its suppliers to efficiently take part in decarbonization in terms of removal or reduction of carbon dioxide (CO<sub>2</sub>) output into the atmosphere by using alternative energy sources based on green electricity and green molecules (such as biofuels and hydrogen).

Suppliers should take measures to minimize the impact of their activities on climate change, including the entire supply chain. As far as possible, they shall strive to reduce their greenhouse gas emissions by defining reduction targets. They shall also respond to Codelab's requests for information on their greenhouse gas emissions and energy consumption corresponding to the products and services they provide to the latter.

### 1.1.2 Responsible Chemical Management

Suppliers should comply with all laws, regulations and requirements for specific prohibitions and restrictions substances. Hazardous chemicals and other materials contained in products, especially those listed as Substances with a very high-level REACH concerns need to be identified and handled in a way that ensures their safe use, recycling or reuse and disposal.

Their use should be prevented or, if not possible, minimized, e.g., compliance with the provisions of the above regulation. Suppliers are obliged to ensure proper maintenance of electrical and electronic equipment with all relevant EU standards, such as RoHS and REACH, regardless of the country of use, including non-European countries.

### 1.1.3 Animal Welfare

Codelab is committed to the highest standards for ethical behavior extending to the treatment of animals. We require compliance with all applicable legal requirements, and we expect our suppliers to implement industry-leading policies and practices related to the ethical treatment of animals. Codelab 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.

## 1.2

## SOCIAL RESPONSIBILITY

Codelab expects the supplier to comply with applicable legislative and regulatory requirements regarding Labour and Human rights.

### 1.2.1 Health & Safety

Codelab expects suppliers to provide a safe and healthy working environment and will take all possible steps to prevent incidents and injuries. Occupational hazards and injuries should be documented, and the necessary measures must be taken to prevent accidents from reoccurring.

Suppliers will provide all employees with the necessary instructions and training and free personal protective equipment necessary to ensure safe working methods.

### 1.2.2 Working time regulations

Codelab expects supplier to ensure that the working hours are not excessive, and that the maximum working day complies with the domestic legislation and that proper work breaks are applied.

### 1.2.3 Human Rights

Supplier shall not engage in or support the use of any form of forced, coercion, or illegal human trafficking or work. Work must be on a voluntary and personal basis, documents and property cannot be confiscated in order to force someone to work. Human rights must be respected.

### 1.2.4 Women's rights

Codelab expects the supplier to introduce regulations required by law to protect women's rights, in particular regarding equal pay, employment in particularly strenuous and harmful work, and the protection of pregnant women and mothers.

### **1.2.5 Child and adolescent labour**

Codelab expects the supplier not to employ people who have not reached the minimum age for employment. This is exploitation of children under the minimum age of legal employment, or fifteen (15) years is prohibited. Employees under the age of eighteen (18) may not carry out dangerous job.

Supplier should endeavour to protect every child from economic exploitation and from performing any work that is likely to interfere with child's education or otherwise be harmful to a child's development.

### **1.2.6 Rights of minorities and indigenous peoples**

It is important to Codelab that our suppliers work with us to promote, protect and respect the rights, dignity, culture and livelihoods of indigenous people's society.

Therefore, we expect that:

- Suppliers help protect the rights of indigenous peoples as recognized by the home country where indigenous communities are located and respond to societal concerns.
- Supplier processes and operations are informed by social relations and members vulnerable populations in their sphere of influence.
- Suppliers make every effort to ensure that appropriate messages and information are in line with the culture appropriate languages and formats that are accessible and understandable to indigenous people's society.

### **1.2.7 Wages and benefits**

Supplier should guarantee wages sufficient to meet the basic needs of its employees and ensure compliance with applicable laws in the countries where they operate.

Codelab expects supplier to follow at least a minimum, statutory wages.

### **1.2.8 Non-discrimination and harassment**

Codelab expects that no supplier's employee may be discriminated against on the grounds of gender, marital or parental status, ethnic or national origin, sexual orientation, religious beliefs, political affiliation, age or disability.

### **1.2.9 Diversity, equality and social inclusion**

Suppliers should promote diversity and equal opportunity through measures that support work-life balance and integration collectives at risk of exclusion, guaranteeing the same opportunities for all employees.

### **1.2.10 Rights to land, forests and water, as well as evictions**

Codelab assumes that supplier company must be able to assert to reassure the public and markets that it is acting in a manner consistent with rights to land, forests and water, as well as evictions.

## **1.3**

## **GOVERNANCE**

### **1.3.1 Code of Business Conduct and Ethics**

Codelab conducts its business with integrity and in compliance with laws and regulations. A commitment to integrity is critical to how we conduct business and maintain our outstanding reputation in the communities where we do business. Codelab CoC is applied and applied from suppliers and standards of honesty and ethical conduct are issued in all business activities.

### **1.3.2 CSR**

Codelab encourages its suppliers to take part in Codelab's CSR activities and participate in our goal to contribute to the sustainable development of the earth and society.

### **1.3.3 Legal Compliance**

Codelab 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 could result in a violation of the law.

### **1.3.4 Preventing Bribery and Corruption**

All forms of corruption and bribery are unacceptable. Suppliers should combat corruption and bribery in all forms, including but not limited to extortion, fraud, money laundering and facilitation payments.

Codelab prohibits suppliers from giving or promising to give anything of value to third parties to obtain or retain business or otherwise induce them to act improperly. Suppliers must conduct business with integrity and in full compliance with all applicable bribery and corruption laws.

### **1.3.5 Audit and Corrective Action Process**

Codelab reserves the right to conduct audits to ensure compliance with these requirements and to take appropriate action, including termination of any relationship with the supplier, if the supplier breaches this Policy, fails to correct it, or repeatedly violates it. Suppliers are required to cooperate with Codelab's direct audit or through an external audit firm used by Codelab.

### **1.3.6 Conflicts of interest**

Suppliers should enforce a conflict-of-interest policy covering professional or business-related conflicts, such as personal financial interests and outside business activities; personal relationships and public mandate.

### **1.3.7 Freedom of association and collective bargaining**

Codelab expects suppliers' workers to be free to form and join trade unions or not to join them and to bargain collectively.

### **1.3.8 Whistleblowing and protection against retaliation**

Suppliers should encourage employees to report any breaches or suspected breaches of integrity. They should have a whistleblowing policy, creating a safe and confidential environment in which employees can make such reports.

Retaliation against an employee who, in good faith, raises concerns about illegal or unethical conduct with the company cannot be tolerated and should be subject to disciplinary action.

### **1.3.9 Fair competition and antitrust law**

Suppliers should define and conduct their commercial activities in complete autonomy from competitors. Suppliers should not engage in any illegal conduct that include:

- agreements, whether horizontal (between competitors) or vertical (between parties at different levels of the supply chain), consisting of agreements, concerted practices or decisions made by an association firm where two or more firms have a common strategy to limit their autonomous behavior in the market,
- acts of abuse of a dominant position,
- acts of concentration without obtaining a legal permit,
- exchange confidential information with its competitors, except to the extent permitted by applicable law.

### 1.3.10 IPR and plagiarism

Codelab expects supplier to comply with Intellectual Property rights (IPR) that are the rights legally recognized to protect ownership of literary, artistic and scientific discoveries. IPR include patents, copyright, industrial design rights, trademarks, plant variety rights, trade dress, geographical indications, and in some jurisdictions trade secrets.

All services provided to Codelab should not violate any IPR regulations and be free of plagiarism.

## 1.4

## SUPPLY CHAIN RESPONSIBILITY

### 1.4.1 Responsible Sourcing of Materials and Product Sustainability

Codelab requires suppliers to comply with all applicable laws and regulations regarding ethical sourcing of materials, including raw materials and manufacturing processes.

### 1.4.2 Implementation of Sustainability Standards in the Supply Chain

Codelab expects its suppliers to comply with that Policy, including identifying risks in their supply chains and taking appropriate action measures to remedy them.

### 1.4.3 Export controls and economic sanctions

Suppliers should never attempt to mislead or improperly or unlawfully avoid payment of import duties, taxes and fees, and should never engage in activities to circumvent legal requirements for international

traffic and trade. Suppliers should know who they are dealing with and must not engage or facilitate business with entities or individuals expressly prohibited by law. In addition, suppliers should be aware of and comply with restrictions on contacts with entities and individuals located in countries subject to trade embargoes and economic sanctions imposed or applied by the European Union.

### 1.4.4 Data protection and security

All the Codelab specific data, documents and records must be protected, archived and disposed of by the supplier in such a way as to make them inaccessible for third parties. To this effect, an effective management system for information security (Information Security Management System, ISMS) shall be considered (e.g. in compliance with the content of the requirements of ISO 27001).

### 1.4.5 Disclosure

Codelab expects every supplier to sign NDA.

Codelab expects the supplier to keep the Confidential Information received in the course of cooperation strictly confidential and not to disclose it to third parties contrary to the cooperation agreement.

The supplier should agree to limit the use and reproduction of Confidential Information only for the purposes set out in the cooperation agreement and should familiarize such personnel with this Agreement and bind them with their obligations before disclosing Confidential Information to its personnel.

Supplier must avoid unauthorized use, dissemination or disclosure to third parties with the same, at least reasonable, care with which it takes care to protect its own confidential information of a similar nature.

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

Suppliers may be required to employ private security contractors to protect their workers where the government is not capable (due to resourcing or other constraints) of providing adequate police protection. In such circumstances, suppliers must ensure that clear and rigorous operating procedures and terms of engagement are established by private security contractors prior to the conduct of any security operations. Employing private security contractors carries risks including that the private security force violates Codelab's operating procedures or rules of engagement.

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The logo for Codelab, featuring a stylized green and grey graphic followed by the word "codelab" in a lowercase, sans-serif font.