



SUPPLIER CODE OF CONDUCT

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Introduction

'We must always have good stuff,' said Carl Erik Josef Nyberg, the founder of CEJN Group ("CEJN") which still is a third-generation family-owned business operating worldwide. The people working at CEJN are united by five core values: safety, environment, quality, innovation and performance, they are our cornerstones and define who we are, how we work, what we believe in and what we stand for. We are all committed to upholding human rights and ensuring the responsible use of natural resources in collaboration with our business partners. This Supplier Code of Conduct ("Code") establishes the ethical, social, and environmental expectations for our suppliers and aligns with how we want to conduct business.

The Code aligns with international laws and frameworks and reflects CEJN's commitment; including the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the core conventions of ILO, the OECD Guidelines for Multinational Enterprises, the Ten Principles UN Global Compact, UNICEF Children's Rights and Business Principle, the 1.5°C ambition expressed in the Paris Agreement and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas.

When "**shall**" is used, it signifies a mandatory requirement that suppliers must meet and when "**should**" is used, it represents recommended practices that CEJN advises suppliers to follow. The Code applies to (but not limited to) all suppliers and sub-contractors delivering goods and services to CEJN, including their parent, subsidiary, and affiliated entities. We expect that suppliers will distribute these requirements throughout their upstream supply chain and actively work to implement equivalent standards.

CEJN HEAD OF SUPPLY CHAIN



Stefan Larsson



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Supplier responsibility

By dedicating themselves to being part of CEJN's supply chain, suppliers commit to complying with the requirements of this Code and that the business between CEJN and the suppliers shall be based on trust and transparency.

CEJN's suppliers shall uphold a strong due diligence process, supported by effective management systems, and proactively address any risks of violating this Code, including, but not limited to, their facilities and supply chain. Suppliers should be open, honest, and transparent about areas needing improvement and diligent in providing accurate facts and data.

Supplier Management System

Suppliers shall have management systems in place that provide effective routines and open dialogue to oversee the compliance with this Code. Such systems shall be appropriate to the size, complexity, and risk of the Supplier's business activities. At a very minimum, the management system shall include a policy commitment from the Supplier's management, effective due-diligence, risk assessment and responsibilities assigned to relevant personnel to monitor and report on the areas covered by this Code. Such management system shall be continuously assessed and improved by the Supplier.



Compliance

Suppliers shall always comply with the local, national and international laws and regulations. Should this Code contradict applicable law in any country or territory, applicable law takes precedence and prevails. In such cases, CEJN shall be immediately informed, and alternative arrangements will be sought after so that the principles and spirit of this code are followed. CEJN provides a flexible approach, except in cases where national law or regulations violate general ethical and universal principles.

In case legal and regulatory requirements are less strict than the Code, the principles and requirements of this document shall apply. In the event that a requirement is both covered by this Code and by applicable law, the stricter regulation offering the greatest protection and standard shall apply.

Suppliers shall have their own Code of Conduct in place that is in line with the directives and guidelines as CEJN is committed to comply with (stated above).

A prerequisite to be part of CEJN's supply chain is the willingness to take part in our supplier assessments, audits, and reporting to evaluate compliance with the Code. CEJN can verify compliance with the requirements of this Code through self-assessment questionnaires and reserves the right to perform on-site audits at any time, either through CEJN's employees or third parties appointed by CEJN.

Lack of cooperation and diligence, as well as failure to address violations and/or timely implementation of correction actions (CEJN is always open to work jointly with our suppliers to resolve problems) to the requirements of this Code may result in formal warnings with corrective action requirements as increased monitoring and additional audits at the supplier's expense, temporary suspension of orders until compliance is restored and for repeated or severe violations it can lead to termination of the business relationship.

Human Rights, Fair Labor, and Employment Conditions¹

CEJN supports and respects international human rights and strives to ensure that our operations do not cause or contribute to adverse impacts on human rights. Suppliers shall respect all internationally recognized human rights directives and treat all employees and business partners with dignity.

Suppliers shall follow ILO Five Fundamental Principles and Rights at Work:

- freedom of association and the effective recognition of the right to collective bargaining
- the elimination of all forms of forced or compulsory labor
- the effective abolition of child labor
- the elimination of discrimination in respect of employment and occupation; and
- safe and healthy working conditions

Suppliers should have a publicly available policy of their commitment to respect human rights and shall be aware of and be initiative-taking in the respect of the rights of indigenous peoples, ethnic minorities,

¹ For more details OECD GUIDELINES FOR MULTINATIONAL ENTERPRISES ON RESPONSIBLE

BUSINESS CONDUCT, chapter IV. Human Rights and chapter V. Employment and Industrial Relations

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and vulnerable groups, including but not limited to, migrant workers, women, sexual minorities, disabled people, and children, as well as local communities in influence of the Supplier's activities and operations.

Suppliers should conduct human rights due diligence to identify, prevent, mitigate, and account for any negative human rights impact of their own operation and supply chain. The due diligence shall be appropriate to their size, the nature and context of operations and the severity of the risks of adverse human rights impacts and they shall apply and respect the local laws regulating working hours in the countries where they operate.

Freedom of Association²

Suppliers shall have the deepest respect for the rights of the individual and demonstrate good faith and mutual respect when dealing with employees and their representatives in the workplace.

CEJN's suppliers shall respect their employees' right to freely form and to join, or not, trade unions or similar employee representative organizations, and to collective bargaining. The right to organize and bargain collectively shall be possible to perform for the employees without any risk for anti-union discrimination and reprisals.

Employees shall be able to openly communicate with the management to share ideas and concerns regarding working conditions and management practices without fear of retaliation, discrimination, or intimidation. Where local law sets restrictions on the rights of association and collective bargaining, the supplier shall let the employees find other forms of representation, association and collective bargaining.

Forced labor³ and child labor⁴

CEJN doesn't accept forced labor under any circumstances and will not contract or purchase goods from suppliers associated with that. Suppliers shall ensure that they do not engage in any form of forced, bonded, compulsory, trafficked, modern slavery or non-voluntary labour.

Child labor isn't accepted by CEJN, and our suppliers shall strive to eliminate all forms of child labour and to follow the UN Convention on the Rights of the Child. The supplier is not to direct or indirect engage children below the minimum age of fifteen and the she supplier shall also secure that the worst forms of child labour does not occur.

The Supplier shall ensure that legally young workers under 18 years of age do not work overtime or during

nights. The young workers are to be protected against conditions of work that could be harmful for their health, safety, and development. Suppliers should have a child labor policy and have a corrective action plan for child labor.

Non-discrimination and harassment⁵

CEJN do not engage in business with suppliers where discrimination and/or harassment are tolerated, based on and not limited to age, ethnic, social or national origin, skin color, gender, sexual orientation, civil status, religion, political opinions, disability, or for any other reason. Suppliers shall take the initiative in implementing diversity, equity and inclusion in the Supplier's activities and operations.

Suppliers' employees, consultants and subcontractors shall have the right to work in an environment that is free from harassment, bullying, threats, and discrimination.

Health, Safety and Work Environment⁶

CEJN will only engage with business partners who provide their employees with a safe and healthy work environment and follow applicable regulations for their type of operation. The supplier shall have a systematic OHS (Occupational Health and Safety) process and system in order to identify, evaluate, monitor and prevent work-related health and hazard risks. The supplier shall report and follow up accidents, near-accidents and risk observations and ensure that these are reported according to laws and requirements in the country where the supplier is operating. Accidents shall be documented with root cause analysis and actions taken to prevent recurrence and a defined process for following up decided actions should exist as well as evidence of completed actions.



The supplier shall provide the competence development employees need to allow them to complete their tasks in a safe manner without

2 ILO Conventions 87 and 98

3 ILO Conventions 29 and 105

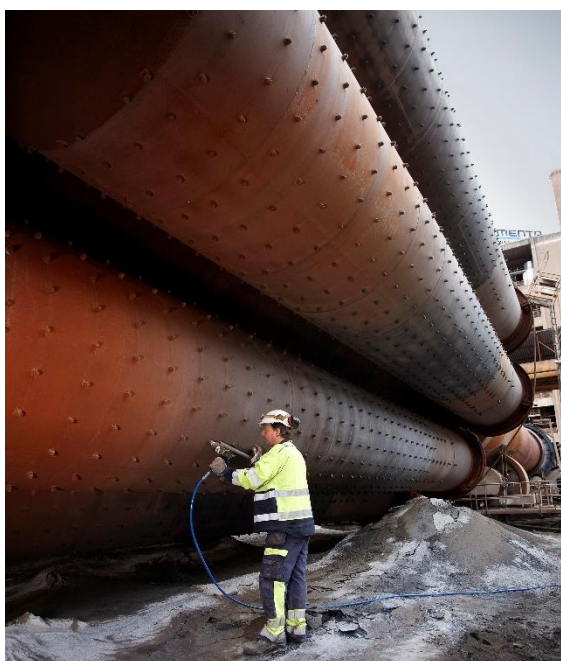
4 ILO Conventions 138 and 182

5 ILO Conventions 100, 111 and 190

6 ILO Conventions 155 and 187

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endangering their health and wellbeing. The supplier shall ensure that their employees get training to manage emergency situations as well as understand the risks associated with their work prior to performing the tasks. If an employee refuses to do their work due to unsafe working conditions this shall be accepted by the management without risks for reprisals and actions are to be taken to secure the working conditions. When an accident happens, first aid and medical assistance must be provided immediately. Employees shall be provided with appropriate personal protective equipment and clothing provided free of charge including access to first-aid supplies.



Suppliers shall have implemented emergency plans, fire safety and emergency response procedures, including notification and evacuation, training, and evacuation drills. Fire safety procedures shall be periodically reviewed and approved by competent authorities.

Employment contracts⁷

Suppliers shall select their employees based on their qualification and skills for the hired position and isn't to discriminate against people based on their age, ethnic, social or national origin, skin color, gender, sexual orientation, civil status, religion, political opinions, disability, or any other reason. For this purpose, the Supplier should have a written routine for the recruitment process that states rules on age verification, screening, and selection of candidates.

Suppliers shall always sign a written contract (in a language understood by the employee) before the employee starts their work or introductory training, whichever comes first. Contracts shall stipulate a

minimum of working hours and zero-hours contracts aren't allowed. The hired person shall always receive a copy of the contract and be able to understand its terms prior to signature. Changes to contracts should be agreed upon by the employee in writing. Employees shall be entitled to all legal social benefits, which at a very minimum shall provide for pension and health benefits. If applicable, workers should be allowed to travel to their home areas at least once a month without affecting their job stability and planned work hours.

Suppliers shall provide accident insurance to all employees, which shall cover full medical treatment for work-related injuries and illnesses. Insurances shall provide compensation for work related injuries and illnesses resulting in permanent disability or death.

Employees shall be entitled to contractual holidays, sick leave, and parental leave at the minimum in accordance with local law. Pregnancy and/or parenthood shall not be considered grounds for termination under any circumstance.

Suppliers shall ensure clean and safe restroom facilities, drinking water, and sanitary food preparation, storage, and eating facilities. If provided, maintain worker dormitories with appropriate emergency exits, access to clean water for drinking and showering, adequate lighting, heating, ventilation, and reasonable personal space. Uniforms, when required, shall be provided in sufficient quantity and free of charge.

Working hours and wages⁸

Suppliers shall make sure that a regular working week for employees does not exceed 48 hours, unless specified circumstances permit temporary exception according to the ILO conventions. The working hours shall not be excessive and must follow applicable laws and regulations. Employees should not be required to work more than 48-hour periods per week and shall be entitled to have at least one day (24 hours of consecutive rest) per six days of work.

Overtime shall always be voluntary and the total working hours should not exceed 60 hours per week and employee. Overtime should not be demanded regularly and should be paid with a premium overtime rate or in accordance with local legislation.

Suppliers shall ensure that wages for a standard working week always meet at least the statutory minimum wage, the prevailing industry wage, or the wage negotiated in collective bargaining agreements, whichever is higher. Any unlawful deductions are prohibited. Wages and benefits should be paid on time, regularly (at least once a month), and

⁷ ILO Conventions 95 and 131

⁸ ILO Conventions 1, 14, 30

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transparently. Employees must be informed about the composition of their wages, including rates, periods, and deductions.

Environmental Requirements⁹

At CEJN we want to conduct our business with a long-term horizon, which means that we intend to create value while constantly seeking opportunities to minimize environmental impact that at least correspond to climate targets that are in line with science.

Suppliers shall have a system for environmental management appropriate to the enterprise size associated with the operations, products and services their full life cycle, including carrying out risk-based assessments for negative environmental impacts. Supplier shall maintain contingency plans for preventing, mitigating, and controlling serious environmental and health damage from their operations, including accidents and emergencies, and mechanisms for immediate reporting to the authorities.

Suppliers should manage environmental violations and complaints with diligence and in a systematic manner, and shall communicate with the affected stakeholders, including the CEJN, if relevant.

Suppliers shall provide adequate education and training to their employees in environmental, health and safety matters, including on the management of hazardous and non-hazardous goods and waste as well as the prevention of environmental accidents.

Suppliers' business activities shall not be conducted in HVC's (High Conservation Value Areas) and shall aim to do the least harm on humans and biodiversity from emissions to land, air, water, and soil, or through noise emissions.

CEJN encourages suppliers to provide ideas and innovative solutions that enable us to reduce negative impacts and maximize positive ones. Suppliers shall identify aspects where they have improvement possibilities, for example prevent water pollution and overconsumption, avoid soil contamination from spills and hazardous waste. Suppliers should continually seek to improve environmental performance, at the level of their own operations and if appropriate upstream in their supply chain.

Greenhouse Gas Emissions and energy efficiency

Suppliers shall reduce water, energy, and raw material consumption, prioritize recycled and sustainable goods and promote circular economy practices (reuse, refurbish, recycle) and the least GHG emitting freight option (e.g., sea and train) and route should be prioritized for the transportation of products or parts when doing business with CEJN.

All emissions (to air, noise, water and soil from facilities and transport) and waste streams shall be monitored, tracked, and documented together with the use consumption of natural resources, such as water, energy, and raw goods. Such information shall be available to CEJN upon reasonable request.



To reach the climate goals the energy efficiency needs to be improved, and fossil fuels need to be replaced with renewable ones, and it can also lead to cost reductions if performed properly. CEJN works proactively by reducing the amount of energy used and urges our suppliers to do the same. Suppliers should set clear goals on renewable energy consumption and aim to phase out fossil fuels.

Suppliers should act for climate mitigation and set GHG (Green House Gas) emission targets that reduce overall emissions according to scopes; 1 direct GHG emissions, 2 indirect GHG emissions and 3 indirect GHG emissions from supply chain up- and down streams, which are in line with the Paris Agreement. This includes shifting to renewable energy, cutting emissions, and protecting natural ecosystems to build a sustainable future.

Responsible sourcing and waste management

CEJN aims to reduce sustainability risks throughout the supply chain. While the extraction of raw goods (such as minerals, metals, forest products, and oil) can generate income, foster growth, and promote prosperity, we recognize the potential negative

⁹ For more details OECD GUIDELINES FOR MULTINATIONAL ENTERPRISES ON RESPONSIBLE BUSINESS CONDUCT, chapter VI. Environment

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impacts on human rights and the risk of fueling conflict. We do not collaborate with suppliers who engage in forced evictions, use private or public security forces, or violate water, land, and forest rights, including the expropriation of land or sites of cultural and ecological significance.

CEJN is committed to ensuring that all raw goods and components used in our supply chain are ethically and responsibly sourced and we comply with: REACH (Regulation for Registration, Evaluation, Authorization and Restriction of Chemicals), RoHS (Restriction of Hazardous Substances in Electrical and Electronic Equipment), POP (Persistent Organic Pollutants), Prop65 (California Proposition 65 List), TSCA (Toxic Substances Control Act), Conflict minerals with the extended list and the restriction of PFAS (Per- and polyfluoroalkyl substances).

Suppliers shall stay updated on relevant chemical regulations applicable to its scope of supply to CEJN to ensure that their products are compliant at any given time and shall declare all items containing Substances of Very High Concern (SVHCs) on the REACH Candidate List above 0,1% (w/w). For our suppliers in EU SCIP IDs shall be provided for all articles containing SVHCs in a concentration above 0,1% (w/w) and for suppliers outside EU we will require specific product information to fulfil the SCIP-registration requirement. Suppliers shall ensure that no ODS' (ozone depleting substances) or HFC's (hydrofluorocarbons) are used in material or components that are supplied to CEJN.

Suppliers shall ensure goods do not contribute to armed conflicts or human rights violations and identify and disclose the use of conflict minerals and minerals on the extended list. Suppliers should follow OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the Conflict Minerals Reporting Template (RMI), and other applicable regulations on conflict minerals. All smelters shall engage with third party audit programs to ensure compliance, and such information shall be available to the CEJN upon request.

Suppliers shall identify potential hazardous substances and chemicals in products, raw goods and articles used in production and work towards reducing the amount. Suppliers shall ensure that they are managed, stored, transported, recycled, and disposed safely. We require that suppliers shall be able to provide declaration of substances used in goods delivered to CEJN.

Suppliers that provide products from forestry (e.g. pallets, packing material) should aim to provide goods from FSC (Forest Stewardship Council) or PEFC (Programme for the Endorsement of Forest

Certification) certified timber or are made of recycled material and be able to show proof of this upon request. Suppliers should monitor and track the composition of their packaging and set targets so that the packaging material (for example wood, cardboard and plastics) that is sent to CEJN can be reused, thereby acting towards a circular economy.



Suppliers shall minimize waste generation and promote recycling, dispose of hazardous waste responsibly in compliance with international agreements. Waste is stored, handled, transported and disposed of in a way that protects the health and safety of people and the environment. No waste is landfilled on site, and the Suppliers aim should be zero waste to landfill. Hazardous and non-hazardous waste shall be kept separate, and waste is not to be incinerated on site, unless for the purpose of recovering energy. Suppliers shall keep updated records on how, where, how much and by whom their waste is treated.

Ethical Business Practices¹⁰

CEJN expects all suppliers to uphold the highest standards of integrity, transparency, and fair business practices. Suppliers shall comply with applicable laws, data protection regulations, and ethical business conduct principles in all business dealings. We will never do business with someone who is likely to harm or jeopardize our brand-name or reputation.

Suppliers should aim to create value that not only focuses on economic gains but is also sustainable in the long term and beneficial for both companies and society. Investment and resource decisions should consider social and environmental impacts. Suppliers must maintain accurate, timely, and relevant compliance information, which should be accessible to CEJN upon request.

Suppliers shall comply with all applicable competition and antitrust laws, including prohibiting price-fixing, bid-rigging, market allocation, and abuse of market

¹⁰ For more details OECD GUIDELINES FOR MULTINATIONAL ENTERPRISES ON RESPONSIBLE

BUSINESS CONDUCT, chapter VII. Combating Bribery and Other Forms of Corruption and X. Competition

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dominance. Avoiding unethical agreements with competitors that restrict fair competition and ensuring sales and marketing activities are conducted transparently and in line with fair competition.

If applicable, suppliers shall verify that the sourcing of parts and raw goods do not contain or make use of counterfeit products or parts. Counterfeit goods contain trademarks that are indistinguishable from those of another product, mimicking them with the purpose of passing themselves as the brand owner. CEJN does not engage in business relationships with suppliers that handle, sale or promote counterfeit goods.

Suppliers shall disclose any potential conflicts of interest that may impact on their relationship with CEJN. This includes business relationships with their customers' employees, shareholders, or board members, commercial interests that could influence decision-making and any situation where personal gain may interfere with business integrity.

Suppliers shall follow export and import control laws, sanction regulations, and trade restrictions issued by competent authorities, including those from the EU, US, or UN, which are applicable to their operations.

Suppliers shall ensure financial transparency and integrity in their business transactions when co-operating with CEJN and all collaborations should be based on long-term value creation and responsibility. Suppliers shall be aware that CEJN will check the suppliers' credit score and finances regularly and that they are to be transparent if there occur any questions due to this.

Anti-bribery and corruption

Suppliers shall comply with applicable anti-corruption laws and is to prohibit bribery, kickbacks, facilitation payments, or any improper advantages to government officials, business partners, or employees and are to ensure that gifts, hospitality, and entertainment not are used to unduly influence business decisions.

Suppliers should implement anti-corruption policies and ensure employees receive training on identifying and reporting corrupt practices. We require our suppliers to disclose details of their corporate structure upon request and our suppliers shall do business in an open and transparent manner to create a long-lasting business relationship.

CEJN doesn't accept the offering, request or acceptance of bribes, extortion or money laundering and encourage our employees to avoid situations where loyalty to the company may come into conflict with other personal interests.

Grievance mechanism (whistle blowing)

Suppliers should have available channels for grievance and remediation to all employees and third parties. Such channels shall allow employees and third parties to raise complaints, concerns, as well as recommendations anonymously without fear of retaliation. Disciplinary measures shall not include mental or physical coercion, including physical punishment, threat of violence, public warnings or punishments, fines, and the removal of contractual benefits. Employees shall be free to seek advice, assistance and a right to appeal decisions.

Suppliers shall inform their employees representatives in writing of CEJN's grievance mechanism and should use CEJN whistleblower channel if they discover any unethical circumstances in the co-operation in theirs and CEJN's business relationship. CEJN's whistleblower mechanism is handled by third party and can be found at our webpage www.cejn.com and through this link [Whistleblower](#)¹¹

Confidentiality and data protection

Suppliers shall respect CEJN's confidential and privileged information and intellectual property rights by protecting against misuse, mishandling, counterfeiting, theft, fraud, or improper disclosure, in accordance with applicable laws and contractual terms with CEJN. Suppliers are required to sign confidentiality agreements, ensuring that all their work, tools, and documents are clearly contracted and legally considered the property of CEJN.



Suppliers shall protect CEJN's confidential information and comply with all relevant data protection laws, such as the GDPR in the EU. They should implement stringent data security measures to safeguard sensitive information, prevent unauthorized access, disclosure, or misuse of confidential data, and ensure that employees sign non-disclosure agreements (NDAs) where necessary.

¹¹ <https://whistleblow.vismadraftit.se/cejn>

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Suppliers shall also have robust physical and cybersecurity measures in place to manage risks and threats. They should adhere to physical and

cybersecurity regulatory requirements, legislation, and establish best practices relevant to their business.

Acknowledgment & Signature

By signing this Supplier Code of Conduct, the supplier acknowledges their commitment to upholding ethical business practices, human rights, environmental sustainability, and legal compliance throughout their supply chain in accordance with this Code.

CEJN may update this Code periodically to reflect changes in for example:

- Legal and regulatory requirements (e.g REACH, RoHS, OECD Guidelines, EU legislation)
- Industry best practices
- Corporate sustainability goals

CEJN is responsible for keeping the Suppliers updated regarding new versions of this document and the latest edition of this Code is always posted on www.cejn.com/guides-support/supplier-center/

.....
Full name of legal entity

.....
Name of authorized representative

.....
Title

.....
Place (City & Country) and Date

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References

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- FSC - Forest Stewardship Council, <https://connect.fsc.org/fsc-public-certificate-search>
- HVC's - High Conservation Value Areas, <https://by.fsc.org/by-en/for-forests/high-conservation-values>
- ILO (International Labour Organization) Conventions, <https://www.ilo.org/international-labour-standards>
- OECD Guidelines for Multinational Enterprises, https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_9789264252479-en.html
- PEFC- Programme for the Endorsement of Forest Certification, <https://www.pefc.org/>
- PFAS - Per- and polyfluoroalkyl substances, <https://echa.europa.eu/-/next-steps-for-pfas-restriction-proposal>
- POP - Persistent Organic Pollutants regulation, <https://www.echa.europa.eu/list-of-substances-subject-to-pops-regulation>
- REACH — Regulation for Registration, Evaluation, Authorization and Restriction of Chemicals, <https://osha.europa.eu/en/themes/dangerous-substances/reach>
- RMI – Responsible Minerals Initiative, <https://www.responsiblemineralsinitiative.org/>
- RoHS - Restriction of Hazardous Substances, https://environment.ec.europa.eu/topics/waste-and-recycling/rohs-directive_en
- The Paris Agreement, <https://unfccc.int/process-and-meetings/the-paris-agreement>
- The United Nations Universal Declaration of Human Rights, <http://www.un.org/en/about-us/universal-declaration-of-human-rights>
- TSCA - Toxic Substances Control Act, <https://www.epa.gov/laws-regulations/summary-toxic-substances-control-act>
- UNICEF Convention on the Rights of the Child, <https://www.unicef.org/child-rights-convention>
- UN Global Compact Ten Principles, <https://unglobalcompact.org/what-is-gc/mission/principles>
- UN Guiding Principles on Business and Human Rights, https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf

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