

GRUNDIUM



SUPPLIER CODE OF CONDUCT

Introduction

At Grundium, we are committed not just to follow all applicable laws and regulations but act honestly and with high ethical standards when conducting our business. This is integrity – doing what is right. Grundium wants to partner with suppliers who are committed to operate their businesses in a similar manner.

Grundium expects all suppliers to adhere with our Supplier Code of Conduct and apply these principles with their own suppliers. Suppliers shall have a management system in place to ensure continual improvement and compliance with these principles. All workers of suppliers should be encouraged to report concerns or non-complying activities without threat of reprisal, intimidation, or harassment. Suppliers shall investigate and take corrective actions if needed. Failing to comply with these standards or failing to correct promptly any non-compliances are taken seriously and will likely to lead to the termination of the business relationship.

Complying with laws and regulations

The supplier shall comply with all applicable laws, rules, and regulations. Where differences exist between local laws, regulations or norms and this code of conduct, the supplier strives to apply whichever sets the highest standard.

Anti-corruption and conflict of interest

The supplier shall have zero tolerance for bribery and corruption. The supplier shall never pay, solicit, or accept bribes or anything of value that can influence decisions. This must be understood broadly and includes for example any payment, discount, loan, political or charitable contribution, reimbursement, gift, meal, entertainment, trip, employment or internship, business opportunity, service, or other benefit, received or given directly or indirectly.

The supplier shall avoid potential conflicts of interest when working with Grundium. Such conflicts, or potential situations leading to a conflict, shall be reported promptly to an independent party at Grundium.

Fair competition and competition laws

The supplier shall comply with all relevant competition and anti-trust laws. The supplier shall not engage in bid rigging, price fixing, allocate markets and will not abuse market power. The supplier shall not discuss prices, costs, profits, and marketing strategies with competitors, or exchange any other information in violation of applicable competitive laws.

Human and labor rights

The supplier shall support and respect the protection of human rights as expressed in the UN Declaration of Human Rights. The supplier shall not use any, or support any use of, child or forced labor and request subcontractors and suppliers to comply with the principles of this policy accordingly.

The supplier strives for fair terms of employment according to applicable laws including minimum wages, overtime, and mandated benefits. The supplier respects the employees' right to create and join unions and negotiate collectively.

Discrimination, equality, and harassment

The supplier shall not allow any discrimination, whether based on age, race, color, nationality, religion, gender, disabilities, sexual orientation, ethnic affiliation, or other similar characteristic. The supplier strives always to offer equal opportunities. No violence, threat or harassments in any form is accepted.

Health and safety

The supplier shall provide a safe and healthy working environment with a goal of zero harm. This means protecting workers from both physical and mental hazards and over exposures by taking all reasonable preventive measures.

Environment and sustainability

The supplier shall comply with relevant environmental laws and consider the lifecycle impacts of their products to both environmental footprints, but also to the environmental footprint of Grundium like other customers and suppliers. Suppliers shall continually find ways to minimize adverse impacts on the environment and use energy and raw materials efficiently. The supplier shall ensure to have systems in place to ensure environmental-friendly management of wastes, emissions, and other hazardous substances.

Trade sanctions and export control

The supplier shall comply with all applicable export control and customs regulations and not to purchase any materials or services from suppliers who are subject to the sanctions imposed by the European Union or the United States, or by any local authorities. Additionally, the supplier shall inform Grundium in advance if any of the material or service sold to Grundium require a license to be exported.

Company assets and data privacy

The supplier shall respect and safeguard Grundium's intellectual property rights, personal data, and other data in accordance with the applicable laws, contracts, and good business practices. The supplier shall ensure its information security level and training of its personnel is adequate to keep all such information confidential and secure.

Conflict minerals

Suppliers of raw materials and components containing tin, tantalum, tungsten, gold (3TG) or cobalt that are part of the direct supply chain of Grundium's product must comply with all applicable laws concerning responsible sourcing and conflict minerals. The suppliers must follow the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas based on their position in the supply chain.