

Code of Conduct for suppliers

Eleda Group



Content

1	Introduction.....	3
2	Foundation for the Code of Conduct for suppliers	3
3	Eleda's principles and values	3
4	Business ethics and anti-corruption	3
5	Human rights	4
6	Employees.....	4
7	Environment and sustainability	5
8	Compliance and reporting of violations	5
9	Updates.....	5

1. Introduction

The Eleda Group's Code of Conduct for suppliers describes the expectations and requirements that Eleda Group (hereinafter Eleda) has for its partners, suppliers, contractors, and consultants at all levels (collectively suppliers).

By entering into agreements with companies within Eleda, the supplier commits to following this Code of Conduct for suppliers and communicating corresponding requirements to their subcontractors.

The business relationship may be terminated if the supplier does not comply with the code. In cases of repeated or severe code violations or deliberate withholding of important information, the business cooperation will be terminated per the agreed termination grounds.

The Code of Conduct is posted on Eleda's website.

2. Foundation for the Code of Conduct for suppliers

The Code of Conduct is based on Eleda's values and builds on the UN Global Compact, <https://unglobalcompact.org/> and its ten principles in the following areas:

- Human rights
- Labor rights
- Environment
- Anti-corruption

The Code of Conduct is also based on recognized standards, such as the International Declaration of Human Rights, the International Labor Organization (ILO) conventions, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises on responsible business conduct.

3. Eleda's principles and values

Commitment - A genuine commitment to colleagues, customers, and other stakeholders.

Community - A community that generates an open and inclusive environment where the aim is for everyone to thrive.

Respect - We show respect for colleagues and customers, and are careful with the resources we use.

4. Business ethics and anti-corruption

Eleda accepts no form of corruption

Eleda's suppliers must always comply with the laws, regulations, and ordinances that apply in the markets where they operate or offer services to Eleda.

Eleda does not accept cash payments for services performed for customers and does not pay cash to its suppliers.

Eleda tolerates no form of corruption, bribery, or extortion. This means, among other things, that Eleda's suppliers must:

- Compete honestly and ethically within the framework of applicable competition laws.
- Conduct business in an ethically correct manner, not offer bribes, hidden commissions, or other illegal or unethical benefits for personal gain or to relatives.
- Any gifts and representation must be easily linked to the business relationship.
- Report business activities, financial situation, and results in accordance with applicable laws and regulations.
- Do not accept or put themselves in situations with a risk of money laundering.
- Protect confidential information obtained from Eleda and use information related to Eleda's operations only as intended.

5. Human rights

Work environment, health and safety

For Eleda, safety, health, and work environment are highly prioritized areas, and Eleda expects its suppliers to act responsibly, systematically, and preventively to continuously improve the work environment and health in their own work.

Suppliers within raw material extraction of risk products, such as natural stone, paving stone, and minerals, must ensure that they comply with applicable laws.

The supplier must provide a safe and healthy work environment that complies with applicable laws and requirements.

The supplier must identify the risks within their own operations and in the supply chain regarding the work environment and work to prevent accidents, injuries, and illness. This includes both physical and psychosocial risks.

Each employee is obliged to stop risky work and report risks, incidents, and accidents that are noticed or occur at Eleda's workplaces in Eleda's deviation management system for the work environment without delay.

Everyone working for the supplier must have relevant competence and training to perform the work safely, have appropriate protective equipment, and be aware of any health risks that the work may entail.

Suppliers working at Eleda workplaces must have valid accident, all-risk, and liability insurance.

No work may be performed under the influence of alcohol or drugs, persons under the influence of alcohol or drugs may not be present at the workplace and must be removed.

Eleda's suppliers are expected to support and respect internationally recognized human rights and not cooperate with companies that do not fully respect these rights. Violations of these rights must never occur.

Forced and Child Labor

Eleda does not accept any form of forced labour or human trafficking. Work must be voluntary without threats or punishment, and employees must be free to leave the workplace after completing their shift. They must also be free to leave their employment after reasonable notice according to national laws or agreements, and they must not be forced to deposit identity documents or money with their employer.

Eleda's suppliers must combat all forms of child labour and, under no circumstances, employ children below the statutory minimum age for employment or the age for completed compulsory education in the country. Eleda's suppliers must not employ workers under 18 years of age to perform work that is defined as dangerous in national law.

Freedom of Association

Eleda only accepts suppliers who respect freedom of association and employees' right to organize themselves in trade unions and negotiate collectively. Workers must be able to exercise these rights without fear of punishment or threats, and discrimination against union members is not accepted.

6. Employees

Employment conditions

Eleda's suppliers must ensure reasonable employment conditions, which must reflect working hours, salary, overtime compensation, and notice period. Working hours, salary, and other compensation must comply with national laws and applicable collective agreements.

Integrity and GDPR

As stated on its website, Eleda has implemented procedures to ensure that the processing of personal data is carried out in accordance with applicable laws. Eleda's suppliers are also required to have processes and procedures in place to guarantee the legal handling of personal data.

Equality, diversity, and equal treatment

Eleda promotes equality and diversity and does not accept any form of offensive treatment regardless of gender, gender identity or expression, ethnic origin, religion or other belief, disability, sexual orientation, or age. Eleda's

suppliers are expected to treat their employees and partners with respect and attentiveness and do not accept any form of harassment, discrimination, bullying, psychological or physical punishment.

7. Environment and sustainability

Eleda works preventively and throughout the organization for minimal environmental impact, therefore we expect the supplier to:

- Enable efficient use of resources and reduction of all types of harmful substances, focusing on climate, energy, materials, and waste.
- Have a proactive approach for continuous improvement of the supplier's environmental work, including the development of the products or services they provide.
- In our joint projects, contribute ideas that can lead to increased sustainability.
- Incidents concerning the environment must be reported, investigated, and addressed.

8. Compliance and reporting of violations

The code must be complied with

Eleda's suppliers must annually check compliance with this Code of Conduct by continuously documenting compliance and providing Eleda with information upon request, and allowing audits to be carried out by Eleda or an appointed third party if Eleda deems it necessary. If the result of such an audit shows that a supplier does not meet Eleda's Code of Conduct, necessary corrective actions must be taken immediately, if this does not happen, Eleda has the right to take necessary actions or terminate the supplier's assignment.

Reporting of irregularities

In case of suspicion of violations of the code, environmental or HR policy, report to the nearest contact within Eleda. Alternatively, you can report anonymously via the whistleblower system at <https://eledawhistleblowing.hwrs.se>. An independent party handles your information confidentially.

Violations can lead to warnings, terminations, or prosecution. Reporting is done within fourteen days. Eleda prohibits punishment for reporting suspicions of rule violations.

Suppliers must check that their value chain follow the same principles as in this code.

9. Updates

Eleda's Code of Conduct for suppliers is updated when needed; the person responsible for keeping the code up to date is Eleda's purchasing manager.