

Company name	Name of document	
Eways AB	Code of Conduct for Eways' Suppliers	
	Date	Version
	2023-02-01	1.2
	Confirmed by Niclas Sahlgren	

Eways' Supplier Code of Conduct sets out key principles and rules to ensure that our suppliers adhere to responsible social, environmental, economic, and ethical rules throughout their operations.

The aim of the Code of Conduct is to support trustful relations between Eways and suppliers. It will support suppliers in understanding Eways' requirements and expectations for respectful and fair behavior throughout the supply chain, including subcontractors, employees and customers.

The Code of Conduct applies to all those involved in Eways' supply chain, whether they are public authorities, public organizations or subcontractors. The supplier undertakes to comply with laws and other applicable requirements and obligations, and to comply with agreements entered into. This applies at all stages and in all countries where the supplier operates.

### **Corruption and Competition Law**

In contacts with customers, suppliers, authorities and public organizations, the interests of the company and the private interests of its employees must be kept strictly separate. Decisions on actions and purchases should not be influenced by matters not directly related to the business. The supplier shall comply with anti-corruption legislation. This means that it is forbidden for the supplier's management, directors and employees to demand, offer, give or receive benefits, in order to influence the business relationship. This also applies to the supplier's employees, relatives, public officials or any other third party. Examples of benefits are gifts, payments, invitations and favors.

The general prohibition does not apply to gifts and entertainment that fall within the scope of normal business practice, convention and courtesy.

The supplier shall comply with applicable laws relating to the protection and promotion of business competition and the regulation of business competition. The supplier shall avoid collusion with competitors and other behavior aimed at influencing prices or conditions or inhibiting open competition.



## **Human Rights and Fair Treatment**

The supplier shall respect and comply with all applicable human rights and labor laws of the country in which the Supplier operates. Eways expects the supplier to actively promote and monitor subcontractors' compliance with these requirements.

#### Discrimination

Eways is committed through its Code of Conduct to treating employees with respect and dignity, in the workplace and in employment and working practices. No form of discrimination, harassment or abuse is accepted by Eways and we expect our suppliers to act in the same way. No form of unfair treatment, for example on the basis of gender, gender identity or expression, ethnicity, religion or belief, disability, sexual orientation or age, is permitted.

## Wages and Working Time

The supplier shall ensure compliance with applicable laws and mandatory industry standards regarding wages and working conditions. Employees' salaries shall be paid on time and in accordance with the applicable national legal standard or industry standard.

All employees shall be provided with written information on their terms of employment, wages and how they are paid. Deductions from wages as a disciplinary measure shall not be made without the consent of the employee.

## Freedom of Association

The supplier shall allow employees to form or join an association or trade union in accordance with applicable laws. Employees shall be allowed to engage in such functions or activities at the workplace without discrimination.

Forced and Child Labour, Human Trafficking and Inhuman Treatment
No form of forced labor or child labor is allowed. The minimum age for access to
employment shall be respected by suppliers and subcontractors.

The supplier shall ensure that no form of work under threat of sanctions or penalties occurs. There shall also be no deposits, recruitment fees or financial guarantees that lead to anyone being put in debt. In the event of employment, written documentation shall be provided containing information on working hours, pay and notice periods.

No form of verbal or physical abuse, threats, sexual abuse, harassment or intimidation of workers will be tolerated.



Eways expects our suppliers to take steps to ensure that they comply with standards applicable to anti-slavery and human trafficking laws. This also applies to subcontractors.

For example, it is not permitted to

- retain any identity documents (passport, ID card, etc.).
- use any form of indebtedness linked to employment, where the employee pays recruitment fees, fines or is otherwise put in debt.
- prevent the employee from leaving with reasonable notice.
- preventing employees from leaving the workplace after completing a shift.

#### **Prohibitions and Sanctions**

Guidelines on prohibitions and requirements for sanctions must be followed. Neither Eways nor our business partners shall be influenced by, or associated with, any person for whom the following sanctions have been imposed:

- Trade sanctions, arms embargoes and other trade restrictions.
- Financial sanctions, freezing of assets.
- Immigration sanctions (travel ban).
- Air and maritime sanctions, deregistration or control of air and maritime movements.

## **Health and Safety**

The supplier shall comply with applicable national laws, regulations and rules to ensure the protection of workers in the workplace. Procedures shall be in place to prevent and minimize health and safety risks and accidents.

The health and safety of employees must be protected in the following ways:

- Ensure working conditions that are safe, hygienic and healthy. Examples of
  actions include personal protective equipment, clean toilets and drinking water,
  food storage facilities, emergency medical care, equipment and emergency
  exits.
- Take and evaluate relevant measures to prevent and minimize injuries.
- Document and follow up accidents and incidents in order to avoid their recurrence.
- If applicable, conduct and document regular health and safety training for employees.
- Comply with health and safety requirements and require subcontractors to do the same.
- If accommodation is provided by the supplier, it should be clean and safe.



# **Social and Environmental Responsibility**

The supplier is expected to maintain public confidence and protect Eways' reputation by taking active social responsibility and avoiding actions or omissions that may diminish trust.

The supplier must comply with laws adopted to protect the environment and ensure that they are enforced. The supplier is also expected to have a developed environmental work with guidelines, targets, reporting and management systems to minimize negative environmental impact.

## **Data Privacy and Security**

Suppliers are obliged to protect the privacy of individuals, the security of Eways and our customers, confidential assets, and information. Personal data provided by Eways or on behalf of Eways may only be used in accordance with the applicable contract and applicable law. Suppliers must ensure that there is a process in place to protect data and personal information.

Suppliers must commit their employees to protect trade and company secrets. It is prohibited to disclose or provide access to confidential information without proper authorization or if the information is already publicly available.

## **Supplier's responsibility to communicate the Code of Conduct**

Eways expects the supplier to make use of available legal tools, such as a whistleblower function, to provide the opportunity to raise an alarm about irregularities. All known or suspected breaches of the Code of Conduct must be reported immediately to Eways.

The supplier is expected to inform its subcontractors about this Code of Conduct for Suppliers.

Where permitted by law, Eways will treat reported breaches as confidential. In cases where violations are discovered, Eways may allow the supplier to take corrective action. If a breach violates the law, Eways reserves the right to terminate the relationship with the supplier.

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By signing, I confirm that I, as the authorized representative of the company named below, have read and accept the terms and principles of the Eways Supplier Code of Conduct.

Date:	Date:
Supplier signature	Niclas Sahlgren Signature
Name clarification (not for digital signature)	Name clarification (not for digital signature)
Position (authorized representative of the company):	Position (authorized representative of the company): CEO
Company name:	Eways AB