

S:t Eriks Supplier Code of Conduct

INTRODUCTION

S:t Eriks is Sweden's leading supplier of prefabricated concrete products. We operate ten production sites and sell our products to both business-to-business customers as well as private consumers. S:t Eriks is since 2018 owned by Volati AB. We at S:t Eriks are fully committed to ensuring that we, together with our suppliers and business partners, do the best we can to comply with national and international legislation, sustainability standards and norms.

BASIS FOR THE CODE

This Supplier code of conduct (Scoc) sets out minimum requirements that we at S:t Eriks expect our suppliers and business partners to adhere to. The code is based on the ten principles of the UN Global compact and its underlying conventions and declarations. Suppliers and business partners shall always follow national legislation and, when applicable, also follow legislation with a wide territorial scope, such as the UK Slavery Act, UK bribery Act and the Foreign corrupt Practices Act (FcPA). If national regulations set out a more stringent position than the principles in this code, such regulations shall prevail.

SCOPE

This Scoc applies to all suppliers, sub-contractors and business partners (the supplier/suppliers), providing products/and or services to S:t Eriks. The code also applies to their employees and consultants, whether permanently employed, temporarily contracted, directly employed or supervised (employees). All suppliers and employees must comply with the requirements set out in this code and distribute the requirements to suppliers throughout the supply chain. If requested, suppliers shall inform S:t Eriks of subcontractors used for products and services delivered to S:t Eriks.

ADDITIONAL INFORMATION

Suppliers shall, if requested, participate in self-assessments and cooperate during site visits and audits arranged by S:t Eriks and performed by third-parties. If deviations towards the principles set out in this code are identified, the supplier shall provide a corrective action plan to be approved by S:t Eriks.

Suppliers are obligated to inform S:t Eriks if any breaches, or suspected breaches, towards the principles set out in this Scoc are found. Such information shall not be used against the supplier if acting in good faith. Any violations or breaches shall be reported to the supplier's contact person at S:t Eriks. Any material breach towards the principles in this code gives S:t Eriks the right to immediately terminate an agreement with the supplier.

Human Rights

FUNDAMENTAL HUMAN RIGHTS

Supplier shall protect fundamental human rights and treat all employees with dignity and respect.

CHILD LABOUR

No person below the minimum legal age of employment in the country of operation shall be allowed to work, directly or indirectly, with suppliers associated with S:t Eriks. Only people above the age of 18 (eighteen) years old and above the age of completing compulsory education shall be employed. Adequate transitional economic assistance and appropriate educational opportunities shall be paid by the supplier to replace any child workers found working for the supplier. Young workers, below the age of eighteen, are not allowed to carry out hazardous work, heavy work or work night shifts. The working hours of apprentices shall not interfere with school or replace spare time.

FORCED AND BONDED LABOUR

All forms of involuntary or bonded labour is strictly forbidden. Employees shall not be required to lodge deposits or identity papers with their employer or agent upon or during their employment. Employees shall be able to move around freely in the workplace facilities and have the opportunity of leaving the premises outside of working hours.

FREEDOM OF EXPRESSION AND RIGHT TO PRIVACY

Employees and stakeholders right to privacy and freedom of expression shall be respected.

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

All employees shall be allowed to organise, join or not to join, a trade union or employee representative organisation of their choice. The employees shall also have the right to bargain collectively.

HARASSMENTS AND ABUSE

All forms of harassment, abuse and corporal punishment are strictly prohibited. Nobody shall be subject to physical punishment, unlawful detentions, physical, sexual, psychological or verbal harassment or abuse. Deductions from wages as a disciplinary action is not permitted.

DISCRIMINATION

Discrimination is prohibited, regardless of grounds and specifically on ethnicity, gender, sexual orientation, marital, social or parental status, religion, political views, nationality, disability, age or

union affiliation. Diversity and equality shall be promoted, e.g. in recruitment and promotion processes, remuneration programs and parental leave.

GRIEVANCE MECHANISM

Suppliers shall ensure that there is an appropriate grievance mechanism, e.g. suggestion box or computer-based form, through which employees are able to voice concerns anonymously without the fear of punishment or retribution.

CONFLICT MINERALS

Suppliers that deliver products containing tin, tantalum, tungsten and/or gold to S:t Eriks must have a clear policy in place and undertake supply chain due diligence to identify and mitigate the risk of the minerals financing conflicts and contributing to human rights abuses.

Labour Rights

EMPLOYMENT CONTRACTS

All employees, directly or indirectly employed, whether on a permanent or temporary contract basis, are entitled to written employment contracts in a language understandable to the employee. The contract shall at a minimum state; working hours, overtime compensation, salary, frequency of payment and notice period.

WAGES

Employees shall be paid fair wages that can at least meet the basic needs. If the minimum wage isn't deemed to cover basic needs, a living wage should be applied by calculating a salary level that is enough to cover basic needs and some discretionary income.

WORKING HOURS

A normal working week shall not exceed 48 hours. Overtime shall never exceed 12 hours per week, and shall not occur on a regular basis unless regulated otherwise in a collective bargaining agreement. Overtime shall always be voluntary and compensated at a premium rate. Employees are entitled to at least one day off in every seven-day period.

HEALTH AND SAFETY

Suppliers are responsible for ensuring the safety of all employees. ISO 45001 certification or similar standard is preferred. If such management system is not applied, the supplier shall take adequate measures for preventing physical and psychosocial illnesses. Clear workplace instructions shall be established, distributed and communicated to employees in a language they understand and be

regularly updated. Health and safety training, including but not limited to; fire safety, correct handling of chemicals and machinery, emergency preparedness and first aid shall be conducted on a regular basis. Suppliers shall also provide adequate personal protective equipment (PPE), such as helmets, ear covers and facemasks, to employees free of charge.

ACCIDENTS AND INJURIES

Accidents and injuries shall be documented and reported to the management team and records shall be kept for five years. Measures shall thereafter be taken to prevent accidents from reoccurring. Employees shall go through regular health checks to evaluate any hazards or long-term injuries associated with work tasks, such as medical checks shall be provided at the supplier's expense.

WORKING ENVIRONMENT

Suppliers shall provide a safe and sanitary working environment with adequate ventilation and controlled noise, dust, temperature and humidity. All employees shall have access to basic amenities such as drinking water, clean and lockable toilets, resting areas and a sanitary place for food storage. If work wear is needed, gender separated changing rooms shall be provided.

If housing is provided by the supplier, dormitories shall live up to the same standard as work facilities and be clean, safe and fit for purpose.

Environment

PRECAUTIONARY APPROACH

The supplier shall apply a precautionary approach through an environmental perspective and strive to reduce negative impact on the environment through all its operations.

ENERGY AND EMISSIONS

To minimise greenhouse gas emissions, suppliers shall reduce their energy consumption and prioritize energy from renewable sources. Greenhouse gas emissions shall be monitored, and reduction targets shall be set.

RESOURCES AND WASTE

Waste shall be kept at a minimum and suppliers shall strive to reduce, reuse and recycle material and water as much as possible. All resources shall be handled with responsibility to minimise emissions, effluents, pollutions and waste. Water and energy shall be used respectfully in areas with scarce resources.

TRANSPORTATION AND TECHNOLOGY

Rail transports shall be used whenever possible and road and sea transports shall be prioritized over airfreight. Suppliers shall strive to use fuel-efficient vehicles and environmentally friendly fuels for all transports. Suppliers shall prioritize and promote the use of environmentally friendly technologies and strive to choose transportation services and machinery with the least environmental impact.

Anti-Corruption

ANTI-CORRUPTION

All forms of corruption, including but not limited to bribery, extortion, fraud, money laundering and facilitation payments, is strictly prohibited. We expect all our suppliers to conduct business according to highest ethical standards and show transparency regarding e.g. competition laws, tax payments and data protection. Suppliers shall follow national and international regulations and be committed to detecting, preventing and tackling corruption. This includes having adequate anti-corruption policies and procedures in place.

BRIBERY

Nobody shall directly or indirectly ask for, give or accept a gift, payment or undue advantage for personal gain or as an intention to influence a business transaction.

CONFLICT OF INTEREST

The suppliers shall comply with international regulations and anti-trust laws to protect customers from unfair business arrangements. Fair competition and free markets shall be respected and business decisions shall not be made to obtain a personal or business advantage.

GIFTS AND HOSPITALITY

Receiving or giving of gifts is permitted if the gift can only be seen as a gesture of hospitality, e.g. a representational meal. If the supplier is unsure about the value or intention of a gift, it should be discussed and decided upon internally by the management team.

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