

# SUPPLIER CODE OF CONDUCT

Corporate Compliance Program



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# **Code statement**

We only collaborate with Suppliers and Partners who share our commitment to ethical, social, and environmental responsibility, ensuring compliance with all applicable laws and regulations in the regions where we operate.

We commit to upholding human rights, ensuring non-discriminatory and fair treatment in the workplace, and prohibiting forced labor, child labor, and any form of exploitation across our supply chain.

We aim to promote a safe and healthy work environment by encouraging Suppliers to adopt occupational health and safety management systems and continuously improve safety measures.

We commit to supporting environmental sustainability, urging Suppliers to improve energy efficiency and responsibly manage waste and hazardous materials.



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President and CEO of Consilium Safety Group

Adopted November 10, 2024



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# **Supplier Code of Conduct**

### 1. Purpose

Consilium Safety Group (hereinafter "Consilium Safety Group" or "Consilium) is a global leader in safety and safety-related technologies, within fire and gas detection, for the marine, energy, oil and gas, transport and building sectors. Based on more than 50 years of experience and continuous research within the field, Consilium Safety Group offers state of the art fire and gas safety solutions for marine, building, transport and oil & gas applications. Our goal is to protect lives, assets and the environment.

Consilium Safety Group believes in a transparent and collaborative approach to business and sees shared responsibility in achieving successful and responsible business. The following Supplier Code of Conduct ("Code of Conduct" or the "Code") comprises standards on how Consilium Safety Group conducts socially, ethically and environmentally responsible business. The Code of Conduct is aligned with Consilium's core values, I take responsibility, I take initiative, We deliver and One Global Team. The Code of Conduct is based on internationally agreed regulations and standards on various areas.

### 2. Scope

The purpose of this Code of Conduct is to define minimum requirements and aspirations for all persons that deliver goods and/or services to any entity of the Consilium Safety Group, including their parent, subsidiary or affiliate entities as well as their respective employees and agents (hereinafter individually and collectively referred to as "Suppliers") and other business partners, *i.e.* agents, distributors, subcontractors, *etc.* (hereinafter individually and collectively referred to as "Partners").

All Suppliers and Partners are expected to see, approve and work actively to adhere to the standards and principles set in the Code. Consilium reserves the right to refrain from engaging in cooperation with suppliers and partners who do not sign or comply with the Code.

# 3. Roles and responsibilities

### **Employees**

- All employees are responsible for adhering to this Policy and upholding ethical business practices in their daily work. They are expected to:
  - Act in accordance with the policy guidelines.
  - Report any violations or concerns through appropriate channels.
  - Participate in required training to stay updated on policy changes.

### Managers

Managers are expected to lead by example and ensure compliance within their teams. They are responsible for:

- Acting as role models by demonstrating adherence to the policy.
- Ensuring their team members understand and comply with the policy.
- Taking proactive steps to address policy breaches or issues.
- Providing guidance to employees on how to follow the policy.



### **CEO**

The CEO has ultimate responsibility for the effective implementation and oversight of this Policy. The CEO's responsibilities include:

- Ensuring the necessary resources and support are available for compliance.
- Approving and reviewing policy changes.
- Overseeing the enforcement of the policy throughout the organization.

### 4. Policy principles

### 4.1. Compliance with Applicable Law

Consilium Safety Group expects all Suppliers and Partners, as us, to follow all applicable local, national, and international laws, and regulations in the regions they operate, which can include:

- Restriction of Hazardous Substances in Electrical and Electronic Equipment (RoHS)
- Registration, Evaluation, Authorisation, and Restriction of Chemicals (REACH)
- Waste of Electrical and Electronic Equipment (WEEE)

or similar laws and regulations.

Legislation shall be applied should differences exists between customs, norms, laws and/or regulations and the following requirements set in this Code of Conduct.

### 4.2. Human Rights and Labor

The term "workers" refers to all types of employments (*e.g.* contract employment and temporary employment including consultants, agency staff, trainees *etc.*).

### Non-discrimination

The Supplier or Partner shall keep a workplace free from all forms of discrimination based on race, color, age, sex, gender identity or expression, sexual orientation, ethnicity, disability (intellectual, physical and mental), religion, political affiliation, union membership, national origin, marital status or other. Consilium Safety Group does not accept discrimination of any kind in connection to access to employment, remuneration, promotions, job assignments, benefits, and/or termination.

### Fair treatment

Workers shall be treated equally, fairly, with dignity and respect and enjoy a good working environment. The workplace must be free from all forms of harassment, threats and inhumane treatment including sexual harassment, sexual abuse, corporal punishment, verbal abuse or unreasonable restrictions when entering or exiting the facilities. The Suppliers are urged to have policies and procedures to support these requirements, clearly communicated to workers.

### Prohibition of forced, compulsory or any form of involuntary labor

Suppliers or Partners shall not tolerate any form of forced labor and will be required to take steps to verify, evaluate and address the risks of forced labor and human trafficking amongst



their staff and supply chains. Suppliers shall not tolerate acts such as the lodging of deposits or the retention of identity documents, the withholding of any part of an employee or worker's salary, benefits, property or documents in order to force those employees or workers to continue to provide services to the Supplier. Suppliers shall have in place their own policies and procedures in order to ensure that the risk of forced labor and human trafficking is reduced as far as possible. Consilium Safety Group expects Suppliers to illustrate the steps that they take to identify key areas of vulnerability and risk, in relation to forced labor and human trafficking.

### Prohibition of child labor

Child labor is a violation of human rights. Consilium Safety Group is strictly against child labor and other forms of exploitation of children. Under no circumstances shall the Supplier employee or use child labor. According to the ILO Convention no. 138, the definition of a child is a person younger than 15 years of age, unless local laws stipulate a higher age for employment or compulsory education.

Consilium Safety Group also expects Suppliers to respect all legal aspects and limitations in employment of persons below the age of 18 years. Young workers shall be protected from being economically exploited, and performing work likely to be hazardous or to be harmful to the child's health or mental, physical, moral, or social development. Under no circumstances shall a juvenile worker's employment interfere with its education.

Consilium Safety Group urges our Suppliers to assess the risks of child labor in its entire supply chain. If the Supplier identifies child labor, or other forms of mistreatment against young workers, structured action plans must be immediately established and communicated to Consilium. The measures taken must ensure the best interest of the child, to secure that the child will not be transferred to another Supplier.

### Freedom of association and collective bargaining

The Supplier shall respect the workers right to freely form, join, and associate with a workers organization of their own choice, seek representation, and bargain collectively in accordance with applicable laws and regulation. The workers right to freely participate in activities of the above sort, and openly communicate these shall be encouraged. Enjoying these rights shall under no circumstances result in any reprimands from management.

### Worker contracts, work hours and wages

Our aspiration is that every worker shall have a written and signed contract, stating the terms of employment in accordance with local laws. Contracts shall be written in a language understood by the worker, and include all essential information such as salary, working hours, overtime compensation, benefits and notice.

Overtime work shall be in accordance with national legislation.

The payment of wages shall be in accordance with national legislation on minimum wages and be paid in a timely manner. Consilium Safety Group encourages the Supplier to provide compensation to the worker if the legal minimum wage is not considered to cover a person's basic needs.

Deductions from wages as a disciplinary measure shall not be permitted.



### 4.3. Health and Safety

Suppliers shall comply with all applicable laws and regulations relating to health and safety issues. Consilium also urge the supplier to have an occupational health and safety management systems according to ISO45001 or similar. All Suppliers shall have, as a minimum, an occupational health and safety policy and targets with the purpose to continuously improve.

### Injury prevention and safety procedures and systems

Suppliers shall provide a work environment that is safe and healthy, and continuously work to prevent potential risks of accidents, injury or health hazards exposed to workers. Personal protective equipment shall be provided to workers, kept available and workers shall be educated in both the importance and usage of these.

The Suppliers shall also continuously work to update safety procedures and inform workers on how to keep themselves away from risks. Suppliers are urged to uphold systems to manage, track and report occupational accidents and incidents, injuries and illnesses. Systems shall follow up on accidents and incidents, and corrective actions implemented due to safety flaws. In the unlikely event of an accident the workers shall receive proper and necessary medical treatment.

### Emergency preparedness and response

Suppliers shall identify and assess emergency events and minimize their impact by implementing emergency plans and response procedures. Training, drills and exercises for emergency response shall be held regularly for the workers. Emergency equipment for fire safety and first aid, emergency exits, routes and maps shall be visible as well as adequately and clearly marked.

### Handling of chemicals and hazardous materials

Hazardous materials and chemicals shall be handled with safety and stored in a secure and safe manner. Workers working with hazardous materials shall carry distinguished knowledge in handling and its risks. Labelling on chemicals and information of handling the chemicals shall be posted visibly.

Safety data sheets containing information that users need in order to be able to handle the product in a safe and environmentally acceptable manner must be available and posted visibly. The labelling on chemicals must be in accordance with the original packaging. It must always be possible to know what substance the packaging contains and what risks there may be.

### 4.4. Environmental Management

Suppliers shall work actively to improve their environmental management and comply with all applicable laws and regulations relating to sustainability.

### Environmental management system

Consilium Safety Group urges Suppliers to have an environmental management system. All Suppliers shall have, as a minimum, an environmental policy or system according to ISO14001 or similar, which ensures continuous improvement of their own environmental performance.



### Waste management

Suppliers must manage and dispose of hazardous and non-hazardous waste generated from operations as required by applicable laws and regulations.

### Energy efficiency

Suppliers shall strive to use energy more efficiently and avoid energy waste. Consilium Safety Group encourages all Suppliers to set energy efficiency targets, to monitor energy consumption and, if possible, to source energy from renewable sources. Consilium encourages all Suppliers to document all their work progress within energy efficiency.

### 4.5. Ethical Business Practices

Suppliers shall comply with all applicable laws and regulations relating to ethical business practices.

### Anti-corruption and anti-bribery

Consilium Safety Group does not accept corruption and bribery and expects their Suppliers to do the same. Suppliers must not pay or accept bribes and shall not take any actions to violate or cause its business Partners to violate any applicable anti-bribery laws and regulations. Anti-corruption policies and programs approved by management, and understood by workers shall be adopted among Suppliers. Any suspected corrupt activity must be taken seriously and handled accordingly.

Suppliers are urged to implement complaint mechanisms, such as whistle-blower systems, hot lines or equivalent to promote the follow up of reported concerns. The anonymity of the worker shall be protected at all times.

### Free competition

Consilium Safety Group requires its Suppliers to comply with valid and applicable competition and antitrust laws. In particular, Suppliers will not conclude anti-competitive agreements with competitors, Suppliers, customers or other third parties and will not abuse a dominant market position.

### Export controls and trade sanctions

Consilium Safety Group's Suppliers shall comply with all valid and applicable laws with respect to export controls and trade sanctions.

Suppliers shall always comply with EU and US export controls and trade sanctions, even if not immediately applicable to the Supplier itself.

### Sourcing of minerals

It is Consilium Safety Group's policy to avoid sourcing of any part, product, material or service that contain any of the conflict minerals such as columbite-tantalite (tantalum), cassiterite (tin), wolframite (tungsten) or gold from the Democratic Republic of Congo (DRC), or an adjoining country.



Suppliers shall exercise due diligence to ensure that these conflict minerals are not contained in its products in the entire supply chain.

### 5. Commitments

**Ethical Labor Practices:** We commit to ensuring that all suppliers and partners strictly adhere to fair treatment, non-discrimination, and the prohibition of forced or child labor across their operations.

**Health and Safety Standards:** We commit to requiring suppliers to maintain safe working conditions, with regular training, personal protective equipment, and emergency preparedness plans in place.

**Environmental Responsibility:** We commit to fostering sustainability by working with suppliers who actively manage their environmental impact, including reducing waste and improving energy efficiency.

**Anti-corruption and Compliance**: We commit to zero tolerance for corruption or bribery, requiring suppliers to adopt and enforce anti-corruption policies and comply with relevant export control and trade sanction laws.

### 6. Key deliverables

**Objective**: Create human rights due diligence process in line with EU taxonomy minimum safeguards.

**Target:** Develop and finalize a comprehensive HRDD framework that aligns with the EU taxonomy minimum safeguards, outlining the necessary steps for implementation and compliance by 2025.

### 7. Monitoring and reporting

Compliance and Monitoring: To meet expectations and requirements in this Code of Conduct, Consilium Safety Group expects Suppliers to continuously improve and review their performance in the above-mentioned areas. The adherence to this Code must primarily be based on trust, but Consilium Safety Group will, from time to time perform audits, on site visits, Supplier self-assessments and requests for information or data related to our Suppliers' compliance to the requirements set in this Code. The Supplier shall supply Consilium Safety Group, or a third party appointed by Consilium Safety Group with this information upon request.

If a Supplier deviates from the requirements in this Code of Conduct, appropriate corrective and preventative actions have to be taken. Suppliers who do not implement such appropriate corrective and preventative actions, or who have critical deviations against the Code of Conduct, runs an increased risk of exclusion from current and future business with Consilium. Consilium will in certain circumstances take further actions up to and including termination of the contract. Transparency is expected, and Consilium Safety Group welcomes the Supplier to share information where expectations and requirements might have been infringed.

**Training**: All new employees will undergo mandatory training on this policy. Ongoing training will be provided to keep staff up to date, with materials available in the company's learning system.

### 8. Violations of this policy



It is every employee's responsibility to ensure that this code is followed. We do not tolerate illegal or unethical behaviour. Anyone violating the code may be subject to disciplinary action, up to and including termination of employment. Any employee who suspects violations of this code is expected to raise their concerns in line with standard reporting procedures or may submit their concerns anonymously to Consilium's whistleblower system run by Nordic Whistle. At Consilium we do not tolerate any form of retaliation against anyone raising their genuine concerns.

### 9. Approval, validation and distribution

- Prepared by: Compliance Office
- Reviewed & approved by: CEO (and Board of Directors for Compliance Program)
- **Distribution**: The policy is available to all employees on the Consilium <u>Intranet</u> and distributed during onboarding.
- **Continuous Improvement**: This policy will be reviewed and updated annually to reflect ongoing changes in the business strategy and objectives.

### 10. Contact information and Responsible Officers

Philip Isell Lind af Hageby President and CEO is responsible for the overall oversight and implementation of this policy.

Hiba Tul Waheed, Compliance Officer is responsible for Consilium's day-to-day compliance with this policy. Should you have any questions or need further assistance, please feel free to contact her at: hiba.tulwaheed@consiliumsafety.com

\* \* \*



### **Supplier Acknowledgement**

We, the undersigned, hereby confirm that we have received, read and understood the contents of the Consilium Safety Group's Supplier Code of Conduct and undertake to actively work to comply with the Supplier Code of Conduct in our dealings for, to and with Consilium.

We further undertake to notify Consilium in writing as soon as possible should an issue relating to the compliance with the Supplier Code of Conduct be identified.

Company name		
Company address		
Place and date		
Signature		
Clarification of signature		