

Supplier Code of Conduct

June 2022



CONSOLIS

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1. Introduction

Consolis policy regarding suppliers is to respect each party's interests with transparent and fairly negotiated contract terms. It is built on three pillars: dialogue, professionalism and respect of commitments. We strive to build long-term relationships with our suppliers to form partnerships that are lawful, ethical and mutually beneficial. Our contracting process is objective and we use only legitimate, business-related criteria when choosing suppliers.



We at Consolis act with integrity, objectivity and respect for each other, our customers, our partners and our environment, and are committed to fulfilling our duties as responsible citizens. We expect the same from all our Suppliers.

We expect our Suppliers to adhere to the principles of this Supplier Code of Conduct and to ensure that their own suppliers and subcontractors respect equivalent principles to those of this Supplier Code of Conduct.

1.1. *Who is this Supplier Code of Conduct for?*

The purpose of this Supplier Code of Conduct is to set out what we expect, as a minimum, of our suppliers, their employees and affiliates, sub-contractors, distributors, re-sellers, representatives, intermediaries, consultants, joint venture partners and other business partners (generally referred to as our “**Suppliers**”).

In addition to their general compliance with laws and contractual obligations, Suppliers are required to uphold our fundamental principles and comply with this Supplier Code of Conduct. Any failure to comply with this Supplier Code of Conduct could result in termination of all business and/or contractual relationships with Consolis, without prejudice to any other rights Consolis may have.

Suppliers, when requested, are expected to allow Consolis to audit their adherence to this Supplier Code of Conduct, as set out below in section 1.5.


1.2. *Foundation of our Supplier Code of Conduct*

This Supplier Code of Conduct builds on our core values and sustainability commitments, international and national legislation, and it supports and is aligned with the United Nations’ Global Compact as well as other international ethical guidelines.

Our values commit us to act with the highest levels of ethics, and to conduct business in a responsible and sustainable way and we expect the same of our Suppliers.

1.3. Reporting misconduct

If you become aware of a situation that may involve a violation of this Supplier Code of Conduct or any applicable laws or regulation in your relationships with Consolis, you can report it through Consolis Group Alert Channel.



Alert Channel system

Suppliers are encouraged to report any conduct that they believe is in breach of Consolis' Supplier Code of Conduct, policy or applicable laws and regulations. Any potential issues shall be reported via Consolis Alert Channel, a service that is provided by a third party and available to suppliers in all languages.

Please refer to page 12 for contact details.

Consolis will treat all reports confidentially to the extent reasonably possible, consistent with local laws, Consolis policy and need to conduct a thorough investigation. All reports will be investigated promptly and thoroughly, consistent with applicable laws.

As a Supplier to Consolis, you are expected to maintain a similar reporting system within your own organization consistent with applicable laws and regulations.

1.4. No retaliation

Consolis does not retaliate against anyone who raises a concern in good faith about a possible violation of this Supplier Code of Conduct or any applicable laws or regulation.

Similarly, you must not retaliate or tolerate retaliation against anyone who, in good faith, reports suspected or known misconduct.

1.5. Auditing

The Supplier must allow Consolis (or any third party authorised by Consolis) to verify compliance with the requirements of this Supplier Code of Conduct through dialogue, disclosure of information or, if considered necessary by Consolis, an audit of the Supplier's operations. Any such audit shall take into consideration the Supplier's interest in undisturbed operations and not be in conflict with the Supplier's statutory and contractual obligations.

If Consolis finds that the Supplier is not acting in compliance with this Supplier Code of Conduct, Consolis will specify which issues need to be corrected or improved. The Supplier must then take corrective actions promptly and provide adequate evidence of improvements. Consolis nevertheless reserves the right to cancel outstanding orders, suspend future orders, and/or terminate the main

contract with the Supplier in case of a material breach of this Supplier Code of Conduct or the Supplier refusing to take corrective actions. Should the main contract between Consolis and the Supplier, to which this Supplier Code of Conduct forms an integral part (as an Appendix or by reference), contain separate termination rules, it is nevertheless understood by both parties that a breach of this Supplier Code of Conduct may be considered a material breach of the main contract, thus entitling Consolis to terminate the main contract.

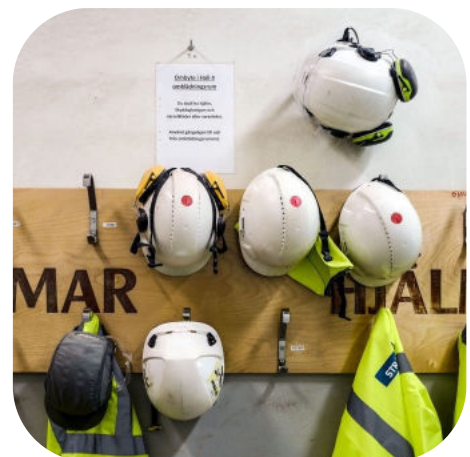
Similarly, you are required to evaluate your supply chain to ensure compliance with the principles set out in this Supplier Code of Conduct, and to conduct audits of your supply chain as part of your business routines or as and when requested by Consolis.

2. Compliance with laws

Our Suppliers must stay up to date, and comply with, national legislation as well as relevant and applicable international regulations and conventions related to the areas mentioned in this Supplier Code of Conduct and applicable to the Supplier's operations. Where the requirements in this Supplier Code of Conduct are stricter than local laws, the requirements of this Supplier Code of Conduct must be applied. In the event of actual or potential contradictions between this Supplier Code of Conduct and applicable laws and regulations, suppliers must notify Consolis.

3. Health, Safety & well-being

When conducting our business, we are committed to our vision of zero work accidents to our employees, our contractors, our suppliers and our customers. By integrating health and safety considerations into all aspects of our business, we protect our people, achieve sustainable growth and accelerated productivity, drive compliance with all applicable regulations and develop the technologies that expand the sustainable capacity of our world.



Our Suppliers must comply with all health and safety laws and limit workers' exposure to potential health and safety hazards by implementing appropriate systems and controls, including proper design, engineering and administrative controls, preventative maintenance, safe work procedures, easy and accessible reporting, communication and support channels, and active monitoring of such systems and controls. They must assign responsibility for health and safety issues within their organisation.

Our Suppliers are expected to work together with us to secure a healthy and safe working environment and to train adequately all their workforce and other relevant third parties such that they are able to work safely. Suppliers must ensure full understanding of site requirements at visits.

Employees of our Suppliers must have the right to refuse a work situation if they reasonably believe that it presents an imminent and serious risk to their health and safety.

Our Suppliers must notify us immediately in the event of a breach or suspected breach of health and safety laws impacting or likely to impact its operations with Consolis or this Supplier Code of Conduct. All health and safety incidents related to our project sites and in our workplaces should also be notified to us immediately.

4. Fair working conditions

At Consolis, we aim for engaged and motivated employees with equal opportunities and fair employment conditions. Diversity and equality are prioritized areas throughout the organization and encompass everything from recruitment processes to employee dialogues and career development.

We are committed to providing equal opportunities regardless of race, ethnicity, national origin, religion or belief, gender, sexual orientation, gender identity or expression, age, disability, marital or family status or any other characteristic. Our Suppliers shall commit to do the same.

Our Suppliers must be aware of and address any human rights impacts that they cause or contribute to or that are directly linked to their operations, products, or services. Child labor or labor under legal minimum age is unacceptable to Consolis. Equally, Suppliers must work to prevent child labor or labor under legal minimum age in their operations and supply chain and ensure legal working conditions for young workers.



As a Supplier to Consolis, you must:

- ensure there is no forced, bonded or involuntary labor in your operations.
- recognise and respect employees' right to freedom of association, belonging to a union and collective bargaining.
- pay a living wage, i.e. a legal minimum wage or industry standard (whichever is higher) and, in any event, calculated by reference to the income an individual needs to meet basic standards of living and to participate fully in society.
- ensure that working hours are not excessive, comply with applicable laws and collective agreements and that overtime compensation is duly paid in accordance thereof.
- ensure that all codes of conduct and other policies are set out in writing, and any action or disciplinary measures taken pursuant to such codes and that policies are recorded in writing.

- respect all human rights and conduct human rights due diligence to avoid and address potential adverse impacts.

5. No discrimination or harassment

Our Suppliers must respect the personal dignity, privacy and rights of each employee, and must not tolerate any physical or mental harassment or abuse, expressed verbally or non-verbally. Our Suppliers must prohibit behavior, language, and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

Our Suppliers must not discriminate unfairly in hiring or during the employment lifecycle, whether active or by means of passive support on the grounds of age, nationality or ethnicity, religion, political beliefs, sexual orientation, gender identity or expression, physical ability or any other characteristic protected by law or International Labor Organization Conventions.

6. Climate and Environment

For Consolis, sustainable development is a long-standing commitment. We are convinced that our growth and competitiveness are inextricably linked to the quality of living conditions in the places where we operate and that there can be no sustainable economic development without considering the environment.

Our Suppliers must comply with all environmental laws and must establish, implement and maintain a risk-based approach to reduce or minimize any negative environmental impact from their activities, products and services.

Our Suppliers must use resources efficiently and ensure adequate operational control minimising adverse environmental impacts.

Our Suppliers must take precautionary measures as soon as there is reason to believe that an action could harm the environment or public health and strive to develop and support environmentally friendly techniques in their products, processes, designs and material selection.



As a Supplier to Consolis, you must:

- assign responsibility within your organisation to oversee compliance and address other environmental issues and ensure that your employees have appropriate know-how and resources related to controlling environmental issues.

- strive to promote and improve circularity in your business models, product design, and operations.
- handle environmental violations and complaints systematically and communicate them to concerned bodies and record in writing any action or disciplinary measures taken pursuant to applicable laws and policies.

7. Protection of assets, property and equipment

Consolis assets come in many different forms – physical, electronic, financial and even intangible forms. Whether it is a Consolis laptop, our brand or even a facility or building, we expect everyone to take good care of our assets, including our Suppliers.

Our Suppliers are expected to respect the assets of Consolis and its stakeholders. Suppliers shall only use assets belonging to Consolis and others as and when appropriately authorised and shall not tolerate theft of assets.

8. Confidentiality

Like all organisations, we depend on the use and exchange of information for our business decisions and day-to-day activities and we will exchange information with our Suppliers. We need to ensure we create, use responsibly and protect this information, especially when it comes to data such as personal details (as per section 9.5 below), commercially sensitive information and intellectual property – both our own and that of others.



We expect our Suppliers to respect confidential information relating to Consolis and its stakeholders, and to take all reasonable measures to prevent confidential information from being disclosed to any person who does not need and have a right to that information in the course of their work.

9. Business ethics

9.1. *Anti-corruption and bribery*

We are committed to conducting our business with the highest level of integrity. Any and all forms of corruption and bribery are strictly prohibited. Our Suppliers must conduct business and must

ensure that all those within their supply chains conduct business with integrity, and likewise do not tolerate any form of bribery or corruption.

As a Supplier to Consolis, you must:

- never request, accept, pay, offer or authorise bribes, either directly or indirectly, under any circumstances. This includes never seeking to improperly influence or bribe a Consolis employee, customer, or public official (including foreign public officials) or any other individual or entity.
- not offer or make facilitation payments, nor permit others to offer or make such payments on your behalf.
- establish systems, controls and clear procedures to identify corruption and bribery risks within your businesses and supply chains and take all necessary action to prevent corruption or bribery taking place. Preventive measures will include (amongst other things) adequate training, clear communication and reporting channels and active monitoring of systems and controls.

9.2. Hospitality and gifts

We do not request, accept, offer, authorise or provide hospitality or gifts that may improperly influence – or create the appearance of improperly influencing – our business decisions, or decisions by our customers or others with whom we work.

As a Supplier to Consolis, you must:

- not offer or accept hospitality or gifts that may improperly influence – or create the appearance of improperly influencing your business decisions or those of Consolis.
- not pay for the travel or accommodation costs of Consolis' representatives when they are visiting you nor offer them excessive gifts, hospitality, or entertainment, except moderate and reasonable catering in direct connection with business events.

9.3. Fair competition

Fair competition creates a healthy marketplace. It ensures that the best and most innovative products and services are available on the market at the lowest prices. In order for Consolis to compete lawfully and with integrity, we monitor our operations continuously and we do not tolerate anti-competitive behavior.

As a Supplier to Consolis, you must:

- respect fair competition and antitrust laws, ensure compliance within your supply chains and not enter into any agreement concerning price fixing or market sharing.
- not participate in bid rigging by way of bid suppression, complementary or cover bidding, bid rotation, or other mechanisms that limit fair competition in tender situations.

9.4. Conflict of interest

As part of our duty to uphold our reputation, we must avoid improper conflicts of interest and always act and make decisions in the best interest of our employer. A “conflict of interest” occurs when our personal interests interfere with, or appear to interfere with, our ability to perform our jobs without bias. It can derive from hospitality and gifts, charitable contributions, political contributions, sponsorship or personal relationships.

We require our Suppliers to act in the same manner as Consolis and avoid conflict of interests in their business dealings.

We request our Suppliers to report to Consolis any situation you identify which constitutes or may constitute a conflict of interest in your dealings with Consolis.

9.5. GDPR

Our Suppliers must comply with all data protection laws and use personal data only when lawful and necessary to fulfill legitimate business purposes.

As a Supplier to Consolis, you must:

- ensure compliance with laws and directives providing for the protection, transfer, access and storage of personal information. This includes in particular those applicable standards set out in the General Data Protection Regulation (GDPR) (Regulation EU 2016/679).
- always ensure appropriate electronic, administrative, physical, and technical controls around data privacy and security when handling any form of personal data and further comply with all applicable laws and regulations when using personal data in any way (including but not limited to processing, transferring, storing, saving, registration and deletion of personal data).

Our Suppliers must report to us any breach or suspected breach of any such laws regarding Consolis data or those of its employees.

9.6. Trade compliance – Sanctions

Trade compliance includes regulations governing the import, export and domestic trading of goods and services as well as international sanctions and restrictive trade practices.

Consolis Group is fully committed to conducting its business in compliance with all applicable laws and regulations, including trade restrictions, economic or financial sanctions or trade embargoes imposed, administered or enforced from time to time by the United Nations Security Council, the European Union and/or any other national and supranational authorities having jurisdiction in countries where Consolis operates.

We expect our Suppliers to also comply (and ensure their supply chains comply) with all such laws and regulations.

In addition, as a Supplier to Consolis, you

- understand that Consolis needs to know its external parties and you are transparent about the real beneficial owners with whom Consolis conducts business.
- understand and observe that Consolis is vigilant in watching for countries and/or external parties who may be on a sanctions list or may have a related company in a country subject to sanctions.

Our Suppliers must report to us any breach or suspected breach of any such laws and regulations or of this Supplier Code of Conduct.

9.7. *Anti- money laundering*

Money laundering occurs when the proceeds of crime are hidden in legitimate business dealings, or when legitimate funds are used to support criminal activities, including terrorism.

Our Suppliers must not engage in any form of money laundering activity and must comply at all times with all applicable anti-money laundering laws.

As a Supplier to Consolis, you must:

- follow any due diligence requirements required by law regarding your business partners.
- ensure that your business transactions do not involve acquiring, using or holding monetary proceeds or property acquired with the proceeds of crime.
- if you have knowledge or suspicion that a counterparty is involved in money laundering in connection with a transaction with Consolis, promptly report it.
- transparently and accurately record and disclose details of business activities, corporate structure, financial situation and performance in accordance with applicable laws.

10. Contacts for reporting



Group General Counsel :
Emmanuelle Cochard
emmanuelle.cochard@consolis.com

Consolis Alert Channel Websites:

- <https://consolis.ethicspoint.com> (desktop website)
- <https://consolismobile.ethicspoint.com> (mobile-friendly website)

Consolis Alert Channel Telephone Numbers:

Denmark: 80 83 06 56	Egypt : see note 1	Estonia: 8000 044 629
Finland: 0800 416154	France: 0 805 98 55 36	Germany: 0800 1803960
Hungary: 80088550	Indonesia: 0800 1401897	Latvia: 80205327
Lithuania: 8 800 30 435	Netherlands: 0800 0232878	Norway: 80062435
Poland :800005047	Romania: 0800 890 421	Spain: 900876288
Sweden: 020-088 00 15	Tunisia : see note 2	

Note 1 : For Egypt call : 2510-0200 (Cairo), 02-2510-0200 (Outside Cairo), 02-2510-0200 (Cellular throughout Egypt). At the English prompt dial: 844 979-4904

Note 2 : For Tunisia: From an outside line contact your local operator. Request a reverse charge or collect call to be placed to the United States, to the number below. All reverse charge or collect calls will be accepted by the Contact Centre using an automated English message. At the prompt dial: +1 704-526-1125