



## WESTERMO NETWORK TECHNOLOGIES

# Westermo Supplier Code of Conduct

## General

The Supplier Code of Conduct applies to all Westermo suppliers globally.

Westermo requires all business activities to be carried out with integrity and ethics. Westermo and its suppliers will observe the following guidelines:

- Comply with laws and regulations in countries where the group operates and with the Supplier Code of Conduct.
- Respects the Universal Declaration of Human Rights (UDHR) and ILO's Declaration on Fundamental Principles and Rights at Work. ([www.unglobalcompact.org](http://www.unglobalcompact.org)).
- Strive to follow OECD Guidelines for Multinational Enterprises. ([www.oecd.org](http://www.oecd.org))

The purpose of this Supplier Code of Conduct is to set a foundation for a sustainable supply chain with respect for laws and regulations, human rights, the environment and ethics.

## Responsibility

Persons in a supervisory position are responsible for ensuring that the Supplier Code of Conduct is being complied with by their staff. This means that they shall ensure that all employees under them are aware of the content of the Supplier Code of Conduct and follow up on its compliance. Employees are individually responsible for ensuring that their business activities are conducted in compliance with this code and relevant laws and regulations. Westermo expects suppliers, subcontractors and partners to act according to the requirements set in this Supplier Code of Conduct. In addition, Westermo encourages their suppliers to establish their own Code of Conduct in accordance with their business activities and with relevant content from this Supplier Code of Conduct.

## Conflict of interest

All supplier employees must avoid any relationship, activity, ownership interest (direct or indirect) or similar arrangements as well as the acceptance of gifts or any kind of other benefits which could reasonably create a conflict between the interest of an employee and the interests of Westermo; or which could be considered to influence the professional judgement of an employee in their exercise of company business.

All employees have a duty of transparency in relation to conflicts of interest. Disclosure is in their best professional interest.

When an employee is faced with an actual or apparent conflict of interest, they must inform their manager in order to obtain a written decision on how to proceed.

## Our Corner Stones

### Business Integrity

A Westermo supplier conducts its business professionally, honestly and ethically.

- Supplier employees must not enter into any situation in which their personal or financial interest may conflict with those of Westermo.
- The supplier is politically independent and do not contribute to political parties or candidates.
- No one may, directly or indirectly, demand or accept, offer or give any kind of bribe, kickback or any other unlawful or unethical benefit to employees or other representatives or associates of the supplier or any third party.

### Environment

Westermo suppliers will uphold good knowledge about the environmental influence of our products and services under their entire life cycle, and reduce it wherever possible. The natural resources should be used considerably and efficiently in order to decrease negative environmental influence.

- Suppliers have the responsibility to comply with environmental law and respect the environment wherever they work.
- Environmental actions should be implemented if it is technically, financially environmentally justified.
- The health of the workers and the safety of the workplace are prioritized aspects. The supplier provides safe and healthy working conditions.
- Suppliers will continuously improve products and services to provide customers with an opportunity to reduce operational costs whilst improving environmental performance.
- Follow the principles of ISO 14001
- Suppliers ensures that any chemicals and hazardous materials are handled, stored, moved, used, reused, recycled or disposed safely.

## Social

Suppliers respects the Universal Declaration of Human Rights. This means that the supplier;

- does not accept child labour
- does not tolerate direct or indirect discrimination with regards to employment and occupation
- supports and respects the protection of internationally proclaimed human rights
- does not use any form of forced or compulsory labour
- recognizes freedom of association and the right to collective bargaining
- does not exceed the maximum workweeks set by local law
- comply with compensation according to all applicable wage laws. Employees shall be compensated for their overtime with payrates greater than regular hourly rates.

Westermo encourages the supplier to actively enhance the equity, diversity and inclusion within the workplace through policies and other activities.

## Transparency

The supplier will report financial information accurately and completely and have appropriate internal controls and processes to ensure that accounting and financial reporting complies with law, regulations and listing requirements.

Concerning communication, the Westermo supplier will act in an open dialogue with all interested parties. However, the Westermo supplier will not inappropriately spread information that is of commercial value. This also applies to information that may have an impact on the share value of Westermo's owners Ependion. Financial information will be released in strict compliance with the regulations governing such information.

## Sub-suppliers

The ability to deliver quality products is depending on close collaboration their sub-supplier. Westermo expects the same adherence to these requirements from sub-suppliers contracted by the supplier as from the supplier itself. The supplier is expected to communicate the requirements of this Supplier Code of Conduct to their sub-suppliers as well as ensuring that the sub-suppliers meet the requirements.

## Non-Compliance

Valuable supplier dialogue and relations will be the foundation of fulfilling this Supplier Code of Conduct. The supplier is expected to meet the requirements of this Supplier Code of Conduct and if not, implement measures to ensure the fulfilment. If these measures with appropriate actions are not performed by the supplier to fulfil this Supplier Code of Conduct, this will be deemed as a contractual breach by the supplier. In addition, lack of cooperation to meet the requirements of this Supplier Code of Conduct may lead to ceased business relation with the supplier and Westermo.

By signing this document, the supplier accepts and agrees to the requirements set in this Westermo Supplier Code of Conduct.

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