



Supplier Code of Conduct

Purpose of our Supplier Code of Conduct

This Supplier Code of Conduct (the Code) applies to all OX2 suppliers of work, goods, services or other business activities and its business partners (the Suppliers) in every part of the world.

The purpose of the Code is to define the basic sustainability requirements placed on OX2's Suppliers. The requirements are based on the UN Global Compact, the UN Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises. The Code also reflects OX2's Values and Code of Conduct.

OX2's Suppliers are obligated to implement the principles of this Code in all their business activities and in relation to sub-suppliers. Suppliers shall also comply with any additional requirements agreed in the contract documents. For OX2, it is important that all activities and business conducted in our supply chain are in line with this Code of Conduct. Suppliers are expected to have appropriate management systems in place to ensure compliance with this Code, proportionate to the size, complexity, and risk environment of their business.

Business principles

Suppliers shall comply with all the applicable laws and regulations in all locations where they conduct business. In addition, they are expected to apply the highest business ethics standard. Hence, should the Code provide for a higher business ethics standard than is required by national laws or regulations, the principles of the Code shall be applied. The Code shall apply to all the supplier's operations, including manufacturing, delivery, sales and support.

At the request of OX2, the Supplier shall provide information about which companies that are subcontractors in relation to OX2 and provide specific documents confirming the compliance with this Code.



Human Rights

The Supplier shall recognize and respect international *human rights* standards in accordance with the UN Guiding Principles on Business and Human Rights. It shall avoid directly causing or contributing to adverse human rights impacts and, where possible, seek to prevent or mitigate adverse human rights impacts linked to our companies through its business relationships.

Non-discrimination

The Supplier shall strive for a corporate culture that is fully *non-discriminating* out of gender, sexual orientation, race, ethnic origin, religion, disability, or age.

OX2 also expects that Supplier's employees, with the same qualifications, experience, and performance, receive equal pay for equal work compared to others who perform the same work under similar working conditions.

Child labor

The Supplier shall not, in any circumstances, employ workers who are below the minimum legal employment age, or no less than 15 (or 14 years in countries subject to the developing country exception of ILO Convention 138) or otherwise apply child labor as defined by the International Labor organization conventions. Supplier shall also not benefit from the use of child labor, and not employ young persons under the age of 18 for hazardous work.

Forced labor

Forced or compulsory work may not be applied, and employees shall be free to terminate their employment after the agreed period of notice, in accordance with national law or contract. The employer must not require employees to deposit money or identity documents with them to gain employment.

Minimum wage

Salary shall be fair and at least amount to the highest of the minimum amounts under applicable law or remuneration normally applied in the Supplier's industry. Unlawful, unauthorized, or disciplinary salary deductions are not allowed.

Working hours

The Supplier shall comply with applicable national legislation and industry standards regarding working hours and public holidays. Employees should have at least one day off per seven-day week.

Health and safety

The Supplier shall comply with the applicable laws and regulations regarding working environment and working conditions. The Supplier shall prioritize the health and safety of the workers. This means, among other things, that the Supplier must ensure that appropriate protection is used, that used equipment and buildings are safe, and that hazardous substances and hazardous waste are handled safely. Furthermore, there must be clear rules and procedures for health and safety in the workplace that are complied with.

If the Supplier provides housing for employees, they must be safe, hygienic and allow for personal privacy.

Freedom of association

The Supplier shall recognize and respect employees' freedom of association and to negotiate collectively with the Supplier. The Supplier shall not in any way impede the establishment, maintenance or administration of such employee organizations or collective bargaining agreements. The Supplier shall also not take disciplinary or discriminatory measures against personnel organizing workers or staff affiliated to a trade union.

Rights of indigenous people

Suppliers shall respect the rights of indigenous and tribal people and their social, cultural, environmental, and economic interests, including their connection with lands and other natural resources. Suppliers should follow the principles of free, prior, and informed consent, and participation to obtain broad-based consent of indigenous and tribal peoples in their activities.

Anti-corruption, money laundering and sanctions

The highest standards of integrity are to be expected from Suppliers, including its sub-suppliers, and other entities acting on behalf of the Supplier, in all business interactions. Any form of extortion, bribery, or corruption, including improper offers of payments, benefits or hospitality are prohibited. Suppliers shall establish and maintain policies and procedures designed to prevent bribery and corruption.

Supplier shall not provide OX2 representatives or employees with gifts or hospitality which may influence or appear to influence a representatives or

employees decision in relation to the Supplier.

Suppliers shall implement protective measures and refrain from any activities which may be considered part of the money laundering process. Suppliers shall comply with all applicable laws and regulations regarding export control and export restrictions, as well as economic sanctions imposed by the EU, US, UK or UN.

Environment

Supplier shall comply with all relevant environmental legislative and regulative requirements, maintain all applicable licenses, registrations and permits, and work according to an environmental management system delivering resource efficiency, as well as emergency response preparedness.

The Supplier shall evaluate the environmental performance of its activities, minimize environmental impact, and make continuous improvements in environmental protection.

OX2 also expects that the Supplier, if required by law or otherwise if applicable to Supplier, prepares an environmental declaration. Such environmental declaration shall be provided upon request by OX2.

Conflict Minerals

Suppliers of tin, tungsten, tantalum, gold, and other conflict minerals shall make a reliable determination of the origin and source of such minerals. In the case these minerals are produced in or sourced from conflict-affected areas an enhanced due diligence mechanism with respect to sourcing chain and origin shall be undertaken by the Supplier.

Compliance and control

Supplier is responsible for ensuring and monitoring their sub-supplier's compliance with the principles of the Code. Suppliers should immediately report violation of the Code, by Supplier or sub-supplier, to OX2 Head of Procurement, Head of Sustainability alternatively through our Whistleblowing function, <https://report.whistleb.com/en/ox2>, which can be used anonymously if necessary. In addition, Supplier shall:

- ensure that measures are taken to correct the violation; and
- follow-up to ensure future compliance

If the violation of compliance concerns a sub-supplier and they still exist after a corrective action has been requested, the Supplier undertakes to replace the Sub-supplier.

OX2 shall have the right to audit or to appoint an independent auditor to audit



Supplier's and Supplier's subcontractors' performance, including their premises and such records, as well as such documents as OX2 may reasonably require for the purpose of verifying Supplier's compliance with its obligations under Code.

The Supplier is not obliged to give OX2 access to its cost structure or information about other customers. OX2 shall comply with the security requirements set by the Supplier in relation to audit conducted in accordance with this section.

Material breach of the Code or repeated refusal to provide the required information, OX2 is entitled to terminate the cooperation with the Supplier.

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Paul Stormoen, CEO