



<b>Document type</b> Group Policy	<b>Approved</b> LT / CEO	<b>Policy structure</b> <ul style="list-style-type: none"><li>— Code of Conduct</li><li>— <b>Supplier Code of Conduct</b></li><li>— Whistleblowing Policy</li><li>— Human Rights Policy</li></ul>
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# Supplier Code of Conduct



# OX2 Supplier Code of Conduct

## Purpose of our Supplier Code of Conduct

The purpose of the Supplier Code of Conduct (the Code) is to define the basic sustainability and regulatory compliance requirements that OX2 requires of our Suppliers. These requirements are based on the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises. The Code also reflects OX2's Values and Code of Conduct.

## Your conduct

The Code applies to all OX2 suppliers of work, goods, services, or other business activities and its business partners (Suppliers), in every part of the world. Suppliers who engage subcontractors when providing goods or services to OX2 must make such subcontractors aware of OX2's Code or adopt their own code with equivalent requirements.

Suppliers must comply with all applicable laws and regulations in all locations where they conduct business. In addition, they are expected to apply the highest business ethics standards in all business activities. If the Code sets a standard that is higher than what is required by national laws or regulations, then the standard in the Code must be applied. The Code shall apply to all operations undertaken by a Supplier, including manufacturing, delivery, sales and support.

## Use of this Code

We reserve the right to undertake due diligence and risk assessments to verify compliance with this Code and expect our Suppliers to cooperate and provide supporting evidence that OX2 may reasonably require to monitor and review their compliance with this Code.

Compliance with this Code is a material consideration for OX2 in assessing every aspect of its Supplier relationships.

## Human rights

Our Suppliers must:

1. ensure workers have freely chosen employment, with no forced, bonded or indentured labour, and prohibit participation in any state-sponsored mandatory labour programs;
2. conduct business activities in a manner which respects human rights, and must not hold a person in slavery or servitude, employ, engage or otherwise use forced or compulsory labour, trafficked labour or child labour;
3. have in place, and maintain, adequate procedures to identify, prevent, mitigate and account for modern slavery and adverse human rights impacts in their operations and supply chains;
4. respect the rights of Indigenous people and their social, cultural, environmental, and economic interests, including their connection with lands and other natural resources;
5. seek free, prior, and informed consent of Indigenous peoples affected by their operations, as well as the participation of Indigenous peoples where practicable;
6. not provide us with, or use on any of our projects, any products identified in international reports such as the ILO-OECD-IOM-UNICEF Joint Report on Ending Child Labour, Forced Labour and Human Trafficking in Global Supply Chains, or other credible sources that document goods produced with child or forced labour; and
7. not discriminate against any worker based on gender, sexual orientation, race, ethnic origin, race, religion, disability, age, marital status, political affiliation, union membership or any other characteristic protected by law in hiring and other employment practices.

## Labour

Our Suppliers must:

1. not employ workers who are below the minimum legal employment age, or under 15 years (or 14 years in countries subject to the developing country exception of ILO Convention 138);
2. ensure that workers under the age of 18 do not perform work that is likely to jeopardise their health and safety, including night shifts and overtime;
3. comply with all applicable laws and regulations with respect to wages, benefits, resignation, superannuation or other retirement savings, leave entitlements, working hours and insurance that apply in the countries in which they operate;
4. not use wage deduction as a disciplinary or performance improvement measure;
5. not require workers to deposit money or identity documents with anyone, including labour hire agencies, to gain employment;
6. offer fair and transparent terms and conditions of employment (including fair remuneration) that provide for an adequate standard of living, working hours and working conditions;
7. permit freedom to move and associate, including collective bargaining and seeking of representation, in accordance with local laws; and
8. not take disciplinary or discriminatory measures against personnel organising workers or staff affiliated to a trade union on the basis of such activities.

## Health and safety

Our Suppliers must:

1. comply with the applicable health and safety laws and regulations;
2. prioritise the health and safety of its workers, including, among other things, providing and maintaining safe systems of work, including the provision of: appropriate personal protective equipment, safe equipment and buildings, worker amenities that are safe and clean (including access to toilet facilities and drinking water), and ensuring systems are in place for the handling of hazardous substances and hazardous waste;
3. ensure provision of information, training, instruction and supervision that is necessary to protect all persons from risks to their health and safety arising from work carried out as part of the Supplier's business; and
4. ensure that where housing is provided, the premises include access to hot water for bathing, adequate heating and ventilation, reasonable personal space, and permission to enter and exit the facilities.





### **Business integrity**

Our Suppliers must:

1. act ethically and with integrity at all times;
2. comply with all applicable laws relating to the prevention of bribery, corruption, fraud, tax evasion, money laundering or similar, or related activities, and maintain policies and procedures designed to prevent contravention;
3. seek to identify and report any real or apparent conflicts of interest, be it competing personal or professional interests;
4. in all dealings with us, not violate any applicable customs, trade controls and sanctions laws and regulations with which we must comply, to the extent that such compliance does not violate mandatory law applicable to the relevant Supplier;
5. maintain a policy and exercise due diligence to reasonably assure that any raw materials and minerals (including tin, tungsten, tantalum, gold, and other conflict minerals) they use in their supply chain are not the result of human rights abuses in any stage of production, including mining, processing and manufacturing;
6. not provide OX2 representatives or employees with gifts or hospitality which may influence or appear to influence an OX2 representative's or employee's decision in relation to the Supplier; and
7. act ethically and fairly in all dealings with their supply chain, including adhering to timely payments and not enforcing unfair contract terms on their suppliers.

### **Environment**

Our Suppliers must:

1. comply with all relevant environmental laws, maintain all applicable licenses, registrations and permits, and work according to an environmental management system delivering resource efficiency, as well as emergency response preparedness;
2. evaluate the environmental performance of its activities, minimize environmental impact, and make continuous improvements in environmental protection; and
3. if required by law or other rules, policies or commitments applicable to the Supplier, prepare an environmental declaration, which must be provided upon request by OX2.

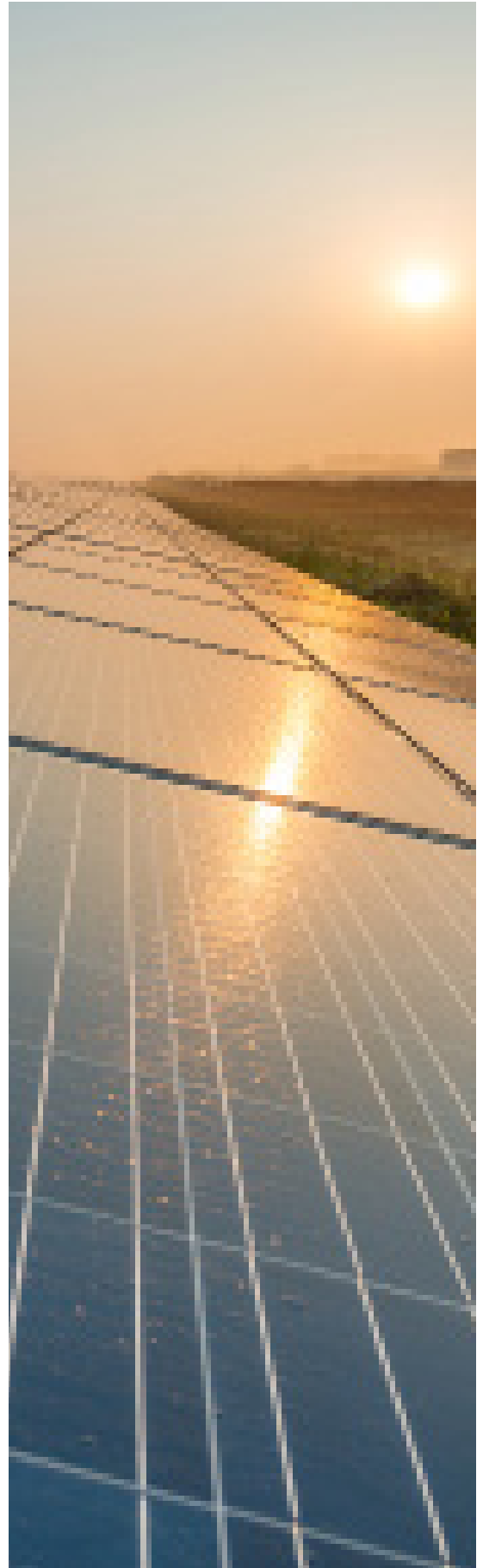
### **Compliance and control**

Our Suppliers must:

1. have adequate management systems in place to ensure compliance with this Code, proportionate to the size, complexity, and risk environment of their business;
2. monitor compliance with this Code, including by their suppliers, and to notify OX2's Head of Procurement or the Chief Communications and Sustainability Officer immediately of any breaches or suspected breaches (reports can be made anonymously using our Whistleblowing service, <https://report.whistleb.com/en/ox2>); and
3. take reasonable steps to address, remedy and prevent repetition of any breach of this Code or possible breaches of this Code.

Where we find instances of non-compliance by our Suppliers with the Code, we will investigate to understand the causes and take appropriate actions, including mandating corrective action plans. Our Suppliers are required to cooperate in any such investigation and provide OX2 access to relevant information on reasonable request. We maintain the right, in our discretion, to terminate our relationship with any Supplier that materially, repeatedly or knowingly violates our Code.

Stockholm 2026-04-28  
Matthias Taft , CEO



#### Revision history

Revision index	Description	Date	Issued by	Approved by
0	First issue	2020-02-10	Head of Sustainability	CEO
1	Yearly approval	2023-02-09	Head of Sustainability	CEO
2	Yearly approval	2024-04-16	Head of Sustainability	CEO
3	Yearly approval	2026-04-28	Chief Communications and Sustainability Officer	CEO

## Related policies

[Code of Conduct](#)

[Whistleblowing Policy](#)

[Human Rights Policy](#)

