

POLICY

Valid from

24 October 2024

Approved by

Board of Directors

Eastnine AB (publ)

Supplier Code of Conuct

1. General

Eastnine is committed to conducting business in a responsible and sustainable way guided by fairness, transparency and mutual respect. This Code applies to providers of goods and services to Eastnine under a contractual agreement and includes suppliers, subcontractors, service providers, consultants, intermediaries and agents. Eastnine requires its suppliers and subcontractors to comply with this Code, when doing business with or on behalf of Eastnine, and ensure that all rules and principles described in this Code of Conduct apply in their own supply chain. At Eastnine's request, the supplier must provide documented evidence on how this process is managed. We also encourage our suppliers to engage in constructive dialogue with us regarding the Code when doing business together.

1.1. Compliance with laws and regulations

Suppliers are required to comply with all applicable laws, rules and regulations in the countries where they operate. Eastnine expects its suppliers to meet the more stringent requirements between this Code and applicable laws. In case of contradictions or a conflict between this Code and applicable laws and regulations, the supplier is expected to inform Eastnine of such conflict.

Eastnine is a signatory to the United Nations (UN) Global Compact, and we support its Ten Principles reflecting human rights, labour, the environment and anti-corruption. We further support the rights of all people as described in the Universal Declaration of Human Rights adopted by the UN and in the conventions of the UN's International Labour Organization. We encourage our suppliers to share the same commitments and adhere to these principles in their own business.

1.2. Transparency

Eastnine reserves the right to check or audit suppliers' compliance with this Code. Accordingly, at Eastnine's request suppliers are expected to provide to Eastnine, or a third party authorized by Eastnine, information relevant for this Code. Eastnine also expects its suppliers to have appropriate controls in place within its own and supply chain operations to ensure compliance with this Code.

1.3. Consequences if the Code is violated

Suppliers shall inform Eastnine of any violations of the Code. Suppliers are expected to take all appropriate actions and corrective measures to address such violations. The failure to comply with the Code and refusal to take corrective measures may result in suspending or terminating the suppliers' activities with Eastnine.

2. Human Rights and Labour Rights

Eastnine expects its suppliers to respect internationally proclaimed human rights as proclaimed in the UN Guiding Principles on Business and Human Rights and take measures to avoid causing, contributing or being linked to human rights infringements through their business actions.

2.1. Child labour

Suppliers should not participate in or benefit from any form of child labour. No children below the minimum age of employment or the age for completing compulsory education in their country, should be employed by Eastnine's suppliers. No workers under the age of 18 shall be employed by the suppliers to perform any work defined as hazardous in national law.

2.2. Forced or compulsory labour

Suppliers shall not participate in, or benefit from any form of forced labour, including such practices as the unlawful or illegitimate withholding of wages. Suppliers shall not allow any practice that would restrict free movement of employees. Such practices may include requirements that employees must submit ID documents, passports or work permits as a condition to gain employment.

3. Working conditions

Suppliers must ensure that employees have reasonable working hours, wage conditions and benefits that are in compliance with applicable regulations and relevant ILO conventions, specifically ILO Declaration on Fundamental Principles and Rights at Work, and respect employees' right to organise in voluntary employee organisations and enter into collective bargaining agreements.

3.1. Working hours

Working excessive hours may pose a threat to workers' health. Suppliers shall ensure compliance to applicable laws and regulations, or relevant collective agreements with regards to working hours. In cases where local regulation is deemed inadequate, the ILO's standards on working time should be used by a supplier to regulate working hours, rest and leisure.

3.2. Living wage

Eastnine expects its suppliers to ensure that wages paid to the employees meet a living wage criteria for the market where supplier is operating.

3.3. Health and safety

We strive to promote a work environment that supports health, safety and well-being of people working within our value chain. We expect our suppliers to work systematically towards ensuring the employee's health and safety in accordance with applicable regulation and beyond. If applicable, workers should have regular and documented health and safety training, personal protective equipment must always be made available and used, and hazardous chemicals and materials must be properly handled. All hazardous work shall be preceded by and be based on documented adequate risk management with implemented controls.

All workers must have access to clean sanitary facilities and clean drinking water.

Suppliers shall without undue delay report to Eastnine all health and safety incidents related to our project sites and in our workplaces.

3.4. Freedom of association and collective bargaining

Suppliers shall recognize and respect employees' right to freedom of association and collective bargaining.

4. No discrimination or harassment

Eastnine respects rights of all individuals and strives to provide environment characterised by equal opportunities and respect, and we tolerate no forms of harassment or discrimination in our value chain.

Suppliers are expected to offer equal opportunities to all and not practice any form of discrimination in hiring and employment practices. No discrimination is permitted on the basis of gender, national or ethnic origin, age, disability, sexual orientation and religious faith.

Any behaviours that can be perceived as offensive or intimidating, including any form of unwanted attention of a sexual nature, are unacceptable.

5. Environment

Eastnine is committed to reducing its negative impact on the environment and invests significant efforts to improve environmental performance of Eastnine's properties and business processes. The goal is to be a regional sustainability leader in our markets of operation.

Eastnine prioritizes suppliers who actively and systematically work with environmental performance of their products and services pursuing strategies targeting reduced energy, water and material consumption, and increased use of renewables and recycled materials. Biodiversity impacts in the events of nature interventions should be analysed and handled responsibly.

Our suppliers must comply with domestic and international environmental legislation and regulations, and must obtain the required permits and licenses. In addition, the suppliers are expected to continuously improve their environmental performance and increase the use of environmentally friendly technology, resulting in reduced carbon emissions and more effective climate action.

Eastnine's suppliers must adhere to a precautionary approach to environmental challenges, avoiding significant harm to nature and the environment when decisions are made. An assessment of the risk of environmental impact must be included in the project implementation, and the risk of adverse impact should be modelled according to the worst rather than best case scenario to ensure maximum damage prevention.

6. Data protection and confidentiality

Eastnine respects everyone's right to the protection of their personal data and the right to integrity. Eastnine's suppliers must respect the privacy of employees and third parties and shall ensure that all uses of personal data takes place in accordance with applicable statutes and regulations. If the supplier in the course of its business with Eastnine processes personal data on behalf of Eastnine, a separate data processing agreement must be established and complied with in accordance with the GDPR prior to this processing.

Suppliers are expected to ensure the protection of confidential information received from Eastnine, our customers and third parties against misuse, theft, fraud or improper disclosure.

7. Anti-corruption and anti-bribery

Eastnine has zero tolerance for all forms of bribery or corruption including embezzlement, money laundering, extortion, facilitation payments, fraud and favouritism of family and friends (nepotism) as well as any benefits, favours or gifts than may unduly affect the involved parties.

Suppliers shall conduct their operations with an equally high level of integrity, and zero-tolerance for any form of bribery or corruption. Suppliers shall not offer any benefits or gifts to Eastnine employees or its intermediaries, and neither shall accept any benefits, gifts, or facilitation payments from Eastnine employees or its intermediaries. This applies regardless of whether the benefit is offered directly or indirectly.

All invoices, reports and documents must be complete and accurate.

8. Fair competition

Fair and open competition is in the best interests of all market players and society at large as it results in efficiency and innovation, which are important for a well-functioning economy. Eastnine is committed to fair competition and tolerates no breaches of competition law.

Suppliers shall respect and comply with all applicable competition laws and regulations and not enter into discussions or agreements with competitors concerning pricing, market sharing or other similar cartel activities.

9. Conflicts of interest

Eastnine strives to conduct its business in an ethical way where we actively avoid conflicts of interest, and we demand the same in our supply chain. Conflicts of interest can originate from benefits such as travel and entertainment, gift, charitable gifts, political contributions, sponsoring and close relations.

Eastnine suppliers must never attempt to exert influence on the processing or decision of a case when there are conditions or circumstances (business-related, financial, or private) that can lead to a potential or actual conflict of interest.

Suppliers shall notify Eastnine of any actual or perceived conflict of interest situations in their work with Eastnine.

10. Sanctions

Suppliers shall not engage in business dealings with a sanctioned country, group, organization or individual. Eastnine shall be notified immediately if there is a sanctions breach on a supplier side.

11. Complaints and grievances

Suppliers should make available appropriate grievance mechanisms to personnel and interested parties to make comments, recommendations, reports or complaints concerning the workplace, the environment or suppliers' business practices.

12. Reporting concerns to Eastnine – whistleblowing

In the context of providing a contractually agreed service or goods to Eastnine, if the supplier, its employees, its contractors, or any other party believes that the terms of this Code are not followed, or that Eastnine is in violation of this Code, suppliers are encouraged to report such concerns to the Eastnine's management, or via a designated whistleblowing channel at <http://www.eastnine.com/en/whistleblowing>.

RESPONSIBILITY

Responsibility for implementation of this policy: CEO

Responsibility for implementation control: CFO

Responsibility for review: Board of Directors

Time for review: Annually or as needed.

DISTRIBUTION

Internally within the Group and externally.

This policy was originally adopted by the Board of Directors on 28 August 2018 and latest updated on 24 October 2024.
