



SINFRA CODE OF CONDUCT FOR SUPPLIERS

This Code of Conduct applies to framework agreements signed from 4 June 2025



Sinfra is a purchasing centre with high standards and expectations for framework agreement suppliers involved in agreements procured for the benefit of its members. Sinfra imposes stringent sustainability requirements on these suppliers across all areas of sustainability: environmental, social, and economic. Sinfra expects framework agreement suppliers to work continuously towards improvement in all sustainability areas, in accordance with this Code of Conduct, in collaboration with Sinfra and its members.

Framework agreement suppliers are responsible for passing on the requirements of this Code of Conduct, or equivalent internal requirements, to any subcontractors and partners involved in the supply chain for products and services delivered to Sinfra's members under the framework agreement. Subcontractors and partners must also comply with these requirements.

Sinfra's Code of Conduct is based on:

- The Ten Principles of the UN Global Compact, including human rights, labour rights, environment and anti-corruption
- The UN Universal Declaration of Human Rights
- The UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, including guidance on due diligence for responsible business conduct
- ILO Core Conventions on forced labour, freedom of association, child labour, discrimination, and safe and healthy working environment
- The Rio Declaration on Environment and Development
- The United Nations Convention against Corruption
- Essential legal requirements for robust operations (including requirements for vital societal functions and services, critical infrastructure and/or security-sensitive activities or other protective security legislation)

Environment

Framework agreement suppliers must manage their operations in a responsible and proactive manner with regard to the environment. This means applying the precautionary principle throughout the entire value chain and working preventively to minimize environmental risks and negative impacts. Environmental considerations should be an integrated part of daily operations—both strategically and operationally.

Environmental Legislation

Framework agreement suppliers must conduct their operations in accordance with applicable environmental legislation and relevant regulatory requirements. This includes ensuring that all necessary environmental permits and licenses are in place, up to date, and complied with according to current regulations. Understanding which environmental laws are relevant to the supplier's operations is part of this responsibility.

Environmental Management Systems

Framework agreement suppliers must act in accordance with ISO 14001 or an equivalent environmental management system. Sinfra encourages suppliers to be third-party



certified and thereby audited by an independent body. Such a system provides the foundation for structured and long-term environmental work that enables continuous improvement. Suppliers are encouraged to work systematically with goals, measurement, follow-up, and improvement of their environmental performance, and to pass on environmental requirements throughout their supply chains.

Resource Management and Environmental Impact

Framework agreement suppliers must actively work to avoid, minimize, and limit waste and emissions arising from their operations. Resource use—including energy, water, land, and raw materials—should be characterized by efficiency, circularity, and sustainable utilization. This entails a responsibility to eliminate or prevent negative impacts on the environment and ecosystems where possible.

If environmental impact cannot be entirely avoided or minimized, the supplier must take responsibility for any resulting damage. It is of utmost importance that operations are conducted with respect for biodiversity, ecosystem services, and the needs of local communities—particularly regarding access to clean drinking water, clean air, and fertile agricultural land.

Hazardous substances must be handled with great care and in accordance with applicable legislation. Suppliers are encouraged to replace hazardous substances with less harmful alternatives where possible and to integrate best available technologies into their operations to continuously reduce environmental and health impacts.

Climate Impact

Framework agreement suppliers should actively work to reduce negative climate impact. Sinfra encourages suppliers to take action throughout the value chain to reduce their climate footprint. Suppliers should set targets for reducing climate impact and continuously monitor progress towards reducing greenhouse gas emissions, preferably in line with the Paris Agreement's 1.5°C scenario.

Sinfra encourages the use of renewable energy, energy efficiency measures, climate-smart transport solutions, reduced climate impact from products and services, and investments in innovations that contribute to reduced climate impact. Where climate impact cannot be avoided, active mitigation efforts are expected.

Waste Management and Circularity

Waste must be managed in a structured, traceable, and responsible manner. Suppliers must work to minimize the amount of waste generated during production, distribution, and post-use—and prioritize reuse, recycling, and circular solutions over landfill or incineration. Products should, as far as possible, be designed for circular flows with potential for reuse, long lifespan, and material recycling.

Hazardous waste must be handled in accordance with applicable legislation and with the highest possible regard for environment and human health. Suppliers are encouraged to work systematically to improve their waste management, for example through monitoring and collaboration with approved waste management partners.



Human Rights

Sintra's framework agreement suppliers must respect, support, and protect human rights as defined by the United Nations and in accordance with international conventions on civil and political rights, as well as the International Covenant on Economic, Social and Cultural Rights—both in the workplace and throughout their business operations. All employees and workers must be treated fairly, with dignity and respect.

All products and services delivered to Sintra's members under the framework agreements must be produced under conditions that are consistent with human rights. Suppliers must actively work to identify risks throughout their value chain and take measures to avoid causing, contributing to, or being linked to adverse impacts on human rights.

Gender Equality and Non-Discrimination

Gender equality is a fundamental human right. Likewise, equality (the equal value of all people) holds a prominent place in the UN's Sustainable Development Goals. Gender equality, equality, diversity and inclusion are strategic areas and values essential for sustainable development. They require active measures to be realized at all levels of society.

Businesses have both a responsibility and an opportunity—as well as a vested interest—in promoting gender equality in the workplace, in the market, and in society at large. All framework agreement suppliers must work to promote gender equality as well as equality in general wherever they have the ability to influence. All framework agreement suppliers must also work to prevent discrimination. Guidance can be found in initiatives supported by the UN Global Compact, such as the Women's Empowerment Principles (WEP), which help companies and workplaces implement gender equality.

National Legislation

Framework agreement suppliers must operate in full compliance with the laws of the countries in which they are active. National legislation must always be regarded as the minimum standard for working conditions and labour rights. Where national legislation imposes stricter requirements than international conventions (such as the ILO Core Conventions or the UN Declaration of Human Rights), national legislation shall take precedence.

All necessary permits, licenses, and other regulatory requirements must be obtained and complied with.

Conflict Minerals

Framework agreement suppliers offering contracted products that may contain so-called conflict minerals must take appropriate measures to identify the use of such minerals in their supply chain and establish traceability or chain of custody to their source or processing location. Suppliers must also take appropriate steps to ensure that risks are identified and that suitable preventive, mitigating, and remedial actions are taken throughout the supply chain. Upon request, suppliers must share relevant information regarding the origin of conflict minerals, as well as any audits and controls conducted.

Suppliers are encouraged to publicly disclose their due diligence efforts. They must also work to replace or reduce the use of conflict minerals in their supply chains wherever



possible. Due diligence efforts regarding conflict minerals should also cover other high-risk minerals, such as cobalt.

Labour Rights

All framework agreement suppliers must respect fundamental labour rights as outlined in the ILO Core Conventions. These conventions form the basis for decent working conditions and include the right to freedom of association, collective bargaining, protection against discrimination, prohibition of child labour and forced labour, and a safe working environment.

All workers within the supplier's operations and supply chain must be treated fairly, equally, and with respect for their dignity. The working environment must be safe, inclusive, and free from harassment, discrimination, or any other form of abusive treatment.

Sinfra expects suppliers to work proactively to ensure that these principles are upheld throughout their operations. Products and services delivered under Sinfra's framework agreements must be produced in accordance with these fundamental labour rights.

Child Labour and Young Workers

Child labour, as defined by the ILO Convention, is prohibited. Suppliers must actively combat all forms of child labour. Suppliers must not employ children below either the minimum legal working age or the age for completing compulsory education in the country of operation. Suppliers must not employ workers under the age of 18 for tasks that may be hazardous or harmful to their health and safety.

Suppliers are responsible for developing socially and economically sustainable alternatives (e.g. education) to child labour, using their own or external resources, in cases where child labour is found to occur.

Forced Labour

The use of any form of forced or penal labour is strictly prohibited. Suppliers must ban all use of forced labour, slavery, contractual work, or compulsory labour.

All work, including overtime, must be voluntary. Workers must have the right to freely leave their job or terminate their employment with reasonable notice. Suppliers must not require workers to surrender identification documents, passports, or work permits as a condition of employment.

Non-Discrimination

Suppliers must not engage in any form of discrimination in hiring, employment practices, or professional activities. This includes access to training, promotion, and compensation, based on race, colour, religion, gender, gender expression, sexual orientation, age, physical ability, health status, disability, political opinion, nationality, social or ethnic origin, trade union membership, marital status, or any other reason¹.

¹ Note that sexual harassment is defined as discrimination



Wages, Benefits, and Working Hours

Suppliers must pay all their workers at least the minimum wage required by applicable laws and regulations and provide all statutory benefits. Wages must be paid directly to the employee, in full and on time. All employment terms—including compensation, working hours, holidays, leave, and public holidays—must comply with applicable laws and regulations, particularly mandatory industry standards. Overtime must be compensated.

Freedom of Association and Collective Bargaining

Suppliers must recognize and respect employees' rights to freely associate and bargain collectively. In situations where the right to organize and bargain collectively is restricted by law or still developing, suppliers must allow workers to freely choose their own representatives and facilitate dialogue between employees and management regarding wages and working conditions without fear of retaliation.

Safe and Healthy Working Environment

Suppliers must ensure a safe and healthy workplace, or any other location where production or work is carried out, in accordance with international guidelines. Workers must be informed of any potential health risks associated with their work, provided with appropriate health and safety training, and given access to relevant protective equipment. To prevent accidents, suppliers must conduct regular risk assessments and inspections, as well as promote a culture where workers can report incidents and risks without fear of negative consequences.

Business Ethics

All framework agreement suppliers must conduct their business with integrity, transparency, and in accordance with applicable laws and internationally recognized principles of business ethics. Suppliers must actively combat all forms of corruption, including bribery, undue influence, extortion, bribes, and other forms of misconduct.

Operations must be characterized by openness and accountability. This means that decisions and business relationships must never be influenced by private or hidden interests, but always be based on objectivity and professionalism. Suppliers are expected to have appropriate governance systems and procedures in place to prevent, identify, and manage risks related to corruption and misconduct throughout the value chain. Suppliers must provide regular and documented business ethics training for employees, including new hires.

Sinfra encourages its suppliers to maintain an open corporate culture with high ethical standards. Suppliers must promote and allow the reporting of any suspected unethical or illegal behavior without fear of retaliation.

Anti-Corruption

Sinfra opposes all forms of corruption, including bribery, extortion, and embezzlement. Suppliers must not give, promise, or offer—nor accept—anything of value with the intent to influence a decision, secure an advantage, avoid a disadvantage, or establish or



maintain a business relationship. This also applies to third parties connected to the supplier's operations.

Anti-Cartel Practices

Sinfra's framework agreement suppliers must not participate in cartels for the purpose of gaining unfair advantage. Cartels, particularly in the form of price-fixing, market sharing, or production limitations, are strictly prohibited.

Conflicts of Interest

Suppliers must avoid conflicts of interest that could undermine their credibility with Sinfra or damage the trust of Sinfra's members or other stakeholders trust in Sinfra or Sinfra's members.

Protection of Third-Party Rights and Information

Suppliers must respect intellectual property rights and protect confidential information by safeguarding it against misuse, theft, fraud, or improper disclosure.

Grievance Channels and Remediation Mechanisms

Suppliers should provide appropriate grievance mechanisms for all personnel and affected stakeholders, including impacted communities, allowing them to submit feedback, recommendations, reports, or complaints related to the workplace, environment, or business practices. Suppliers should have a remediation process in place to appropriately address and follow up on reported violations of human rights and other issues covered in this Code of Conduct, while protecting the integrity and potential anonymity of whistleblowers and preventing retaliation.

Compliance and Commitment

Framework agreement suppliers commit to adhering to the principles outlined in this Code of Conduct. Suppliers must have appropriate control systems in place to ensure their own compliance with this Code. They must also communicate the requirements of Sinfra's Code of Conduct to their supply chain, or alternatively, apply their own equivalent standards. If internal standards are used instead of Sinfra's Code, a verification must be conducted to ensure that the minimum requirements—aligned with the UN Global Compact (human rights, labour rights, environment, and anti-corruption), the Universal Declaration of Human Rights, ILO Core Conventions on forced labour, freedom of association, child labour, non-discrimination, and occupational health and safety, as well as legal and due diligence requirements—are included in the supplier's own code and communicated throughout the supply chain.

Suppliers must also have a monitoring system in place to follow up on compliance and implementation among any subcontractors and suppliers directly or indirectly involved in the provision of goods and services to Sinfra's members.



Commitment to Continuous Improvement

Sinfra recognizes that suppliers are at different stages of maturity in their sustainability work. Therefore, Sinfra commits to collaborating with its suppliers to promote continuous improvement. If it becomes evident that a supplier does not meet the requirements and expectations outlined in this Code of Conduct, Sinfra may offer guidance on which areas need to be addressed or strengthened.

The supplier must then promptly take relevant corrective actions and demonstrate clear progress. Sinfra also encourages suppliers to participate in joint initiatives aimed at raising industry standards and contributing to a more sustainable and responsible supply chain.

Due Diligence and Transparency

Suppliers are expected to conduct risk-based due diligence in proportion to their size, impact, resources, and business operations, covering sustainability in both their own activities and their supply chain. This means identifying and assessing risks and potential impacts in areas such as human rights, labour rights, environment, and business ethics, and implementing appropriate preventive, mitigating, and remedial measures.

Upon request, suppliers must provide Sinfra with information about their due diligence processes and outcomes.

Monitoring and Verification

By signing the framework agreement, the supplier confirms that they—and any subcontractors and partners—comply with the requirements set out in this document. The signature also grants Sinfra the right to verify compliance through audits or other means.