

SINFRA'S CODE OF CONDUCT FOR SUPPLIERS

This Code of Conduct applies to framework agreements signed until 2023-10-31

Sinfra is a purchasing centre and has high standards and expectations for framework agreement suppliers procured by Sinfra for the benefit of its members.

For Sinfra, sustainability is simply a good deal for both framework agreement suppliers and members. To be a good deal, it must be sustainable at all levels, both from an environmental and a CSR perspective, as well as a technical, legal and economic standpoint. Sinfra's members need sustainable framework agreement suppliers as much as framework agreement suppliers need sustainable and viable clients.

Sinfra procures framework agreements on behalf of its members. Procured framework agreement suppliers have a unique opportunity to provide members with the technology and/or services they need through direct contact with Sinfra's member companies, which can call off on the agreements directly since the procurement is already complete. Sinfra expects you, as a framework agreement supplier, to safeguard and defend the agreement entered into. This means that, as a supplier, in addition to sales and technology development within the scope of the agreement, you are constantly striving to improve in every area of this code of conduct in collaboration with Sinfra and its members. It goes without saying that, as a framework agreement supplier, you actively participate in the improvement and follow-up work led by Sinfra. This may involve, for example, self-evaluation surveys, visits and other activities to drive sustainability work in the industry.

Framework agreement suppliers are expected to do their utmost to limit the climate impact, improve technology, be an active and law-abiding part of a positive societal development and work to combat all forms of corruption. As part of its sustainability work, Sinfra will set objectives for framework agreement suppliers in areas we deem a priority.

Sinfra's subcontractors who are not framework agreement suppliers are also expected to follow this code of conduct.

Sinfra's code of conduct is based on the ten principles of the UN Global Compact. These ten principles are themselves based on the UN Declaration of Human Rights, the ILO's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration and the UN Convention against Corruption. The ten principles are contained in appendix 1.



Human rights (Global Compact principles 1 and 2)

Sinfra's suppliers must respect, support and protect human rights in accordance with the UN's definition and international conventions, both in the workplace and throughout its business. All employees and other workers should be treated with dignity and respect. Suppliers must also work to ensure that their suppliers respect, support and protect human rights.

Sinfra's suppliers must respect fundamental social requirements throughout their business. Products supplied to Sinfra and Sinfra members via Sinfra's agreements shall be manufactured under conditions compatible with:

- The UN Global Compact
- The ILO's eight fundamental conventions nos. 29, 87, 98, 100, 105, 111, 138 and 182
- The UN Convention on the Rights of the Child, article 32
- The occupational health and safety legislation in force in the country of manufacture
- The employment law and social security cover that apply in the country of manufacture

National legislation

The legislation in the countries where the supplier operates must be complied with, and always serves as a minimum threshold for employee conditions. If the national legislation sets higher demands than the ILO conventions or the UN Declaration of Human Rights, this will always take precedence. Suppliers must obtain all necessary permits and licences and keep these up to date, and comply with business and reporting requirements in accordance with these permits and licences. Suppliers must abide by all laws, regulations and ordinances in the countries in which they conduct business.

Sinfra expects its suppliers to conduct their business in accordance with applicable laws and to adhere to internationally agreed rules on business ethics.

Working conditions (Global Compact principles 3-6)

Child labour and young workers

Child labour, as defined in the ILO conventions, is prohibited. Suppliers must work to combat all forms of child labour. Suppliers are not permitted to employ children under either the minimum employment age or the maximum age of compulsory education in the country. Suppliers may not employ workers under the age of 18 to perform work that may be hazardous or harmful to their health and safety.



Suppliers have a responsibility to develop socially and economically viable alternatives (e.g. training) to child labour in cases where it is discovered to exist.

No forced labour

It is prohibited to use any form of forced or penal labour. Suppliers shall prohibit any use of forced labour, slave labour, contract work or penal labour.

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

No discrimination

Suppliers may not engage in any form of discrimination concerning employment, recruitment procedures or professional practice, including access to training, promotion and rewards, whether based on race, skin colour, religion, gender, gender expression, sexual orientation, age, physical condition, state of health, disability, learning disability, political views, nationality, social or ethnic origin, trade union membership, marital status or other reason.

Salaries, benefits and working hours

Suppliers must pay all workers at least the minimum required by applicable laws and regulations and offer all statutory benefits. Salaries should be paid directly and in full to the employee at the agreed time. All employment conditions, including pay, working hours, holidays, leave and public holidays, must comply with the applicable laws and regulations, and in particular mandatory industry standards. Overtime must be paid.

Freedom of association and right to collective bargaining

Suppliers must recognise and respect employees' right to organise freely and bargain collectively. In situations where the right to organise and bargain collectively is restricted by law, or under development, suppliers must allow employees to freely choose their own representatives and the supplier must facilitate meetings between employees and company management to discuss pay and working conditions without negative consequences.

Environment (Global Compact principles 7-9)

Waste management and pollution prevention

Suppliers must strive to avoid or reduce all waste and emissions resulting from their business. Suppliers must use effective technology wherever possible to reduce the environmental impact.



Chemicals must be processed in a way that is safe for humans and the environment. Suppliers must do their utmost to reduce their climate impact. The products must wherever possible be designed for reuse/recycling.

Health and safety

Suppliers must guarantee a safe and healthy workplace or other location where production or operations are performed. The work environment must maintain compliance with international guidelines. Employees must be informed of any health risks posed by the work and given appropriate work environment training. All employees must be provided with and use appropriate protective equipment.

Business ethics (Global Compact principle 10)

Anti-corruption

Sinfra works to combat all forms of corruption, including bribery, extortion and embezzlement. Suppliers may not give, promise or offer, nor accept anything of value for the purposes of securing a decision or an advantage, avoiding a disadvantage or maintaining business. This also applies to third parties with connections to the supplier's business.

Anti-cartel

Sinfra's suppliers may not participate in cartels in order to gain an advantage on improper grounds. Cartels, particularly in the form of price fixing, market sharing and production restrictions are prohibited.

Conflict of interest

Suppliers must avoid conflicts of interest that could jeopardise the supplier's credibility with Sinfra or Sinfra's members, or damage other parties' trust in Sinfra or Sinfra's members.

Protection of third parties' rights and information

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

Duty

Sinfra expects its suppliers to adhere to the principles set out in this code of conduct. Suppliers must have the appropriate control systems to ensure compliance with this code of conduct or similar



standards. The control system also applies to the supplier's subcontractors and suppliers, who are either directly or indirectly involved in the supply of products and services to Sinfra or Sinfra's members.

Consequences of breaches

Breaches will be dealt with by implementing the appropriate measures. Depending on the gravity of the breach, appropriate measures may involve requesting corrective actions, or terminating working relationships with suppliers, subcontractors or contractors who have commissioned, facilitated or used unacceptable methods.

Inspections

By signing of the agreement on behalf of the supplier, the CEO/responsible signatory shall certify that the supplier and any subcontractors will comply with the requirements set out in this document. Signing shall give Sinfra the right to inspect, or in any other way verify that the requirements set out in the document have been met.

Global Compact

The UN Global Compact asks companies to adopt, support and implement ten principles relating to human rights, employment law issues, the environment, and corruption within their sphere of influence.

The principles of the UN Global Compact have universal consensus and are based on the UN Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the UN Convention against Corruption.

10 principles of the Global Compact:

Human rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: Make sure that they are not complicit in human rights abuses.

Working conditions

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: The elimination of all forms of forced and compulsory labour;

Principle 5: The effective abolition of child labour; and

Principle 6: The elimination of discrimination in respect of employment and occupation.



Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: Undertake initiatives to promote greater environmental responsibility; and

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

