

# Code of Conduct for Orbis' Suppliers



## 1 Introduction and scope

Orbis Oy and its affiliates (later Orbis) are committed to adhering to all applicable legislation and ethical principles in all their operations. Orbis strives for long-term business relations and healthy cooperation with its suppliers and other key stakeholders. We want to contribute to a better environment and living and working conditions for all people and employees and expect the same from our suppliers and partners.

This Supplier Code of Conduct specifies the principles that Orbis's suppliers shall follow in their operations. The Code of Conduct defines Orbis's approach to ethical business practices, human and work-related rights, and environmental values. The jointly agreed operating principles promote profitable business operations and a culture of responsibility and integrity, prevents unlawful and unethical practices, and strengthens confidence in our stakeholders. Our suppliers are also obliged to ensure that all their suppliers involved in the production of goods and services for Orbis comply with this Code of Conduct.

This Code of Conduct is applied to Orbis' suppliers in all countries in which Orbis operates.

## 2 Business operations

### 2.1 Compliance with laws and regulations

When carrying out business operations, suppliers must comply with national laws, statutes, orders and governmental instructions in their respective countries. Local requirements imposed by legislation must be complied with even when they are stricter than this Code of Conduct.

Suppliers should encourage ethical behavior and compliance with laws in their company culture.

If any unlawful or unethical action is detected in a supplier's business operations, the supplier must take necessary measures to address such action appropriately and to prevent similar action occurring in the future.

### 2.2 Fair competition

In their operations, suppliers must promote free and fair competition in the market and comply with applicable competition laws. Suppliers shall not take part in any measures aimed at preventing, restricting, or distorting competition.

## 2.3 Bribery and corruption

Orbis has a zero-tolerance on bribery and corruption. Suppliers may accept or engage in any kind of bribery or corruption neither by themselves nor by third parties or intermediaries. Suppliers must not, directly or via third parties, promise or offer monetary or any other benefits to anyone to gain illegal business benefits or to influence decisions. Suppliers may not request, accept, or receive monetary or other benefits from other people for these purposes.

## 2.4 Relationships with partners

Suppliers must verify the background of their suppliers and other partners, and the legitimacy of their business operations before starting any cooperation.

Suppliers may not take part in money laundering, financing of terrorism or criminal activity in any form, and they must abide by all applicable sanction programs.

# 3 People

## 3.1 Safe working conditions

Orbis is committed to providing all its employees and suppliers with a safe and healthy work environment. Suppliers must comply with laws on occupational safety, Orbis' requirements for occupational safety, and other safety and health instructions.

Suppliers must specify individuals responsible for matters of occupational health and safety in their organization. Suppliers also must promote proactive occupational safety culture, provide induction, and ensure absolute compliance with occupational safety legislation and safety instructions as well as training on these.

## 3.2 Equal treatment and human / work-related rights

Equal treatment of all employees is one of Orbis' key values. We promote open, honest, and respectful communication among all employees. Suppliers may not discriminate against anyone based on their ethnic origin, age, gender, family situation, sexual orientation, conviction, functional limitations, political views, or other similar factors. Suppliers may not accept any form of bullying or harassment, such as violence, sexual harassment, inappropriate punishments, or any kind of abuse.

Suppliers must respect and promote internationally recognized human and work-related rights in all their operations. Suppliers must respect employees' right to organize, join, or not join associations and trade organizations, and to collectively negotiate with the employer.

Suppliers may not accept any kind of forced labor or use of child labor.

# 4 Environment

In cooperation with their employees, customers and vendors, suppliers must aim at reducing the environmental impact of their operations, and act proactively in environmental matters.

Suppliers must continuously improve the eco-friendliness of their products and/or services, and actively seek means to reduce harmful effects on the environment throughout the life cycle of their products/services.

Suppliers must comply with legislation related to the environment, environmental permits, and other applicable orders. Suppliers must aim to reduce or eliminate the amount of waste generated or other harmful impact on the environment, for example, by recycling material or waste.

Suppliers must exercise due diligence on the source and chain of custody of any tantalum, tin, tungsten, and gold in products they supply to Orbis to assure that they are sourced in compliance with the OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

Suppliers must ensure that their employees are aware of and trained in environmental requirements.

## 5 Reporting

Orbis or a third party designated by Orbis has the right to supervise compliance with this Code of Conduct and to audit the supplier in relation to this.

If Orbis notices that the supplier does not abide by this Code of Conduct, Orbis will notify the supplier of the matter. The supplier must take corrective measures without delay and demonstrate their implementation in an adequate manner.

Orbis has the right to cancel orders made, suspend future orders and/or terminate the agreement with the supplier if the supplier has violated this Code of Conduct.

If the supplier notices or suspects that the provisions of this Code of Conduct are being violated, the supplier must immediately report the matter to Orbis. The supplier must also ensure that its employees, suppliers, and other key stakeholders have a reporting channel available for reporting any violations of ethical guidelines and rules.

**Place and date**

**Company name**

**Name**

**Title**