



 Foxway

Policy

Supplier Code of Conduct

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1. Context

The essence of Foxway (meaning Foxway AB and all its subsidiaries) is to make a positive impact on society. As simple as that.

First and foremost, we do it through our daily business, by enabling circular and resource-efficient IT solutions. We aim to prolong the use of IT equipment, keep natural resources circulating and reduce the carbon footprint of our customer base and the global digital ecosystem. And secondly - by providing affordable IT solutions and developing social impact initiatives related to our know-how, Foxway has the ambition to reduce digital seclusion-based inequalities among vulnerable groups and minorities.

We can only achieve this by practicing responsible business conduct in our own operations and expecting our suppliers and business partners across the whole value chain to do the same. By "responsible business conduct," we mean respect for human rights, fair labor relations, care for the natural environment, business ethics, and compliance.

This Supplier Code of Conduct (the "Code"), grounded in Foxway's Sustainable Procurement Policy, outlines to our Suppliers the principles we expect them and their subcontractors to comply with while doing business with Foxway.

2. Scope

This Code comprises aspects related to the following frameworks:

- United Nations Global Compact (UNGC),
- United Nations Universal Declaration of Human Rights (1948), The International Labour Organization Core Conventions, The United Nations Convention on the Rights of the Child (Article 32), The United Nations Guiding Principles on Business and Human Rights, The International Bill of Human Rights, The United Nations Rio Declaration on Environment and Development, and The United Nations Convention against Corruption,
- OECD Guidelines for Multinational Enterprises,
- when applicable, OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas,
- the general principles of ISO 9001, ISO 14001, ISO 27001, ISO 45001 standards, and a good corporate governance approach,
- and generally recognized economic, social, environmental, and ethical norms of behavior, common sense, and good faith.

3. Applicability

This Code sets out the mandatory minimum requirements to be followed by Foxway's Suppliers.

We expect all Suppliers to comply with this Code and do their utmost to live up to its requirements within their entire supply chain for the duration of the business agreement(s) with Foxway.

It is the Supplier's responsibility to ensure that its employees, relevant affiliated companies, and subcontractors are informed about the content of this Code and comply with the requirements. In cases of conflict between relevant laws and the principles described in this Code, the highest standard shall prevail.

4. Environment

We expect our Suppliers **to have a policy and due diligence processes** in place for environmental matters. Additionally, the Suppliers should:

Environmental management

- Comply with all relevant and applicable environmental legislation and regulations relevant to the Supplier's location(s) and type(s) of operations.
- Support a precautionary approach to environmental challenges and minimize environmental impacts across their value chain.
- Prevent damage to the environment and surrounding communities, i.e., significant spills and pollution.
- Voluntarily undertake initiatives to promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies.
- Implement an environmental management system, which complies with or is equivalent to the requirements of the ISO14001 or Eco-Management and Audit Scheme (EMAS) standards.
- Avoid greenwashing in their actions and messages.

Climate

- Measure carbon footprint of their own operations.
- Adapt to climate impact and build resilience within their operations.
- Employ procedures to minimize climate impact/carbon footprint (ideally with an aim for carbon neutrality) across their upstream and downstream value chain on company and product/service level.

Resources

- Minimize the use of natural resources (including virgin materials, scarce materials, and polluting resources).
- Minimize waste generation from their own operations, practice proper waste management principles, and minimize the amount of landfill waste.
- Optimize the use of resources and keep them circulating, e.g., through reusing, refurbishing, recycling.
- Minimize the use of energy and use renewable energy sources where possible.
- Minimize the use of water, especially in areas with water stress.
- Employ a lifecycle perspective concerning environmental impact from products and services.
- Encourage responsible and sustainable consumption.

Nature and biodiversity

- Minimize the direct and indirect impact of their operations on biodiversity and natural habitats.
- Minimize different types of air emissions.
- Minimize the use of hazardous chemicals and other materials.

In addition to the above-mentioned minimum requirements, we strongly encourage our Suppliers to further their commitment by introducing additional voluntary measures (for example by committing to and reporting towards Science Based Targets or SME Climate Hub), innovative solutions, and best available techniques to reduce their environmental footprint.

5. Labor and Human Rights

We expect our Suppliers **to have a policy and due diligence processes** in place for labor and human rights-related matters. Additionally, our Suppliers should:

Non-discrimination and equal opportunities

- Treat all employees – whether with a part-time or full-time contract, temporarily or permanently hired within own team, by subcontractors, or in other labour relations – with equal respect and dignity.
- Respect differences between people (including employees) and not participate directly or indirectly in human rights violations.
- Not discriminate regarding gender, nationality, language, religion, race, age, disability, sexual orientation, marital status, political opinion, financial status, union membership, social and ethnic origin, disability, and other special needs.
- Avoid physical, mental, verbal, nor sexual harassment or any abuse of people.
- Promote a culture of diversity in the workplace and equal opportunities where appointments to jobs, rewarding, and personal success depend on individual ability and performance.

Forced labor

- Avoid using and accepting child labor by respecting and acting according to the ILO convention No. 138 on the minimum age for admission to employment and work. Suppliers shouldn't employ anyone under 15 years of age or below the country's legal minimum age.
- Not exploit young workers with work that keeps them away from the education that they are entitled to. Additionally, they should not perform night shifts and overtime nor any other work that is heavy, hazardous, or unsafe to their physical and mental health and development. The term 'young worker' refers to any person over the age of 15 or the minimum legal working age in the relevant territory and under the age of 18.
- Avoid using and accepting other forms of compulsory or forced labor, including trafficking.

Labor relations

- Have employment agreements in writing and in a language that employees understand.
- Enable and support the freedom of association, the right to form or be a trade union member, and to bargain collectively.
- Not discriminate against worker's representatives or members of trade unions, and not hinder them from carrying out their representative functions in the workplace.
- Guarantee the right of expression of employees and maintain proper feedback and grievance mechanisms.
- Protect personal data of employees.

Working time and remuneration

- Comply with all national laws regarding wages and remuneration, working hours, overtime, and vacation.
- Pay all employees and contractors a living wage that provides a discretionary income in compliance with all applicable national laws. Under no circumstances can the payment be less than the national or locally stipulated minimum wage.
- Pay wages directly to the employee within the agreed-upon timeframe and in full.
- Pay overtime compensation and clearly specify this in wage statements.
- Allow employees at least one day of rest per week.
- Keeping working hours within legal limits or a maximum of 60 hours per week, including overtime.
- Enable equal pay for equal work for employees with the same qualifications, experience, and performance, focusing on avoiding the gender pay gap.

Workplace health and safety

- Maintain a health and safety management system, including satisfactory hazard and risk management.
- Conduct regular training on emergency preparedness.
- Provide employees with the best possible work conditions: a safe, healthy, hygienic work environment, with appropriate personal protection equipment and free access to drinking water.
- Implement processes, raise awareness, and build a culture among employees and contractors to minimize the causes of hazards inherent in the working environment and to prevent any accidents and injury to the health.
- Report any severe incident, accident, or fatality in the workplace related to the Supplier's business relationship with Foxway.

6. Business Ethics

We expect our Suppliers to **have a policy and due diligence processes** in place for matters related to governance, compliance, business ethics, and anti-corruption. Additionally, our Suppliers should:

Anti-corruption

- Neither directly nor indirectly request, accept, nor themselves practice any form of corruption, including bribery (both monetary or non-monetary gifts or favors) and the abuse of power, position, or property.
- Neither directly nor indirectly request, accept, nor itself use goods (gifts, services, or other), personal relations, or other inappropriate considerations with the intention to improperly influence business relationships or decision making.
- Only offer or accept gifts or similar benefits to or from a third party if modest in value and consistent with reasonable hospitality given within the ordinary course of business.

Fair competition and avoidance of conflict of interest

- Practice free and fair competition and support the open market.
- Make decisions in both the Supplier and Foxway's best interest and avoid any conflict of interest.

Economic crime prevention

- Prevent, and refrain from any act or omission in connection with financial crime, particularly fraud, extortion, money laundering, and other related crimes.
- Affirm that the Supplier or its shareholders are not subject to any economic or administrative sanctions.

Insurance coverage

- Ensure accurate and complete insurance schemes covering their operations, services, and products.

Transparency

- Adhere to accurate and transparent accounting that fully complies with the law and good accounting practice.
- Disclose regularly and publicly an overview of the management approach and performance on its material environmental, social, and governance aspects.

Confidentiality and privacy

- Safeguard personal and organizational data privacy by collecting, using, holding, and processing data carefully, responsibly, and according to applicable laws and regulations; and taking adequate security measures to avoid the leakage, theft, or other misuses of the data.

- Respect confidentiality obligations with Foxway, including not misusing or disclosing any information that may qualify as sensitive personal data, insider information of Foxway's present and future business operations, or other information which might be reasonably considered as confidential, or which is protected by law.
- Never use Foxways' name or any related information and resources (including the business relationship between the Supplier and Foxway) publicly without the prior written approval of Foxway or unless explicitly agreed in the contract.
- Never use Foxways' name or any related information and resources in relations with policymakers, including in promoting interests of political parties or candidates.

7. Sustainable procurement

We expect our Suppliers to **have a policy and due diligence** processes in place for sustainable procurement. Additionally, our Suppliers should:

- Set clear expectations regarding environmental, labor and human rights, and business ethics standards that their upstream and downstream suppliers should adhere to and communicate those through a Supplier Code of Conduct or a similar document.
- Regularly identify risks in their own supply chain and employ proper mitigation strategies and procedures.
- Ensure that their subcontractors have all necessary environmental permits and licenses to carry out business activities that relate to the Supplier's contract with Foxway.

8. Conflict Minerals and Responsible Mining

We demand that our Suppliers work proactively to ensure that minerals (such as, but not limited to, tungsten, tantalum, tin, and gold) in their products and supply chain are responsibly sourced in accordance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

We expect our Suppliers to, when relevant, have a policy and due diligence processes in place for conflict minerals-related matters. Additionally, the Suppliers should:

- While sourcing from conflict-affected and high-risk areas, neither tolerate nor by any means profit from, contribute to, assist with, or facilitate the commission by any party of:
 - any forms of torture, cruel, inhuman and degrading treatment,
 - any forms of forced or compulsory labour,
 - child labour,
 - other gross human rights violations and abuses such as sexual violence,
 - war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- Refrain from supporting, directly or indirectly, any non-state armed groups through the extraction, transport, trade, handling or export of minerals.

9. Supplier transparent relations and cooperation with Foxway

We expect our suppliers to give us relevant feedback and constructive criticism on how we conduct our business operations. We also encourage our suppliers to share their best practices on ESG work and sustainability with us and the entire supply chain network.

10. Compliance and implementation process

1. Our Suppliers are introduced to this Code when discussing and eventually signing an agreement with Foxway for the provision of products and/or services.
2. Each Supplier shall, upon request from Foxway, provide the necessary information and documentation to verify that the Supplier, its employees, relevant affiliated companies, and subcontractors are compliant with this Code. Unless agreed on a case-by-case basis, the requested documentations shall be provided in English.
3. Each Supplier is required to have appropriate management systems in proportion to the size, complexity, and risk environment of the Supplier's business, to enable adherence to this Code.
4. The appropriate management system should cover a systematic approach to the following:
 - assessment, mitigation, and management of risks, preferably with measurable targets;
 - monitoring of performance, identifying potential breaches;
 - neutral investigation and follow-up procedures in case of occurred confirmed violations; and
 - communication and training about requirements for employees, subcontractors, and suppliers.
5. Should the Supplier be unable to meet the requirements of this Code, or is involved in any negative press, investigation, or violation of this Code, they should relay this information to the Supplier's primary contact at Foxway. Violations can be also reported anonymously and confidentially via Foxway's whistleblowing process at: foxway.trumpet-whistleblowing.eu. Foxway guarantees anonymity and ensures that no one who has drawn attention to the breach in good faith is threatened by discrimination or punishment.
6. Any non-conformities with this Code must be promptly corrected and may be subject to sanctions. In the event of a material breach, Foxway is entitled to terminate the contract with immediate effect.
7. All deviations to this Code need to be agreed upon with a Foxway Sustainability Team representative.

Each Supplier and Foxway jointly state that they will actively seek ways for further improvement in the areas of responsible business conduct for the sake of the sustainable future of society.

Version history

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