



 Foxway

Policy

# Foxway Sustainable Procurement Policy

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*This Sustainable Procurement Policy (the “Policy”) defines our guiding principles and approach to integrating sustainability considerations into all procurement activities undertaken by Foxway (meaning Foxway AB and its subsidiaries). These principles apply to the procurement of all goods and services, including consultancy services.*

*This Policy aims at ensuring that procurement activities allow Foxway to obtain the best value for money from its vendors avoiding waste and misappropriation of resources, while driving good ethical, social, and environmental practices in line with Foxway’s vision and values.*

*This Policy is aligned with the values and principles set out in our Code of Conduct and forms the basis for our Supplier Code of Conduct. This Policy is based on international conventions and guiding principles including UN Global Compact, UN Declaration of Human Rights, OECD Guidelines and the general principles of ISO 9001, ISO 14001, ISO 27001 and ISO 45001 standards.*

*Should the principles and guidance contained in this Policy conflict with specific principles or guidance applicable to a specific project, initiative or alliance, the strictest shall prevail.*

## Principles

Procurement shall be conducted in an impartial, transparent and accountable manner. Sustainable procurement is hereby defined as procurement that has the most positive environmental, social and economic impact possible.

### 1. Environmental Sustainability

1.1 Procurement shall seek to minimize the impact on the environment including, but not limited to resource use, pollution, biodiversity protection, and combatting climate change.

1.2 The procurement organization shall understand the nature of the products and materials they are supplying and recognize their responsibility to protect the environment.

1.3 The procurement organization shall take into consideration the following criteria when assessing potential suppliers:

- presence of policies and due diligence processes on environmental issues;
- supplier’s environmental management practices;
- supplier’s commitment towards climate change mitigation and adaptation;
- supplier’s commitment towards waste minimization and sustainable use of natural resources, as well as sustainable production and consumption
- supplier’s commitment towards minimizing their direct and indirect impacts on the natural environment and biodiversity.

### 2. Labour and Human Rights

2.1 The procurement organization shall seek to achieve high standards of integrity, inclusivity, transparency and stewardship in its supply chain by conducting business with responsible vendors that respect the rule of law and human rights.

2.2 The procurement organization shall take into consideration the following criteria when assessing potential suppliers:

- presence of policy and due diligence processes on human rights and labor matters;
- supplier’s commitment towards non-discrimination and equal opportunities at the workplace;
- supplier’s commitment towards mitigation of any forms of child- and forced labour;
- supplier’s commitment towards a safe and just working environment (notably working time, remuneration and health and safety conditions);

- supplier's commitment towards employees' involvement and development (notably fostering social dialogue, respecting freedom of association, providing proper grievance mechanisms).

2.3 All prospective vendors shall be given an equal opportunity to participate in Foxway's procurement activities and be treated with fairness to ensure that they are given the same level of information when preparing quotations or tenders. The procurement organization shall not discriminate against vendors based on factors such as race, color, religion, gender, age, disability or political affiliation.

2.4 The procurement organization shall take appropriate measures to prevent information leakage voluntary or involuntary that may create any asymmetry of information between prospective vendors during the procurement process.

### **3. Business Ethics and Governance**

3.1 The procurement organization shall respond to ethical operating practices in line with our Code of Conduct.

3.2 The procurement organization shall take into consideration the following criteria when assessing potential suppliers:

- presence of policies and due diligence processes for compliance, ethics and anti-corruption matters;
- supplier's commitment towards anti-corruption practices;
- supplier's commitment towards mitigation of anti-competitive practices;
- supplier's commitment towards economic crime prevention;
- supplier's insurance coverage;
- supplier's practices and transparency regarding accounting and managerial approach towards ESG-issues;
- supplier's commitment towards data security.

3.3 The procurement organization shall, when relevant, take into consideration Foxway's Policy on Responsible Sourcing of Minerals from Conflict-Affected and High-Risk Areas.

### **4. Financially Sound Procurement Practices**

4.1 Procurement shall be conducted with the aim of obtaining best value for money while adhering to Foxway's environmental, social and ethical values. Beyond the numbers provided by the prospective vendors, cost shall be assessed across the entire procurement cycle (including the cost of the procurement activity itself), as well as the entire life cycle of the acquired goods and provided services.

4.2 Quotations and tenders should be evaluated not only in terms of price competitiveness, but also equally considering the quality of the products/services to be procured and the track record of the prospective vendors.

### **5. Supplier Diversity**

Foxway strives to build a diverse global supply chain by creating mutually beneficial partner relationships and paving the way for small and diverse global businesses. We are actively committed towards extending opportunities to small enterprises and diverse businesses that meet our procurement and contractual standards.

### **6. Supplier Engagement and Training**

6.1 Foxway requires targeted Suppliers to participate in its Supplier Training Programs to help ensure that Foxway's policy commitments are implemented and reinforced.

6.2 Foxway's Supplier Training Programs include, but are not limited to, the subjects of diversity, equality and inclusion; ensuring onsite health and safety standards; sustainable procurement; environmental engagement and reporting; and circularity.

6.3 Suppliers are identified for program participation based on Foxway's own assessment mechanisms and are expected to participate as requested.

## 7. Continuous Improvement

7.1 Foxway is committed to responsible sourcing and all Suppliers must meet the standards specified in this Policy and the Supplier Code of Conduct.

7.2 The commitments identified in this Policy and corresponding targets are measured with the help of relevant KPIs set and disclosed in Supplier Management Manual.

## 8. Ensuring Supplier Suitability

8.1 Foxway conducts appropriate risk-based due diligence on all Suppliers during the initiation of the relationship, and throughout the term of the relationship.

8.2 Suppliers must comply with Foxway's due diligence procedures and provide complete, accurate, and timely information when requested to facilitate such efforts.

8.3 Suppliers must provide periodic certifications of compliance with relevant laws and the Supplier Code of Conduct, and perform any other requested mitigation activities, in a form, manner and timeframe acceptable to Foxway.

## 9. Implementation and Monitoring

9.1 General Counsel is responsible for overseeing the implementation of this sustainable procurement policy.

9.2 Regular audits and assessments will be conducted to monitor compliance with the policy and identify areas for improvement.

9.3 The policy will be revised once a year to assure compliance with external and internal guidelines.

## Review and Approval

This Policy has been reviewed and approved by:

### Version history

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