Supplier Code of Conduct

Valid for Buchen Sweden AB and its subsidiaries

Buchen Sweden AB is part of the Remondis Group. The goal of the Remondis Group is to enjoy sustainable growth and we believe that this is only possible if all legal and ethical requirements are complied with. As part of an international group with operations throughout Sweden, we cooperate with many suppliers of goods and services, both domestically and in other countries. We are responsible for conducting our business in a sustainable manner and expect our suppliers to share this responsibility; and we require compliance with this Supplier Code of Conduct in our supplier contracts.

The Supplier Code of Conduct applies to all suppliers to Buchen Sweden AB and its subsidiaries (from here on referred to as Buchen).

It is your responsibility as a supplier to comply with this Code of Conduct and to ensure and monitor that your subcontractors comply with the Supplier Code of Conduct; and to do your utmost to ensure that the Code is complied with throughout the supply chain. Suppliers to Buchen are expected to select their own suppliers and subcontractors after having carried out checks for compliance with sustainability requirements.

A basic requirement is that our suppliers must at least comply with relevant legislation and regulations in the countries where they operate. Buchen follows the Remondis global Code of Conduct and Corporate Compliance Guidelines and recognises the ten principles of the UN Global Compact* and its underlying declarations and conventions, working to ensure that these tenets are promoted in the societies and environments in which the group operates.

The Supplier Code of Conduct consists of the following sections: Monitoring and review; Business ethics; Human rights; Health and safety; Environment; Protection of property, information, and personal data; How to report suspected breaches.

Where the Supplier Code of Conduct imposes stricter requirements than relevant legislation, the Code takes precedence. In case of conflict between the Code and relevant legislation, the legislation takes precedence.

* www.unglobalcompact.org

Monitoring and review

Buchen reserves the right to verify compliance with the Supplier Code of Conduct through supplier self-assessment and the review of certificates and other compliance information; and reserves the right to conduct pre-announced on-site audits to ensure compliance with this Code. As a supplier, you cooperate with Buchen by providing the relevant information and data that we request, such as emission levels, water consumption and other resource consumption. If a significant deficiency is noted, the supplier shall draw up an action plan in consultation with Buchen. As a general rule, Buchen has the right to terminate the supply agreement with the supplier, in whole or in part, in the following cases:

- 1. The Supplier is unable or unwilling to follow and implement the required measures.
- 2. The Supplier has materially breached the regulations at least once.
- 3. The supplier has intentionally breached the Code of Conduct.
- 4. The supplier has knowingly withheld information about non-compliance with the Code.

Business ethics

Healthy competition

- No to illegal cartel agreements!

Buchen complies with competition law, promotes fair competition on the market and is convinced that free competition is an important basis for a well-functioning economy in society, which benefits all market players. Competition law plays an important part in protecting fair competition and preventing distortions that are detrimental to competition. Buchen does not accept breaches of competition law.

For you as a supplier this means:

- You conduct your business based on the principle of fair competition towards competitors and other players.
- You do not participate in arrangements or practices between companies that may be harmful to competition, such as
 participating in bidding cartels; or participating in other cartel activities with competitors, for example by dividing up
 markets or customers; or by entering into price agreements.
- You refrain from any conduct that may constitute an abuse of a dominant position in the market.
- You determine your own business plan and prices and do not share any plans for future pricing with competitors.

Integrity in business transactions

- No to corruption!

Buchen stands for high integrity and transparency. We have zero tolerance for all forms of bribery and corruption, as well as embezzlement, money laundering, unauthorised commissions, extortion, and fraud.

For you as a supplier this means:

- You refrain from giving, promising, offering, soliciting, or receiving any compensation or benefits that are contrary to applicable law and good business practice, or that may affect, or be perceived to affect, the objectivity of any decision.
- You act against any kind of corruption and ensure that personal interests do not influence business activities.
- You work according to established codes of conduct, processes, and routines in the business to prevent and deter corruption and conflicts of interest as well as financial crime.

Focus on the company's interests

- No to conflicts of interest!

Buchen does not accept that irrelevant and private considerations are taken into account in business transactions. Integrity in business transactions is of paramount importance to maintain reputation. We avoid actions that may give the impression that we are unduly influenced by our business decisions and expect the same from our suppliers.

For you as a supplier this means:

- You act with integrity and avoid getting into situations where a conflict of interest may arise.
- You will only accept gifts and invitations if they are of reasonable value and character in the circumstances and to the
 person offering or receiving them.

- You will inform Buchen if you are at risk of a conflict of interest in the performance of your duties towards us.
- You have rules of conduct in your business to prevent and avoid situations of conflict of interest.

Cooperation and transparency with authorities etc.

- No to withholding or providing false information!

Buchen acts constructively and transparently with all authorities and provides information that is complete and accurate in a timely manner. We expect our suppliers to act professionally when dealing with authorities.

For you as a supplier this means:

- You cooperate and act transparently in contacts with authorities within the framework of your assignment with us.
- You check that any information provided is correct and complete, and seek guidance from Buchen when needed, such as on issues of access and permissions relating to files and other information owned by Buchen.

Trade sanctions

Buchen continually monitors political developments around the world, including how trade sanctions affect or may affect our customers and suppliers; and requires our suppliers to be vigilant to such sanctions.

For you as a supplier, this means:

- You respect both national and international sanctions, embargoes, and other restrictions on foreign trade.
- You monitor world events on an ongoing basis and take appropriate action where necessary.
- You provide Buchen with relevant information on how you work with issues in the supply chain that arise from trade sanctions.

Human rights

Within Buchen, we respect and support international conventions on human rights.

For you as a supplier this means:

Non-discrimination

- You treat all your employees and job applicants with respect and dignity.
- You prohibit any behaviour that constitutes discrimination or harassment. This includes, for example, discrimination
 on the grounds of ethnicity, gender, sexual orientation, marital status, pregnancy, parenthood, disability, religion, or
 background.
- Ensuring equal opportunities, respecting diversity, and recognising3 the qualities of each person.

Child labour

- You prohibit the employment of children under the legal working age in any given country. Regardless of the country, the child must not be under the age of 15. This applies throughout the value chain.
- You work to detect child labour and take immediate action and, if detected, work to find the best solution for the child

and his or her family.

• You do not employ young workers under the age of 18 for any form of work that may pose a risk to their health, safety, or well-being.

WORKING FOR THE FUTURE

Forced labour and working conditions

- You prohibit forced labour of any kind, such as slavery, human trafficking, or the detention of workers in illegal ways.
- You are responsible for ensuring that work is carried out voluntarily in return for compensation and without subjecting employees to threats, sanctions or violence, deprivation of liberty, withholding of identity documents or restriction of legal rights.
- You are responsible for ensuring that employees are free to consent to work and can resign in accordance with applicable laws, regulations and collective agreements.

Wages and benefits

- You are responsible for ensuring that wages and other compensation are paid to employees on time and in full and in accordance with all applicable laws (minimum wage, overtime, vacation entitlement, sick leave, parental leave, etc.) and that employment contracts including such terms are in place.
- You respect employees' freedom of association and right to collective bargaining in accordance with applicable laws and conventions.
- You are responsible for compensating employees so that they achieve a fair wage equivalent to a living wage.

Health and safety

Buchen works actively to prevent risks at work and to strengthen safety. The commitment of our suppliers is crucial for continuous improvement in health and safety work.

For you as a supplier this means:

- You create a safe and healthy working environment and deliver services and products under conditions that minimise risks to the health and safety of your employees as well as Buchen's employees.
- You undertake to establish and actively comply with a health and safety policy or similar document that ensures both the physical and psychosocial working environment.
- You have implemented safety rules in the workplace and are responsible for, and provide, relevant protective equipment and other necessary equipment.
- You are responsible for requiring your employees to be rested, sober and drug-free in the workplace and to be in good health to perform their duties safely.
- You have notified your employees to stop, without risk of consequence, any work that cannot be done safely.
- You carry out continuous health and safety risk assessments and actively follow up and take action based on them.
- You have a process for reporting incidents and accidents and provide ongoing health and safety training for your employees.

Environment

Environmental issues are an integral part of Buchen sustainability work. Buchen aims to establish responsible relationships with its suppliers and involve them in its environmental work in order to minimise negative environmental impacts throughout the life cycle of products and services.

For you as a supplier, this means:

- You conduct your business in an environmentally responsible manner, strive for a life cycle approach to the environmental impact of products and services, and comply with applicable laws, regulations and permits.
- You identify actual and potential negative environmental impacts in your own operations and in your value chains; and set relevant environmental requirements for your subcontractors.
- You prevent, remedy, and mitigate negative environmental impacts in your own operations and in your value chains; and have systems in place to manage deviations.
- You work continuously to reduce resource consumption, such as raw materials, energy and water, and work to reduce the use of hazardous chemicals. You comply with REACH and RoHS* rules on chemicals and substances.
- You strive to minimise emissions to land, air and water that have negative environmental and climate impact.
- You measure, monitor, and improve your environmental impact measures and processes and work to continuously improve environmental performance, emissions, and resource consumption.

* Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and establishing a European Chemicals Agency (REACH); and Directive 2011/65/EU of the European Parliament and of the Council on the restriction of the use of certain hazardous substances in electrical and electronic equipment (recast) (RoHS).

Protection of property, information, and personal data

Buchen takes care of its property and takes measures to protect both the company's and our business partners' tangible and intangible assets from damage, loss, intrusion, theft, and misuse. We respect personal privacy and everyone's right to have their personal data processed securely, and we set relevant requirements for information security.

For you as a supplier, this means:

- You protect property owned by Buchen or our stakeholders in a secure manner and hold appropriate equipment, permits and insurance.
- You comply with applicable data protection regulations and have internal procedures in place to comply with data subjects' rights.
- You have actively worked on information security, have procedures for authorisation and access to data, and comply with agreements and regulations on confidentiality and professional secrecy.

How to report suspected breaches

Suspected violations of the Supplier Code of Conduct can be reported to the responsible manager at Buchen, HR or the Head of Safety and Culture.



Furthermore, reports can be made anonymously using Buchen's whistleblowing service Qnister Whistle, which is available on the company website, <u>www.buchen.se</u>, or by leaving a message on the Qnister Whistle Hotline: +46 36 330 07 40.

Buchen Sweden AB: +46 60 64 47 90