

Supplier Code of Conduct

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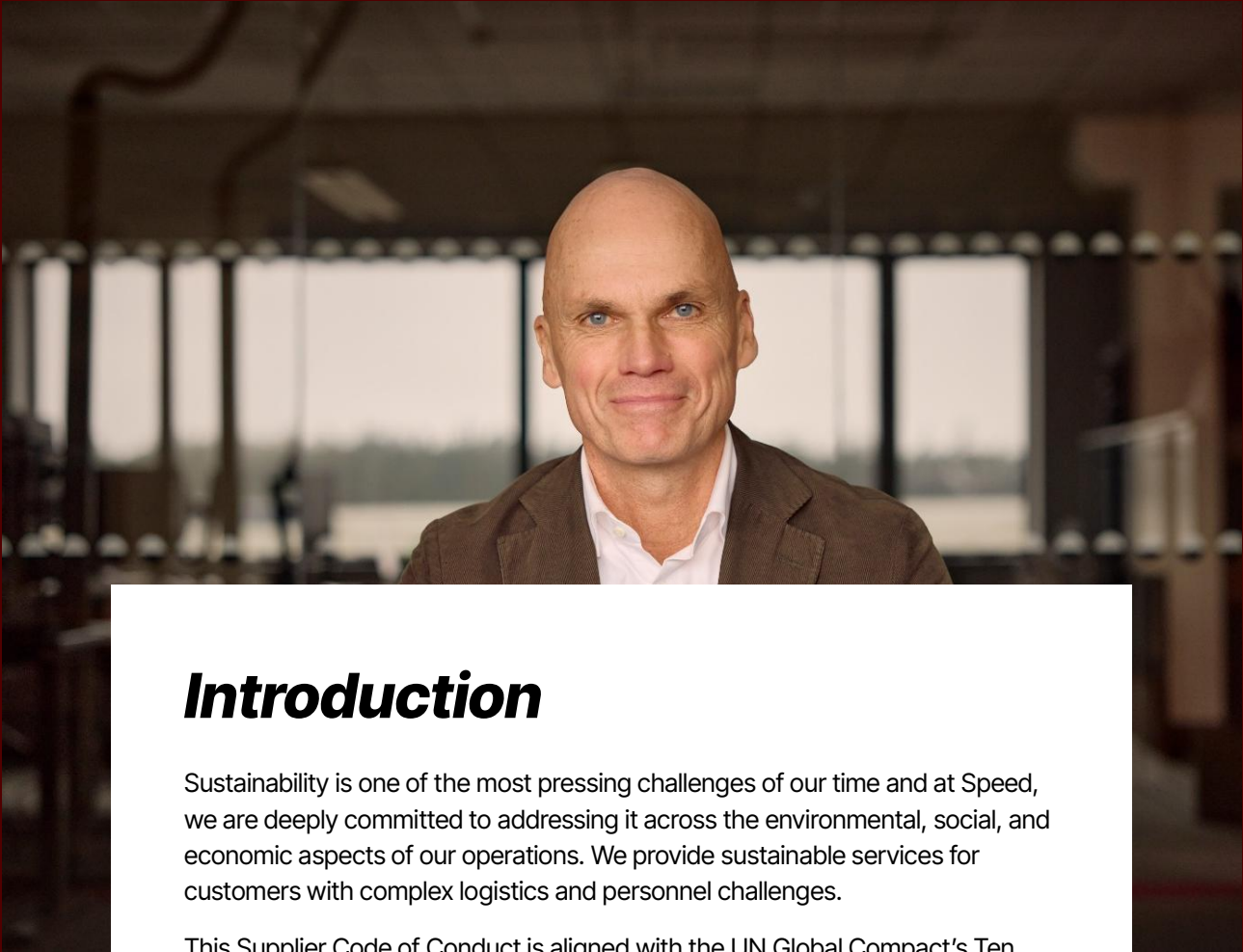
This Supplier Code of Conduct applies to suppliers to the parent company Speed Group and its subsidiaries.

This Code was adopted by Speed Groups' Executive Management Team on 2025-02-18.

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Introduction

Sustainability is one of the most pressing challenges of our time and at Speed, we are deeply committed to addressing it across the environmental, social, and economic aspects of our operations. We provide sustainable services for customers with complex logistics and personnel challenges.

This Supplier Code of Conduct is aligned with the UN Global Compact's Ten Principles¹, the United Nations Guiding Principles on Business and Human Rights², the International Labour Organization's (ILO) eight Fundamental Conventions³ and United Nations Convention against Corruption (UNCAC)⁴. We are committed to compliance not only with local laws but also with international conventions and ethical standards.

For us, sustainability is more than just a responsibility to customers - it is essential to our long-term success. Our efforts extend beyond internal activities to collaborations with customers, suppliers, and partners, fostering positive change beyond our organizational boundaries.

Conducting business responsibly is a core principle, and you as a supplier play a vital role. This Supplier Code of Conduct outlines the ethical and sustainable business practices we uphold. Together, we aim to be a force for positive change, working collaboratively to address the global climate challenge. Our Code embodies our values, rooted in the legislation and international frameworks we endorse.

Hans Sahlin, CEO

¹ <https://unglobalcompact.org/what-is-gc/mission/principles>

² www.ohchr.org/documents/publications/guidingprinciplesbusinessshr_en.pdf

³ <https://www.ilo.org/international-labour-standards>

⁴ <https://legal.un.org/avl/ha/unc/unc.html>

Purpose

The purpose of the Speed Supplier Code of Conduct (referred to as the 'Code') is to ensure that Speed conducts business ethically and sustainably throughout the entire value chain.

At the heart of our business is a commitment to respecting human rights, ensuring fair and safe working conditions, protecting our assets and interests, and upholding ethical and environmentally responsible business practices. These commitments are integral to our operations, and we expect the same dedication from our Suppliers.

By adhering to this Code, Suppliers affirm their commitment to shared values and the well-being of all stakeholders.

The Code covers all three dimensions of sustainable development; environmental, social and economic.



Our General Requirements

This Supplier Code of Conduct applies to all of Speed's Suppliers.

Suppliers are required to comply with all the requirements outlined in this Code or any mutually agreed-upon equivalent standard.

Suppliers must adhere to all applicable laws, regulations, permits, and standards in all countries where they operate. Where the requirements outlined in this Code exceed local laws and regulations, the Code's requirements take precedence.

Suppliers are required to ensure and monitor that their Suppliers comply with the requirements of the Code or other mutually agreed-upon equivalent standards.

Suppliers must provide evidence of compliance with the Code upon request and maintain transparency. Speed reserves the right to verify compliance through methods such as self-assessments, surveys, audits, or other forms of evaluation.

Suppliers are expected to work proactively to identify and address any risk of non-compliance with the Code. Any violation of the requirements in this Code must be reported to Speed without delay.

This Supplier Code of Conduct is further divided into six parts, each detailing specific requirements:

- Respect for the Environment
- Climate Impact
- Respect for People and Human Rights
- Business Ethics and Confidentiality
- Management system
- Cooperation and Compliance

Failure to address non-compliance with this Supplier Code of Conduct may result in a reduction in business, and if adequate corrective actions are not taken, could ultimately result in the termination of the business relationship with Speed.



Respect for the Environment

As part of our commitment to sustainable development, we place great importance on the environmental dimension of our operations. We believe that protecting the environment and preserving natural resources is not only our responsibility but also vital for the long-term success of our business.

We expect our Suppliers to share this commitment by implementing practices that minimize their environmental impact. This includes reducing greenhouse gas emissions, managing waste responsibly, and using resources efficiently.

Environmental Considerations

Suppliers must integrate environmental considerations into their operations and decision-making processes.

Environmental Impact

Suppliers are expected to adopt environmentally friendly practices to minimize their environmental impact.

Water Use

Suppliers that use water in their operations have to track their water consumption, identify opportunities for reducing water use, and implement measures to increase water efficiency. This may include measures such as reducing water

Precautionary Principle

Supplier shall follow the precautionary principle, exercising caution in the face of potential environmental risks. Suppliers shall take a precautionary approach to environmental and health risks and take measures to prevent harm waste, recycling water, and using water-efficient technologies and practices.

Biodiversity

Suppliers must identify and minimise negative impacts on biodiversity and ecosystems while taking measures to protect and preserve them. This may include measures such as avoiding activities in sensitive areas, restoring damaged ecosystems, and promoting sustainable practice.

Pollution Prevention

Suppliers with considerable emissions of pollutants (or noise) into the surrounding air or wastewater must implement measures to reduce emissions of harmful pollutants and improve air and water quality.

Waste Management

Suppliers are encouraged to adopt a waste management strategy that follows the waste hierarchy and prioritizes, in order: prevention, reduction, reuse, recycling, energy recovery, incineration without energy recovery, and safe and environmentally responsible disposal.

Suppliers must track their waste and identify opportunities to improve waste management.

Hazardous Material

Suppliers handling hazardous materials (e.g. dangerous goods, chemicals, or hazardous waste) are responsible for ensuring they are correctly identified and labelled while ensuring their safe and responsible management, storage, use, recycling, and disposal with considerations for both the environment and people. This includes compliance with The Candidate List of Substances of Very High Concern (SVHC) in REACH, which is published by the European Chemicals Agency (ECHA) and regularly updated. Substances on this list may have serious and often irreversible effects on humans and the environment, and their use in production or existence in products must be communicated to Speed along with suitable measures for safe handling.

The supplier must implement measures to minimise the generation of hazardous materials.





Climate Impact

Climate change is one of the most pressing challenges facing our planet, and we are committed to doing our part to address it. As part of this commitment, we expect our Suppliers to take proactive steps to reduce their climate impact and align their operations with the goals of the Paris Agreement.

This includes measuring and reporting greenhouse gas (GHG) emissions, setting targets to reduce these emissions, and implementing strategies to achieve those targets. Actions may include increasing energy efficiency, transitioning to renewable energy sources, and reducing emissions from transportation.

Report GHG Emissions

As part of our commitment to reducing our environmental impact, we require our Suppliers to measure and report their greenhouse gas (GHG) emissions for Scope 1, 2, and, if applicable, Scope 3, per the GHG Protocol.

Energy Efficiency

Supplier shall measure and actively work to reduce their energy consumption. They should strive to increase the use of renewable and alternative energy sources in their operations and logistics systems.

Climate Targets

Suppliers must set ambitious and achievable climate targets. These targets should align with the goals of the Paris Agreement: to limit global warming to well below 2 degrees Celsius above pre-industrial levels, while pursuing efforts to cap the temperature increase at 1.5 degrees Celsius.

Respect for People & Human Rights

We strive to ensure that our operations have a positive impact on the communities in which we operate and that we respect the rights and dignity of all individuals. We expect our Suppliers to share this commitment and adhere to high standards of social responsibility. This includes adhering to labour rights, promoting diversity and inclusion, and ensuring safe and healthy working conditions.

The term 'Employee' used in this Code includes every person working for the Supplier, including but not limited to employees, contractors, consultants, trainees, and senior management.

Human Rights

Suppliers must respect the UN conventions on human rights and take responsibility for their employees, subcontractors, and the communities in which they operate.

Wages & Benefits

Suppliers are required to provide fair wages and benefits in accordance with relevant standards in the locations where they operate.

Child Labour

Suppliers cannot employ individuals under the age of 15 or the higher statutory minimum age applicable in their location.

Working Hours

Suppliers must ensure that Employee working hours comply with the minimum requirements set by national laws and relevant ILO conventions.

Terms of Employment

Suppliers shall strictly prohibit forced labour, slave labour, or any form of involuntary work at their workplaces.

Suppliers must ensure that their Employees are entitled to fair and reasonable employment conditions in compliance with national laws, collective agreements, and relevant ILO conventions.

Freedom of Association

Suppliers shall respect Employees' right to freedom of association and collective bargaining.

Health & Safety

Suppliers must be committed to providing a safe and healthy working environment, with a focus on continuous improvements.

Safety Hazards

Suppliers shall identify and control risks of potential exposure to safety hazards. This includes those posed by machines, equipment, chemicals, biological, or physical agents.

Suppliers must ensure that these risks are identified, assessed, and controlled through appropriate measures, such as providing personal protective equipment, implementing safety procedures, and conducting regular safety training for Employees.

Accidents

Suppliers must have a system in place for reporting, evaluating, and addressing risks related to accidents and near accidents. This system should aim identify root causes and implement preventive measures to avoid future incidents.

Emergency Preparedness

Suppliers must have a robust emergency preparedness plan to ensure continuity and minimise risks during unforeseen events. This includes identifying risks, developing action plans, training staff, and

having communication strategies to promptly inform all relevant parties.

Sanitation

Suppliers must ensure that their Employees have access to hygienic toilet facilities, clean drinking water, and sanitary eating areas. These essentials contribute to maintaining the health and well-being of the workforce, while ensuring a productive and sustainable working environment.

Non-Discrimination & Non-Harassment

Suppliers shall provide equal opportunities to all individuals, regardless of race, gender, sexual orientation, age, nationality, religion, ethnicity, disability, or other distinguishing characteristics.

Suppliers must actively foster a corporate culture and work environment free from discrimination and harassment.

Respect for Land Rights

Suppliers shall respect the land rights of local communities and indigenous peoples.



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Business Ethics & Confidentiality

Effective governance is a cornerstone of sustainable development and responsible business practices. It encompasses the systems, processes, and principles that ensure an organisation is managed in a transparent, accountable, and ethical manner.

We expect our Suppliers to share our commitment to ethical business practices and to adhere to high standards of business conduct. This includes complying with all applicable laws and regulations, avoiding conflicts of interest, and maintaining accurate and transparent records. Business integrity is essential, and confidentiality is a crucial aspect of responsible business practices. It involves protecting sensitive information and ensuring it is not disclosed to unauthorized parties.

Anti-Corruption

Suppliers shall maintain a zero-tolerance policy against corruption, actively working to ensure its absence in their operations.

Counterfeit Parts

Suppliers must implement effective systems and processes to ensure that no counterfeit parts are used in their products. This includes thorough scrutiny of the supply chain, regular testing and inspection of parts, and prompt reporting and remediation of any identified issues.

Conflict of Interest

Suppliers are responsible for ensuring that Employees avoid conflicts of interest and report any such situations to their immediate supervisor or leadership.

Money Laundering

Suppliers must ensure that their operations are not involved in any form of money laundering activities or the financing of illegal activities.

Trade Sanctions & Export Control

Suppliers shall comply with trade sanctions and export control regulations.

Safe Products

Suppliers are responsible for ensuring that all manufactured products comply with applicable laws and regulations on product safety. Suppliers must remain informed about relevant safety regulations and conduct regular inspections to ensure continued compliance.

Information Security

Suppliers must comply with all applicable laws and regulations concerning information security to protect Speed's information. Suppliers must have a management system in place to ensure the protection of confidential information, intellectual property, and personal data from improper disclosure, loss, theft, or misuse.

Any incidents of information security, including cybersecurity breaches, must be reported promptly to Speed.

Confidential info & Intellectual Property

Suppliers shall take all appropriate measures to safeguard Speed's confidential information and intellectual property from improper disclosure, loss, theft, or misuse.

Fair Competition & Business Practice

Suppliers shall promote fair competition and ethical business practices, adhering to applicable laws and industry norms.

Protection of Personal Data

Suppliers must comply with all applicable laws, regulations, and specific contractual provisions regarding personal data.

Personal information must be protected when it is collected, stored, processed, transmitted or shared.

Responsible Sourcing of Raw Material

Suppliers must ensure that raw materials are responsibly sourced in accordance with the OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This guarantees that the sourcing of minerals does not contribute to conflicts or human rights abuses.



Management System

We require all our Suppliers to implement a robust management system. This system should be based on a recognised standard and encompass key areas such as quality, environmental performance, health and safety, and information security.

Implement Management system

Suppliers shall implement and maintain a relevant management system to ensure compliance with this Code.

Legal and Customer Requirements

Suppliers must establish a process to identify and comply with all applicable legal and customer requirements.

Risk Management

Supplier shall have a process to identify and address risks within its management and operation.

Training

Suppliers are responsible for training their Employees to ensure that they act in accordance with the requirements outlined in this Code.



Business Continuity Management - BMC

Business Continuity Management (BCM) is a strategic process designed to ensure that an organization can maintain critical business processes during and after disruptions. For Speed, it is important that our suppliers have an effective BCM plan in place. This ensures that the supplier's operations can continue without interruption, thereby guaranteeing that our own business processes remain unaffected. By requiring our suppliers to implement and maintain a BCM plan, we can achieve a high level of reliability and resilience throughout our supply chain.

The supplier shall maintain and implement an effective Business Continuity Management (BCM) plan to ensure business continuity in the event of disruptions or interruptions. This plan shall include, but is not limited to, the following:

- **Risk Assessment and Analysis:**
Identify and assess potential risks and threats that may affect the business.
- **Continuity Strategies:**
Develop and implement strategies to manage and minimize the impact of identified risks.
- **Recovery Plans:**
Develop detailed plans to restore business operations to normal after a disruption.
- **Testing and Exercises:**
Regularly test and exercise the BCM plan to ensure its effectiveness and identify areas for improvement.
- **Review and Update:**
Regularly review and update the BCM plan to ensure it is current and relevant.



Cooperation & Compliance

Providing data and fostering cooperation is essential for building strong and successful business relationships. This involves sharing relevant information and working collaboratively to achieve common goals.

We expect our Suppliers to provide accurate and timely data to support our decision-making processes. Additionally, we highly value collaboration and encourage Suppliers to contribute to identifying opportunities for improvement and addressing any issues.

Disclosure of Information

Suppliers must, upon request, provide Speed with documents and data necessary to verify compliance with the Code. This may include, but is not limited to, completing self-assessment questionnaires and/or on-site audits by Speed or an independent third party appointed by Speed.

Report Non-Compliance

Suppliers are required to inform Speed without delay if they suspect or discover non-compliance with the requirements of this Code or applicable laws and regulations. Such reports can be made through the Supplier's contact at Speed or via Speed's whistleblower function.

<https://report.whistleb.com/en/speedgroup>

As stated above, failure to address non-compliance with this Code may result in a reduction of business. If adequate corrective actions are not taken, it may ultimately lead to the termination of the business relationship with Speed.