

Adlibrisgruppen

Adlibrisgruppen Supplier Code of Conduct

Adlibrisgruppen

Contents

Introduction.....	3
1. Human Rights.....	4
1.1 Forced Labour.....	4
1.2 Young Workers and Child Labour.....	4
2 Labour Rights.....	4
2.1 Wages, Benefits, Working Hours and Leave.....	4
2.2 Human Treatment.....	4
2.3 Discrimination.....	4
2.4 Freedom of Association.....	5
3 Health and Safety.....	5
3.1 Occupational Safety.....	5
3.2 Emergency Preparedness.....	5
3.3 Accident/Incident Management.....	5
3.4 Sanitation, Food, and Housing.....	5
3.5 Health and Safety Communication.....	6
4 Environment.....	6
4.1 Environment Management.....	6
4.2 Environmental Permits and Reporting.....	6
4.3 Hazardous Substances.....	6
4.4 Waste Management.....	6
4.5 Air Emissions.....	6
4.6 Water Management.....	6
4.7 Energy Management System.....	6
5 Ethics.....	7
5.1 Anti-Corruption.....	7
5.2 Transparency.....	7
5.3 Whistleblowing.....	7
5.4 Conflict Minerals.....	7
5.5 Privacy.....	7
6 Implementation and Monitoring.....	7

Adlibrisgruppen

Introduction

This Supplier Code of Conduct is an agreement between Adlibris AB, Adlibris.com AS, Adlibris OY and Odlanu i Sverige AB, hereinafter called "Adlibrisgruppen," and its manufacturers, suppliers, consultants, and service providers, hereinafter called "Supplier." The suppliers' employees, subcontractors, consultants, interns, student workers and temporary staff are all referred to in this policy as "employees."

At Adlibrisgruppen we recognize that our business has an impact on social, economic, and environmental issues. Adlibrisgruppen is committed to being a responsible employer and a good corporate citizen. Adlibrisgruppen Supplier Code of Conduct, henceforth referred to as "the Code," is the basis of our efforts to make our supply chain more sustainable.

All Adlibrisgruppen's activities must be conducted with respect and consideration for Human Rights, Labour Rights, Health and Safety, Business Ethics and for the Environment. The Code is an integral part of Adlibrisgruppen's business and supported by top management. Adlibrisgruppen expects all suppliers of products and services to act in a manner consistent with this Code. For all purchasing of products, services and/or raw material, suppliers must take reasonable steps to ensure the third party is aware of the Code, and acts in a responsible manner consistent with the guidelines of this Code.

The Supplier Code of Conduct is based on the Ten Principles of the United Nations Global Compact and follow the Universal Declaration of Human Rights, the ILO (International Labour Organisation) Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the UN Convention Against Corruption. The Code also follows the principles for the OECD Guidelines for Multinational Enterprises and the UNICEF Children's Rights and Business Principles. It also stipulates that supplier must comply with local legislation. In case of conflict between the Code and local legislation the higher standard shall be followed.

Suppliers must work towards full compliance with the Code. The supplier must also sign the Code as commitment requested by Adlibrisgruppen. Audits might be performed by Adlibrisgruppen or their sub-suppliers/partners to ensure compliance of Adlibrisgruppen Supplier Code of Conduct.

Adlibrisgruppen

1. Human Rights

1.1 Forced Labour

Adlibrisgruppen does not accept any forms of forced or bonded labour and does not accept the use of prison labour. Employment must be freely chosen, and the employee must be free to leave the premises after their shift ends. No employee can be forced to continue employment any longer than they themselves want. Guards may be posted only for normal security reasons. Payment of wages to employees must not be withheld (ILO Conventions 29 and 105 and Modern Slavery Act 2015).

1.2 Young Workers and Child Labour

Adlibrisgruppen does not allow child labour in any form. Unless local law stipulates a higher standard, no person younger than 15 shall be employed.

Employees under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. For authorized minors, management is responsible for providing age-appropriate working conditions, hours of work and wage, in compliance with applicable local law. In the absence of local law, the wage rate for student employees, interns, and apprentices shall be at least the same wage rate as other entry-level employees performing equal or similar tasks.

If a child is found working at a site where Adlibrisgruppen products or components are produced, a remediation program must be defined and applied immediately, ensuring the child's social situation. If rectification actions are not taken, Adlibrisgruppen will stop doing business with the supplier.

2 Labour Rights

2.1 Wages, Benefits and Working Hours

Wages must be paid regularly, on time, and must reflect the experience, qualifications, and performance of the employee. Compensation paid to employees shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. For each pay period, employees shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. Deductions from wages as a disciplinary measure shall not be permitted.

2.2 Human Treatment

Adlibrisgruppen does not accept the use of any form of corporal or verbal punishment or harassment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to employees.

2.3 Discrimination

No employee shall be unfairly treated based on race, gender, age, political affiliation, religion, ethnic or national origin, caste, sexual orientation, maternity status, membership in employee's organizations including unions or any other personal characteristics, disabilities, or any other reasons for discrimination.

Adlibrisgruppen

2.4 Freedom of Association

All employees have the right to form or join employees' associations, including a trade union of their own choosing, and to bargain collectively. Adlibrisgruppen does not accept disciplinary or discriminatory actions from the employer against employees who choose to peacefully and lawfully organize or join an association. (ILO Conventions 87, 98 and 135)

3 Health and Safety

3.1 Occupational Safety

The supplier shall provide and maintain a safe work environment and integrate sound health and safety management practices into its business, in line with local laws, recognized management systems such as ISO 45001 and ILO Guidelines on Occupational Safety and Health. Where hazards cannot be prevented by these means, employees are to be provided with appropriate, well-maintained, personal protective equipment free of charge, and educational materials about personal risks associated with these hazards.

Employees shall have the right to refuse unsafe work and to report unhealthy working conditions. Reasonable steps must also be taken to reallocate pregnant employees and nursing mothers working in hazardous conditions, to non-hazardous working conditions.

3.2 Emergency Preparedness

The supplier shall identify and assess potential emergency situations. For each situation, the supplier shall develop and implement emergency plans and response procedures that minimize harm to life, environment, and property.

Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Emergency plans should also include appropriate fire detection, suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans.

3.3 Accident/Incident Management

Occupational accidents, diseases and incidents must be monitored. The supplier shall have a system for employees to report health and safety incidents and near-misses, as well as a system to investigate, track, and manage such reports.

The supplier shall implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate employees' return to work. First Aid supplies and medical assistance must be available at each shift, in case of accidents.

3.4 Sanitation, Food, and Housing

The Supplier's site/s must be equipped with basic human standards such as clean drinking water, hygienic toilets, sufficient light, ventilation, and temperature. Employee dormitories, provided by the supplier or a labour agent, are to be maintained to be clean, safe, and provided with appropriate emergency egress, hot water for bathing or showering, adequate lighting, heat, and ventilation. There should also be individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

Adlibrisgruppen

3.5 Health and Safety Communication

Suppliers shall provide employees with appropriate workplace health and safety information and training in the language of the employee or in a language the employee can understand. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by employees. Training is provided to all employees prior to the beginning of work and regularly thereafter.

Employees shall be encouraged to raise any health and safety concerns without retaliation when exposed to, including but not limited to, mechanical-, electrical-, chemical-, fire-, and physical hazards.

4 Environment

4.1 Environment Management

Adlibrisgruppen value a systematic environmental approach based on established standards to the relevant industry e.g., ISO 14000. The Supplier must take responsibility for their impact on the environment and on human health.

4.2 Environmental Permits and Reporting

All required environmental permits, approvals and registrations are to be obtained, maintained, and kept current, their operational and reporting requirements are to be followed. Necessary certificates shall be submitted within 5 days, upon request, to Adlibrisgruppen.

4.3 Hazardous Substances

Suppliers are to adhere to all applicable laws and regulations (e.g., RoHS, REACH) and to customer requirements regarding prohibition or restrictions of specific substances, including labelling for recycling and disposal.

4.4 Waste Management

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid non-hazardous waste.

4.5 Air Emissions

Air Emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled, and treated as required prior to discharge.

4.6 Water Management

All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal.

4.7 Energy Management System

The supplier should always strive to minimize its impact on the environment by improving energy efficiency. Suppliers are to look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

Adlibrisgruppen

5 Ethics

5.1 Anti-Corruption

Bribery, of any kind, is not accepted. Adlibrisgruppen's suppliers must not offer nor accept bribes or other means of obtaining undue or improper advantages.

Suppliers must comply with applicable anti-corruption laws and not offer anything of value, either directly or indirectly, to government officials to obtain or retain business. Suppliers must not make illegal payments to government officials themselves or through a third party.

5.2 Transparency

All business dealings should be transparently performed and accurately reflected on the supplier's business' books and records. Information regarding supplier's labour, health, safety and environmental practices, its business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

5.3 Whistleblowing

Whistle-blower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body. Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistle-blowers are to be maintained, unless prohibited by law. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

5.4 Conflict Minerals

Responsible Sourcing of minerals: Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture. This policy is to assure that the minerals are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD), Due diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

5.5 Privacy

Suppliers shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers are to comply with privacy and information security laws (e.g., GDPR) and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

6 Implementation and Monitoring

All suppliers must communicate the content in this Code to all employees and subcontractors involved in the production of Adlibrisgruppen products. The supplier shall ensure that the requirements are implemented and upon request require a signed document where the subcontractor acknowledges and accepts the requirements.

All suppliers are obliged to inform Adlibrisgruppen about where each order is being produced. Adlibrisgruppen reserves the right to make announced or unannounced visits at any time to all places of production, including the subcontractors of goods intended to

Adlibrisgruppen

be supplied to Adlibrisgruppen. Adlibrisgruppen furthermore reserves the right to assign an independent third party to conduct inspections to ensure compliance with the Code.

If Adlibrisgruppen finds that a supplier does not comply with the Code and if an agreed corrective action plan is not implemented within an agreed time limit, Adlibrisgruppen will consider terminating its business relationship with this supplier.