

Title:	Diab Group Supplier Code of Conduct	Owner: Approver:	Per Hökfelt Per Hökfelt
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## Diab Group Supplier Code of Conduct

### Introduction

Diab has a clear attitude as regards business integrity, and we follow the international guidelines defined by the Global Compact's ten principles, as well as "Children's Rights and Business Principles", the OECD's guidelines for multinational companies and the UN's guiding principles relating to companies and human rights. We condemn all forms of corruption and fraud, and demand openness, integrity and honesty in all parts of our business operation in every country. In the same way, we clearly repudiate child labour, forced labour and working conditions that can be viewed as harmful, abusive or directly hazardous.

Diab aims to be an international role model in the sandwich industry sector when it comes to ethics, working environment, equality and diversity, and will conduct activities that facilitate sustainable social development and generate prosperity. In order to achieve this, Diab's suppliers also have to be at the forefront regarding these issues and comply with the requirements in this Supplier Code of Conduct.

### Compliance with requirements

Diab's suppliers must always comply with the most demanding requirements in Diab's supplier code of conduct or in relevant legislation. The basic requirements must be fulfilled from the very first delivery of a product or service. The supplier shall upon request provide such information to Diab as may be necessary to demonstrate compliance with the requirements, if needed give Diab representatives access to facilities and provide related documents in connection with any visit or audit.

### Implementation

The basic requirements in Section 1 must be fulfilled by all suppliers from the very first delivery of a product or service. In addition to the requirements in Section 1 the requirements in Sections 2-7 must be fulfilled, by selected suppliers, within agreed time.

## 1. Basic requirements for all suppliers

### 1.1. Legal requirements

There must be procedures to ensure compliance with Sustainability laws and regulations that apply to the business. This includes all parts of this supplier code of conduct.

### 1.2. Forced and bonded labour

All forms of forced and bonded labour are unacceptable. Work must take place on a voluntary basis, and personal documents and property must not be confiscated in order to force somebody to work.

### 1.3. Child labour

All forms of child labour are unacceptable, and documentation certifying the age of all employees must be available. All forms of work that can have a negative impact on the child's right to a healthy childhood and development, or that prevent the child's education, are classified as child labour. All forms of violence, compulsion and the exploitation of children are unacceptable. A person below the age of 15 is viewed as a child unless local legislation has defined other age for being able to work or for mandatory schooling. Documents certifying the age of all employees must be available.

### 1.4. Wages and working hours

As a minimum, statutory wages must be paid and applicable working hour legislation must be followed. Paid wages and worked time must be documented in a transparent system and must cover all employees.

### 1.5. Worker protection

The business must be run in such a way that serious accidents or incidents are systematically prevented.

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### 1.6. Accident insurance

All employees must have accident insurance that covers healthcare for work-related injuries and compensation in the event of invalidity caused by work-related accidents.

### 1.7. Environment

The business must be run in such a way that serious discharges and emissions to the ground, water or air are systematically prevented.

### 1.8. Business ethics

All forms of corruption and bribes are unacceptable. Documents may not be manipulated. Statutory tax must be paid. Any tax liabilities in relation to public authorities must be regulated.

## 2. General requirements

### 2.1. Responsibility for the Supplier Code of conduct

A clear organisational structure, division of responsibility and written procedures must exist to ensure the implementation of and continued compliance with the requirements in this supplier code of conduct.

### 2.2. Subcontractors

The requirements in this supplier code of conduct must be communicated on to all tier one subcontractors. This can be done using this DIAB Supplier Code of Conduct or a corresponding code. The supplier must make sure that it is entitled to carry out revisions based on the supplier code of conduct with tier one subcontractors. In the event of repeated, serious breaches by a subcontractor, the business relationship has to be terminated.

### 2.3. Information to employees

All employees must be notified about the content of this supplier code of conduct, which must always be available to the employees in a language that the employees understand. This can be done using this DIAB Supplier Code of Conduct or a corresponding code.

### 2.4. Internal audits

Procedures for internal audits based on the supplier code of conduct must be implemented. Audits must be carried out at least every 12 months and, based on the results, measurable goals and an action and responsibility plan must be drawn up. This must be made available to DIAB's representatives on demand.

### 2.5. Continual improvements

Based on the results of internal audits and other activities, plans for preventive measures and continual improvements must be drawn up and implemented.

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### 3. Human rights

#### 3.1. Policies & procedures

A policy and relevant procedures for preventing and remedying any discrimination, persecution, exploitation and disciplinary measures must be implemented and communicated to all employees, including hired personnel.

#### 3.2. Discrimination

There must not be any form of discrimination against employees due to religion, faith, gender, pregnancy, age, political views, trade union membership, nationality/ethnicity, disability, health, sexual orientation or other factors. All employees, including hired personnel, must enjoy the same rights and social benefits.

#### 3.3. Penalties

All forms of physical punishment and threats of physical or mental violence are prohibited. The supplier may not use any public warning or penalty system, including wage deductions, and all employees must be entitled to appeal against warnings, penalties and dismissals. The appeals must be documented.

#### 3.4. Respect for people in the local community

The supplier must act responsibly and with respect in relation to people in the local community, and must respect the rights of indigenous people.

### 4. Work & employment conditions

#### 4.1. Employees' rights

##### 4.1.1 Forced and bonded labour

All forms of forced and bonded labour are unacceptable. Labour in the form of prisoners in prisons may not be used. Work must take place on a voluntary basis, and personal documents and property must not be confiscated in order to force somebody to work. Employees must be free to leave the workplace at the end of their shift.

##### 4.1.2 Recruitment & Termination

Employees must not be charged any fee in conjunction with their recruitment, and they must be fully entitled to hand in their notice in accordance with the applicable employment agreement without any penalty or wage deduction. Indebtedness may not be applied with the aim of binding employees to the employment.

##### 4.1.3 Health & Safety committee

There must be a well-established health & safety committee where employees can contribute and thereby influence developments regarding health and safety in the workplace. Identified risks and implemented measures must be documented.

##### 4.1.4 Whistleblow

There must be documented procedures for handling complaints in respect of discrimination, persecution and unsatisfactory conditions that all employees are aware of, including hired personnel.

##### 4.1.5 Freedom of association

All employees must be entitled to join, or to choose to refrain from joining, any kind of employee organisation without risking reprisals, persecution or penalties. In countries where the right to organize is restricted or prohibited, the supplier must not prevent alternative forms of independent employee representation.

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#### 4.1.6 Collective bargaining

Employees must be entitled to conduct collective bargaining without risking reprisals, persecution or penalties. In countries where the right to carry out collective bargaining is restricted or prohibited, the supplier must not prevent alternative forms of independent bargaining.

### 4.2 Children & Young workers

#### 4.2.1 Child labour

All forms of child labour are unacceptable, and documentation certifying the age of all employees must be available. All forms of work that can have a negative impact on the child's right to a healthy childhood and development, or that prevent the child's education, are classed as child labour. All forms of violence, compulsion and the exploitation of children are unacceptable. A person below the age of 15 is viewed as a child unless local legislation has defined other age for being able to work or for mandatory schooling. Documents certifying the age of all employees must be available.

#### 4.2.2 Preventive measures

There must be documented procedures that prevent child labour in the operation itself and at subcontractors.

#### 4.2.3 Measures on the discovery of child labour

The supplier must have documented procedures for discovering and immediately acting in the event of child labour in its own operation and at subcontractors. All measures must take place in the way that is "in the best interest of the child". The child must immediately leave the workplace and the supplier must ensure that the child is provided with the right conditions for their future development. Diab must be notified immediately if child labour is discovered.

#### 4.2.4 Young workers

Young workers are young people who have reached legal working age but who are at the most 18 years old. The supplier must ensure that employment and work duties conform to applicable laws and that the work duties are not carried out at night and do not entail a risk to health and safety.

### 4.3 Employment conditions

#### 4.3.1 Authority inspections

When an authority has carried out a working environment inspection, the results and an action plan, including a timetable and implemented measures, must be documented.

#### 4.3.2 Employment contract

All employees must have a signed employment contract before the employment may begin. As a minimum, the employment contract must contain the employer's name, the employee's name and personal ID number/date of birth, the position, salary, working hours, overtime compensation, benefits and notice period.

#### 4.3.3 Wage lists & attendance records

Information about wage payments and worked time must be documented for all employees. This information must be saved for at least 24 months, and must as a minimum include worked regular hours, overtime, any piece work pay and bonuses, subsistence allowances and any wage deductions as well as paid net wages.

#### 4.3.4 Overtime work & leave

The total working hours may not exceed local legal limits or 48 hours per week. All overtime work must be voluntary, although not exceeding 12 hours per week. All employees must have at least one day off per week, as well as holiday and leave in accordance with applicable legislation and local traditions.

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Exemptions from the above may only be made by agreement with trade unions or other employee organisations.

#### 4.3.5 Wages

As a minimum, the statutory wage must be paid out regularly, at least once a month. Every time wages are paid, employees must receive a payslip containing information about worked regular hours, overtime, any piece work pay and bonuses, subsistence allowances, any wage deductions as well as paid net wages.

#### 4.3.6 Benefits

All employees must receive statutory benefits such as illness and accident insurance and a pension.

### 4.4 Worker protection & safety

#### 4.4.1 Risk analysis

Risk analyses and risk reductions covering the entire business must be carried out and documented, as well as being updated in the event of significant changes to the business. Preventive measures must be carried out to reduce the need for personal protective equipment.

#### 4.4.2 Reporting, analysis & corrective actions

A procedure must be implemented for reporting, analysis and corrective actions in the event of incidents and accidents, and the number of incidents and accidents must decrease.

#### 4.4.3 Working procedures & Training

Working procedures that minimise the risk of injuries and unhealth must be implemented. Employees who operate machine or other equipment where there is a risk of serious incidents or accidents, must receive relevant training which is updated as necessary or in accordance with applicable legislation. All new employees must receive relevant training regarding health and safety as a part of their introduction. The content of the training must be described and there must be a register of trained employees.

#### 4.4.4 Machines & Equipment

All mechanical equipment, vehicles and other equipment used in production and working processes must be safe to use and equipped with the necessary safety equipment to prevent injuries. Written procedures for preventive maintenance must be implemented, and the equipment must be inspected and certified according to applicable legislation.

#### 4.4.5 Safety information

Safety information and warning signs must be easily visible in all risk areas. The written information and/or signs, which are in a language that the employees understand, must describe the risk and what the employees have to do to minimise it.

#### 4.4.6 Protective equipment

Personal protective equipment must be available and be free of charge for all employees who have work duties where there is a potential risk of injury. The areas where protective equipment is to be used must be clearly marked, e.g. with illustrative signs.

#### 4.4.7 First aid

Relevant first aid equipment must be easily accessible to all employees. The equipment must be stored in a clearly marked location, be unlocked, and the contents must be checked and supplemented regularly. Selected employees in all departments/shifts must undergo first aid training. The training must be provided by certified training staff at least every 24 months. The content of the training must be described and there must be a register of trained employees.

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#### 4.4.8 Working conditions

The workplace must offer good working conditions in respect of cleanliness, hygiene, ergonomics, noise, temperature, lighting and air quality. Measurements and evaluations must be documented. Toilets, washing facilities and break areas must be easily accessible for all employees.

#### 4.4.9 Drinking water

Clean drinking water must be easily available and must be free of charge for all employees.

#### 4.4.10 Alcohol & drugs

There must be a drugs policy with the aim of preventing work under the influence of all kinds of alcohol and drugs. The policy must be implemented and be well known to all employees.

#### 4.4.11 Traffic safety

There must be a traffic safety policy and established traffic safety goals. A programme of action must be drawn up and measures must be implemented to achieve the traffic safety goals.

### 4.5 Worker accommodation

#### 4.5.1 Standard

Accommodation that is provided by the employer must be secure and of a good standard. Single women and men must be offered accommodation together with other employees of the same gender. The employees must be completely free to leave the accommodation 24 hours a day, and must have access to a private area measuring at least 3.8 m<sup>2</sup>. The accommodation must be supplied with a bed or mattress to sleep on, and must be ventilated and/or heated on the basis of local climate conditions. Sleeping areas must be lockable from both inside and outside, and each employee must have access to an individually lockable store for their personal belongings.

#### 4.5.2 Cleaning

All areas must be cleaned regularly and be well maintained. There must be an appropriate number of toilets and washing areas, which must be well looked after and well equipped. The areas where food is served must conform to local requirements regarding sanitation and hygiene.

#### 4.5.3 Safety

There must be at least two evacuation routes and exits per floor, to ensure rapid and safe evacuation of all employees. These must be unlocked from the inside. The fire protection must conform to the requirements set out in sections 6.2.2 – 6.2.6 below.

## 5. Environment

### 5.1. External environment

#### 5.1.1. Emissions into the air

All relevant laws and ordinances relating to emissions into the air must be complied, and relevant permits and test reports must be documented.

#### 5.1.2 Noise

All relevant laws and ordinances relating to noise must be complied, and relevant permits and test reports must be documented.

#### 5.1.3 Water

Water must be treated correctly within the supplier's site or at an external water treatment facility that is approved by the local authorities. In those cases where the supplier has its own water treatment facility,

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this must be managed and maintained in an appropriate manner bearing in mind the process and the amount of water, so that treated water complies with the requirements stipulated by local public authorities. The employees who look after the facility must have received adequate training.

#### 5.1.4 Ground

There must be established procedures for preventing and dealing with the contamination of ground. In the event of any contamination, established procedures must be followed and measures must be implemented immediately to minimise the damage. The incident must be reported to the relevant authority and be handled in accordance with the directives laid down by the authority.

In the event land is being exploited, an environmental impact assessment must be performed in accordance with applicable legislation, with the aim of ensuring that consideration is given to biodiversity and other environmental conditions.

### 5.2 Internal environment

#### 5.2.2 Energy

There must be established procedures for measuring, following up and analysing energy consumption in respect of fuel for vehicles, electricity, heating and cooling. Goals for improved energy efficiency must be established and an action plan must be developed based on the results.

#### 5.2.3 Water

There must be established procedures for measuring, following up and analysing water consumption in production processes. Goals for reduced consumption must be established and a plan of action must be developed based on the results.

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#### 5.2.4 Products & materials

When developing and manufacturing products that are sold to Diab, it is essential, as far as technically and financially feasible, to select the best possible design, construction, materials and manufacturing technique from a sustainability perspective. A traceability system for sensitive raw materials must be established.

#### 5.2.5 Waste

##### 5.2.5.1 Waste register

A register of waste and hazardous waste must be drawn up and continually updated with information regarding the type and quantity of waste.

##### 5.2.5.2 Procedures

Documented procedures for sorting, storing, transporting, recycling and landfill of various types of waste must be drawn up and implemented. The procedures must also describe how the health and safety of affected employees are protected.

##### 5.2.5.3 Competence

Employees who handle waste must undergo relevant training to guarantee their level of competence. The content of the training must be described and there must be a register of trained employees.

##### 5.2.5.4 Handling of waste

All waste must be stored, handled and transported in such a way that ground, water or air is not contaminated and so that the risk of ignition or explosion is minimised. Waste and hazardous waste must be kept separate, and areas for sorting and storing must be clearly delimited. In addition, the waste containers must be clearly marked.

##### 5.2.5.5 Recycling

Sorted waste must be sent for recycling, provided there is an established infrastructure with serious partners on the market.

##### 5.2.5.6 Business partners

The partners that are used for waste management must have the permits that are required in accordance with applicable local laws and regulations.

##### 5.2.5.7 Landfill

Waste may only be incinerated or deposited in landfill under controlled conditions at facilities indicated by local public authorities.

#### 5.2.6 Chemicals

##### 5.2.6.1 Register

All chemicals that are used must be documented in a register that is continually updated. Details about the chemicals' name, area of application and references to material safety data sheets must be present. Material safety data sheets must be available in languages that affected employees understand.

##### 5.2.6.2 Procedures

Documented procedures for the purchase, storage, handling and use of chemicals, as well as dealing with incidents and accidents involving chemicals, must be established and implemented.

##### 5.2.6.3 Chemicals Blacklist

Diab Group has developed a Chemicals and Materials Blacklist that is developed in line with our customers and our internal requirements for precautionary principles of use of hazardous or dangerous chemicals. All suppliers must adhere to this list. Any case of not meeting the requirements needs to be communicated to



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Diab and approved by Diab before use. The Diab chemicals and materials blacklist is available on the Diab website [www.diabgroup.com](http://www.diabgroup.com)

#### 5.2.6.4 Competence

Employees who handle chemicals must undergo relevant training to guarantee their level of competence. The content of the training must be described and there must be a register of trained employees.

#### 5.2.6.5 Handling chemicals

All chemicals must be stored, handled and transported in such a way that ground, water or air are not contaminated and so that the risk of ignition or explosion is minimised. Chemicals must be stored in areas with a solid floor that does not absorb any spilled chemicals. If liquid chemicals are stored in the area, the floor must be fitted with an edging that is sufficiently high to contain the entire content of the largest chemical container. If chemicals are stored in an underground tank, this must be monitored to ensure that any leaks are prevented and discovered at an early stage.

#### 5.2.6.6 Marking

All chemical containers must be marked in such a way that the content and risks are clear to the employees.

### 5.3 Emergency preparedness & Fire protection

#### 5.3.2 Emergency preparedness

An emergency plan based on identified risks must be drawn up and implemented. Procedures for preventing and dealing with emergency situations must be implemented.

### 5.4 Fire protection

#### 5.4.2 Documentation

In the event of all incidents and fires, the cause must be analysed and preventive actions implemented and documented.

#### 5.4.3 Competence

A relevant number of employees within each work area must learn to use the fire safety equipment. This training must be repeated at least every 24 months, the content must be described and a register of trained employees must be available. All employees must receive information about applicable fire safety procedures before taking up their position.

#### 5.4.4 Fire safety equipment

Relevant fire safety equipment must be in place and all manual equipment must be easily accessible, easy to identify from distance, well maintained and unlocked. The operation of the equipment must be tested, guaranteed and documented at least every 12 months. Approved equipment must be marked and the date of the approval must be evident.

#### 5.4.5 Evacuation

Marked evacuation routes and exits must exist in order to ensure the efficient evacuation of all employees. The marking must be either lit or luminous. Evacuation routes and exits must not be blocked, and doors must be unlocked from the inside and must open outwards.

#### 5.4.6 Evacuation alarm

There must be a working evacuation alarm that emits a continuous sound that can be heard by all employees. In premises where there are high noise levels, the alarm must be supplemented with a light signal. The alarm can be activated manually, and automated alarms must have an independent power supply to ensure they continue working in the event of a power cut.

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#### 5.4.7 Evacuation drills

Evacuation drills must be carried out for all departments/shifts, with as many employees as possible, at least every 12 months. There must be evacuation leaders who are responsible for ensuring that all employees have been evacuated. The date and time when the drills were carried out must be documented, and it must also be clear which departments/shifts took part, the time required for the evacuation, as well as what corrective measures need to be implemented, if any.

## 6 Business ethics

### 6.1 Anti-corruption policy

There must be an anti-corruption policy that clearly deprecate all forms of bribes, corruption, money laundering, conflicts of interest or tax offences, and it must be implemented.

### 6.2 Documents and registers

All documents, registers, reports, etc., related to the supplier code of conduct must be transparent, correct and reliable.

### 6.3 Taxes

All legal taxes and charges, as well as any royalties, must be paid and reported transparently in the country where the operation is conducted. Any tax liabilities in relation to public authorities must be regulated.

### 6.4 Training and information

All affected employees must be trained in and continually notified about policies, rules and responsibilities regarding business ethics. The content of the training must be documented and a register of participants must be drawn up.

## 7.1 References

**This supplier code of conduct is based primarily on the following guidelines:**

### **The UN's Global Compact**

The UN's Global Compact is the global business sector's appeal for sustainable enterprise. According to the UN's Global Compact, companies are challenged to support and act on the basis of the following ten principles:

#### **Human rights**

Principles 1-2: Companies should support and respect the internationally recognised human rights and ensure that they themselves are not involved in breaches of human rights.

#### **Work and employment conditions**

Principles 3-6: Companies should uphold freedom of association and actual recognition of the entitlement to collective bargaining, as well as the abolition of all forms of forced labour, child labour and discrimination in employment and the exercise of an individual's profession.

#### **Environment**

Principles 7-9: Companies should support the precautionary principle with regard to environmental risks, take the initiative to promote greater assumption of environmental responsibility, and encourage the development and distribution of environmentally friendly technology.

#### **Anti-corruption**

Principle 10: Companies should work to counter all forms of corruption, including extortion and bribes.

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### OECD's guidelines for multinational companies

The countries that adopt the OECD's guidelines encourage companies to comply with the guidelines and contribute to economic, environmental and social development, and to minimise the difficulties that their various operations can give rise to. In this work, governments collaborate with companies, trade unions and voluntary organisations.

The guidelines in brief:

- Respect human rights, contribute to sustainable development and the continued training of employees.
- Openness about the business, products and services, in relation to both financial and other information.
- Respect the employees' union rights, co-operate in various ways with the employees' representatives and work to counter child labour. Provide information about and alleviate the negative consequences of companies shutting down.
- Strive to achieve continual improvement. Protect health, safety and the environment, for example through environmental management systems and by applying the precautionary principle. Develop and supply products and services with no unwanted environmental effects.
- Do not give bribes, promote openness and the employees' awareness of the company's policy against bribes.
- Provide information about products to consumers and establish procedures for resolving consumer disputes.
- Endeavour the transfer technology and knowledge to the host country.
- Do not collaborate with competitors, thereby restricting competition.

### The UN's guiding principles for companies and human rights

In 2011, the UN Human Rights Council unanimously adopted a recommendation targeted at all states and all companies in the form of guiding principles relating to:

- The state's obligation to protect individuals against their rights being infringed by private parties, including companies.
- The commercial sector's responsibility to respect human rights.
- Access to effective legal remedies for those who consider that their human rights are being infringed.

We hereby confirm adherence to this Code of Conduct

Signature:

Name:

Title:

Company Name:

Date: