# Supplier Code of Conduct

## Advania Group

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# 1 Introduction

## 1.1 Purpose and foundation

At Advania, we are committed to responsible and sustainable business practices, and we systematically integrate respect for human rights, fair and safe working conditions, environmental responsibility, and business ethics into every part of our value chain. Advania is a signatory of the UN Global Compact; our work and this Code is based on its Ten Principles on human rights, labour, environment, and anti-corruption as well as internationally recognised declarations, conventions and standards.[1]

Our suppliers and business partners play a vital role in helping us deliver secure, reliable, and sustainable solutions to our customers. This Supplier Code of Conduct outlines the core expectations we have for our suppliers and their subcontractors. It serves as a foundation for our collaboration and supports continuous improvement across our partnerships. Each supplier is responsible for ensuring that their subcontractors adhere to the same or equivalent standards. By working together, we can reduce risks, minimise negative impacts, and promote more sustainable business practices.

## 1.2 Scope

This Code applies to all suppliers with a contractual relationship with an Advania Group company, excluding one-off transactions (e.g. taxi rides or meals). Suppliers are responsible for complying with this Code—or equivalent standards—and must cascade its requirements throughout their supply chain, ensuring that subcontractors also meet these expectations.

Advania Group is a member of the Responsible Business Alliance, the world's largest industry coalition dedicated to promoting responsible business conduct in global supply chains. IT suppliers contributing to Advania's delivery of products and services to customers are also expected to acknowledge and adhere to the Responsible Business Alliance (RBA) Code of Conduct.

## 1.3 Ownership and review

This Code is reviewed annually and is updated as required in response to organisational changes or emerging risk situations. Each Advania company's local CEO is responsible for overseeing its local implementation. The Board of Directors of Ainavda Holding holds ultimate responsibility for reviewing and approving the Code.

[1] The Universal Declaration of Human Rights, International Labour Organization's Declaration on Fundamental Principles and Rights at Work, The Rio Declaration on Environment and Development, The UN Convention against Corruption, The UN Convention on the Rights of the Child, article 3, The UN Guiding Principles for Business and Human rights and the OECD Guidelines for multinational enterprises.

# 2 General requirements

## 2.1 Legal compliance

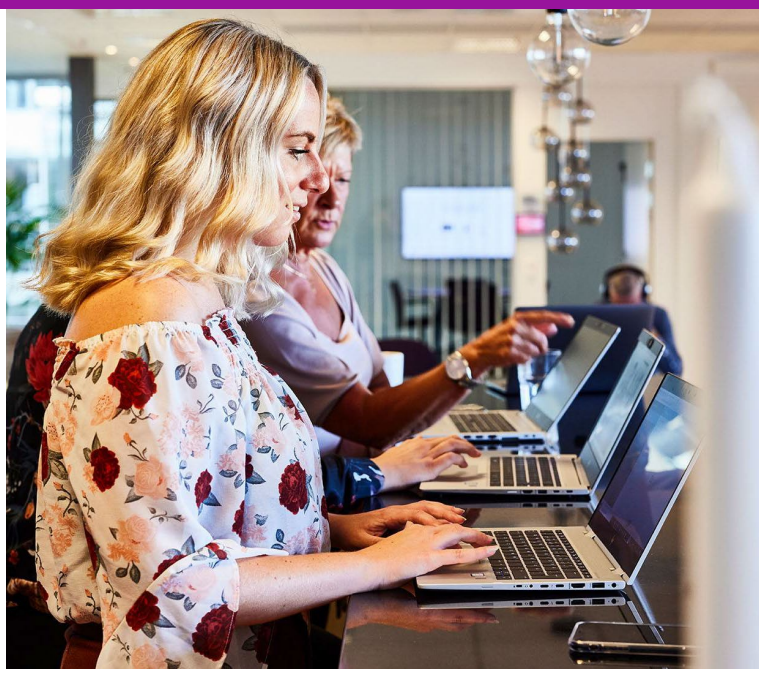
Suppliers must comply with all applicable laws and regulations in the countries where they operate and hold all necessary permits. Where this Code sets higher standards than local law, the stricter requirement applies—unless it would conflict with local legal obligations. In such cases, suppliers are expected to make reasonable efforts to meet the Code's intent within legal limits.

## 2.2 Due diligence

Suppliers are expected to conduct risk-based sustainability due diligence that is proportionate to the nature and scale of their operations, including their supply chains. This involves identifying and assessing actual and potential risks and impacts on people, communities, and the environment. Where suppliers cause or contribute to adverse impacts, they are expected to take appropriate action to enable remedy, including implementing compensation and restoration measures where relevant.

Where relevant, suppliers must ensure the responsible sourcing of gold, tungsten, tantalum, tin (3TG), cobalt and other conflict minerals and high-risk materials by tracing their origin, managing risks, and setting clear expectations for upstream partners.

Where extraction impacts local communities—especially Indigenous peoples—suppliers must respect their rights, including land rights and free, prior, and informed consent (FPIC), in line with international human rights standards.



## 2.3 Management systems

Suppliers are expected to have appropriate management systems in place to support compliance with this Code and drive continuous improvement. These systems should enable the identification and mitigation of relevant risks, set measurable objectives, and monitor performance in key areas such as human rights, labour practices, environmental impact, and business ethics. Suppliers are encouraged to certify their management systems under international standards, such as ISO 14001 for environment and ISO 27001 for information security, ISO 45001 for occupational health and safety and ISO9001 for quality.

## 2.4 Product standards

Suppliers must ensure compliance with product-related environmental requirements and may be asked to declare the material content and origin of products. Products delivered to Advania should be certified by recognised environmental or sustainability labels, such as TCO Certified or EPEAT Gold for IT products or The Nordic Swan Ecolabel or EU Ecolabel for other goods, such as cleaning products, food, and office supplies.

## 2.5 Reporting channels and non-retaliation policy

Suppliers should provide appropriate reporting channels for workers and other stakeholders, including affected communities, to raise concerns. These mechanisms must ensure that workers can report concerns without fear of retaliation, and that all reports are investigated and addressed in a timely manner.

Advania encourages anyone with knowledge or reasonable suspicion of serious misconduct related to breaches of law, our values, or ethical principles to report it via our whistleblowing channel. The channel is managed by an independent third party and allows for anonymous reporting. All reports are confidential, and Advania does not tolerate any form of retaliation against anyone reporting in good faith. While hard evidence isn't required, reports must be honest and made based on the reporter's knowledge.

The whistleblower portal is available at https://report.whistleb.com/advania or via www.advania.com

## 2.6 Transparency and performance reporting

Suppliers are required to promptly inform Advania of any issues, breaches, or concerns that may affect Advania's operations, reputation, or compliance with legal and ethical standards Suppliers are also expected to transparently disclose relevant data and information related to their performance upon request. This includes, but is not limited to, greenhouse gas emissions, resource and water usage, pollution levels, climate change adaptation and mitigation measures, salient human rights issues, labour practices, and ethical business conduct.

## 2.7 Follow-up and consequences of non-compliance

Advania reserves the right to monitor Suppliers' compliance with this Code. Suppliers are expected to cooperate fully, provide requested information, and participate in follow-up activities, including self-assessments and third-party audits. If non-compliance is identified, Advania will require a corrective action plan within an agreed timeframe. While Advania aims to support improvement and does not seek to terminate business relationships unnecessarily, we will not continue business with suppliers where compliance is unachievable. Failure to implement corrective actions or serious violations may lead to contract termination.

# 3 Human rights and working conditions

Suppliers are expected to respect and promote human and labour rights, adhere to the principle of “do no harm,” and proactively manage risks to avoid causing or contributing to human rights violations. They must ensure fair treatment and safe working conditions for all workers, with particular attention to the rights and needs of vulnerable groups—including migrant workers, women, children, persons with disabilities, and Indigenous peoples—whose situations may heighten the risk of adverse impacts or social inequalities.

## 3.1 Modern slavery

Suppliers must prohibit all forms of modern slavery, including forced and bonded labour, prison labour, slavery, human trafficking, and other forms of exploitation or abuse. Workers must not be required to surrender identification, pay employment fees, or make deposits. The supplier must provide employees with a written employment contract in a language that the workers understand, outlining employment terms and conditions of employment. All work must be voluntary, and workers must have the right to leave their accommodation and workplace without restriction during leisure time and be free to terminate their employment with reasonable notice.

## 3.2 Child labour and young workers

Suppliers must prevent all forms of child labour and may not employ children below the minimum employment age or the age for completing compulsory education, whichever is higher in the country of operations. No young worker under the age of 18 shall be engaged in work that is hazardous or likely to harm their health, safety, development or well-being. Suppliers must implement appropriate mechanisms to verify the age of workers. In cases where child labour is identified, the supplier must take appropriate remedial actions in the child's best interests, in collaboration with their family and local organisations.

## 3.3 Inhumane treatment, harassment and discrimination

Suppliers must treat all workers with dignity and respect, ensuring equal opportunities based on merit and performance, including access to employment, training, promotion and remuneration. Discrimination on any grounds—such as gender, sexual orientation, ethnicity, disability, religion, age, marital status, pregnancy, trade union affiliation, caste, or any other protected characteristic—is strictly prohibited. Physical punishment or harassment of any kind, including sexual, verbal, physical, or psychological abuse, threats, or degrading treatment, is never tolerated.

## 3.4 Wages and benefits

Suppliers must pay wages and benefits that meet or exceed the legal minimum and should work towards providing a living wage that ensures a decent standard of living. Overtime should be compensated at a premium rate and clearly itemised on payslips. Wages must be paid regularly, directly to the worker, with no unauthorised deductions. Charging recruitment fees or imposing fines is strictly prohibited.

## 3.5 Working hours

Working hours must comply with national laws and must not exceed legal limits—or 60 hours per week where no limit exists—with at least one day off in every seven day period. A standard work week should not regularly exceed 48 hours and excessive or forced labour is prohibited. Overtime must be voluntary and within legal limits. Suppliers must comply with national legislation regarding compensation for annual leave, public holidays, sick pay, and parental leave and should promote a healthy work-life balance.

### 3.6 Freedom of association and right to collective bargaining

Suppliers must respect workers' rights to freely associate, join or not join unions, and engage in collective bargaining without fear of retaliation or harassment. They should support open dialogue between workers and management on wages, working conditions, and other employment terms. Where freedom of association is restricted by law, suppliers should enable alternative forms of worker representation and allow employees to freely elect their representatives.

### 3.7 Occupational health and safety

Suppliers must provide a safe and healthy working environment, prevent risks and minimise health impacts. Workers must receive appropriate personal protective equipment and regular, documented health and safety training. Fire extinguishing equipment and emergency exits must be clearly marked, accessible, and supported by regular evacuation drills. Clean toilet facilities, potable water, and—where relevant—hygienic food storage must be available. Any accommodation provided must be clean, safe, ventilated, and offer access to clean toilets and drinking water.

## 4 Environmental responsibility

Suppliers are expected to comply with all applicable environmental laws and obtain the necessary permits and licenses for their operations. They must adopt a precautionary approach, proactively reducing their environmental footprint and climate impact from their operations and should monitor, set targets and report on their material impacts. Suppliers should also be aware of their impact on local communities and minimise the risk of water, soil air pollution which may harm the health and well-being of local community members and surrounding ecosystems.

### 4.1 Climate and energy

Suppliers must actively work to reduce greenhouse gas (GHG) emissions (Scope 1,2 and 3) across their operations and value chains, aligning climate strategies with global targets, preferably the 1.5°C target of the Paris Agreement. Suppliers are encouraged to set science-based climate targets and should implement climate adaptation measures relevant to their operations.

Suppliers must prioritise energy efficiency, transition to fossil-free and renewable energy sources. Data centres providing services to Advania or its customers should be powered by electricity from renewable sources.

### 4.2 Circular economy and waste management

Suppliers should strive to apply circular principles and demonstrate continuous improvement in reducing resource consumption. This includes designing for durability, reuse, repair, and refurbishment; using recycled or responsibly sourced materials where possible; and supporting product recovery, recycling, and lifecycle optimisation to minimise environmental impact.

Suppliers must comply with all applicable waste management regulations, ensuring proper handling, storage, and disposal of waste. They are expected to prioritise in accordance with the waste hierarchy principles in descending order: minimisation of waste generation, reuse, recycling of materials, energy recovery and landfill. Hazardous waste must be sorted and stored separately and disposed of by licensed professionals.

## 4.3 Chemicals

Suppliers must manage chemicals and hazardous substances in a way that protects people and the environment. All chemicals must be handled, transported, stored and disposed of safely. Suppliers must apply the precautionary principle and should replace hazardous substances—including substances of very high concern—with safer alternatives.

## 4.4 Air, water and biodiversity

### Air pollution

Where applicable, suppliers should make efforts to control and reduce the release of air pollutants such as dust, fumes, and chemicals, that could affect local air quality. Suppliers are encouraged to monitor the air quality around their facilities and should adopt best practices and explore opportunities to improve control technologies to reduce emissions over time.

### Water management

In water-intensive operations, suppliers should minimise water use, improve efficiency, promote water conservation practises and ensure that wastewater is treated and disposed of in compliance with local laws.

### Biodiversity

Where operations significantly impact biodiversity, suppliers should protect and restore natural habitats. This includes avoiding deforestation and ecosystem degradation and promoting biodiversity conservation initiatives.

# 5 Business ethics

Suppliers are expected to operate all business ethically and transparently and in compliance with local legislation and international anti-corruption standards. Suppliers must take proactive measures to prevent, detect, and address any form of corruption or unethical behaviour.

## 5.1 Corruption and financial integrity

Suppliers must adopt a zero-tolerance approach to all forms of corruption, including bribery, extortion, fraud, and embezzlement. No monetary or non-monetary benefits may be offered or accepted to gain an improper advantage or influence decisions. This includes gifts, hospitality, travel, services, or other personal benefits. Corrupt practices such as nepotism, favouritism, conflicts of interest, or abuse of power for personal gain, are also strictly prohibited. Suppliers must actively prevent and reject financial crimes, including money laundering, tax fraud, tax evasion, and the misuse of offshore or high-risk structures.

## 5.2 Export controls and sanctions

Suppliers must comply with applicable laws and regulations related to export controls, trade restrictions, and economic sanctions. This includes ensuring that products, services, technology, and data are not transferred or used in violation of such laws.

## 5.3 Anti-trust and competition law

Suppliers must comply with applicable competition and antitrust laws, including refraining from engaging in anti-competitive practices such as price fixing, bid-rigging, or market sharing, or exchanging commercially sensitive information with competitors.

## 5.4 Data privacy

Suppliers must comply with all applicable data protection laws, including but not limited to the General Data Protection Regulation (GDPR) and the UK GDPR. This includes ensuring the security of personal data and adhering to regulations regarding the processing, storage, and transmission of personal data [to ensure the confidentiality, integrity, and availability of data].

## 5.5 Information security

Suppliers and sub-suppliers are expected to have documented and implemented appropriate technical and organisational security controls as appropriate to their business, which are subject to regular review, assessment and improvement. Where applicable, suppliers should demonstrate and ensure the ongoing confidentiality, integrity, availability and resilience of processing systems, applications and services supplied to Advania. Where relevant, suppliers should strive to certify their information security initiatives under an international standard such as ISO 27001 or similar.

## 5.6 Artificial Intelligence (AI)

Suppliers must comply with all applicable laws and regulations related to AI, including but not limited to the EU AI Act and other relevant international standards. AI must be used responsibly, with safeguards to prevent harm, discrimination, rights violations, or privacy breaches, and reflect principles of accountability, fairness, and responsible innovation.

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