

# BUSINESS PARTNER CODE OF CONDUCT

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## **1 INTRODUCTION**

GRANGEX vision is to actively contribute to a sustainable society by striving to become the leading mineral development company group in Europe that develops and engages in responsible extraction and recycling of minerals that contribute to a better society and climate.

We recognize the importance of our role in the global supply chain and our responsibility for the economic, environmental, and social impact from our activities. This includes identifying, preventing, mitigating, and accounting for adverse environmental, human rights and governance impacts in our own operation and in the supply chain. We expect the same commitment from our business partners.

At GRANGEX we are committed to uphold high standards of ethics in all our business interactions and support and adhere to principles in recognized international standards and frameworks upon which this Supplier Code of Conduct is based on. These include:

- United Nations International Bill of Human Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work (ILO)
- The OECD Guidelines for Multinational Enterprises,
- UN Guiding Principles on Business and Human Rights

## **2 GENERAL REQUIREMENTS**

This Supplier Code of Conduct (the "Code") sets out GRANGEX Group's (hereafter GRANGEX) principles for responsible business conduct and minimum expectations on our all our business partners. Business partners includes suppliers, subcontractors, joint venture partners, agents, distributors, representatives, and customers.

As business partner to GRANGEX, you comply with all applicable laws and regulations wherever you operate and meet the requirements set out in this Code, as well as your contractual obligations to GRANGEX.

If a business partner use subcontractors for services and products supplied to GRANGEX, it is the responsibility of that business partner to use the same principles to evaluate and select their subcontractors.

We promote an open dialogue with all our suppliers and work together with them to help them meet our requirements. Should the business partner consider any requirement in this Code of Conduct conflict with the national laws or regulations in a country or territory they operate, the business partner must notify GRANGEX to discuss how the requirements in this Code can be accommodated without conflicting with such laws or regulations.

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### **3 HUMAN RIGHTS**

We require our business partners to respect the same international human rights principles and standards as GRANGEX.

#### **Human rights due diligence**

All employees, regardless of their form of employment, shall be treated fairly, with dignity and respect in accordance with fundamental human rights. Business partners must have adequate procedures in place for compliance and remediation of human rights violations.

#### **Children and young workers**

Business partners may not use, or support any use of, child labour or other exploitation of children. Not hire persons who are younger than the age to complete compulsory education or younger than 15 years (or age 14, where permitted by ILO convention No. 138). Workers under the age of 18 must be protected from performing any work that may harm their physical or mental development, interfere with their education, or compromise their potential or dignity.

#### **Forced labour**

Business partners may not use, participate in, or benefit from any forced or involuntary labour. No one should be subjected to work under threat of punishment or forced to deposit money or original documents (such as passports, diplomas) at the beginning of or during their employment. Employees must be allowed to move freely at work and have the right to leave the workplace premises during and outside working hours.

#### **Discrimination, harassment, and abuse**

Business partners shall not discriminate in employment and employment practices. Discrimination includes but is not limited to ethnicity, national or social origin, religion, age, disability, gender, sexual orientation or identity, union membership, political opinion or other characteristics protected under local law and ensure equal and fair treatment of all workers.

Business partners should not tolerate physical punishment, unlawful detention, or physical, sexual, verbal harassment, or abuse.

#### **Protection of citizens in local communities**

Business partners shall act responsibly towards the neighbouring community, safeguard the rights of indigenous peoples and landowners, and treat all members of the community fairly and with dignity and respect. Business partners shall not tolerate or in any way profit from, contribute to, assist with or facilitate the commission of any party: war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide. If companies use security services to protect their operations, they must ensure that international guidelines and standards for the use of force are respected.

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## **4 LABOUR RIGHTS and EMPLOYMENT CONDITIONS**

The requirements in this Code that relate to the business partner's personnel must apply to all their employees, including temporary employees, consultants and contractors.

### **Freedom of association and the right to collective bargaining**

Business partners should respect the right of workers to form and join, or not join, a union of their choice and to bargain collectively without fear of reprisals. GRANGEX encourage Business Partners to engage in dialogue with their employees to motivate workplace engagement.

### **Wages and contracts**

All employees must be paid fair and reasonably, and wages must comply at a minimum with applicable law or industry standards, whichever is higher and GRANGEX encourage all business partners to pay living wages to their employees. The payment must be done regularly, at least monthly. The wages paid must be documented in a transparent system that covers all employees.

All employees must have access to adequate social security. It must be ensured that all employees receive statutory benefits such as sickness and accident insurance and pension benefits.

All employees must be informed of their terms of employment. All employees have the right to written employment contracts in a language that is understandable to the employee. No fee may be charged in conjunction with their recruitment and all employees must be fully entitled to give notice to terminate their employment in accordance with the applicable employment contract without any penalty or wage deduction.

### **Working hours**

Working hours, overtime, breaks and leaves must comply with applicable laws, collective agreements, and industry standards. Hours worked must be documented in a transparent system that covers all employees.

### **Health and safety**

Business partners must ensure, as far as reasonably possible, a safe and healthy work environment. Work premises, including company provided living quarters, and factory conditions must be such that workers can perform their functions in a safe and healthy environment. This includes fire prevention and effective emergency response preparedness. Necessary protective equipment and protective clothing shall be available at no cost to employees.

Business partners should establish appropriate organizational structures and procedures for effective management of health and safety risks including effective control measures to mitigate those risks. It should be ensured that all employees are sufficiently aware of the risks and appropriately trained to mitigate such risks. Health and safety accidents and incidents should be documented and managed.

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Relevant health and safety performance data and statistics related to continuous improvement programs, including but not limited to accidents, incidents, lost-time injuries, near misses and occupational illnesses should be tracked and documented.

## **5 ENVIRONMENT AND CLIMATE**

GRANGEX is continuously striving to reduce and minimize the environmental impacts of our activities and our products. This includes mitigating climate change, the protection of biodiversity and ecosystems, sustainable use of resources, circularity, prevention of harmful emissions to air, water and land as well as responsible land ownership, acquisition and use. We require our business partners to share our commitment to reduce and minimize the environmental impact.

### **Precautionary approach and environmental management**

All business partners should conduct their businesses in an environmentally sustainable and resource-efficient way and comply with all relevant regulations and conventions.

It is expected that business partners establish a risk-based approach to reduce or minimize negative environmental impact and ensure that it is implemented and maintained. Further, it is expected that an organizational structure and procedures are established, e.g. in the form of environmental management system, for an effective management of environmental impact and potential impact and to work with continuous improvement.

Relevant environmental data related to continuous improvement should be monitored, e.g. energy use data, greenhouse gas emissions, water consumption, fauna and flora protection and restoration, chemical use, waste generation and treatment and material recycling and reuse.

### **Climate mitigation and energy consumption**

Business partners shall continuously strive to minimize greenhouse gas (GHG) emissions and we encourage to set GHG reduction targets in line with the Paris agreement.

Business partners strive to choose fossil free energy sources and to work for energy efficiency. As far as possible choose fossil free means for transportation of products and services to GRANGEX.

### **Resource use and waste**

Business partners should strive to reduce the use of resources, this include but not limited to water, energy, chemicals, and materials. GRANGEX supports its business partners in the development of environmentally friendly techniques in their products, processes, and design.

Business partners should work to prevent and minimize the amount of waste. Wastes should as far as possible be reused or recycled. Waste not reused or recycled must be sent for appropriate waste treatment in accordance with applicable legislation and waste to landfill should be minimized.

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### **Biodiversity and ecosystems**

Business partners should understand the connections that its business may have on impacts on biodiversity and ecosystems and, as relevant, act to safeguard those.

## **6 BUSINESS ETHICS/ BUSINESS ETHICS AND INTEGRITY**

Business partners shall conduct their business in an ethical manner and with high integrity.

Applicable laws and regulations relating to anti-corruption, anti-money laundering, antitrust, trade compliance, privacy and tax laws and regulation shall be respected.

### **Anti-corruption/Bribery and corruption**

GRANGEX has zero tolerance for bribes and corruption. Business partners must take measures to prevent corruption. Business partners shall never offer, accept, pay or promise, give, or authorize payment of any money or anything of value to anyone for the purpose of influencing any act or decision.

### **Fraud, extortion, money laundering and trade sanctions**

Business partners shall have adequate procedures in place to prevent, detect and address financial crimes, including but not limited to fraud, extortion and money laundering, and to comply with trade sanctions. GRANGEX can, upon request, support in the screening of trade sanctions.

### **Fair competition**

Business partners shall comply with all competition and antitrust laws. This includes, but is not limited to, not entering into discussions or agreements with competitors regarding pricing, market sharing or other similar activities.

### **Conflict of interest**

Business partners should not engage in relationships, participate in activities, or have an interest in a venture where personal or other inappropriate relationship has or may influence a business decision. If such conflict of interest arises while engaged with GRANGEX, the business partner shall take appropriate measures to eliminate the conflict of interest and notify GRANGEX of this.

### **Taxes, fees, and royalties**

Business partners shall ensure that all statutory taxes, fees, and royalties related to mineral extraction, trade and exports are paid to governments. This commitment includes ensuring that such payments are made public in accordance with the principles set out under the Extractive Industries Transparency Initiative (EITI).

### **Proprietary information and data privacy.**

Business partners shall treat confidential, sensitive, or proprietary information with respect and not to use or disclose it in any other manner than as permitted. Intellectual property rights such as

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patents, trademarks, copyrights, trade secrets, know-how and technical data shall be respected and not used in any other way than permitted by GRANGEX.

Business partners must comply with all applicable data-privacy regulations and laws on the collection, processing and transfer of personal data.

## **7 RESPONSIBLE VALUE CHAIN**

Business partners are expected to ensure a responsible value chain and to apply corresponding requirements as presented in this Code on their business partners. Further, it is expected that the Business partner assess risks in their value chain and act to cease, prevent or mitigate actual adverse impacts to people or the environment.

### **Conflict minerals**

Conflict minerals include tin, tantalum, tungsten and gold (3TG) and other minerals that are classed as conflict minerals. Business Partners providing parts, products or raw materials that contain one or more conflict minerals and source from conflict-affected and high-risk countries are expected to exercise due diligence following the OECD due diligence guidelines.

## **8 COMPLIANCE AND MONITORING**

Business partners must ensure their own compliance with the Code as well as their value chain. Business partners shall have appropriate processes in place to verify compliance with the requirements in this Code. Compliance may be subject to audits or assessment by other means, e.g. self-assessments. Business partners are expected to participate in audits and to provide access to data, documentation, and other information to verify compliance.

In the case of a material breach of the requirements in this Code, GRANGEX reserves the right to discontinue the business relationship or to terminate any agreement with the business partner. GRANGEX value good cooperations with its business partners and if possible and appropriate, GRANGEX will allow the business partner the option to remedy a breach.

## **9 REPORTING OF CONCERNS**

Business partners are expected to report non-compliance and raise concerns related to breaches of the requirements of this Code either directly to their contact person or to another person at GRANGEX. Alternatively, concerns may be reported to **TITLE xxxx@grangex.se, e.g compliance@grangex.se**.

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