



Supplier Code of Conduct
Ahlberg Group

Introduction

The Ahlberg Group is dedicated to environmentally and socially responsible corporate governance and expects the same commitment from all of our suppliers. We also expect our employees to uphold principles of environmental, social, and ethical behavior, integrating these values into our corporate culture. Furthermore, we are committed to continuously improving our business practices, products, and services in terms of sustainability, and we encourage our suppliers to contribute to these efforts in a holistic manner.

The Ahlberg Group's Supplier Code of Conduct outlines key requirements for compliance with legal and regulatory standards, anti-corruption measures, social and labor conditions, child labor prevention, and environmental protection. We expect our suppliers to align with this commitment and make reasonable efforts to promote compliance with the principles of this Code among their own suppliers and subcontractors.

Compliance with Laws

The Ahlberg Group expects its suppliers to comply with applicable national and international laws and regulations, including the International Labour Organization (ILO) conventions, the United Nations Universal Declaration of Human Rights, industry standards, and any other relevant legal requirements. In countries where legal requirements or other rules differ from this Code, the stricter requirements shall apply.

Human Rights and Working Conditions

Suppliers must ensure the protection of all internationally proclaimed human rights and avoid any involvement in human rights violations. Special attention should be given to safeguarding the rights of particularly vulnerable groups, such as women, children, migrant workers, and (indigenous) communities

Prohibition of Forced Labor

- Slavery, servitude, forced or compulsory labor, exploitation, human trafficking, or any form of oppression shall not be supported or tolerated.

Prohibition of Child Labor

- No workers under the age of 15 may be employed. In countries covered by ILO Convention 138 (with exceptions for developing countries), the minimum age may be reduced to 14 years.
- Workers under the age of 18 shall not be employed in roles that may jeopardize their health, safety, or morals.

Non-Discrimination and Respect for Employees

- Ensure equal treatment of employees regardless of skin color, race, nationality, ethnicity, social origin, disability, sexual identity and orientation, political, ideological or religious beliefs, marital status, gender, or age, and promote equal opportunities.
- Discrimination, harassment, and any form of inappropriate treatment—such as psychological abuse, sexual harassment, or coercion—shall not be tolerated. This includes harmful gestures, language, or physical contact that is sexually exploitative, threatening, or abusive.

Ethical Recruitment

- All recruitment and hiring practices must adhere to the highest ethical standards. Workers must be freely chosen and treated with fairness, free from coercion, deception, or mistreatment.
- When using external recruitment agencies or intermediaries, ensure they are carefully selected and monitored to comply with ethical recruitment standards.

Freedom of Association

- Recognize and respect employees' legal right to form and join trade unions and participate in collective bargaining. Employees who are members of unions should not be discriminated against or favored.

Working Hours, Wages & Benefits

- Comply with applicable working hour regulations globally.
- Ensure fair wages and comply with all relevant wage and compensation laws.
- For cross-border personnel deployments, adhere to all relevant legal provisions, particularly concerning minimum wage requirements.

Health & Safety, Security Forces

- Act in accordance with applicable health and safety standards and provide safe working conditions.
- Provide employees with appropriate training on health and safety matters.
- Establish and implement an appropriate health and safety management system.
- When working with private or public security forces, ensure the protection of employees' and stakeholders' human rights, including avoiding any form of unlawful physical or psychological violence.

Grievance Mechanism

- Offer employees access to a secure and confidential process for reporting any violations of this Code of Conduct. Protect whistleblowers or complainants from retaliation.

Environmental and Climate Protection and Conservation of Natural Resources

- Comply with relevant environmental regulations and international standards, striving to minimize pollution and continuously enhance environmental and climate protection efforts to conserve natural resources.
- Reduce greenhouse gas emissions by implementing energy-efficient processes and increasing the use of renewable energy sources to combat climate change.
- Ensure responsible management of chemicals and sustainable resource use, including promoting reusability and recycling, to protect the environment from pollution and safeguard the health of employees and surrounding communities.
- Maintain high standards of soil, water, and air quality, reduce water consumption, minimize noise pollution, and ensure proper waste treatment and disposal.
- Uphold animal welfare in all production and supply chain processes by promoting humane practices and strictly avoiding cruelty.
- Protect biodiversity through effective measures to minimize adverse impacts on ecosystems and endangered species.

- Promote sustainable land use and the protection of forests and natural habitats to prevent deforestation and reduce the ecological footprint of our operations.
- Prohibit unlawful expropriation of land, forests, or water bodies, ensuring that all land use complies with legal and ethical standards.

Fair Business Practices

Financial Responsibility

- All financial records must be accurate, complete, and submitted in a timely manner. Embezzlement, fraud, or manipulation of financial data are strictly prohibited.

Disclosure of Information

- All relevant information must be disclosed accurately and promptly, ensuring transparency in all financial and business dealings.

Plagiarism

- Plagiarism is strictly prohibited. Individuals are required to ensure the originality of their work and to properly cite all sources.

Anti-Corruption and Bribery

- Corruption and bribery are not tolerated in any form. Direct or indirect involvement, as well as the offering, granting, or promising of benefits to public or private sector representatives to influence official actions or gain unfair advantages, is strictly forbidden. This also includes refraining from offering or accepting illicit facilitation payments.

Fair Competition, Antitrust Law, and Intellectual Property Rights

- Comply with both national and international competition laws, avoiding price-fixing, market or customer allocation, market manipulation, or collusion.
- Respect the intellectual property rights of others and refrain from unauthorized use or infringement.

Conflicts of Interest

- Avoid any real or perceived conflicts of interest that could affect business relationships with the Ahlberg Group. All potential conflicts should be disclosed and mitigated promptly.

Money Laundering and Terrorism Financing

- Actively prevent money laundering and the financing of terrorism, ensuring that no direct or indirect support is provided for such activities.

Data Protection

- Handle personal data confidentially and responsibly, respecting individuals' privacy. Ensure personal data is adequately protected and used solely for legitimate purposes.

Foreign Trade Law

- Comply with all applicable export, import, customs, and foreign trade regulations to ensure legal and ethical business practices.

Responsible Sourcing of Materials

- Implement effective measures to avoid the use of raw materials in products that originate from conflict zones or high-risk areas, and that may contribute to human rights violations, corruption, the financing of armed groups, or other harmful impacts.

Supply Chain

- Ensure that suppliers adhere to the core principles of this Code of Conduct, and verify their compliance based on risk assessments.
- Uphold the principles of non-discrimination in the selection and management of suppliers.