



Supplier and Business Partner Code of Conduct

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What this Code requires

- Comply with all applicable laws and respect fundamental human rights, environmental responsibility, and ethical business conduct.
- Maintain human rights and environmental due diligence processes appropriate to your size and risk profile.
- Ensure safe and fair working conditions, prohibit forced labour and child labour, and protect the right to organise.
- Conduct business with integrity – zero tolerance for bribery, corruption, and anti-competitive behaviour.
- Cooperate with Foxway on monitoring, audits, and corrective actions. Report concerns via Foxway’s whistleblower channel.

Questions? Contact Foxway Procurement at sustainable.procurement@foxway.com.

1. Introduction – Our expectations and partnership approach

Foxway TopCo AB and all its subsidiaries (“Foxway”, “we”, “us” or “our”) are committed to conducting business responsibly, ethically, and sustainably. Our success as a circular economy and technology lifecycle partner depends on trust, transparency, and long-term collaboration with our suppliers and business partners.

This Supplier and Business Partner Code of Conduct (“Code”) sets out the minimum standards we expect from all suppliers, service providers, contractors, partners, and other third parties working with or on behalf of Foxway (“Business Partners”, “you” or “your”).

This Code is aligned with, and complements, Foxway’s own Code of Conduct, which sets out how Foxway conducts its business. We encourage all Business Partners to review Foxway’s Code of Conduct as a reference for our shared values and way of working.

We recognise that Business Partners differ in size, maturity, and geographic context. Foxway therefore expects this Code to be implemented in a risk-based and proportionate manner, taking into account the nature of the Business Partner’s operations and relationship with Foxway. At the same time, compliance with applicable laws and respect for fundamental human rights, environmental responsibility, and ethical business conduct are non-negotiable.

By working with Foxway, Business Partners commit to complying with this Code and to working constructively with Foxway to prevent, mitigate, and address any identified risks or shortcomings.

Our circular impact

Every device Foxway refurbishes and puts back into use avoids the carbon emissions, water consumption, and raw material extraction associated with manufacturing a new device. Our Business Partners are essential to making this circular model work. Together, we are building a more sustainable technology ecosystem.

2. Scope and applicability

This Code applies to all Business Partners engaged by Foxway, including suppliers, subcontractors, consultants, agents, logistics providers, recyclers, refurbishers, and other third parties providing goods, services, or works.

Business Partners are responsible for ensuring that their employees, representatives, affiliates, and subcontractors involved in delivering goods or services to Foxway are aware of and comply with this Code.

Business Partners must comply with all applicable local and international laws and regulations. Where requirements in this Code go beyond local law, Business Partners are expected to apply the higher standard to the extent permitted by applicable law. Where local law imposes stricter requirements than this Code, the stricter local requirement shall prevail.

Q: *We are a small recycling company with 15 employees. Do all parts of this Code apply to us equally?*

A: Yes, the principles apply to all Business Partners regardless of size. However, Foxway expects implementation to be proportionate to your size and risk profile. A 15-person recycling company is not expected to have the same systems as a multinational corporation. See Appendix 1 for size-appropriate guidance on due diligence.

3. Definitions

Term	Definition
Business Partner	Any supplier, subcontractor, consultant, agent, logistics provider, recycler, refurbisher, or other third party providing goods, services, or works to or on behalf of Foxway.
Code	This Supplier and Business Partner Code of Conduct.
Affected Communities	Local or indigenous communities that experience material actual or potential impacts, risks, or opportunities from a Business Partner’s operations.
Conflict minerals	Tin, tantalum, tungsten, gold (3TG), cobalt, and other minerals sourced from conflict-affected and high-risk areas.
Due diligence	An ongoing process to identify, prevent, mitigate, and account for actual and potential adverse impacts on human rights and the environment.
Material breach	A violation of this Code that is serious in nature or effect, including any breach involving forced labour, child labour, bribery, or serious environmental harm.
Remediation	Actions taken to restore or compensate for an adverse impact and to prevent its recurrence.

4. Frameworks and standards

This Code is based on internationally recognised standards and guidelines, including:

- United Nations Global Compact (UNGC)
- United Nations Universal Declaration of Human Rights
- International Labour Organization (ILO) Core Conventions
- United Nations Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- OECD Due Diligence Guidance for Responsible Business Conduct
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (where applicable)
- United Nations Convention against Corruption
- United Nations Convention on the Rights of the Child (Article 32)
- EU WEEE Directive (Directive 2012/19/EU) and national transpositions
- General principles of ISO 9001, ISO 14001, ISO 27001, and ISO 45001
- Recognised principles of good corporate governance

5. General requirements

5.1 Legal compliance and responsible business conduct

Business Partners must conduct their business in compliance with all applicable laws, regulations, and permits, including those relating to labour, health and safety, environment, data protection, competition, and anti-corruption.

Business Partners are expected to continuously improve their sustainability and ethical performance over time.

5.2 Human rights and environmental due diligence

Business Partners must establish and maintain human rights and environmental due diligence processes that are appropriate to their size, risk profile, and operating context. We have produced a guideline for our SME partners as set out in Appendix 1.

Due diligence processes must be aligned with the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct, and, where applicable, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Business Partners must designate a contact person responsible for due diligence matters and for communication with Foxway regarding sustainability and compliance issues.

Q: *We already have an ISO 14001 certification. Does that satisfy the due diligence requirement?*

A: ISO 14001 is a strong foundation for environmental management, but due diligence under this Code also covers human rights, labour standards, and supply chain transparency. We encourage you to build on your ISO 14001 system to integrate these additional elements. See Appendix 1 for practical guidance.

5.3 Complaints and grievance mechanisms

Business Partners must maintain effective grievance or complaints mechanisms through which employees, suppliers, and other stakeholders can raise concerns relating to human rights, environmental impacts, or unethical conduct.

In addition, Foxway provides an independent grievance and whistleblowing channel that is available to Business Partners, their employees, subcontractors, and other relevant stakeholders. The Foxway grievance channel may be used to report concerns related to:

- Actual or suspected violations of this Code
- Unethical, improper, or unlawful conduct involving Foxway or its Business Partners
- Adverse human rights or environmental impacts connected to Foxway's operations or business relationships

Reports may be submitted confidentially and, where permitted by law, anonymously. Foxway prohibits any form of retaliation against individuals who raise concerns in good faith.

Foxway whistleblower channel

foxway.trumpet-whistleblowing.eu – Available to Business Partners, their employees, and other stakeholders. Reports are handled in accordance with applicable whistleblower protection and data protection laws. The availability of Foxway's grievance channel does not replace or relieve Business Partners of their responsibility to maintain their own grievance mechanisms where required by law or this Code.

5.4 Reporting and transparency

Business Partners must cooperate with Foxway's reasonable requests relating to supply chain transparency, due diligence, and monitoring, applied in a risk-based and proportionate manner. This may include, where relevant:

- Responding to self-assessment questionnaires within 30 business days of receipt
- Participating in audits, reviews, or supplier trainings
- Developing and implementing corrective action plans to address identified risks or non-compliance

Where reasonably requested, Business Partners must provide Foxway with relevant information about their own supply chains and business relationships, to the extent necessary for Foxway to meet applicable legal, regulatory, or due diligence requirements.

Business Partners must ensure that all information provided to Foxway is, to the best of their knowledge, accurate, complete, and provided in a timely manner and in a format reasonably requested by Foxway.

Red flag

If Foxway requests information about your supply chain and you are unable or unwilling to provide it, this may indicate a risk that Foxway is required to investigate further. Lack of transparency is itself a risk factor in Foxway's supplier risk assessments.



6. Environmental responsibility

Business Partners must strive to minimise the environmental impact of their operations and supply chains. As a circular technology company, Foxway places particular emphasis on environmental performance across the electronics lifecycle.

6.1 Climate change

Business Partners must take reasonable measures to mitigate climate impact in line with national and international climate goals, including reducing greenhouse gas emissions and increasing the use of renewable energy and energy-efficient solutions where feasible.

6.2 Pollution and hazardous substances

Business Partners must control and reduce emissions that may harm human health or the environment, including air, water, and soil pollution, microplastics, contamination of living organisms and food resources, substances of concern, and substances of very high concern. Hazardous substances must be phased out through substitution with safer alternatives where applicable.

6.3 Water and marine resources

Business Partners must use water resources responsibly by reducing water consumption, promoting water efficiency, preventing over-abstraction, and managing wastewater safely to avoid environmental damage and marine pollution. Where relevant, Business Partners must support the sustainable use of marine resources.

6.4 Biodiversity and ecosystems

Business Partners must protect biodiversity and ecosystems by avoiding sourcing raw materials from critically endangered, endangered, or vulnerable habitats or species; preventing destructive land use (including land degradation, desertification, and soil sealing); and identifying and reducing dependence on ecosystem services where relevant.

6.5 Circular economy, waste, and WEEE

Business Partners must promote a circular economy by reducing the use of virgin raw materials, increasing reuse and recycling, designing products and services that support circular solutions, and ensuring that waste is stored, handled, transported, and disposed of in a way that protects health, communities, and the environment.

Important – WEEE and electronic waste

Business Partners involved in the collection, transport, treatment, recycling, or disposal of waste electrical and electronic equipment (WEEE) must comply with the EU WEEE Directive (2012/19/EU) and all applicable national transpositions. This includes proper handling, reporting, and traceability requirements. Foxway may request evidence of WEEE compliance as part of its supplier assessment process.

Q: We transport used electronics for Foxway. Do the WEEE requirements apply to us?

A: Yes. If you handle, transport, or process waste electrical and electronic equipment on behalf of Foxway, you must comply with WEEE regulations in every jurisdiction where you operate. This includes proper documentation, traceability, and ensuring that WEEE is only transferred to authorised treatment facilities.



7. Human and labour rights

7.1 Working conditions

Business Partners must:

- **Provide secure employment** based on recognised employment relationships as required by law or practice. Labour or social security legislation must not be circumvented through subcontracting, labour contracting, home work, or apprenticeship schemes where there is no real intention to impart skills or provide secure employment.
- **Ensure lawful working hours.** Working hours must comply with legislation or collective agreements, whichever provides the strongest protection. Working hours, excluding overtime, must not exceed 48 hours per week and total working hours must not exceed 60 hours per seven-day period, unless (i) permitted by law and collective agreements, (ii) appropriate safeguards are in place, and (iii) exceptional circumstances exist (e.g. production spikes, accidents, or emergencies).
- **Compensate overtime fairly.** Overtime must be used responsibly and compensated with a premium of at least 125% of the regular salary. Workers must have at least one day off per seven-day period or two days off per 14-day period.
- **Pay fair wages and benefits** that meet at least statutory or industry standards (whichever is higher) and that are sufficient to cover basic needs and allow for some discretionary income.
- **Provide clear employment terms** in writing and in a language employees understand, and ensure that no unauthorised or unclear salary deductions are made.
- **Promote social dialogue** by encouraging open and constructive communication between workers and employers.
- **Respect freedom of association** and the right to organise. Workers must have the right to form and join trade unions or other workers' organisations of their choice without distinction. Where this right is limited by law, parallel, free, and independent forms of association must be enabled.
- **Uphold the right to collective bargaining.** Where this right is limited by law, alternative mechanisms for collective bargaining must be supported.
- **Enable work-life balance,** including for parents, and enable communication between migrant workers and their families where relevant.

- **Ensure a safe and hygienic working environment** considering industry-specific hazards. Risks must be minimised, and workers must receive regular and documented health and safety training.

7.2 Equal treatment and respectful workplace

Business Partners must:

- Promote gender equality and ensure equal pay for work of equal value.
- Provide all workers access to training and skills development without discrimination.
- Promote inclusion of persons with disabilities.
- Prevent and address workplace violence and harassment (including physical abuse or threats, sexual harassment, verbal abuse, intimidation, or fear tactics).
- Encourage and respect diversity and prevent discrimination in hiring, compensation, promotion, dismissal, and retirement on grounds such as race, caste, nationality, religion, age, disability, gender, marital status, sexual orientation, trade union membership, political affiliation, or other relevant status.

Q: *One of our subcontractors pays women less than men for the same production role. Is this our responsibility?*

A: Yes. You are responsible for ensuring that your subcontractors involved in delivering goods or services to Foxway comply with this Code. Equal pay for equal work is a fundamental requirement. You should address this with your subcontractor and report the situation to Foxway if it is not resolved promptly.

7.3 Child labour, forced labour, and other protections

Business Partners must:

- **Prohibit child labour.** Child labour is work carried out by persons under 18 that (i) is harmful to their physical, mental, social, or moral development, or (ii) interferes with schooling or the right to education. Where child labour is identified, measures must be taken to support a transition to education, including through remediation plans.
- **Protect young workers.** Young workers aged 15 (or the minimum legal working age) to 18 may be employed only if work does not affect education and is not heavy, hazardous, or unsafe, and young workers must not work night shifts or overtime.

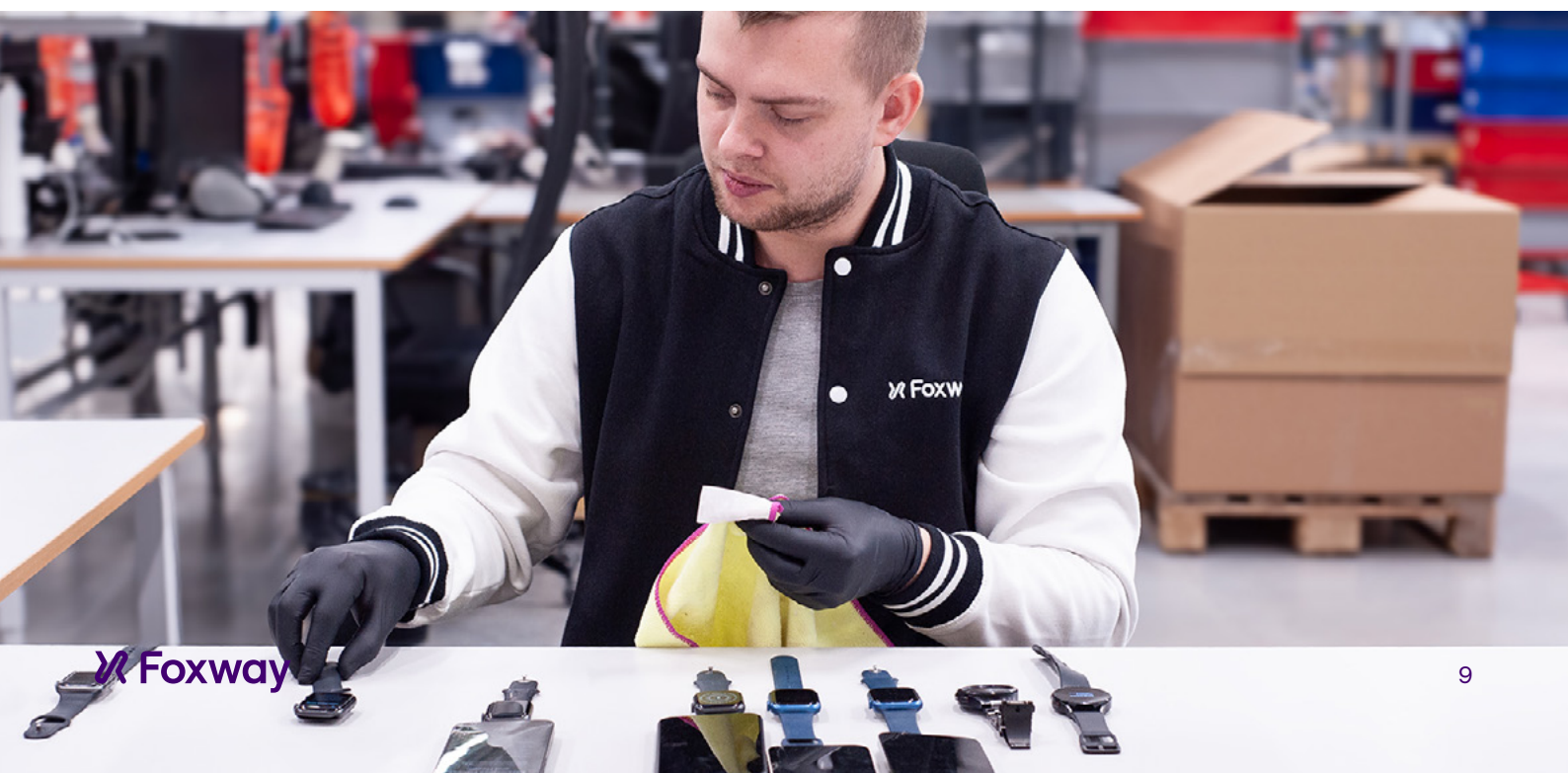
- **Prohibit forced labour.** All work must be voluntary. Business Partners must not use forced labour, servitude, involuntary prison labour, or work performed under threat, coercion, or economic dependence. Workers must not be required to provide deposits or identity documents and must have the right to terminate employment with reasonable notice.
- **Ensure decent living conditions** where housing is provided as part of employment, including that it is clean, safe, and meets basic needs.
- **Ensure access to clean drinking water, sanitation, and hygienic food storage facilities,** and respect workers' privacy, including in provided housing.
- Not cause, contribute to, or benefit from illegal evictions; and where legal evictions occur, take reasonable measures to support access to adequate housing for affected persons.
- Avoid operations that threaten local food security or impede livelihoods linked to agriculture, fishing, or other food production.
- Avoid impairing access to clean water and sanitation for affected communities.
- Conduct land and impact assessments where relevant to avoid forced evictions and respect legitimate land rights.
- Minimise adverse impacts from corporate security arrangements and apply the Voluntary Principles on Security and Human Rights where relevant.
- Ensure that members of affected communities can raise concerns without fear of retaliation.
- Respect freedom of assembly and the right to organise peacefully.
- Respect the rights of human rights and environmental defenders to operate safely and without threats, harassment, or violence.
- Respect indigenous peoples' rights to free, prior and informed consent (FPIC) where applicable.
- Respect indigenous peoples' right to self-determination and participation in decisions affecting their development.
- Respect cultural rights, including language, traditions, customs, and sacred sites.

Red flag – Indicators of forced labour

Be alert to these warning signs in your own operations and supply chain: workers who cannot leave the workplace freely, retention of identity documents or travel permits, excessive wage deductions, debt bondage, threats of violence or deportation, or workers who appear to be under the control of another person. If you identify any of these indicators, you must take immediate action and notify Foxway.

7.4 Affected communities

Where a Business Partner has identified any material actual or potential impacts, risks, or opportunities in relation to local or indigenous communities ("Affected Communities"), the Business Partner must:



8. Business ethics

Business Partners must conduct business with integrity, transparency, and fairness.

8.1 Anti-corruption and anti-bribery

Business Partners must refrain from all forms of corruption, including bribery, embezzlement, trafficking in influence, abuse of office, illicit enrichment, money laundering, and obstruction of justice.

Q: A government official reviewing our export licence has hinted that a small payment would speed up the process. Can we make this payment?

A: No. This is a facilitation payment and is prohibited. Report the request to your compliance function. Foxway has zero tolerance for bribery in any form, whether direct or through third parties.

8.2 Fair competition and anti-competitive behaviour

Business Partners must comply with applicable competition and antitrust laws and must not engage in cartel activity, bid rigging, market sharing, or other anti-competitive behaviour.

Red flag – Competition law

Never discuss prices, margins, market allocation, or bidding strategies with competitors – not even informally at trade events or industry meetings. If a competitor raises these topics, end the conversation immediately and report the incident to your compliance function and to Foxway.

8.3 Conflicts of interest

Business Partners must avoid situations where personal, financial, or other interests could improperly influence business decisions involving Foxway. Any actual or potential conflict of interest must be disclosed to Foxway without delay.

8.4 Trade restrictions and sanctions

Business Partners must comply with applicable trade laws, export controls, customs regulations, and economic sanctions, and must not engage in transactions involving sanctioned countries, entities, or individuals where prohibited by law.

Important – Sanctions compliance

Sanctions regimes change frequently. Before entering into any new business relationship or shipping products to a new destination, verify that the counterparty and destination are not subject to restrictions.

8.5 Books, records, and financial integrity

Business Partners must maintain accurate, complete, and transparent books and records that fairly reflect transactions and comply with applicable accounting and tax laws. False, misleading, or incomplete records are prohibited.

8.6 Ethical tax practices

Business Partners must refrain from aggressive or artificial tax planning that exploits gaps in tax rules to shift profits to low-tax jurisdictions. Tax arrangements must be legal, transparent, and aligned with the purpose of applicable tax laws.

8.7 Political engagement and lobbying activities

Business Partners must ensure that all political engagement and lobbying activities are lawful and transparent.

8.8 Responsible business relationships and payment practices

Business Partners must ensure fair treatment of their own suppliers and apply responsible payment practices, including paying smaller suppliers within reasonable timeframes.

8.9 Animal protection

Where applicable, Business Partners must ensure that animals are treated humanely and in accordance with recognised animal welfare standards.

8.10 Whistleblower protection

Business Partners must ensure that individuals who report concerns or suspected misconduct in good faith are protected against retaliation. Foxway's whistleblower channel may be available as an additional reporting option for Business Partners and external stakeholders.

9. Data protection and information security

Business Partners must safeguard personal and confidential information by collecting, using, storing, and processing data carefully and responsibly, in accordance with applicable laws and regulations, including the EU General Data Protection Regulation (GDPR) and applicable national data protection laws.

Business Partners must implement appropriate technical and organisational security measures to prevent unauthorised access, leakage, theft, or misuse of data.

Important – Data sanitisation for device handling

Business Partners who handle, transport, store, refurbish, or process IT equipment on behalf of Foxway must ensure that all personal and confidential data is securely erased or destroyed in accordance with Foxway's data sanitisation requirements and applicable data protection laws. This includes:

- Using certified data erasure software or physical destruction methods that meet recognised standards (e.g. NIST 800-88)
- Maintaining auditable records of data sanitisation for each device
- Ensuring that devices are stored securely at all times before data sanitisation is complete
- Reporting any data breach or suspected data breach to Foxway within 24 hours of discovery

Where a Business Partner processes personal data on behalf of Foxway, a data processing agreement must be in place before processing begins.

Q: *We refurbish laptops for Foxway. A batch arrived with data still on the hard drives. What should we do?*

A: Do not access or use any data on the devices. Follow Foxway's data sanitisation procedures and ensure all data is securely erased using certified methods before any further processing. Maintain an audit trail for each device. If you suspect a data breach or cannot complete sanitisation securely, notify Foxway immediately.

10. Responsible sourcing of minerals (where applicable)

If a Business Partner sources minerals, especially from conflict-affected and high-risk areas, the Business Partner must:

- Neither tolerate nor profit from, contribute to, assist with, or facilitate torture, cruel, inhuman or degrading treatment, forced or compulsory labour, child labour, sexual violence, war crimes, crimes against humanity, or genocide.
- Refrain from any direct or indirect support to non-state armed groups through extraction, transport, trade, handling, or export of minerals.
- Conduct due diligence for relevant minerals in line with OECD guidance and extend these expectations to its own suppliers.
- Establish and maintain a management system and due diligence process for responsible mineral sourcing, including a publicly available policy where appropriate.
- Understand their mineral supply chain, including intermediaries and country of origin.
- Identify and assess risks associated with mineral sourcing and implement risk mitigation and monitoring.
- Identify smelters and refiners involved and, where possible, verify whether they have been audited against recognised standards.
- Make due diligence efforts and findings accessible to stakeholders on an annual basis, in a manner proportionate to the Business Partner's size and risk exposure and where required by law or contract.

Any interested party may raise concerns regarding the extraction, trade, handling, and export of minerals used in Foxway's products via Foxway's complaints mechanism.

11. Implementation, monitoring, and follow-up

This Code forms part of Foxway's expectations towards its Business Partners and may be referenced in agreements, onboarding processes, and sustainability assessments.

Foxway monitors compliance with this Code through a combination of:

- Supplier self-assessment questionnaires
- Risk-based desk reviews and on-site audits
- Third-party certifications and audit reports
- Incident reports and grievance channel data
- Ongoing dialogue and engagement

Foxway encourages open dialogue and cooperation. Where gaps are identified, Foxway prefers engagement and improvement over disengagement, unless serious or persistent violations occur.

12. Breach, remediation, and consequences

Where Foxway becomes aware of an actual or suspected breach of this Code, Foxway may engage with the Business Partner to seek clarification and, where appropriate, agree on reasonable corrective actions and timelines.

Business Partners are expected to cooperate in good faith to investigate issues, address root causes, and implement corrective measures.

If a Business Partner fails to remedy a material breach of this Code within thirty (30) days after having been notified by Foxway, or within such other reasonable period agreed with Foxway, Foxway may take appropriate measures in accordance with applicable contractual terms, including suspension or termination of the business relationship.

In cases of serious, repeated, or intentional breaches, or where remediation is not reasonably possible, Foxway may take immediate action.

Nothing in this Code limits Foxway's rights or remedies under applicable law or any agreement with the Business Partner.

Consequences of non-compliance

Failure to comply with this Code may result in: a) requirement to implement a corrective action plan within a defined timeframe; b) suspension of new orders or services; c) termination of the business relationship; and d) reporting to relevant authorities where required by law. Foxway takes all breaches seriously and will act proportionately to the severity of the violation.

13. Document information

Version	4.0
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Approved by	Oskar Arndt (General Counsel)
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4.0	Sonia Braska	Oskar Arndt (General Counsel)	May 13, 2026

Appendix 1: Human rights and environmental due diligence checklist for SMEs

This checklist provides size-appropriate guidance for micro, small, and medium enterprises (SMEs) to implement human rights and environmental due diligence (HRDD and EDD) in line with the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct.

Micro enterprises (less than 10 employees)

Human rights due diligence

- Embed respect for human rights in company values and culture.
- Use plain language to communicate expectations (e.g. “treat people fairly”).
- Identify high-risk areas using internal knowledge and common sense.
- Maintain open dialogue with suppliers and workers.
- Informally document actions and decisions (e.g. notes, spreadsheets).

Environmental due diligence

- Identify key environmental impacts (e.g. waste, energy use) relevant to operations.
- Implement basic practices to reduce environmental footprint (e.g. recycling, energy-saving).
- Engage suppliers on simple environmental expectations.
- Use free tools or checklists to monitor own environmental practices.
- Document efforts informally and review periodically.

Small enterprises (between 10 and 50 employees)

Human rights due diligence

- Develop a simple human rights policy aligned with company values.
- Conduct basic risk assessments using internal data and stakeholder feedback.
- Prioritise salient risks and communicate expectations via supplier codes of conduct.

- Track progress through basic indicators (e.g. complaints, audits).
- Join collaborative initiatives to increase leverage and share resources.

Environmental due diligence

- Create a basic environmental policy outlining key commitments.
- Assess environmental risks in operations and supply chain.
- Set simple targets for improvement (e.g. reduce water use, minimise packaging).
- Monitor supplier compliance with environmental standards.
- Engage staff in environmental awareness and training.

Medium enterprises (51–250 employees)

Human rights due diligence

- Establish a formal HRDD policy and process including risk identification, mitigation, and grievance mechanisms.
- Use structured due diligence tools like risk matrices and stakeholder maps.
- Train staff and suppliers on human rights expectations.
- Engage in multi-stakeholder initiatives or certifications.
- Report publicly or to stakeholders on HRDD efforts.

Environmental due diligence

- Develop a formal environmental management system or policy.
- Conduct detailed environmental risk assessments across operations and supply chain.
- Implement mitigation measures and monitor performance using KPIs.
- Provide training and capacity building for staff and suppliers.
- Report on environmental performance and continuous improvement efforts.