



 Foxway

Policy

Supplier Code of conduct

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Context

The essence of Foxway is to make a positive impact on society. As simple as that.

First and foremost, we do it through our daily business – enabling circular and resource-efficient IT solutions. We aim to prolong the use of IT equipment, keep natural resources circulating, reduce the carbon footprint and impact the biodiversity of our customer base and the global digital ecosystem.

Secondly, by providing affordable IT solutions and developing social impact initiatives related to our know-how, Foxway reduces digital seclusion-based inequalities among vulnerable groups and minorities.

We can only achieve this by practicing responsible business conduct in our own operation and expecting our suppliers and business partners across the whole value chain to do the same.

By "responsible business conduct," we mean respect for human rights, fair labor relations, care for the natural environment, business ethics, and compliance. This Code of Conduct aims to scope these aspects more specifically and communicate to our suppliers the principles we expect them to comply with.

Furthermore, we expect our suppliers to adhere to these principles and ensure that their subcontractors comply with the same. Together we can contribute to a better society and act as good examples of how close partnerships, positive information sharing, and best practices contributes to a better world.

Welcome to Foxway! We are glad to have a relationship with you as one of our key suppliers and partners!

Scope

Foxway's Supplier of Code of Conduct (hereinafter "the Code ") comprises aspects related to the following frameworks:

- + + the principles of The United Nations Global Compact (UNGC) as the principal basis for the Code;
- + + the principles of The United Nations Universal Declaration of Human Rights (1948), The International Labour Organization Core Conventions, The United Nations Convention on the Rights of the Child (Article 32), The United Nations Guiding Principles on Business and Human Rights, The International Bill of Human Rights, The United Nations Rio Declaration on Environment and Development, and The United Nations Convention against Corruption;
- + + the OECD Guidelines for Multinational Enterprises;
- + + the general principles of ISO 9001, ISO 14001, ISO 27001, ISO 45001 standards, and a good corporate governance approach.
- + + and generally recognized economic, social, environmental, and ethical norms of behavior, common sense, and good faith.

The unavoidable foundation of these principles must comply with all applicable and relevant international and national laws and regulations.

Applicability

The Code sets out the mandatory minimum requirements to be followed by the Supplier and Foxway.

We expect Suppliers during the term of the agreement(s) with Foxway to comply with this Code of Conduct. They do their utmost to live up to its requirements within their organizations (in all countries and sites where they operate) their entire supply chain.

It is the Supplier's responsibility to ensure that its employees, relevant affiliated companies, and subcontractors are informed about the content of the Code and comply with the requirements.

In cases of conflict between relevant laws and the principles described in this Code, the highest standard shall prevail to ensure responsible operations.

1. Environment

We expect our suppliers to:

- + Have a policy and due diligence processes in place for environmental matters.

Environmental management

- + Comply with all relevant and applicable environmental legislation and regulations due to its location(s) and type(s) of operations.
- + Support a precautionary approach to environmental challenges and minimize environmental impacts across its value chain.
- + Prevent damage to the environment and surrounding communities, i.e., significant spills and pollution.
- + Voluntarily undertake initiatives to promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies (see more below in the box).
- + Implement an environmental management system, which complies or is equivalent to the requirements of the ISO14001 or Eco-Management and Audit Scheme (EMAS) standards.
- + Avoid greenwashing in its actions and messages.

In addition to the above mention minimum requirements for environmental impact management, we encourage the Suppliers to exceed official requirements by introducing additional voluntary measures, innovation, and best available techniques to reduce their environmental footprint.



We expect our Suppliers, at least in the following categories, to:

Climate

- + Minimize climate impact/carbon footprint (ideally with an aim to carbon neutrality) across their value chain on company and product/service level, including in its operations, through supplier requirements, and as the result of the consumer usage of products and services.
- + Adapt to climate impact and build the resilience of its operations.

Resources

- + Minimize the use of natural resources (including virgin materials, and scarce materials, and polluting resources).
- + Minimize the generation of waste.
- + Optimize the use of resources and keep them circulating, e.g., through reusing, refurbishing, recycling.
- + Practice proper waste management principles and minimizing the amount of landfill waste.
- + Minimize the use of energy, produce, or consume renewable energy where possible.
- + Minimize the use of water, especially in areas with water stress.
- + Employ a life-cycle perspective concerning environmental impact from products and services.
- + Encourage responsible and sustainable consumption.

Nature and biodiversity

- + Minimize the direct and indirect impact of its operations on biodiversity and natural habitats.
- + Minimize different types of air emissions.
- + Minimize the use of hazardous chemicals and other materials.

2. Human rights and labor practice

We expect our suppliers to:

- + Have a policy and due diligence processes in place for human rights and labor matters.

Non-discrimination and equal opportunities

- + Treat all employees - whether with a part-time or full-time contract, temporary or permanently hired within own team, by subcontractors, or in other labor relations - with equal respect and dignity.
- + Respect differences between people (including employees) and not participate directly or indirectly in human rights violations. This means non-discrimination concerning gender, nationality, language, religion, race, age, disability, sexual orientation, marital status, political opinion, financial status, union membership, social and ethnic origin, disability, and other special needs.
- + Avoid physical, mental, verbal, nor sexual harassment or any abuse of people.
- + Promote a culture of diversity at the workplace and equal opportunities where appointments to jobs, rewarding, and personal success depend on individual ability and performance.

Forced labour

- + Avoid using and accepting child labor by respecting and acting according to the ILO convention No. 138 on the minimum age for admission to employment and work. Suppliers should employ no one under 15 years of age or below the country's legal minimum age.
- + Not to exploit young workers with work that keeps them away from schooling that they are entitled to. Nor perform night shifts and overtime nor any other work that is heavy, hazardous, or unsafe to their physical and mental health and development (for the sake of clarity, the term 'young worker' refers to any person over the age of 15 or the minimum legal working age in the relevant territory and under the age of 18).
- + Avoid using and accepting other forms of compulsory or forced labor, including trafficking. All work or services extracted from any person under the menace of any penalty, or the said person has not offered him or herself voluntarily.

Labour relations

- + Have employment agreements in writing.
- + Enable and support the freedom of association, the right to form or be a trade union member, and to bargain collectively.
- + Not to discriminate against worker's representatives or members of trade unions. And not to hinder carrying out their representative functions in the workplace.

- + Guarantee the right of expression of employees, maintain proper feedback and grievance mechanisms for them.
- + Protect personal data of employees.

Working time and remuneration

- + Comply with all national laws regarding wages and remuneration, working hours, overtime, and vacation.
- + Pay all employees and contractors a living wage that provides a discretionary income in compliance with all applicable national laws (under no circumstances can the payment not be less than the national or locally stipulated minimum wage).
- + Pay wages directly to the employee within the agreed-upon timeframe and in full.
- + Pay overtime compensation and clearly specify this in wage statements.
- + Allow employees at least one day of rest per week.
- + Keeping working hours within legal limits or a maximum of 60 hours per week, including overtime.
- + Enable equal pay for equal work for employees with the same qualifications, experience, and performance, focusing on avoiding the gender pay gap.

Workplace health and safety

- + Maintain a health and safety management system, including satisfactory hazard and risk management.
- + Conduct regular training for emergency preparedness.
- + Provide employees with the best possible work conditions: a safe, healthy, hygienic work environment, with appropriate personal protection equipment and free access to drinking water.
- + Implement processes, raise awareness, and build a culture among employees and contractors to minimize the causes of hazards inherent in the working environment and to prevent any accidents and injury to the health.
- + Report any severe incident, accident, or fatality in the workplace related to the Supplier's business relationship with Foxway.

3. Conflict minerals and Responsible mining

We demand that our Suppliers work proactively to ensure that minerals (such as, but not limited to, tungsten, tantalum, tin, and gold) in their products and supply chain are responsibly sourced in accordance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

- 1) While sourcing from conflict-affected and high-risk areas, we expect our Suppliers to neither tolerate nor by any means profit from, contribute to, assist with, or facilitate the commission by any party of:
 - i) any forms of torture, cruel, inhuman and degrading treatment;
 - ii) any forms of forced or compulsory labour;
 - iii) child labour;
 - iv) other gross human rights violations and abuses such as sexual violence;
 - v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- 2) Foxway will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals.
- 3) Foxway will perform periodic compliance assessments in line with Foxway's Conflict Mineral Policy (<https://www.foxway.com/en/corporate-information/reports/>). Should any breaches be identified, Foxway reserves the right to suspend the cooperation with the Supplier. The Supplier is furthermore expected to draw out and implement a Corrective Action Plan within three months of receiving the results of the audit.

4. Compliance, ethics, and anti-corruption

We expect our suppliers to:

- + Have a policy and due diligence processes in place for compliance, ethics, and anti-corruption matters.

Anti-corruption

- + Not to directly or indirectly request, accept, nor itself practice any form of corruption, including bribery (both monetary or non-monetary gifts or favors) and the abuse of power, position, or property.
- + Not to directly or indirectly request, accept, nor itself use goods (gifts, services, or other), personal relations, or other inappropriate considerations with the intention to improperly influence business relationships or decision making.
 - + *Gifts or similar benefits may only be offered to, or accepted from, a third party if modest in value and consistent with reasonable hospitality given within the ordinary course of business.*

Fair competition and avoidance of conflict of interest

- + Practice free and fair competition and support the open market.
- + Make decisions in the companies' best interest, i.e., both the Supplier and Foxway, and avoid any conflict of interest.

Economic crime prevention

- + Prevent, and refrain from any act or omission in connection to financial crime, particularly fraud, extortion, money laundering, and other related crimes.
- + Affirm that the Supplier or its shareholders are not subject to any economic or administrative sanctions.

Insurance coverage

- + The Supplier is obliged to ensure accurate and complete insurance schemes covering its operations, services, and products.

Transparency

- + Adhere to accurate and transparent accounting that fully complies with the law and good accounting practice.
- + Disclose regularly and publicly an overview of the management approach and performance on its material environmental, social, and governance aspects.

Confidentiality and privacy

- + Safeguard personal and organizational data privacy by collecting, using, holding, and processing data carefully, responsibly, and according to applicable laws and regulations, and taking adequate security measures to avoid the leakage, theft, or other misuses of the data.
- + Respect confidentiality obligations with Foxway, including not to misuse or disclose any information that may qualify as sensitive personal data, insider information of Foxway's present and future business operations, or other information which might be reasonably considered as confidential, or which is protected by law.
- + Not to use Foxways' name or any related information and resources (including the business relationship between the Supplier and Foxway) publicly without the prior written approval of Foxway or unless explicitly agreed in the contract.
- + Not to use Foxways' name or any related information and resources, in relations with policymakers, including in promoting interests of political parties or candidates.

Supplier transparent relations and cooperation with Foxway

We expect our suppliers to give us relevant feedback and constructive criticism on how we operate, behave and work – we all aspire to improve the business together. All improvements, complaints, or ideas are welcome.

We encourage our suppliers to share their best practices on ESG work and sustainability; together, we can do more good and more business.

We ask our suppliers to respond to our yearly assessment as our strategic Supplier.



Compliance and implementation process

- 4) The Supplier is introduced to the Code of Conduct when signing a cooperation contract or starting a cooperative relationship.
- 5) Henceforward, the Supplier provides the necessary information to verify the compliance with the Code at least once a year to Foxway or its representatives (upon request).
- 6) Each Supplier is required to have appropriate management systems, in proportion to the size, complexity, and risk environment of the Supplier’s business, to enable adherence to the Code.
- 7) The appropriate management system should cover a systematic approach to the:
 - a. *assessment, mitigation, and management of risks, preferably with measurable targets;*
 - b. *monitoring of the performance, noticing defaults or breaches;*
 - c. *neutral investigation and follow-up actions in case of notices and occurred confirmed violations;*
 - d. *communication and training about the requirements to own employees, subcontractors, and suppliers.*
- 8) The Supplier shall provide Foxway with the necessary information and allow Foxway or its representatives to access the Supplier’s relevant premises and documentation to verify that its employees, relevant affiliated companies, and subcontractors comply with the Code.
- 9) Should the Supplier be unable to meet the requirements or are involved in any negative press, investigation, or violate the Code of Conduct. The Supplier must report immediately to the Supplier’s primary contact in Foxway. Or you can notify anonymously and confidentially via Foxway’s whistleblowing process at: foxway.trumpet-whistleblowing.eu.
- 10) Foxway guarantees anonymity and ensures that no one, who has drawn attention to the breach in good faith, is threatened by discrimination or punishment.
- 11) Actions inconsistent with the Code must be promptly corrected and may be subject to sanctions.
- 12) In the event of a material breach, Foxway is entitled to terminate the agreement with immediate effect.
- 13) Deviations to the Code need to be agreed upon with the ESG director or your representative of Foxway.

The Supplier and Foxway jointly state that they will actively seek ways for further improvement in the areas of responsible business conduct for the sake of the sustainable future of society.

Version history

Foxway takes the responsibility to review the content of the Code on an ongoing basis as and when necessary, and keep it relevant and up to date.

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Approved by:	Martin Backman CEO	Martin Backman CEO