



 Foxway

Report

Due Diligence Report on Conflict Minerals 2023

1. Company information

Foxway Group

Location: Solna, Sweden

Industry: IT

Time Period covered: October 2022–October 2023

2. Company Supply Chain Policy

To avoid the use of conflict minerals, which directly or indirectly finance or benefit armed groups and/or involve other serious human right abuses in high-risk and conflict-affected regions, Foxway has developed a sustainable procurement policy. The policy is fully aligned with the third edition of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). We are committed to addressing any Annex II risks if identified.

The policy was reviewed and approved by senior management, which committed to support its implementation. The policy has been widely disseminated to relevant stakeholders (suppliers, customers, employees etc.) and is available on the company website at www.foxway.com

4. Company Management Systems

Management Structure

The company follows through on its commitments in the supply chain policy and has developed an internal procedure for due diligence with the following aspects:

- The company has an overall governance of ethical principles (Employee Code of Conduct) yearly approved by the board and a Supplier Code of Conduct approved by the CSO (Chief Sustainability Officer).
- A separate Policy on Conflict Minerals has been introduced in October 2023, to be read alongside Foxway Sustainable Procurement Policy.
- The governance is managed by the presidents of each business division, with President of Recommerce Business Area and President of CWS Business Area having joint responsibility for overseeing the conflict minerals due diligence program and supply chain risk management, with support from the ESG department.
- From this year onwards, the procurement teams will be trained regularly in sustainable supply chain management in relation to conflicts minerals.
- Due Diligence on Conflict Minerals is to be performed yearly from 2023 onwards, as described in the abovementioned policy.

Internal Systems of Control

Foxway has established its due diligence management system to be aligned with the OECD Guidance in October 2023 and communicated the updated sustainable procurement policy and sourcing requirements to all identified upstream suppliers in the same month.

From 2023 onwards, Foxway shall gather information regarding conflict minerals from all of our direct OEM and spare parts providers that have contracts exceeding 100 000€.

Since 2021 Foxway has a whistle-blowing function in place, applying both internally and externally, managed by a third-party law firm (<https://foxway.trumpet-whistleblowing.eu/>). All grievances raised are thoroughly investigated by the whistleblowing committee.

Record Keeping System

Foxway requires that all records relating to the due diligence program are maintained at least for five years and that they be properly used and safely stored in our online company database.

5. Risk Identification

To identify risks related to conflict minerals we adhered to the following procedure:

- The procurement teams performed a supplier assessment on all Foxway's suppliers with contracts exceeding 100 000€. 171 suppliers met this criterium. Out of those, 102 were subject to due diligence in connection with conflict minerals.
- The available data on the suppliers' policies regarding conflict minerals was viewed and assessed by the procurement teams.
- Public Due Diligence Reports made and disseminated by suppliers with contracts exceeding 500 000€ and representing 98% of Foxway's business volume were duly read and assessed by Foxway's ESG Team.
- Had any red flags been identified, the company would further engage with its suppliers to clarify and improve the documents as needed. However, no red flags were identified during this reporting period.

Details

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