



INVISIO Supplier Code of Conduct

INVISIO[®]

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1 Objectives and Scope

The INVISIO Group (hereinafter referred to as “INVISIO”) strongly believes in promoting ethical and sustainable practices within its business operations.

Aligned with the principles of the UN Global Compact and International Labour Organization (ILO), INVISIO is dedicated to advancing ESG-responsible and sustainable business practices. INVISIO requires its suppliers to uphold similar standards in ethical conduct, labour, human rights, and environmental protection, fostering an ethically responsible supply chain. The company anticipates all suppliers to embrace sustainable practices and promote social responsibility within their operations, while continuously updating relevant corporate policies and implementing suitable management systems.

This Code applies to all INVISIO suppliers worldwide.

2 Supplier Code of Conduct Standards

2.1 Compliance with applicable laws

2.1.1 Laws and Standards

To meet the provisions of this Code, suppliers are to comply with all national laws and regulations as well as other applicable standards in countries in which they do business. Where there are differences between the provisions of this Code and national laws or other applicable standards, suppliers shall adhere to the higher or more stringent requirements.

2.2 Human Rights and Labour Rights

INVISIO Group expects all its suppliers to respect and promote human rights in their operations. This includes adhering to international human rights standards and avoiding any practices that may contribute to human rights violations. INVISIO is dedicated to fostering a responsible supply chain and requires, by this Code, its suppliers to demonstrate a commitment to human rights in their own businesses.

Forced or compulsory labour is defined as work or service which is exacted from any person under the menace of penalty and for which the said person has not offered himself voluntarily.

Suppliers must not participate in, or benefit from, any form of forced labour, including bonded labour, forced prison labour, slavery, servitude, or human trafficking. Employees must have the freedom of movement during their employment.

These requirements are meant to be applied to the whole supplier’s supply chain.

2.2.1 Equal Opportunity

Suppliers shall not discriminate in recruitment and employment practices.

All employees must have equal opportunities, and the suppliers is required to promote a behaviour based on:

- **Non-discrimination:** Ensuring that all individuals are treated fairly and without prejudice, regardless of their race, gender, age, religion, sexual orientation, or any other personal characteristic.
- **Diversity and Inclusion:** Encouraging a diverse and inclusive workplace where individuals of all backgrounds feel valued and respected.
- **Access to Employment:** Providing equal access to employment opportunities and ensuring that selection processes are fair and based on merit.
- **Remuneration and Benefits:** Offering equal pay for equal work and providing benefits and opportunities for career advancement that are not discriminatory. Compensation paid to

workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

- **Training and Development:** Providing equal access to training and development opportunities, regardless of an individual's background or personal characteristics.
- **Harassment and Bullying:** Creating a workplace that is free from harassment and bullying and taking steps to prevent and address such behaviours when they occur.
- **Accommodation:** Making reasonable accommodations for individuals with disabilities, where necessary, to support their full and equal participation in the workplace.
- **Personal Privacy:** Employee's right to privacy must be respected whenever the supplier gathers or keeps private information or implements employee-monitoring practices.

2.2.2 Freedom of Association

Suppliers must recognize and respect the right of employees to join any organized associations of their own choosing and to bargain collectively as permitted by local laws and regulations. Suppliers shall not discourage membership or unions. Workers' representatives shall not be subjected to discrimination and shall be given access to employees at the workplace.

2.2.3 Prohibition of Child Labour

INVISIO Group respects the children's right to development and education. Suppliers must not engage in child labour. The minimum age for admission to employment or work that must not be less than the age for completing compulsory schooling, and in any case not less than 15 years. Apprenticeship programs for children below the minimum age of employment must be paid for and clearly aimed at training. Suppliers shall refrain from hiring young workers to perform any types of work which is likely to jeopardize their health, safety, or morals.

2.2.4 Health and Safety

A safe and healthy working environment must be provided and occupational health and safety practices which prevent accidents and injury must be promoted, including protection from fire, accidents, and toxic substances. Suppliers shall ensure to communicate to employees with clearly establishing written policies and procedures regarding health, safety, welfare, and general facilities and that these policy topics are adhered to. Suppliers shall provide employees with the protective equipment and training necessary to perform their tasks safely.

2.2.5 Conflict of Interest

INVISIO Group employees and their family members may not serve as officers, directors, agents, or consultants of a Supplier, except with the consent of INVISIO Senior Management. If such a relationship exists between Supplier and any INVISIO employee or family member, and it has not already been disclosed to INVISIO and may cause an actual or perceived conflict of interest, Supplier shall disclose that relationship to INVISIO Whistleblower Service.

2.3 Environment

INVISIO expects all its suppliers to have a management system in place that prioritizes respect for the environment and sustainability, in line with the principles of the UN Global Compact and ESG guidelines. This includes the following key commitments:

- Implementing environmentally responsible practices, such as reducing waste and emissions, conserving resources, and reducing the carbon footprint of operations.
- Managing the use of chemicals and pollutants in a responsible manner, ensuring that they are handled and disposed of safely, and avoiding any practices that may contribute to environmental harm.

- Incorporating recycling and waste management practices into operations to reduce the environmental impact of products and packaging.
- Adopting a life-cycle management approach that considers the environmental impact of products throughout their entire lifecycle, from production to disposal.
- Implementing measures to prevent and address any negative impacts on the local communities and environments.
- Integrating sustainability and social responsibility considerations into decision-making processes and business operations.
- Monitoring and reporting environmental impact and carbon footprint within the company, in accordance with the latest standards.

By demonstrating a commitment to these principles, INVISIO's suppliers will not only contribute to a more sustainable and responsible supply chain, but also align with the company's values and expectations for ethical and responsible business practices.

2.4 Other requirements

2.4.1 Conflict Minerals

At INVISIO, we understand the significance of responsible sourcing and the avoidance of *conflict minerals* in our supply chain. Although we do not source conflict minerals directly, we do use products that may contain them (e.g. electronics). Hence, it is critical that our suppliers meet legal requirements and implement due diligence measures to guarantee responsible sourcing of these minerals.

INVISIO expects its suppliers to comply with international laws and regulations such as Regulation (EU) 2017/821, the *Dodd-Frank Act* and the OECD Due Diligence Guidance for Responsible Mineral Supply Chains.

This includes conducting thorough risk assessments and having effective systems in place to mitigate the use of minerals that contribute to human rights violations.

2.4.2 Export and International Sanctions

Compliance with sanctions and export control regulations is a legal requirement that is non-negotiable for INVISIO. Our suppliers must similarly adhere to these regulations and ensure that their activities do not violate any sanctions or embargoes imposed by the UN, EU, US and other countries where INVISIO Group operates.

It is imperative that our suppliers have in place proper systems and processes to assess and monitor their compliance with these regulations. This includes conducting due diligence on their customers, suppliers, and other third parties to avoid involvement in activities that are in violation of sanctions and export control laws.

We take our legal obligations in this area very seriously, and we expect the same level of commitment from our suppliers. Failure to comply with sanctions and export control regulations can result in severe legal and reputational consequences for all parties involved.

For this reason, INVISIO will not do business with suppliers who cannot demonstrate their compliance with these regulations.

2.4.3 Political neutrality, confidentiality, and marketing

INVISIO stands for political neutrality regarding political issues, parties, and representatives. The INVISIO name and assets must not be used to engage in any activities that could be perceived as promoting a particular political interest or ideology.

Suppliers are expected to maintain the confidentiality of any information related to INVISIO, its products, intellectual property, and customers that they may receive while conducting business with the company. This information must not be disclosed to any third party without the prior written consent of INVISIO.

The suppliers are also responsible for taking appropriate measures to ensure that this information remains confidential and secure.,

The use of INVISIO's name for promotional purposes should only be made with explicit authorization from the company.

Suppliers are expected to act in a manner that upholds the integrity and impartiality of INVISIO and its values.

3 Anti-Corruption and bribery

INVISIO is committed to maintaining the highest standards of ethical behaviour, including a zero-tolerance policy towards corruption and bribery in all forms. Supplier must refrain from offering any form of gifts, payments, fees, services, discounts, privileges, charitable contributions, or any other benefits to employees of INVISIO that could potentially sway them in the execution of their responsibilities. INVISIO's selection of suppliers is determined exclusively by bid prices, quality, capability, and availability to perform the required tasks. INVISIO neither solicits nor expects such behaviour from its suppliers, and its employees are explicitly prohibited from suggesting or implying that such activities could impact their business relationship or prospects with INVISIO.

All suppliers are expected to adhere to the same principles. Additionally, they shall perform due diligence in their business practices, including conducting appropriate background checks and maintaining accurate records of payments and transactions. It is crucial that all personnel are fully informed and trained on anti-corruption and bribery policies and understand their role in maintaining compliance.

By doing so, Suppliers contribute to maintaining the integrity of INVISIO's supply chain and the reputation of the company as a responsible and trustworthy business partner.

4 Additional Obligations

The obligations under INVISIO Group Supplier Code of Conduct are in addition to the supplier's other obligations pursuant to any purchase or other agreement in place between INVISIO and Suppliers.

Suppliers ensure that similar requirements are deployed further down the value-chain to their suppliers.

INVISIO encourages its suppliers to actively collaborate and report any violations of the principles outlined in this Supplier Code of Conduct through our whistleblowing service: <https://report.whistleb.com/en/invisio>

Together, we can ensure a safe, ethical, and respectful working environment for all.