

# Supplier code of conduct

## Introduction

At Mind Energy sustainability is an integrated part of our business, and we are committed to contributing to sustainable development for present and future generations. For us to ensure that we adhere to sustainable development means that we are committed to identifying, preventing, mitigating and accounting for adverse impacts on the environment, human rights and governance in our own operations and supply chain.

Therefore, we have developed a code of conduct for our suppliers, in line with the UN Global Compact. We expect our suppliers to comply with this code of conduct and ensure that their suppliers adhere to the principles contained herein, as well as to be open to collaboration with us to remedy identified non-compliances within a reasonable timeframe.

If you become aware of any instances of non-compliance in your value chain it is your duty to inform us immediately.

We reserve the right for a 3<sup>rd</sup> party to visit the supplier's premises to conduct an unannounced audit concerning the issues contained in this Code of Conduct.

## Labour and Human Rights

Respecting human rights and labour standards in our own operations and supply chain is very important to Mind Energy. Therefore, we expect our suppliers to respect human rights in their own operation and supply chain and have processes in place to detect and address relevant human rights issues. We expect our suppliers to respect human rights in accordance with the UN Guiding Principles on Business and Human Rights, or the European Convention on Human Rights, and to adhere to labour standards in accordance to ILO Declaration on Fundamental Principles and Rights at Work, or OECD Guidelines for Multinational Enterprises.



We expect our suppliers to be aware of any human rights impacts or issues in their value chain and to address these by performing due diligence to identify, prevent, mitigate and account for the business impact on human rights.

Hereunder Mind Energy emphasizes the following human rights which we expect our suppliers to comply with:

**Remuneration and wage equality:** Suppliers must provide fair wages and equal remuneration for work of equal value, for all employees being guaranteed conditions of equal pay for equal work in line with legal requirements. The supplier must provide adequate training for employees to do their job, and a fair contract including a fair termination process in line with the applicable country's laws. Wages shall be paid regularly and in accordance with national law and industry standards.

**Equal opportunities:** We expect our suppliers to treat their employees equally regarding recruitment, job training, promotion, employee benefits and services and salary. The supplier must ensure equal opportunities for all employees regardless of gender, age, ethnicity, national or social origin, religion, trade union membership, disability or sexual orientation.

**Fair working hours, rest, leisure and holidays:** The supplier must ensure that working hours, including overtime and work benefits, are in line with national legal requirements. The employee has a right to adequate rest between shifts, ensuring a good work/life balance and the supplier must provide paid holidays in line with national legal requirements.

**Maternity leave:** We expect our suppliers to provide adequate maternity leave for expectant mothers before childbirth and adequate leave after birth, in line with the national legal requirements.

**Safe and healthy working conditions:** All employees are entitled to work in a safe and healthy environment and the supplier must take adequate steps to prevent injuries and accidents by providing adequate Health & Safety equipment and training relevant for the job. The supplier must provide work premises which maintain fire safety regulations and hygiene standards, including emergency exits, provision of water and availability of sanitary facilities, ventilation and heating where appropriate, proper lighting and adequate first aid. We expect our suppliers to comply with applicable Health & Safety laws and regulations and to educate and



protect employees from any harm that could occur from workplace actions. Employees must have the right to refuse a work situation if they reasonably believe that it presents an imminent risk to their health and safety.

**Freedom of association and collective bargaining:** We expect that our suppliers respect their employees' right to freedom of association to seek representation in a worker's association or join a trade union of their choice, or not join one, without fear of discrimination due to that fact, intimidation or reprisal. Suppliers must allow employees to appoint independent work representatives, and the supplier shall allow constructive dialogue with the chosen representative and negotiate in good faith. We also expect that our suppliers will comply with their employees' right to collective bargaining agreements addressing working conditions, employee relations and terms of employment between employers and workers in accordance with the laws of the countries in which they are employed.

**Forced labour and modern slavery:** The supplier must not tolerate forced labour or modern slavery in any form in its own operations, and it must address and mitigate related risks in its supply chain. This includes forced overtime, coercion, mental and/or physical abuse, deception and abuse of power, use of trafficked workers, restriction of workers movements, withholding workers' wages, and confiscation of identity documents/passports.

**Child labour:** Child labour is not tolerated in our supplier's own operations, and they must ensure legal working conditions for young workers. Young employees must be over the legal age where the national law stipulates and workers under the age of 18 must not perform work that interferes with their mandatory schooling or is in any way hazardous to their physical, social or mental wellbeing. The supplier must work towards preventing child labour in its supply chain.

**Discrimination and harassment:** The supplier must not tolerate any form of harassment, physical or mental abuse, bullying or discrimination. Suppliers must respect the personal dignity, freedom of thought and conscience, and rights of each employee. Suppliers must ensure that their hiring process is non-discriminatory and not biased towards age, ethnicity, nationality, religion, political beliefs, sexual orientation, gender identity or expression, pregnancy, illness, physical ability or any other characteristic protected by law or ILO conventions. We expect our suppliers to have mechanisms in place to report, investigate and



sanction instances of discrimination and harassment without reprisals or retaliation.

## Environment

The supplier shall have processes in place to identify environmental risks & negative impacts and to address these to mitigate the business' adverse impact on the environment. We expect the supplier to be compliant with relevant local and national environmental laws and regulations.

We expect our suppliers to monitor their Greenhouse gas emissions and to set targets for reductions in line with the Paris Agreement. This includes providing Mind Energy with its scope 1, 2 & 3 emissions data on request, CO2 intensity values, or providing us with the emissions data related to the services provided by the suppliers. If either of these options are not possible you need to inform us immediately.

We expect our suppliers to make concerted efforts to reduce their negative impact on the environment regarding pollution and use of natural resources. We expect our suppliers to have controls in place to minimize pollution of air, water and soil, negative impacts on biodiversity, natural ecosystems and tropical forests, and to reduce its waste to landfill by using different methods, such as recycling/reusing or choosing more biodegradable materials. If a supplier must dispose of hazardous waste, we expect them to do this in an environmentally safe manner and to follow national environmental laws. We expect our suppliers to have an environmental management system (EMS) in place, such as ISO 14001.

## Business ethics

**Privacy, Intellectual Property and data protection:** Suppliers must respect stakeholders' right to privacy. The supplier must follow all appropriate legislation for personal data protection and use personal data only when necessary to fulfill legitimate business purposes (E.g. GDPR in the EU). The supplier must also respect laws regarding Intellectual Property Rights, preventing unauthorized disclosure to third parties, and make sure to prevent any misuse of Intellectual Property as a part of a licensing agreement. The supplier must implement appropriate measures for data security to mitigate the risks associated with suppliers' access to Mind



Energy's data. This is applicable to all stakeholders that engage with the supplier's organization, both internally and externally.

**Anti-corruption:** Suppliers must not engage in corrupt practices or bribery and must have processes in place to prevent these types of illicit activities. Suppliers must comply with local laws and international anti-corruption conventions, such as the United Nations Convention against Corruption, and must not offer or accept anything of value to improperly influence stakeholders to gain an unfair business advantage.

**Competition law:** Suppliers must abide by fair competition principles and honour an open market. The supplier must not engage in agreements with competitors on underhand activities, such as price setting or market sharing, or any other actions which violate rules on anti-trust.

**Sanctions:** Suppliers for Mind Energy have a responsibility to ensure that they comply with regulations regarding international sanctions. We also expect them to ensure that third parties they deal with have been screened for sanctions and are not listed on applicable sanctions lists. If there are any inconsistencies regarding this area, we expect to be informed immediately so that we can act on this information.