



SUPPLIER CODE
OF CONDUCT
(THE SUPPLIER CODE)

INFRANCRD

Järnväg för generationer

Supplier Code of Conduct

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Introduction

Infranord's Supplier Code of Conduct ("the Supplier Code") establishes the ethical and business principles that suppliers and other business partners must follow when conducting services for Infranord.

A supplier refers to any company that provides products, personnel, or services to Infranord, including material suppliers, service providers, contractors, consultants, agents, and intermediaries.

The Supplier Code reflects Infranord's ambition to conduct business with economic, social, and environmental sustainability. The Supplier Code is adapted to the company's Sustainability Policy and covers the parts of the Sustainability policy that apply to suppliers. The Sustainability Policy is based on the UN Agenda 2030 goals and the UN Global Compact principles on human rights, labour rights, environment, and anti corruption. In addition, Infranord adheres to the Construction and Real Estate Sector Agreement Against Bribery and Corruption (ÖMK), developed in cooperation with the Institute Against Bribery (IMM).

Fundamental Principles

Infranord's suppliers must conduct its business in accordance with applicable legislation and with a businesslike, ethically defensible, and sustainable approach. Suppliers must also comply with applicable collective bargaining agreements.

The Supplier Code specifies a minimum standard for suppliers' business, meaning it must be complied with even if applicable legislation specifies a lower standard.

The Supplier Code applies to all suppliers with whom Infranord has entered into an agreement. If the Supplier Code has not been incorporated into the written contract documents, the supplier's provision of goods, personnel, or services, acceptance of Infranord's purchase order, or issuance of an invoice constitutes acceptance of the Supplier Code.

The Supplier must operate in accordance with the Supplier Code in a systematic and preventive manner. The Supplier shall ensure that all employees and subsequent tiers in the supply chain are informed of and comply with the Supplier Code.

Business Ethics and Business Relations

The Supplier must only enter into agreements that comply with applicable laws, regulations, and ordinances, and shall respect and comply to other agreements that meet these requirements.

The Supplier must have routines ensuring that goods provided have been produced and transported under conditions that meet at least the following standards:

- The UN Universal Declaration of Human Rights
- ILO core conventions on forced labour, child labour, discrimination, work environment, freedom of association, and the right to organize
- Article 32 of the UN Convention on the Rights of the Child
- Applicable occupational health and safety legislation in the country of manufacture
- Applicable labour and social security legislation in the country of manufacture, including established minimum wages
- Applicable environmental legislation in the country where work is performed
- The UN Convention against Corruption

The Supplier must comply with international and EU sanctions. Guidance can be obtained from the UN and EU sanctions maps.

The Supplier must hold all necessary permits and certifications required for the work performed by their organization.

Cooperation with customers, suppliers, and other parties must be characterized by mutual trust and respect, and a shared commitment to act in accordance with a business ethics and professional approach.

The Supplier must prevent bribery and corruption at all levels. Neither suppliers nor their employees may accept or offer improper compensation in the form of money, gifts, travel, hospitality, accommodation, services, or other benefits that may influence, or be perceived to influence, the supplier's independence or business judgment.

Business agreements and collaborations must always be designed in compliance with applicable competition law and without anti competitive elements, such as collective boycotts or improper exclusivity agreements. The Supplier must not participate in cartels or unlawful agreements with competitors, such as price fixing, market sharing, bid rigging, or other arrangements that restrict competition.

All information received by the supplier regarding Infranord and its other contracting parties must be treated confidentially and may not be disclosed to unauthorized persons.

Infranord's resources, such as equipment, materials, and consumables, may only be used for the company's business operations and intended purposes, and must be used with restraint.

The Supplier must ensure that their employees receive continuous training and development to maintain the competence required for Infranord's projects.

Work Environment and Safety

The Supplier must ensure a safe working environment and actively support Infranord's zero accident vision for work related incidents and personal injuries in all operations. The Supplier's employees and hired resources share responsibility for performing work with strong safety awareness and in a work environment that meets at least the legal requirements, collective agreements, and industry practice. In any conflict between these principles and performance demands, safety and health must always take precedence.

Bullying, harassment, and discrimination are not tolerated under any circumstances, either within the supplier's organization or in interactions with external parties. The Supplier must work to prevent abusive conduct and promote tolerance and equal treatment through systematic work environment management. The Supplier must strive for gender balance and counteract wage disparities based on gender.

The Supplier have a total prohibition on child labour and forced labour and must ensure that such practices do not occur in any part of their operations.

The Supplier must ensure that Infranord's workplaces are free from alcohol, narcotics, and other substances whose use, risk use, misuse, or dependency may negatively affect employees or the overall work environment.

The Supplier must work to ensure that the workplace is free from political and religious influence.

Environment and Climate

The Supplier must promote sustainable development with limited climate and environmental impact and reduced negative effects on biodiversity. This means that the Supplier must prevent and minimize pollution of air, soil, and water, and reducing energy and resource consumption. The Supplier must ensure sustainable handling of waste generated in their operations and reuse and recycle materials. When possible, active choices should be made based on environmental and climate impact.

The Supplier must ensure control over resource consumption related to products and services in their supply chains.

Responsibility, Control and Compliance

Compliance

If a supplier violates the Supplier Code and fails to remedy the identified breach after written notice within the timeframe unilaterally determined by Infranord, Infranord has the right to terminate the business relationship. A breach that is not remedied must always be considered a material breach of contract.

Follow up

Infranord has the right to conduct audits and request emissions data from suppliers related to obligations in the Supplier Code or specific assignments. If necessary, the audit may be extended to include subsequent tiers in the supply chain. The Supplier must assist during these audits and ensure the possibility of auditing their supply chain. Infranord may engage a third party to conduct audits. This third party will be independent and paid by Infranord.

Dialogue

The Supplier Code is fundamental in Infranord's procurement processes and sets principles from which the company does not deviate. However, Infranord encourages an open dialogue about the Supplier Code and how cooperation and interfaces between Infranord and the supplier can be improved. The Supplier Code is therefore a recurring agenda item at supplier meetings.

Infranord expects suppliers to contact the Infranord procurement department if questions arise regarding the conditions in this Code.

Whistleblowing Function and Reporting of Misconduct

The Supplier must report incidents and accidents occurring at Infranord's workplaces to the relevant Infranord manager.

Suppliers must be able to report irregularities and misconduct safely to Infranord. Infranord has therefore established a whistleblowing function managed by an external party.

The whistleblowing function is limited to serious irregularities and misconduct such as bribery or corruption, conflicts of interest, financial fraud, environmental crimes, safety deficiencies, and serious forms of discrimination, bullying, and harassment. For more information about Infranord's whistleblowing function, see:

Infranord [Visselpipan](#)

Comments regarding minor violations or general dissatisfaction and complaints must be reported and handled through Infranord's ordinary reporting channels to the procurement department.

Criminal acts must be reported to law enforcement authorities.