

## Supplier Code of Conduct

### Changes from latest version

*Updated text concerning international sanctions.*

#### 1. PURPOSE

##### **Introduction.**

Infranord is a railway construction company owned by the Swedish government. The company builds and maintains infrastructure. Infranord's owners and Board of Directors have stated that the company should be a model of sustainability.

Basic documents and principles

Infranord's Supplier code of conduct is based on the company's sustainability policy and describes how the company's suppliers should act to contribute to Infranord's ambition to be a sustainable company and example. Infranord's Supplier code of conduct contains the parts of the Sustainability policy that affect the company's suppliers.

Infranord's Sustainability policy follows the goals of Agenda 2030, the UN's corporate initiative Global Compact as well as the Building and Property sector's agreement to counter bribery and corruption (ÖMK), which was developed with the support of the Swedish Anti-Corruption Institute (Institutet Mot Mutor "IMM").

#### 2. SCOPE

##### **Infranord's suppliers.**

Infranord's suppliers must follow this Supplier code of conduct when carrying out assignments for Infranord and must ensure that the code is communicated and complied with by all the supplier's employees and in the downstream supplier chain.

This Supplier code of conduct applies to all suppliers who supply products, personnel or services to Infranord, including material suppliers, service providers, contractors, consultants, agents and intermediaries. This Supplier code of conduct does not apply to suppliers who provide goods or services of a simpler nature such as bakeries, restaurants, taxi companies or similar.

The Supplier code of conduct is included as a contract document in contracts entered. In the event that no written agreement is signed, the supplier's supply of the goods, personnel or services, by acceptance of Infranord's purchase order or by issuing an invoice, the supplier indicates agreement to comply with the Supplier code of conduct.

## 3. WORKFLOW

### **Sustainability**

Infranord works actively to create a sustainable supplier base because it is crucial for the company's long-term development, and necessary from a profitability perspective. A sustainable supplier base can withstand stresses and is adaptable as well as open to change.

Infranord's suppliers must follow the UN corporate initiative Global Compact and its ten principles regarding human rights, labour law, environment and anti-corruption. The principles are based on the UN's Declaration of Human Rights, the ILO's fundamental conventions on human rights at work and the Rio declaration. Infranord's suppliers must also strive to improve continuously and to raise awareness, through the exchange of experiences and evaluation of their own activities.

The work must be conducted systematically and proactively, which means that you as a supplier must:

### **Working environment**

- Create conditions for a safe and secure working environment and good health on equal terms for all employees.
- Adopt and work actively for Infranord's vision for zero work-related accidents and injuries.
- Ensure that time and cost requirements are not prioritised before safety and good working environment.
- Report incidents and accidents in the required manner to the Infranord manager at the relevant workplace.
- Ensure that your employees do not engage in political or religious propaganda in the workplace.
- Ensure that Infranord workplaces are free from alcohol and narcotics, any use, hazardous use or abuse as well as free from any other dependency that could negatively affect the employees and the workplace.
- Prohibit and prevent discrimination and victimisation and promote tolerance and equal treatment.
- Promote an equal distribution of men and women and ensure equal pay for equal work.
- Have zero tolerance towards child labour.

### **Business relations**

- Only conclude agreements that are consistent with applicable laws and regulations and that comply with and respect the agreements concluded.
- Comply with applicable laws and regulations as intended and ensure compliance with the right collective agreements.
- Comply with applicable international sanctions as intended.
- Prevent bribery and corruption at all supplier levels. This means, among other things, that you, as a supplier to Infranord, may neither receive nor give undue compensation in the form of gifts, travel, representation, subsistence, services or any other means.
- Comply with good business practice and act ethically in their own operations and in relationships with Infranord's customers, suppliers and other interested parties.
- Ensure that all information concerning Infranord's business activities is treated confidentially.
- Not use Infranord resources for any other use than that intended.

- Ensure that your employees are continually trained and developed to have the skills that correspond to the needs of Infranord's projects.

### **Environment**

- Work to minimise emissions and spills to air, ground and water and make efficient use of resources.

All in all, Infranord's suppliers must, through their operations, create a well-functioning, sustainable and safe supply to Infranord.

### **Compliance**

In the event that a supplier violates the Supplier code of conduct and does not address the identified infringement after written request and within the timeframe set by Infranord unilaterally, Infranord has the right to terminate the business relationship. An unrectified infringement of the Supplier code of conduct must always be deemed to constitute a material breach of contract within the scope of the business agreement.

### **Follow-up**

Infranord has the right to perform audits of its suppliers related to the Supplier code of conduct. If necessary, the audit may also be extended to include downstream suppliers. As a supplier, you should assist in these audits and also ensure the possibility of auditing your supply chain. Infranord may hire third parties to perform audits. This third party is funded by Infranord and must be independent.

### **Dialogue**

The Supplier code is essential in Infranord's procurement and establishes principles that the company does not deviate from. However, Infranord encourages an open dialogue about the Supplier code and how the collaboration and interface between Infranord and you as a supplier can be improved. Therefore, the Supplier code of conduct is a recurring item on the agenda at supplier meetings.

Infranord expects the company's suppliers to contact Infranord's purchasing department in the event of questions related to the terms of this code of conduct.

### **Whistleblowing system**

Suppliers to Infranord should feel that they can report irregularities and abuses in a safe way. Therefore, Infranord has established a whistleblower system operated by an external party. The whistleblowing system is limited to serious irregularities and abuses such as: bribery or corruption/conflict/financial fraud/environmental crime/security deficiencies/serious forms of discrimination, bullying and harassment. For details about Infranord's whistleblowing system please see:

<http://www.infranord.se/om-infranord/infranords-whistleblower/>

Comments regarding minor wrongdoing or general dissatisfaction and complaints are reported to and managed by Infranord's ordinary reporting channels to the Infranord purchasing department.